ESEA Flexibility

Request

Revised February 10, 2012

U.S. Department of Education
Washington, DC  20202

OMB Number:  1810-0708

Paperwork Burden Statement

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INTRODUCTION

The U.S. Department of Education (Department) is offering each State educational agency (SEA) the opportunity to request flexibility on behalf of itself, its local educational agencies (LEAs), and its schools, in order to better focus on improving student learning and increasing the quality of instruction. This voluntary opportunity will provide educators and State and local leaders with flexibility regarding specific requirements of the No Child Left Behind Act of 2001 (NCLB) in exchange for rigorous and comprehensive State-developed plans designed to improve educational outcomes for all students, close achievement gaps, increase equity, and improve the quality of instruction. This flexibility is intended to build on and support the significant State and local reform efforts already underway in critical areas such as transitioning to college- and career-ready standards and assessments; developing systems of differentiated recognition, accountability, and support; and evaluating and supporting teacher and principal effectiveness.

The Department invites interested SEAs to request this flexibility pursuant to the authority in section 9401 of the Elementary and Secondary Education Act of 1965 (ESEA), which allows the Secretary to waive, with certain exceptions, any statutory or regulatory requirement of the ESEA for an SEA that receives funds under a program authorized by the ESEA and requests a waiver. Under this flexibility, the Department would grant waivers through the 2013–2014 school year, after which time an SEA may request an extension of this flexibility.

REVIEW AND EVALUATION OF REQUESTS

The Department will use a review process that will include both external peer reviewers and staff reviewers to evaluate SEA requests for this flexibility. This review process will help ensure that each request for this flexibility approved by the Department is consistent with the principles described in the document titled ESEA Flexibility, which are designed to support State efforts to improve student academic achievement and increase the quality of instruction, and is both educationally and technically sound. Reviewers will evaluate whether and how each request for this flexibility will support a comprehensive and coherent set of improvements in the areas of standards and assessments, accountability, and teacher and principal effectiveness that will lead to improved student outcomes. Each SEA will have an opportunity, if necessary, to clarify its plans for peer and staff reviewers and to answer any questions reviewers may have. The peer reviewers will then provide comments to the Department. Taking those comments into consideration, the Secretary will make a decision regarding each SEA’s request for this flexibility. If an SEA’s request for this flexibility is not granted, reviewers and the Department will provide feedback to the SEA about the components of the SEA’s request that need additional development in order for the request to be approved.
GENERAL INSTRUCTIONS

An SEA seeking approval to implement this flexibility must submit a high-quality request that addresses all aspects of the principles and waivers and, in each place where a plan is required, includes a high-quality plan. Consistent with ESEA section 9401(d)(1), the Secretary intends to grant waivers that are included in this flexibility through the end of the 2013–2014 school year. An SEA will be permitted to request an extension of the initial period of this flexibility prior to the start of the 2014–2015 school year unless this flexibility is superseded by reauthorization of the ESEA. The Department is asking SEAs to submit requests that include plans through the 2014–2015 school year in order to provide a complete picture of the SEA's reform efforts. The Department will not accept a request that meets only some of the principles of this flexibility.

This version of the ESEA Flexibility Request replaces the document originally issued on September 23, 2011 and revised on September 28, 2011. Through this revised version, the following section has been removed: 3.A, Option B (Option C has been renamed Option B). Additions have also been made to the following sections: Waivers and Assurances. Finally, this revised guidance modifies the following sections: Waivers; Assurances; 2.A.ii; 2.C.i; 2.D.i; 2.E.i; Table 2; 2.G; and 3.A, Options A and B.

High-Quality Request: A high-quality request for this flexibility is one that is comprehensive and coherent in its approach, and that clearly indicates how this flexibility will help an SEA and its LEAs improve student achievement and the quality of instruction for students.

A high-quality request will (1) if an SEA has already met a principle, provide a description of how it has done so, including evidence as required; and (2) if an SEA has not yet met a principle, describe how it will meet the principle on the required timelines, including any progress to date. For example, an SEA that has not adopted minimum guidelines for local teacher and principal evaluation and support systems consistent with Principle 3 by the time it submits its request for the flexibility will need to provide a plan demonstrating that it will do so by the end of the 2011–2012 school year. In each such case, an SEA’s plan must include, at a minimum, the following elements for each principle that the SEA has not yet met:

1. **Key milestones and activities:** Significant milestones to be achieved in order to meet a given principle, and essential activities to be accomplished in order to reach the key milestones. The SEA should also include any essential activities that have already been completed or key milestones that have already been reached so that reviewers can understand the context for and fully evaluate the SEA’s plan to meet a given principle.

2. **Detailed timeline:** A specific schedule setting forth the dates on which key activities will begin and be completed and milestones will be achieved so that the SEA can meet the principle by the required date.

3. **Party or parties responsible:** Identification of the SEA staff (e.g., position, title, or office) and, as appropriate, others who will be responsible for ensuring that each key activity is accomplished.
4. **Evidence**: Where required, documentation to support the plan and demonstrate the SEA’s progress in implementing the plan. This *ESEA Flexibility Request* indicates the specific evidence that the SEA must either include in its request or provide at a future reporting date.

5. **Resources**: Resources necessary to complete the key activities, including staff time and additional funding.

6. **Significant obstacles**: Any major obstacles that may hinder completion of key milestones and activities (e.g., State laws that need to be changed) and a plan to overcome them.

Included on page 19 of this document is an example of a format for a table that an SEA may use to submit a plan that is required for any principle of this flexibility that the SEA has not already met. An SEA that elects to use this format may also supplement the table with text that provides an overview of the plan.

An SEA should keep in mind the required timelines for meeting each principle and develop credible plans that allow for completion of the activities necessary to meet each principle. Although the plan for each principle will reflect that particular principle, as discussed above, an SEA should look across all plans to make sure that it puts forward a comprehensive and coherent request for this flexibility.

**Preparing the Request**: To prepare a high-quality request, it is extremely important that an SEA refer to all of the provided resources, including the document titled *ESEA Flexibility*, which includes the principles, definitions, and timelines; the document titled *ESEA Flexibility Review Guidance*, which includes the criteria that will be used by the peer reviewers to determine if the request meets the principles of this flexibility; and the document titled *ESEA Flexibility Frequently Asked Questions*, which provides additional guidance for SEAs in preparing their requests.

As used in this request form, the following terms have the definitions set forth in the document titled *ESEA Flexibility*: (1) college- and career-ready standards, (2) focus school, (3) high-quality assessment, (4) priority school, (5) reward school, (6) standards that are common to a significant number of States, (7) State network of institutions of higher education, (8) student growth, and (9) turnaround principles.

Each request must include:

- A table of contents and a list of attachments, using the forms on pages 1 and 2.
- The cover sheet (p. 3), waivers requested (p. 4-6), and assurances (p. 7-8).
- A description of how the SEA has met the consultation requirements (p. 9).
- Evidence and plans to meet the principles (p. 10-18). An SEA will enter narrative text in the text boxes provided, complete the required tables, and provide other required evidence. An SEA may supplement the narrative text in a text box with attachments, which will be included in an appendix. Any supplemental attachments that are included in an appendix must be referenced in the related narrative text.

Requests should not include personally identifiable information.
Process for Submitting the Request: An SEA must submit a request to the Department to receive the flexibility. This request form and other pertinent documents are available on the Department’s Web site at: http://www.ed.gov/esea/flexibility.

Electronic Submission: The Department strongly prefers to receive an SEA’s request for the flexibility electronically. The SEA should submit it to the following address:
ESEAflexibility@ed.gov.

Paper Submission: In the alternative, an SEA may submit the original and two copies of its request for the flexibility to the following address:

Patricia McKee, Acting Director
Student Achievement and School Accountability Programs
U.S. Department of Education
400 Maryland Avenue, SW, Room 3W320
Washington, DC 20202-6132

Due to potential delays in processing mail sent through the U.S. Postal Service, SEAs are encouraged to use alternate carriers for paper submissions.

REQUEST SUBMISSION DEADLINE

SEAs have multiple opportunities to submit requests for the flexibility. The submission dates are November 14, 2011, February 28, 2012, and an additional opportunity following the conclusion of the 2011–2012 school year.

TECHNICAL ASSISTANCE MEETING FOR SEAS

The Department has conducted a number of webinars to assist SEAs in preparing their requests and to respond to questions. Please visit the Department’s Web site at: http://www.ed.gov/esea/flexibility for copies of previously conducted webinars and information on upcoming webinars.

FOR FURTHER INFORMATION

If you have any questions, please contact the Department by e-mail at ESEAflexibility@ed.gov.
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Insert page numbers prior to submitting the request, and place the table of contents in front of the SEA’s flexibility request.

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<tr>
<td><strong>Legal Name of Requester:</strong></td>
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<tr>
<td>Wisconsin Department of Public Instruction</td>
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<tr>
<td><strong>Requester’s Mailing Address:</strong></td>
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<tr>
<td>125 South Webster Street</td>
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<td>P.O. Box 7841</td>
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<td>Madison, WI 53707-7841</td>
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<td><strong>State Contact for the ESEA Flexibility Request</strong></td>
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<tr>
<td><strong>Name:</strong> Lynette Russell</td>
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<td><strong>Position and Office:</strong> Assistant State Superintendent, Division for Student and School Success</td>
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<td><strong>Contact’s Mailing Address:</strong></td>
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<td><strong>Telephone:</strong> 608-266-5450</td>
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<td><strong>Fax:</strong> 608-267-9142</td>
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<td><strong>Email address:</strong> <a href="mailto:lynette.russell@dpi.wi.gov">lynette.russell@dpi.wi.gov</a>.</td>
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<td><strong>Chief State School Officer (Printed Name):</strong></td>
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<tr>
<td>Tony Evers</td>
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<tr>
<td><strong>Telephone:</strong> 608-266-8687</td>
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The State, through its authorized representative, agrees to meet all principles of the ESEA Flexibility.
By submitting this flexibility request, the SEA requests flexibility through waivers of the ten ESEA requirements listed below and their associated regulatory, administrative, and reporting requirements by checking each of the boxes below. The provisions below represent the general areas of flexibility requested; a chart appended to the document titled ESEA Flexibility Frequently Asked Questions enumerates each specific provision of which the SEA requests a waiver, which the SEA incorporates into its request by reference.

1. The requirements in ESEA section 1111(b)(2)(E)-(H) that prescribe how an SEA must establish annual measurable objectives (AMOs) for determining adequate yearly progress (AYP) to ensure that all students meet or exceed the State’s proficient level of academic achievement on the State’s assessments in reading/language arts and mathematics no later than the end of the 2013–2014 school year. The SEA requests this waiver to develop new ambitious but achievable AMOs in reading/language arts and mathematics in order to provide meaningful goals that are used to guide support and improvement efforts for the State, LEAs, schools, and student subgroups.

2. The requirements in ESEA section 1116(b) for an LEA to identify for improvement, corrective action, or restructuring, as appropriate, a Title I school that fails, for two consecutive years or more, to make AYP, and for a school so identified and its LEA to take certain improvement actions. The SEA requests this waiver so that an LEA and its Title I schools need not comply with these requirements.

3. The requirements in ESEA section 1116(c) for an SEA to identify for improvement or corrective action, as appropriate, an LEA that, for two consecutive years or more, fails to make AYP, and for an LEA so identified and its SEA to take certain improvement actions. The SEA requests this waiver so that it need not comply with these requirements with respect to its LEAs.

4. The requirements in ESEA sections 6213(b) and 6224(e) that limit participation in, and use of funds under the Small, Rural School Achievement (SRSA) and Rural and Low-Income School (RLIS) programs based on whether an LEA has made AYP and is complying with the requirements in ESEA section 1116. The SEA requests this waiver so that an LEA that receives SRSA or RLIS funds may use those funds for any authorized purpose regardless of whether the LEA makes AYP.

5. The requirement in ESEA section 1114(a)(1) that a school have a poverty percentage of 40 percent or more in order to operate a schoolwide program. The SEA requests this waiver so that an LEA may implement interventions consistent with the turnaround principles or interventions that are based on the needs of the students in the school and designed to enhance the entire educational program in a school in any of its priority and focus schools that meet the definitions of “priority schools” and “focus schools,” respectively, set forth in the document titled ESEA Flexibility, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.

6. The requirement in ESEA section 1003(a) for an SEA to distribute funds reserved under that
section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its LEAs in order to serve any of the State’s priority and focus schools that meet the definitions of “priority schools” and “focus schools,” respectively, set forth in the document titled ESEA Flexibility.

7. The provision in ESEA section 1117(c)(2)(A) that authorizes an SEA to reserve Title I, Part A funds to reward a Title I school that (1) significantly closed the achievement gap between subgroups in the school; or (2) has exceeded AYP for two or more consecutive years. The SEA requests this waiver so that it may use funds reserved under ESEA section 1117(c)(2)(A) for any of the State’s reward schools that meet the definition of “reward schools” set forth in the document titled ESEA Flexibility.

8. The requirements in ESEA section 2141(a), (b), and (c) for an LEA and SEA to comply with certain requirements for improvement plans regarding highly qualified teachers. The SEA requests this waiver to allow the SEA and its LEAs to focus on developing and implementing more meaningful evaluation and support systems.

9. The limitations in ESEA section 6123 that limit the amount of funds an SEA or LEA may transfer from certain ESEA programs to other ESEA programs. The SEA requests this waiver so that it and its LEAs may transfer up to 100 percent of the funds it receives under the authorized programs among those programs and into Title I, Part A.

10. The requirements in ESEA section 1003(g)(4) and the definition of a Tier I school in Section I.A.3 of the School Improvement Grants (SIG) final requirements. The SEA requests this waiver so that it may award SIG funds to an LEA to implement one of the four SIG models in any of the State’s priority schools that meet the definition of “priority schools” set forth in the document titled ESEA Flexibility.

Optional Flexibilities:

If an SEA chooses to request waivers of any of the following requirements, it should check the corresponding box(es) below:

11. The requirements in ESEA sections 4201(b)(1)(A) and 4204(b)(2)(A) that restrict the activities provided by a community learning center under the Twenty-First Century Community Learning Centers (21st CCLC) program to activities provided only during non-school hours or periods when school is not in session (i.e., before and after school or during summer recess). The SEA requests this waiver so that 21st CCLC funds may be used to support expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session.

12. The requirements in ESEA sections 1116(a)(1)(A)-(B) and 1116(c)(1)(A) that require LEAs and SEAs to make determinations of adequate yearly progress (AYP) for schools and LEAs, respectively. The SEA requests this waiver because continuing to determine whether an LEA and its schools make AYP is inconsistent with the SEA’s State-developed differentiated recognition, accountability, and support system included in its ESEA flexibility request. The
SEA and its LEAs must report on their report cards performance against the AMOs for all subgroups identified in ESEA section 1111(b)(2)(C)(v), and use performance against the AMOs to support continuous improvement in Title I schools that are not reward schools, priority schools, or focus schools.

13. The requirements in ESEA section 1113(a)(3)-(4) and (c)(1) that require an LEA to serve eligible schools under Title I in rank order of poverty and to allocate Title I, Part A funds based on that rank ordering. The SEA requests this waiver in order to permit its LEAs to serve a Title I-eligible high school with a graduation rate below 60 percent that the SEA has identified as a priority school even if that school does not rank sufficiently high to be served.
**Assurances**

By submitting this application, the SEA assures that:

1. It requests waivers of the above-referenced requirements based on its agreement to meet Principles 1 through 4 of the flexibility, as described throughout the remainder of this request.

2. It will adopt English language proficiency (ELP) standards that correspond to the State’s college- and career-ready standards, consistent with the requirement in ESEA section 3113(b)(2), and that reflect the academic language skills necessary to access and meet the new college- and career-ready standards, no later than the 2013–2014 school year. (Principle 1)

3. It will develop and administer no later than the 2014–2015 school year alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities that are consistent with 34 C.F.R. § 200.6(a)(2) and are aligned with the State’s college- and career-ready standards. (Principle 1)

4. It will develop and administer ELP assessments aligned with the State’s ELP standards, consistent with the requirements in ESEA sections 1111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii). (Principle 1)

5. It will report annually to the public on college-going and college credit-accumulation rates for all students and subgroups of students in each LEA and each public high school in the State. (Principle 1)

6. If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and uses achievement on those assessments to identify priority and focus schools, it has technical documentation, which can be made available to the Department upon request, demonstrating that the assessments are administered statewide; include all students, including by providing appropriate accommodations for English Learners and students with disabilities, as well as alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2); and are valid and reliable for use in the SEA’s differentiated recognition, accountability, and support system. (Principle 2)

7. It will report to the public its lists of reward schools, priority schools, and focus schools at the time the SEA is approved to implement the flexibility, and annually thereafter, it will publicly recognize its reward schools as well as make public its lists of priority and focus schools if it chooses to update those lists. (Principle 2)

8. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, all teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later than the deadline required under the State Fiscal Stabilization Fund. (Principle 3)
9. It will evaluate and, based on that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)

10. It has consulted with its Committee of Practitioners regarding the information set forth in its request.

11. Prior to submitting this request, it provided all LEAs with notice and a reasonable opportunity to comment on the request and has attached a copy of that notice (Attachment 1) as well as copies of any comments it received from LEAs (Attachment 2).

12. Prior to submitting this request, it provided notice and information regarding the request to the public in the manner in which the State customarily provides such notice and information to the public (e.g., by publishing a notice in the newspaper; by posting information on its website) and has attached a copy of, or link to, that notice (Attachment 3).

13. It will provide to the Department, in a timely manner, all required reports, data, and evidence regarding its progress in implementing the plans contained throughout this request.

14. It will report annually on its State report card, and will ensure that its LEAs annually report on their local report cards, for the “all students” group and for each subgroup described in ESEA section 1111(b)(2)(C)(v)(II): information on student achievement at each proficiency level; data comparing actual achievement levels to the State’s annual measurable objectives; the percentage of students not tested; performance on the other academic indicator for elementary and middle schools; and graduation rates for high schools. It will also annually report, and will ensure that its LEAs annually report, all other information and data required by ESEA section 1111(h)(1)(C) and 1111(h)(2)(B), respectively.

If the SEA selects Option A in section 3.A of its request, indicating that it has not yet developed and adopted all the guidelines for teacher and principal evaluation and support systems, it must also assure that:

15. It will submit to the Department for peer review and approval a copy of the guidelines that it will adopt by the end of the 2011–2012 school year. (Principle 3)
An SEA must meaningfully engage and solicit input from diverse stakeholders and communities in the development of its request. To demonstrate that an SEA has done so, the SEA must provide an assurance that it has consulted with the State’s Committee of Practitioners regarding the information set forth in the request and provide the following:

1. A description of how the SEA meaningfully engaged and solicited input on its request from teachers and their representatives.

The Department of Public Instruction (DPI), Wisconsin’s state education agency, actively sought input from teachers representing various student populations on the contents of this request in a variety of ways, including a survey that accompanied a draft of this waiver request, which was posted for a two-week public review and comment period (see Attachment 1). In addition, a number of presentations, briefings, and additional meetings, conversations, and written communications with a variety of stakeholders took place (See Attachment 2, A-H). Below is a summary of the education stakeholders that were consulted in the development of this waiver request.

**Working with Wisconsin’s Unions**

The state superintendent was involved in a statewide process conducted by the Wisconsin Education Association Council (WEAC) and the American Federation of Teachers-Wisconsin (AFT-Wisconsin), the state’s educator unions which collectively represent over 100,000 educators. Throughout fall 2011, WEAC and AFT-Wisconsin organized eight listening sessions, called *Speak Out for Wisconsin Public Schools*, to discuss the future direction of accountability in Wisconsin. The state superintendent attended every *Speak Out* event held around the state. Additional input was gathered through a Facebook page: www.facebook.com/SpeakOutWisconsin. WEAC and AFT-Wisconsin proposed recommendations regarding Wisconsin’s accountability reform as a result of a number of emerging themes. The resulting recommendations, *The ABCs of School Accountability*, informed this request for flexibility. The recommendations can be found in Appendix 1 and are summarized here:

- Wisconsin should create a holistic system of school accountability.
- Wisconsin should develop specific criteria for assessing non-tested subject areas.
- Wisconsin should assess key indicators of school quality, including class size, the quality and availability of staff professional development programs, the availability of vital student support services, and school climate.
- Wisconsin should link educator evaluation systems to professional development programs that promote teaching effectiveness.
- Wisconsin should provide parents with access to meaningful information regarding the strengths and weaknesses of their schools.

The recommendations mirror many of the elements outlined in this proposal.

To follow-up and follow-through on the findings of these listening sessions, DPI continued to reach out to WEAC and AFT-Wisconsin through meetings and other communications to gather their perspectives on the plans found in this request. Their feedback confirmed that this waiver request is necessary, and that teachers support Wisconsin’s direction and the plans found in this request. In addition, WEAC’s president testified at a joint legislative hearing in support of DPI’s proposal on February 2, 2012 (Attachment 2F). As a result of these meetings, DPI proposes to change state statute to reflect more rigorous graduation requirements that also honor the importance of electives. Additionally, as part of the ongoing evaluation of the proposed Accountability Index, DPI intends to complete impact analyses that look carefully for potential negative unintended consequences such as narrowing of curriculum. Advances in data and reporting systems will also enable DPI to produce report cards that provide a fuller representation of the rich and varied educational programs offered in schools.
School Administrator’s Alliance
Consultations with the School Administrator’s Alliance—which includes the state organizations representing principals, superintendents, administrators of special services, and school business officials—resulted in refinement to the accountability labels resulting from the accountability index (discussed in Principle 2). Offering the ACT Suite statewide is a key priority for the Association of Wisconsin School Administrators, and DPI is requesting funds in the 2013-15 biennial budget to make EXPLORE, PLAN, ACT, and WorkKeys available across the state.

Educators of Special Populations
Educator engagement also focused on the needs of students with disabilities. DPI heard from leading advocates in the state, including the Quality Education Coalition (QEC), a coalition of educators, parents, and advocates working to improve the quality of special education in Wisconsin, with whom DPI met two times. DPI also received specific feedback from Disability Rights Wisconsin and the Wisconsin Board for People with Developmental Disabilities. Wisconsin’s Disability Policy Partnership provided input to the state superintendent and other members of the School and District Accountability Design Team early on in conversations about Wisconsin’s new school accountability system. The Wisconsin Disability Policy Partnership includes three of the state’s leading disability agencies: the Wisconsin Board for People with Developmental Disabilities, Disability Rights Wisconsin, and the University Center for Excellence in Developmental Disabilities. Further, the Survival Coalition of Wisconsin Disability Organizations submitted specific comments in response to the public waiver draft. QEC also provided a letter, this one prior to release of the public draft. Overlap in membership of these organizations allowed for an ongoing conversation and DPI looks forward to continued partnership with groups advocating for individuals with disabilities.

The Wisconsin Council of Administrators of Special Services (WCASS) also provided valuable input on the contents of this request. WCASS is chiefly concerned with the educational experience of students with disabilities, English language learners, and students in poverty. As a member of the School and District Accountability Design Team, WCASS provided input on the design of Wisconsin’s new school accountability system. WCASS provided their support for this request, along with their concerns in writing (Attachment 2B).

Meetings with representatives from the organizations above included briefings on the waiver and invited feedback on issues related to cell size, transitions to new assessments, incorporation of subgroups in the accountability index, and the importance of Universal Design for Learning principles, among other issues. The change in minimum group size used for accountability calculations from 40 to 20 is a direct result of input from the organizations listed above. Further, DPI paid particular attention to Universal Design for Learning and the importance of addressing specific needs of students with disabilities in developing transition plans for new standards and new assessments in the narrative of this application.

Educators of English Language Learners
English language learners (ELLs) represent 5.7 percent of Wisconsin’s student population. DPI staff specifically notified a number of stakeholders including district Title III coordinators, bilingual-bicultural coordinators, a regional ELL network, and a variety of district and school-based educators of the public comment period and requested their input via the waiver survey that accompanied the draft. Additionally, the survey accompanying the waiver draft for public review included multiple specific questions about how DPI can ensure the plans proposed in this application better meet the needs of English language learners and educators of English language learners.

Educators at Milwaukee Public Schools
DPI staff engaged a number of administrators in Milwaukee Public Schools (MPS), Wisconsin’s largest district. DPI staff held teleconferences and briefings with a number of MPS staff, including administrators, researchers, their business manager, and director of school improvement on the contents of the proposal. Additionally, the Title I coordinator from MPS participated in the webinar that DPI held for the Committee of Practitioners.
DPI received a letter from MPS that highlights multiple components of the draft waiver that the district supports, including increasing proficiency expectations; considering both achievement growth and proficiency; emphasizing the importance to closing achievement gaps and basing achievement gap analysis on the highest performing subgroup rather than defaulting to the performance of white students; provision of opportunities for extended learning days for students in low-performing schools; and establishment of statewide student information and reporting systems. The letter also requested clarity on a few points, which DPI has addressed: that plans for an early warning data system are underway, but have a long-term timeline; providing clarity within the application narrative about when and which subgroups are factored into the accountability index; and clarifying for MPS the role of DPI in directing reform at a district level. The letter may be found in Attachment 2G.

DPI staff specifically consulted with Milwaukee educators on the issue of supplemental educational services (SES) because MPS has been required to offer SES since 2003. MPS was very supportive of the state’s proposal to waive the SES requirement (as outlined in Principle 2).

DPI briefed almost 200 private schools that participate in the Title I equitable participation process or the Milwaukee Parental Choice Program. DPI also briefed over 20 suburban Milwaukee-area school districts at the Southeastern Wisconsin Schools Alliance meeting.

**Committee of Practitioners**

The Title I Committee of Practitioners (COP) represents a broad range of education stakeholders from across the state, including teachers, administrators, pupil services staff, parents, and school board members. The COP provides recommendations to DPI around important Title I issues including legislation, funding, and programming. The COP meets on a regular basis and members were specifically consulted with regard to the need for this flexibility request, as well as the contents of Wisconsin’s request. They confirmed that the changes outlined here are needed and will greatly improve Wisconsin’s accountability system.

Staff from DPI’s Title I and School Support team held two webinars for the COP during the public comment period, and there was broad geographic representation from participating district and regional staff. The purpose of these webinars was to ensure these practitioners have a comprehensive understanding of the waiver, and to offer an opportunity for questions and feedback to inform the final waiver request.

**Title I Network**

In collaboration with 12 regional cooperative education service agencies (CESAs), the Title I Network provides technical assistance and ongoing professional development to all Title I schools across the state. With financial support from DPI, each CESA has a designated staff person who coordinates and provides expertise around Title I programs. The Title I Network meets with a DPI liaison on a quarterly basis. The Title I Network was updated and consulted at these regularly scheduled meetings on the waiver request. Additionally, the Title I and School Support team provided two webinars during the public comment to ensure a comprehensive understanding of the waiver.

**Public Review**

Prior to submission of this request, DPI posted the flexibility draft for a two-week public comment period and directly invited a plethora of organizations to provide input. These organizations represent Wisconsin’s teachers, principals, superintendents, practitioners focused on serving the neediest students, English language learners, as well as charter schools and private schools. There were more than 700 respondents to the survey that accompanied the waiver draft. Of those responding to the waiver survey, 80 percent were educators:

- 50 percent teachers
- 16 percent administrators
- 14 percent other school/district personnel
The results of the survey showed 75 percent of respondents were in favor of DPI submitting a waiver request. In a number of areas, DPI received very favorable feedback on the contents of the request and the new direction of accountability for the state, demonstrating that the request is in sync with Wisconsin’s educators.

Recurring themes in survey responses, whether addressed in this waiver application or not, have been noted by DPI and will inform ongoing work of the agency. Some of these themes include:

- The importance of more and even better professional development, especially targeted for instruction of students with disabilities and English language learners, i.e., differentiating instruction
- Time should be allocated for teacher collaboration
- Linking individualized education plans with college- and career-readiness planning to personalized learning
- The value of using technology to engage students
- Including advanced students in planning as well as lower-performing students
- The importance of Universal Design for Learning and how this relates to specific accommodations
- Proposed use of portfolio assessments
- Need for more bilingual programs
- Increasing graduation requirements is important; consider including requirements for fine arts and foreign language credits; financial literacy should be a graduation requirement
- Linking graduation requirements to experiences outside the classroom (i.e., internships, work-study, and service learning)
- More vocational training is important
- Parent participation is a key indicator in school and student success
- There should be flexibility to have longer school years or days
- Life skills are important in addition to academic skills
- Consider requirements for pre-service teachers to have coursework in instruction of students with disabilities and English language learners, and coursework in Universal Design for Learning

As a result of this engagement, and that highlighted in the next section, DPI is confident that the contents of this request align to the priorities of Wisconsin’s teachers.

DPI will stay engaged with educators and key stakeholder groups beyond the public comment period, and will continue to do so as the single statewide accountability system evolves. DPI has established a communications plan that includes a variety of outreach and mediums, and is scheduled to present at a number of educator conferences in the coming months to review the contents of this request. Continued engagement with these practitioners is critical to the successful implementation of the system and will, therefore, remain a priority for the state.

2. A description of how the SEA meaningfully engaged and solicited input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes.

The Department of Public Instruction (DPI), Wisconsin’s state education agency, sought input from stakeholders from all areas of education in production of this Request for ESEA Flexibility. Input, questions, and comments were collected in a variety of formats, including meetings over the last year with the Educator Effectiveness and the School and District Accountability Design Teams; recommendations from the Read to Lead Task Force, which also met in 2011; a survey that accompanied a draft of this waiver request, which was posted for a two-week public review and comment period; a number of presentations, briefings and additional meetings, conversations, and written communications with myriad stakeholders.
School and District Accountability Design Team

The work of the School and District Accountability Design Team (Accountability Design Team) greatly informed this request, particularly the proposals contained in Principle 2. A draft report of their recommendations is included in Appendix 2. While the report is not final, it was the origin of many of the proposals in this request, including the selection of four sub-scale areas, the use of an accountability index, the intervention and support processes, and the reporting of accountability performance. DPI solicited specific feedback on a number of issues with the Accountability Design Team, including

- what it means to be college- and career-ready in today’s world;
- developing a definition of college- and career-readiness to guide the work;
- how to meaningfully report student performance (attainment and growth);
- how to meaningfully report on school and district performance;
- how to engage the public in school improvement efforts;
- the design of new report cards including specific engagement over the contents of the school and district report cards;
- what the appropriate interventions would be for schools identified along the performance continuum;
- how interventions might differ based on school type (public, charter, choice); and
- how to move forward in building, piloting, evaluating, and sustaining the accountability system.

The members of the Accountability Design Team included key stakeholders from the business community, parent organizations, philanthropic representatives, elected officials, student advocacy groups, and education leaders, including tribal leaders. The Accountability Design Team was chaired by State Superintendent Evers, Governor Walker, and the chairs of the legislature’s education committees, Senator Olsen and Representative Kestell.

Collaborative Council

Outreach continued with multiple presentations to the State Superintendent’s Collaborative Council, which includes representatives from school boards, school administrators, district administrators, the Wisconsin Association for Supervision and Curriculum Development, regional cooperative educational service agencies (CESAs), the Commissioner of the CESA Statewide Network, institutes of higher education, and aforementioned educator unions, WEAC and AFT-Wisconsin. A recommendation resulting from this briefing was to develop a broad communication plan to educate stakeholders, parents, and the community at large. DPI is currently developing this plan that will involve multiple resources and talking points in order to provide ongoing awareness of the waiver.

Legislators

Deep, sustained engagement around accountability reform occurred with key legislators for over a year. As described in Principle 3, the Educator Effectiveness Design Team included staff from the governor’s office. The Coordinating Committee, which is currently serving as an advisory body to the implementation process for educator effectiveness, includes staff from the Office of the Governor, the chair of the Senate Education Committee, the chair of the Assembly Education Committee, and two additional legislators. Design work on Wisconsin’s educator effectiveness system began over a year ago.

Building on the collaboration around educator effectiveness, the state superintendent and the governor convened the Accountability Design Team, which they chaired along with the chair of the Senate Education Committee and the chair of the Assembly Education Committee. The work of these two design teams serve as the foundation of this request, particularly in terms of the details described in Principles 2 and 3.

In addition, the legislature held an informational hearing on this waiver request on February 2, 2012. Testimony provided at this hearing is included in Attachment 2F.
Parents
The State Superintendent’s Parent Advisory Committee was specifically notified of the two-week public comment period. As part of a regularly scheduled meeting, the State Superintendent’s Parent Advisory Committee received a briefing on the waiver, and committee members were highly encouraged to provide input via the waiver survey. This group will be briefed on DPI’s submission and involved in ongoing conversations, particularly around efforts to increase parent involvement and building parent-friendly accountability reports.

In addition, the Wisconsin Parent Teacher Association was represented on the Accountability Design Team, which provided much of the foundation of the state accountability system. DPI will be presenting at the PTA Convention this spring, as engagement with parent representatives is an ongoing priority for DPI.

Public Review
Prior to submission of this request, DPI posted the flexibility draft for a two-week public comment period. DPI issued a press release [http://dpi.wi.gov/eis/pdf/dpinr2012_15.pdf](http://dpi.wi.gov/eis/pdf/dpinr2012_15.pdf) (Attachment 3) and conducted a broad outreach effort to notify stakeholders of the posting and opportunity to provide feedback via the survey. The outreach included distribution of a Waiver Overview document which served as a user-friendly summary of some of the key proposals in DPI’s draft application (Attachment 3A). A list of organizations contacted, while not exhaustive, is included in Attachment 3H, and collectively represents thousands of stakeholders:

- teachers
- administrators
- district and CESA staff
- advocacy organizations
- parents
- charter schools
- private schools
- institutes of higher education
- legislators
- media

During the public comment period, DPI publicized the Request for ESEA Flexibility, and the opportunity for public input via the DPI homepage. In addition, the state superintendent issued an editorial [http://dpi.wi.gov/eis/pdf/dpinr2012_22.pdf](http://dpi.wi.gov/eis/pdf/dpinr2012_22.pdf) (Attachment 2), and led his weekly electronic briefing, ConnectEd, (Attachment 3E) with this story.

More than 700 stakeholders responded to the survey. The survey requested feedback on each of the principles contained in the waiver, and specifically asked what strategies, supports, and resources could be provided to better address the needs of English language learners (ELLs) and students with disabilities (SwD) in Wisconsin. Suggestions centered on inclusion of instruction explicitly for ELLs and SwDs in both teacher training and professional development for all educators, regardless of grade level or content area. A copy of the survey is included. (Attachment 3D)

Another recurring theme in the survey results was for smaller class size and small group instruction to target student needs more effectively and to personalize instruction as much as possible. In addition, it was clear the process of personalizing learning, and planning for student learning goals must include more than the classroom teacher. Parents and students must be primarily involved, along with teachers and library media specialists, and to whatever extent possible, business, industry, and community leaders who also have an investment in the successful education of students should be involved in personalizing learning, and creating a dynamic, engaging school experience directly tied to career and college expectations. This important input is being taken into consideration as ongoing planning occurs for refinement of the accountability system; supports, interventions, and rewards; and development of resources and training for educators and educational leaders related to implementation of new, college- and career-ready standards and assessments.
Since posting the draft request, the state superintendent received a number of emails from parents, educators, and concerned citizens. The great majority of these letters (near 90 percent) registered support for Wisconsin’s plan to include all schools—public, charter, and schools in parental choice programs (vouchers)—in the state accountability system.

**Peer Review**

This request benefitted from the peer review processes sponsored by the Council of Chief State School Officers (CCSSO). DPI staff attended the fall “pre-peer review” meeting in Chicago in November 2011 and the winter pre-peer review in Dallas in January 2012. These meetings provided structured feedback to DPI staff on elements of their requests that were on track (i.e., development of a system that will continue to evolve over time), and elements that were in need of clarification (i.e., the use of red flags to accompany the accountability index) or reconsideration (i.e., the growth goals established in the public review draft. These sessions included a summary analysis of ESEA Flexibility and an independent review of the U.S. Department of Education’s (USED) letters to states in Round 1 and the accompanying peer review notes and negotiations, which revealed several themes relevant to Round 2 states as they finalized flexibility requests. The CCSSO meetings were designed to assist states in identifying communication strategies and target audiences related to stakeholder engagement. Each state intending to apply for ESEA Flexibility could attend, and each state had the opportunity to meet individually with a group of educational experts to review strengths and weaknesses of the initial proposal, and make recommendations to prepare for submission.

Additional peer review included outreach to other states, and participation in a number of flexibility webinars sponsored by CCSSO and USED.

Throughout the development of this request, DPI consulted with a number of internal teams and each of the Assistant State Superintendents overseeing the five divisions in the agency. The request benefitted from this internal consultation in drawing connections across the reform areas and highlighting areas of success from which to build as DPI moves forward.

**Results of Consultation**

The major design phases of both the new school accountability system and educator effectiveness system were informed from the ground-up by stakeholder input. The entire system presented in this waiver request represents a collaborative effort, the result of hundreds of hours of meetings and briefings, email communications, and compromises. DPI continues to refine the initiatives described in this Request for ESEA Flexibility in response to declared need from districts, feedback from other stakeholders, technical expertise, and evaluation from experts.

This important work is complicated and it benefits greatly from the cooperation of so many diverse stakeholders across the state and around the country. The outline of these systems and the direction this waiver opportunity is taking Wisconsin has been affirmed many times over by stakeholders. The number of refinements to this ESEA Flexibility Request based on DPI’s extensive consultation effort is too many to delineate in full, but there are several key ways in which DPI modified this proposal as a direct result of input or feedback:

- In addition to raising the mathematics and science credit requirements needed for graduation, DPI is advocating for 6.5 elective credits as a graduation requirement across the state, so that art, music, world languages, and technical courses may be a part of every student’s high school experience. This is critical to Wisconsin teachers and families, and was a key finding of WEAC’s Speak Out series discussed above.
- In order that more students are recognized and included in this accountability system, and to avoid the masking of small subgroup performance, DPI will change the cell size used for accountability calculations from 40 to 20. This was a priority for the disability advocacy groups in Wisconsin.
- A combined subgroup will be used when the binary subgroups (ELL, SwD, economically disadvantaged) do not meet cell size, in recognition of the need to closely monitor the performance of these traditionally high-needs student groups.
DPI will continue to incorporate Universal Design for Learning principles into planning and development of resources for standards implementation, assessments, and instructional practices.

DPI will raise cut scores on current assessments to reflect higher expectations for students during the two-year transition between current and next generation assessment systems.

DPI confirmed support for the plans to waive SES in lieu of other extended learning opportunities as well as having significant parental input as part of these plans.

In serving Focus Schools, DPI will be significantly increasing the capacity of Wisconsin’s RtI Center to ensure a high quality, multi system of support, including additional interventions/supports for students with disabilities and English language learners.

DPI will remain engaged with educators and key stakeholder groups beyond the public comment period, and will continue to do so as the statewide accountability system evolves. DPI has established a communications plan that includes a variety of outreach and mediums, and DPI is scheduled to present at a number of educator conferences in the coming months to review the contents of this request. Continued engagement with these practitioners is critical to the successful implementation of the system and, therefore, will remain a priority for the state.

The Department encourages an SEA that receives approval to implement the flexibility to collaborate with the Department to evaluate at least one program, practice, or strategy the SEA or its LEAs implement under principle 1, 2, or 3. Upon receipt of approval of the flexibility, an interested SEA will need to nominate for evaluation a program, practice, or strategy the SEA or its LEAs will implement under principles 1, 2, or 3. The Department will work with the SEA to determine the feasibility and design of the evaluation and, if it is determined to be feasible and appropriate, will fund and conduct the evaluation in partnership with the SEA, ensuring that the implementation of the chosen program, practice, or strategy is consistent with the evaluation design.

Check here if you are interested in collaborating with the Department in this evaluation, if your request for the flexibility is approved.

Provide an overview (about 500 words) of the SEA’s request for the flexibility that:

1. explains the SEA’s comprehensive approach to implement the waivers and principles and describes the SEA’s strategy to ensure this approach is coherent within and across the principles; and

2. describes how the implementation of the waivers and principles will enhance the SEA’s and its LEAs’ ability to increase the quality of instruction for students and improve student achievement.

An education system will only impact every student’s future when it guarantees equal, yet individualized opportunities for all students. Driven by this knowledge, the Department of Public Instruction (DPI) will differentiate and personalize Wisconsin’s education system to transform teaching and learning across the state. Differentiation and personalization—for both student and teacher—mark the difference between successfully educating some and successfully educating all students.
Accordingly, DPI has committed to a robust, sensitive, and impactful statewide accountability system, as demonstrated in the state’s plans across the four Principles of this request.

**Principle 1: Transition to College- and Career-Ready Expectations for All Students**

- A detailed, high-quality plan for implementation of the Common Core State Standards (CCSS) that includes
  - Foundational Guiding Principles for Teaching and Learning;
  - Partnerships with educational leaders, regional service agencies, and institutions of higher education;
  - Formation of an innovative Center for Standards, Instruction, and Assessment to develop rigorous, online instructional resources for the CCSS and assessment systems;
  - Universal Design for Learning Principles;
  - Alignment with Wisconsin’s Model Early Learning Standards (WMELS);
  - Development of essential elements of the CCSS;
  - Lessons learned from a productive partnership with the Wisconsin Response to Intervention Center, which provides excellent methods for differentiation and personalization.
- Wisconsin is transitioning to next generation assessment systems through three assessment consortia.
  - SMARTER Balanced – developing an accessible, balanced assessment system with precision and adaptive differentiation at the heart of the assessment; implementation in spring 2015;
  - Dynamic Learning Maps – developing essential elements of the CCSS and an alternate assessment system; implementation in spring 2015;
  - ASSETS Consortium – developing new English Language Proficiency standards rooted in CCSS expectations and an English language proficiency assessment; implementation in 2015-16.
- Recognizing that the early years provide the foundation for later school success, Wisconsin is working through the Governor’s Early Childhood Advisory Council (ECAC) to align screening and assessment structures and professional development practices for children from birth to third grade.
- Additional changes in college- and career-ready expectations
  - DPI will request funding for EXPLORE, PLAN, ACT, and WorkKeys to provide statewide implementation, in recognition that these assessments provide important information regarding a student’s trajectory toward college and career readiness, and allows flexibility in the trajectory by honoring different pathways to college or career.
  - DPI will change WKCE cut scores to reflect the more rigorous NAEP proficiency scale.
  - DPI proposes changes to state graduation requirements to reflect an increased focus in STEM fields, in recognition of their importance for 21st century learning.

**Principle 2: State-Developed Differentiated Recognition, Accountability, and Support**

- Wisconsin will differentiate how schools are characterized by accountability measures, expectations, and interventions that result from accountability determinations; an approach that is an extension of the belief in the power of differentiation and personalization.
- Wisconsin built an accountability index system using priority areas defined by stakeholders that factor in multiple measures, including attainment and growth, to place schools on a differentiated performance continuum while emphasizing the importance of continuous improvement for all students.
- Rewards, interventions, and supports will begin with diagnostic reviews to individualize appropriate next steps using the most effective and efficient school improvement actions.

**Principle 3: Supporting Effective Instruction and Leadership**

- Wisconsin’s Educator Effectiveness Framework includes formative and summative elements and is intended to link each educator’s professional development to their individual strengths and weaknesses identified in the evaluation system.
- This Educator Effectiveness Framework applies to teachers in all content areas and all principals.
The work outlined here is shaping DPI’s strategic plan to make Every Child a Graduate, and ensure every student in Wisconsin graduates ready for college and career.

PRINCIPLE 1: COLLEGE- AND CAREER-READY EXPECTATIONS FOR ALL STUDENTS

1.A ADOPT COLLEGE- AND CAREER-READY STANDARDS

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

Option A

- The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that are common to a significant number of States, consistent with part (1) of the definition of college- and career-ready standards.

  i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)

Option B

- The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that have been approved and certified by a State network of institutions of higher education (IHEs), consistent with part (2) of the definition of college- and career-ready standards.

  i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)

  ii. Attach a copy of the memorandum of understanding or letter from a State network of IHEs certifying that students who meet these standards will not need remedial coursework at the postsecondary level. (Attachment 5)

1.B TRANSITION TO COLLEGE- AND CAREER-READY STANDARDS

Provide the SEA’s plan to transition to and implement no later than the 2013–2014 school year college- and career-ready standards statewide in at least reading/language arts and mathematics for all students and schools and include an explanation of how this transition plan is likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards. The Department encourages an SEA to include in its plan activities related to each of the italicized questions in the corresponding section of the document titled ESEA Flexibility Review Guidance, or to explain why one or more of those activities is not necessary to its plan.

Wisconsin’s approach to Principle 1: Transition to College- and Career-Ready Standards, builds upon DPI’s strong foundation of Common Core State Standards (CCSS) implementation plans, processes,
infrastructures, and partnerships, while also building up from that foundation in innovative ways that will produce and make available high-quality instructional resources for teachers and other instructional leaders. It also recognizes the need to continually work to align standards, screening and assessment practices, and professional development for all students, including children in pre-kindergarten through high school, and including students of all backgrounds, skills, and interests. Work in the College- and Career-Ready Standards arena is both far-reaching and long-term. It includes new standards, new assessments, and it looks to the higher expectations (college- and career-ready) inherent in these standards and assessments to develop a rigorous transition plan that reaches beyond CCSS implementation.

Proactive Steps Taken Prior to CCSS Adoption
In the year prior to the release of the CCSS (2009), Wisconsin was deep into state-level revision of English language arts and mathematics standards. The Department of Public Instruction (DPI) was working with state-level leadership teams made up of expert educators from the two disciplines to revise Wisconsin’s academic standards with assistance from Achieve and the Partnership for 21st Century Skills. When CCSS discussions began midway through this project, what had initially seemed like bad timing turned into the first of a series of proactive steps DPI was able to take to prepare Wisconsin for the CCSS. Given the teams' previous charge, the statewide English language arts and mathematics teams were able to quickly shift gears from standards writing to CCSS standards reviewing, doing so with a clear perspective of what Wisconsin was looking for in new standards. The teams also turned their attention to considering the implementation of new standards, and began to locate the partnerships needed to best ready the field for the monumental task of shifting to the CCSS.

Throughout the winter and spring of 2010, DPI hosted a series of statewide meetings for education stakeholders, including representatives from regional service providers, cooperative educational service agencies (CESAs); the state’s largest teachers' union; the superintendents' and principals' associations; parent groups; and content area (mathematics, English and reading) professional associations. The goal of these meetings was to craft common messages and approaches to the adoption and implementation of the CCSS and to uncover the best ways to leverage the state’s resources for success. The outcome of these early meetings was a jointly crafted plan for implementation that was co-developed and shared statewide prior to the release of the standards (Attachment 6). This plan charted a path that prepared the field for standards implementation as well as the new Smarter Balanced Assessment Consortium (SBAC) system. Phases of the CCSS implementation plan focused on understanding, curriculum, instruction, and assessment, and provided a consistent systems change approach. Given these proactive steps taken prior to the CCSS release, Wisconsin was well poised to be the first state to officially adopt the CCSS upon their June 2, 2010, release.

Investigation Year (2010-11)
After adopting the standards, DPI worked closely with several groups, including CESAs, the statewide English language arts and mathematics leadership teams, and a newly formed DPI CCSS implementation workgroup, to address the “Investigation” year of the CCSS implementation plan. With assistance and feedback from DPI, the CESA School Improvement Services (CESA-SIS) statewide group (representing all 12 CESAs) created two important statewide professional learning opportunities for the K-16 field. The first, called “Foundations,” provided a consistent one-day overview of the CCSS. Educators were encouraged to come in teams, and left with a local plan and resources for creating foundational awareness of the standards, and for ongoing professional learning. The second series, called “Investigations,” was a deeper look at individual grade level standards in both mathematics and English language arts. Additional statewide implementation activities included learning opportunities available in every CESA; the learning was team-based and ongoing. Over the course of one year, more than 70 percent of Wisconsin’s 424 districts participated in one of these series.

While CESAs were taking the lead with foundational professional learning for the field, DPI’s statewide English language arts and mathematics leadership teams (comprised of K-16 educators, instructional leaders, and DPI staff) worked to draft discipline-specific guidance for implementation of the CCSS.
This work was important for Phase 2 work around curriculum and instruction ([http://www.dpi.wi.gov/cal/pdf/ela-stds.pdf](http://www.dpi.wi.gov/cal/pdf/ela-stds.pdf)). Educators from districts and higher education worked together with assistance from DPI’s regional comprehensive center, Great Lakes West, to create Wisconsin-specific guidance documents for each discipline that addressed the question, “What does effective English language arts/mathematics teaching and learning look like in Wisconsin?” During this content creation, English language arts and mathematics leaders echoed DPI’s forward-looking approach to the CCSS implementation process; the intent was not to connect the Common Core back to Wisconsin’s Model Academic Standards (which are not grade-level standards) by conducting an alignment, but rather to identify the significant changes between the two sets of standards. This approach represented an intention to provide context for the major shift necessary in implementing the CCSS. These teams also met to discuss teaching and learning in each discipline.

### Guiding Principles for Teaching and Learning

During one meeting, the group realized that many of DPI’s core beliefs about teaching and learning transcend English or mathematics; they are simply good practices for all classrooms. As a result, the teams continued to meet across disciplines to create the beginnings of a new resource called “Wisconsin’s Guiding Principles for Teaching and Learning,” six statements that help make clear the core beliefs intrinsic to high-quality teaching and learning. ([Appendix 3 and http://dpi.wi.gov/standards/guiding-principles.html](http://dpi.wi.gov/standards/guiding-principles.html)). The Guiding Principles are:

- Every student has the right to learn.
- Instruction must be rigorous and relevant.
- Purposeful assessment drives instruction and affects learning.
- Learning is a collaborative responsibility.
- Students bring strengths and experiences to learning.
- Responsive environments engage learners.

These guiding principles drive the work of DPI, particularly Principle 1: Every Student has the Right to Learn, and specifically guides work on the Common Core Essential Elements, part of DPI’s participation in the Dynamic Learning Maps Consortium. It also includes DPI’s work to align the CCSS with English language proficiency standards, discussed below. The Common Core Essential Elements—which will serve as the new alternate achievement standards—will be the foundation of instruction and assessment for students with significant cognitive disabilities, comprising approximately one percent of the total student population, and DPI is playing a key role in the development of those elements. Throughout the 2011-12 school year, DPI will partner with Wisconsin’s regional service agencies, special education leaders, institutions of higher education, and general education leaders to develop an implementation timeline and plan for the Common Core Essential Elements (CCEE). A cadre of these representatives guided development of this plan between February and June of 2011. This implementation timeline aligns with that for the alternate assessment, which is slated for initial implementation in the 2014-15 school year.

Framing CCSS and Essential Elements of the CCSS implementation within a full vision for improving education, and linking the effort to other key initiatives as part of a system of high-quality educational practices, is a major focus for DPI. As such, DPI has continued to work with a large internal CCSS implementation workgroup to further develop and connect major initiatives, and to create consistent language, materials, and presentations detailing the connections between standards, instruction, and assessment, and other key initiatives, including Response to Intervention. Notably, DPI has worked to ensure alignment of CCSS resources with early childhood standards, extended grade-band standards, and college- and career-readiness expectations defined by institutions for higher education. As a result of this work, DPI was selected to participate as one of the State Leadership Teams for the College Readiness Partnership with the Council of Chief State School Officers (CCSSO), the American Association of State Colleges and Universities, and State Higher Education Executive Officers to promote broad implementation of CCSS in mathematics and English language arts, with a focus on those issues at the intersection of K-12 and higher education systems.
Furthering Wisconsin’s focus in making the CCSS accessible for all students, Wisconsin’s role as the lead state for the World-Class Instructional Design and Assessment (WIDA) Consortium, recently funded to build the next generation of English language proficiency (ELP) assessments, includes development of ELP standards that directly correspond to the Common Core. Development of these new standards will be a wide-reaching process that engages member states, the WIDA Consortium housed at the University of Wisconsin-Madison, regional educational labs, and other institutions of higher education.

These new, college- and career-ready English language proficiency standards and assessments represent higher linguistic expectations for Wisconsin’s over 49,000 English language learners. Together, the ELP standards and assessments will work to ensure this population is better prepared to access the content of the CCSS. All of this aligns with Wisconsin’s focus on ensuring greater college and career readiness for English language learners.

**Literacy for All**

One additional decision made by Wisconsin’s CCSS Implementation team that appears to set Wisconsin apart from other states is DPI’s approach to the CCSS for literacy in science, social studies, history, and the technical subjects. Quite simply, Wisconsin’s CCSS Implementation workgroup determined that all educators must see themselves as part of the CCSS literacy work. This decision compelled DPI to convene a new statewide leadership team for Literacy in All Subjects, or Disciplinary Literacy, in January of 2011. The Disciplinary Literacy team, made up of educators from career and technical education, the arts, health studies, and the four core content areas, was charged with broadening the scope of the grades 6-12 CCSS literacy standards to include all content areas and all grade levels. The resulting materials parallel DPI’s English language arts and mathematics guidance documents and send a strong message about the need for every content area educator to identify the meaningful expressive and receptive skills students must learn in order to access deeper and richer content knowledge in that discipline ([http://www.dpi.wi.gov/cal/pdf/elas.pdf](http://www.dpi.wi.gov/cal/pdf/elas.pdf)).

Currently, subgroups of educators from each content area are creating literacy-related Google sites ([http://dpi.wi.gov/standards/disciplinaryliteracy.html](http://dpi.wi.gov/standards/disciplinaryliteracy.html)) for educators in their specific content area. This “by us, for us” approach sets up Disciplinary Literacy as an initiative with more differentiation than other, more generic literacy initiatives, and addresses the challenge for creating ownership for the CCSS literacy standards. At this point, Wisconsin’s career and technical educators are some of the most energetic proponents of this connected work.

This approach to disciplinary literacy recognizes that intentional consideration of both the discipline and the reading and writing skills needed to demonstrate learning in that discipline will, in fact, improve students’ access to content. This prioritization of content-specific knowledge and communication skills—beyond reading and mathematics skills—enhances students’ readiness for college and career. In forcing a deeper connection to the content and focusing on thinking, reasoning, speaking, listening, reading and writing like an expert in any content area, students will be better prepared to succeed in work and higher education.

A focus on literacy—in early grades especially—received particular attention through the development and recommendations of the Read to Lead Task Force, convened for the first time in March 2011 by the governor and state superintendent. The Read to Lead Task Force was charged with reviewing the state of reading skills in Wisconsin and developing recommendations and a plan for improvement ([http://165.189.60.210/Documents/Read.pdf](http://165.189.60.210/Documents/Read.pdf)). The Read to Lead Task Force released its report in January 2012.

The Read to Lead Task Force recommendations include:

- Early literacy screening for all four- and five-year old kindergartners;
- Improvements in teacher preparation programs around early learning, including a new, more rigorous, reading exam (i.e., and updated Praxis) for reading educators;
- Aggressive professional development opportunities to enhance skills of current reading educators, including a professional development portal and an annual reading conference; and
• Creation of public-private partnerships to engage Wisconsin philanthropies and businesses around the goal of ensuring every child can read by the end of the third grade.

While the Read to Lead Task Force concentrated its efforts primarily on reading in early grades, this work, combined with DPI’s broader efforts to increase literacy across all content areas and all grades, demonstrates keen attention to the importance of reading skills for future education and career success. The accountability system proposed in Principle 2.B reflects this prioritization.

**Moving Forward**

As Wisconsin moves into Phases 2 and 3 of the CCSS Implementation Plan, DPI has new strategies to leverage existing resources in ways that connect initiatives for student learning. Most notably, DPI is leveraging systems and structures successfully built over the past two years through the collaborative creation of a statewide center for Response to Intervention (RtI). The Wisconsin RtI Center is a DPI-CESA partnership that creates a statewide structure for equitable, high-quality content creation and professional learning around Wisconsin’s vision for RtI ([http://dpi.wi.gov/rti/index.html](http://dpi.wi.gov/rti/index.html)), a vision that includes all students. Wisconsin’s model for RtI includes high-performing students needing additional challenge, as well as low-performing students needing additional support.

The Wisconsin RtI Center employs several statewide experts, ten regional coaches that work with school districts, a statewide data coordinator, and a statewide coaching coordinator. The Wisconsin RtI Center is built on a professional learning community model. The Center currently has 24 endorsed trainers with 24 additional trainers being trained in the 2011-12 school year. The Wisconsin RtI Center has also created an online School-Wide Implementation Review tool that encourages ongoing data evaluation and continuous review for schools.

**A Center for Standards, Instruction, and Assessment**

The model provided by the Wisconsin RtI Center for development and dissemination of high-quality, standardized materials across Wisconsin has guided DPI’s planning around the best process and organizational structure for meeting emerging needs of districts, namely, the need for instructional resources directly related to the CCSS. Building upon this model, DPI will create a Standards, Instruction, and Assessment (SIA) Center. The SIA Center will centralize mathematics and English language arts content and professional learning experts focused on the development of high-quality, standardized CCSS resources and training plans that will be easily accessed at low- to no-cost across the state. The SIA Center will serve as a hub of CCSS content experts to serve the whole state on a regional basis.

The Center will also serve as a coordination point to assure that Wisconsin Model Early Learning Standards, early childhood screening and assessment, and early childhood instructional practices align with the structure beginning at 3rd grade.

Design and plans for the SIA Center reflect these priorities:

- standardization of materials and fidelity of implementation
- low- to no-cost resources
- increased access to content expertise across the state
- centralized leadership connected to DPI
- agility, speed, and responsiveness to needs across the state and DPI’s direction
- partnerships with institutions of higher education

DPI’s planning for the SIA Center is underway, in conversation with institutions of higher education and Wisconsin’s CESA Statewide Network. The goal in building plans for the SIA Center is to focus on identifying the best organizational structure—one that brings together institutions of higher education, CESAs, and other content and instructional experts—that provides CCSS and assessment-related resources; a structure that, with sufficient DPI oversight, is empowered to address needs related to high-quality instructional practices by quickly developing excellent online resources, training plans, and virtual modules.
With the goal of raising the bar and resulting outcomes for all students, the SIA Center will create resources for classroom educators, principals, and other educational stakeholders with a focus on improving instructional practices. For example, resources for classroom educators will focus on how they can improve their practices; resources for principals will focus on how they can best support their classroom educators’ improvement. The SIA Center’s focus on improving instruction situates it well to provide resources that are focused on helping principals and other administrators serve as strong, instructional leaders in their schools.

Ultimately, the SIA Center aims to produce resources that result in improved instructional practices that embed

- a deep understanding of the CCSS and CCEE
- consistent, appropriate attention to data to inform decisions
- assessment practices that improve learning and inform instruction

The initial scope of work for the SIA Center will focus on two things:

1. Establishing a governance structure and relationships with stakeholders across the state
2. Building in-depth K-12 CCSS and CCEE content knowledge in disciplinary literacy, English language arts, and mathematics
   a. in general education
   b. for special education
   c. for English language learners

These foci require

- development of resources that provide representative samples of high-quality instruction that includes purposeful, embedded assessment, based in the CCSS and CCEE
- online instrument, a bank of resources
  o make resources available across the state
  o forum for educators
- Instrument to gauge classroom-level implementation. This would be one of the first resources the SIA Center would provide.

Further detail regarding scope of work, staffing, and timeline is available in Appendix 4, 4a, and 4b.

The SIA Center’s agility to respond to needs of districts and direction from DPI, combined with its process of including educators in the design and development of high-quality resources and provision of those resources through easy-to-use technology platforms, will result in access to instructional materials grounded in the CCSS and CCEE for educators across Wisconsin.

As the primary source of statewide instructional materials aligned to Wisconsin’s college- and career-aligned standards, DPI will ensure the SIA Center’s work is grounded in the Guiding Principles for Teaching and Learning. As such, materials will support teaching and learning for all students, including students with disabilities and English language learners. This intention is one reason why DPI is interested in partnerships with the state’s institutions of higher education to produce high-quality, content-rich resources and to create connections with higher education faculty between CCSS and students outside the general education spectrum such as students with disabilities and English language learners. This partnership will provide the SIA Center access to a strong research-based institution rich with experts in fields including English language arts and mathematics, as well as special education and English as a second language, not to mention incorporating technology into education and differentiating instruction to reach the needs of both low- and high-performing students.

The Guiding Principles for Teaching and Learning also drive the intention for the SIA Center work, which will include Universal Design for Learning (UDL) principles, to ensure that instruction and instructional materials are not just made accessible for all populations, but are in fact designed specifically to reach all students by removing potential barriers to learning. UDL follows naturally from
the Guiding Principles, and is a necessary component of all standards, content, and assessment planning in order to ensure that Wisconsin honors those principles.

Assessing the Common Core
Focused support and resources connect DPI’s vision of Every Child a Graduate Ready for College or Career (http://dpi.wi.gov/sprntdnt/index.html) with the beliefs stated in the Guiding Principles for Teaching and Learning. These resources, produced by the Standards, Instruction, and Assessment Center, will be focused on CCSS and CCEE implementation and instruction and will be differentiated to ensure access for educators of all students. They will be directly related to improving instruction and assessment of college- and career-ready standards. The vision of ensuring students graduate college- and career-ready starts early. As such, DPI's plans for creating resources for all students include children from early kindergarten through high school.

Again, the Wisconsin RtI Center serves as an example in this regard, having created resources in partnership with DPI to promote how RtI aligns with early childhood programs including community medical providers, Head Start, early childhood special education, and four- and five-year old kindergarten. The Wisconsin RtI Center will build upon its successful foundation to continue to create resources related to RtI implementation and practices that reach every student.

One component of the Every Child a Graduate vision (http://dpi.wi.gov/sprntdnt/index.html) involves two questions directly related to DPI's planning. The first, “What and how should students learn?” relates directly to the CCSS and CCEE and development of higher standards for Wisconsin’s students as well as providing guidance for educators in what great instruction of the CCSS and CCEE looks like (the Wisconsin SIA Center). The second question points to transitions in the world of assessment, which is, after all, a key component of high-quality instructional practices. That question, “How do we know if they’ve learned it?” along with specific recommendations from the Next Generation Assessment Task Force, convened in 2009, guided Wisconsin’s participation in three, next generation assessment consortia: the Smarter Balanced Assessment Consortium, Dynamic Learning Maps (DLM) Consortium, and ASSETS Consortium. These consortia, while developing assessments for different populations of students, share a common goal of developing innovative, informative, rigorous assessments to replace the current statewide assessment system, assessments that provide students varying opportunities to demonstrate what they know and can do through a combination of assessment types (formative strategies, benchmark, and summative) as well as item types (including performance tasks and technology enhanced items).

Participation in these consortia ushers in replacements of the current battery of statewide assessments:

Table 1.1. Implementation of Statewide Assessments

<table>
<thead>
<tr>
<th>Current Assessment</th>
<th>Population</th>
<th>New Assessment</th>
<th>Population</th>
<th>Implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wisconsin Knowledge and Concepts Exam</td>
<td>General education students; all but the 1% population</td>
<td>Smarter Balanced Assessment System</td>
<td>All but the 1% population</td>
<td>2014-15</td>
</tr>
<tr>
<td>Wisconsin Alternate Assessment for Students with Disabilities</td>
<td>Special education students with significant cognitive disabilities</td>
<td>Dynamic Learning Maps</td>
<td>Students with significant cognitive disabilities</td>
<td>2014-15</td>
</tr>
<tr>
<td>ACCESS for English language learners</td>
<td>English language learners</td>
<td>ASSETS for ELLs</td>
<td>English language learners</td>
<td>2015-16</td>
</tr>
</tbody>
</table>
These transitions represent a new day for assessment in Wisconsin, one in which assessments that are used for accountability purposes are also designed in such a way as to provide useful, actionable, and timely data directly to educators to help inform classroom practices in an ongoing manner. Further, these assessment consortia, which are designing assessments using UDL principles, are dedicated to considering accessibility issues before, during, and after assessment development to ensure the assessments provide all students opportunities to demonstrate what they know and can do by removing barriers that interfere with access to learning and content.

However, the implementation dates for the new assessments (provided in the table above) leave a window that could easily slip by in the hurry to prepare for these big transitions. In Wisconsin, the DPI has paid particular attention to these transition years, and proposes several important changes to prepare Wisconsin for full implementation of the CCSS and CCSS-based assessments, changes that also reflect the DPI's campaign to raise rigor in classrooms across the state (as well as within DPI). This focus on “moving the needle” toward higher rates of college- and career-readiness, and decreased graduation and achievement gaps, requires additional commitment from DPI. As such, DPI has plans for three significant changes to Wisconsin’s current standard operating procedures:

- change high school graduation requirements to reflect the changing demands of college and career,
- make the EXPLORE, PLAN, ACT, and WorkKeys assessments available to schools and districts so that students, families, and educators can better understand a student’s progress toward college- and career-readiness, and
- make changes to the cut scores for the current statewide assessment system to prepare for upcoming transitions to the CCSS-based Smarter Balanced Assessment System

### Changing Expectations in High School

DPI proposes to increase graduation requirements such that those requirements will place students in a position of success for whatever path they choose beyond high school. DPI proposes to require that statewide minimum graduation requirements include three years of mathematics and three years of science, engineering, or technology credits, with two of those credits required science or science equivalency courses, and the third year including the option to take an engineering or technology credit.

<table>
<thead>
<tr>
<th>Subject Area</th>
<th>Current Requirement</th>
<th>Proposed Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mathematics</td>
<td>2 credits</td>
<td>3 credits</td>
</tr>
<tr>
<td>Science</td>
<td>2 credits</td>
<td>3 credits (2 of which would remain traditional science or science equivalency credits)</td>
</tr>
<tr>
<td>Elective Courses</td>
<td>0 credits</td>
<td>6.5 credits</td>
</tr>
</tbody>
</table>

These changes have not yet taken place, and will require legislative change, but are a priority for DPI and are being reflected in DPI’s strategic planning process currently underway. An analysis of current district-level graduation requirements is available in Appendix 5.

Wisconsin currently requires four credits of English language arts, but the increased importance of strong educational foundations in mathematics and science in order to be competitive in today’s career and collegiate marketplaces cannot be ignored. DPI also recommends putting into statute an additional 6.5 elective credits for graduation, as recommended by the state superintendent last year. Elective courses offer students important opportunities to build upon content-area knowledge and skills with a focus on areas that interest them, and in ways that connect learning to 21st Century Skills. As such, this proposal addresses both the DPI’s intention to personalize learning and to increase focus on preparing students to graduate from high school prepared for both college and career.
These recommended requirements would result in a total of 21.5 credits required for graduation (an increase from the current requirement of 13 credits). This proposal aligns to national averages and current local practice in Wisconsin. Additionally, this is a minimum requirement as many districts will continue to require more credits, and most graduates will complete more credits than the proposed requirement in statute.

As Superintendent Evers said in his 2010 State of Education Speech:

“We can make our high school graduation requirements more meaningful. Right now, Wisconsin law only requires students to complete 13 credits, the lowest in the nation. Most of Wisconsin’s graduates already take at least 21.5 credits. DPI needs to change state law to hold all students to this higher uniform standard, which would put Wisconsin’s requirements above the national average.”


The new graduation requirements will be in effect for students in the four-year adjusted cohort expected to graduate in 2016-17, pending the legislative change mentioned above.

The graduation requirement described above represents one way in which DPI will raise expectations around college and career readiness. DPI is also interested in exploring alternate pathways through and past high school. Based on current legislation, districts may develop “equivalent coursework.” DPI has been working for the past four years, and continues to develop new pathways, on a formal process that streamlines the equivalency process, better ensures the rigor of the coursework, and assists in connecting equivalent coursework to postsecondary institutions. This formal process is available in math, science, English language arts, and social studies. Equivalent coursework is an excellent opportunity for students to gain credits through alternative routes in areas such as agriculture, business, and technology education.

Additionally, high school students can currently earn college credit in a variety of ways in Wisconsin, including Advanced Placement exams, International Baccalaureate programs, Youth Options, College Credit in High School programs through the University of Wisconsin System (UW System), and transcripted credit through the Wisconsin Technical College System (WTCS). More information about options for students to earn college credit in high school is available in this paper: http://dpi.wi.gov/cte/pdf/dualenrollop.pdf.

While options for pursuing college credit in high school are many, they are not equally available across the state, and present different challenges and barriers to students who would seek to take advantage of them. DPI advocates increased availability of, and access to, innovative dual enrollment programs. State Superintendent Evers spoke of this in a recent State of Education Speech: “To make these dual enrollment opportunities a reality takes a new way of thinking about mission of education. It means sharing ownership over college readiness. It means leadership and commitment to breaking down the barriers between PK-12 and higher education and DPI’s linear and divided approach to schooling. We have long talked about seamless education from pre-kindergarten through the postsecondary level. Let’s finally make it so.” The state superintendent has proposed that students have opportunities to earn their high school diplomas early and be admitted directly into college to begin work on an associate or bachelor’s degree. This kind of flexibility reflects that students should pursue their own rigorous pathways to college, career, and beyond. While graduation requirements increase, DPI is also focused on supporting innovation across the state that personalizes learning throughout a student’s education.

**Bridging Secondary and Postsecondary Programs and Opportunities**

DPI’s Career and Technical Education team, in partnership with postsecondary institutions and other external work groups, has built a model for connecting secondary schools with postsecondary instructional programs and 21st Century careers. Implementing a rigorous Programs of Study framework (designed by the United States Department of Education) in Wisconsin has resulted in rich connections between DPI, institutions of higher education, and public schools across the state.
Career clusters and pathways, a critical component of Programs of Study, are grounded in principles that mirror DPI’s focus on college and career readiness and belief that, whatever choice a student makes regarding his or her pathway after high school, that student absolutely must have equal opportunity to all options. (Appendix 6) Some students will pursue a college degree; others enter the workforce or a specific career. The goal of DPI is that Wisconsin schools prepare each and every student for all avenues those students might pursue following high school graduation: two- and four-year college, certification programs, apprenticeships, formal job training, and military service.

Programs of Study are designed to produce higher levels of achievement in a way that eliminates current practices that sort and track high school students in ways that limit options after high school. They alter how core academic subjects are taught; they do not lower expectations about what is taught. In fiscal year 2011, there are 365 districts (of the 378 with high schools) that are involved in the development of Programs of Study. Over 3,800 Programs of Study have been published to the career pathways website (www.wicareerpathways.org) within the first year of its operation, and over 5,000 students registered to use the site between September and December, 2011.

Wisconsin is one of six states awarded a four-year grant by the U.S. Department of Education to develop model Rigorous Programs of Study (RPOS) for Career and Technical Education programs. A model RPOS incorporates ten framework elements that support the development and implementation of effective programs that prepare students for college and careers. The grant will also evaluate the effect of student participation in rigorous programs of study that:

1. Link secondary and postsecondary education
2. Combine academic and career and technical education in a structured sequence of courses
3. Offer students the opportunity to earn postsecondary credits for courses taken in high school
4. Lead to a postsecondary credential, certificate, or degree.

**Providing Measures of College and Career Readiness**

DPI will include funding in the next (2013-15) biennial budget request for schools to administer the EXPLORE, PLAN, ACT, and WorkKeys assessments. This assessment suite provides important information about college and career readiness for students. It also allows for analysis of academic growth during high school, data that are lacking in current assessments.

Further, DPI intends to change cut scores for performance levels on the current state summative assessment, the Wisconsin Knowledge and Concepts Examination (WKCE), so that it provides an indication of student performance on more rigorous assessments, preparing for the transition to the Smarter Balanced Assessment System in 2014-15. Specifically, DPI will statistically align the cut scores with National Assessment of Educational Progress (NAEP) cut scores. This interim measure will provide districts a sense of where cut scores may fall on the more rigorous Smarter Balanced Assessment. The impact of this change will be dramatic and DPI intends to work with districts to field test use of the new cut scores in comparison with current cut scores and as part of the DPI-developed accountability index, discussed in Principle 2.B.

Following evaluation of the field tested index with new performance level cut scores, official reports will be provided for the 2012-13 school year, in the spring of 2013. The index calculations in the 2013 reports will factor in a new baseline that accounts for cut score changes and back-maps this change such that growth calculations are possible. The 2013 results will also be used for accountability determinations that will result in the categorization of schools along a continuum, identification of schools requiring specific interventions, and support as well as rewards. This reporting timeline incorporates a year-long implementation that involves intensive communication and professional learning for schools, districts, and the public. DPI has plans to provide support in the form of talking points, letters to parents, and media outreach packets to schools in preparation for this transition.

The change to new cut scores, while it will certainly result in a drop in proficiency rates, at least in the short term, represents DPI’s belief in the capacity of Wisconsin’s students and schools to perform at
even higher levels. It also acknowledges the importance of raising rigor, and while this change will not result in new test content for the WKCE, it does serve as an interim measure in line with cut score expectations for the new consortium assessments.

**Raising Rigor for Alternate Populations**
DPI is dedicated to raising rigor for all students to ensure multiple pathways to success throughout school and following high school graduation. At this time, DPI does not plan to change cut scores on the Wisconsin Alternate Assessment-Students with Disabilities (WAA-SwD). The discussion of growth for students with severe cognitive disabilities is one Wisconsin is engaging in with experts and stakeholders from across the country through work in the Smarter and Dynamic Learning Maps (DLM) consortia. DPI’s decision to delay the transition to higher rigor (through assessment) for Wisconsin’s alternate population is driven by a desire to approach this work thoughtfully, and sensitive to the fact that increased rigor and expectations for growth must look different for students with disabilities. Instead, DPI’s focus is on development of excellent SwD-focused resources for both educators in both general and special education related to implementation of the Common Core State Standards and the Common Core Essential Elements. Creating connections across the general special education areas is integral to further work around raising rigor.

**Additional Efforts to Raise Rigor and Improve Student Outcomes**
DPI continues to invest significant effort not only to connect the dots between various initiatives at the department—from CCSS implementation to current and future assessments, from Response to Intervention to College and Career Pathways and 21st Century Skills—but in fact to braid those initiatives together and, where appropriate, change or re-focus staff time, resources, and organizational structures to create better efficiencies and improve the unity of Wisconsin’s approach to standards- and instruction-related initiatives, projects, and activities. This braided initiatives approach is also evidenced by the ways DPI is pursuing use of technology to create connections between people, resources, and content, all while raising rigor and personalizing learning.

**Moodle**
Beginning in spring of 2012, DPI will create a statewide Moodle “instance,” a virtual environment for educators to create, share, and learn about online classroom resources. Moodle, which stands for Modular, Object Oriented, Dynamic Learning Environment, is an online course management system and customizable environment for educational communities (http://moodle.org/). It can be used by educators interested in delivering course content outside of class time via online modules or in using rich collaborative online communities during class to enhance learning. Moodle is technology designed to support different learning and teaching styles, and its open-source design makes it interoperable with e-portfolio systems that offer students relevant ways to demonstrate what they know and can do.

In the spirit of shared standards and shared assessments, Moodle brings together educators across the country (and globe). Implementation plans for Common Core State Standards in English language arts and mathematics, as well as implementation of new and updated standards in everything from science, to early learning, to world languages, will benefit from this collaborative environment. Individual users each benefit from a community of over nine million users, a collective environment that contributes to personalization.

**Individualized Learning Plans**
Programs of Study are one part of an Individualized Learning Plan (ILP) that gives students an opportunity to investigate the inter-relationship of educational achievement, life goals, career planning, training and placement; evaluate the present job market and analyze predictions of future trends at local, regional, state, national, and global levels; and propose career options that reflect their interests, skills, and goals. In contrast with a traditional four-year plan that serves more as a backward-looking record of learning, ILPs identify what to achieve, and result in a fluid mapped
academic plan that is forward-looking.

ILPs take into account a student's life outside of school and provide a process that opens students up to unique career opportunities. This deep personalization goes beyond delivery of academic content and treats students as whole people, personalizing long-term planning with the goal that all students will be set up for postsecondary success in college and career.

The use of Programs of Study also has a direct tie to the required Transition Plan for all special education students ages 14 and above. Currently, Wisconsin is investigating the possibility of tying Programs of Study and/or the WiCareerPathways.org site directly into DPI’s special education portal for Individualized Education Plan teams to use during transition planning meetings.

While technology can be used in innovative ways to enhance in- and out-of-classroom academic experiences as well as student academic and career planning, technology also helps teachers, schools, districts, the public, and the DPI to connect and make informed decisions. Work to personalize learning, implement college- and career-ready standards, and raise rigor in assessments and accountability systems must be informed by a well-designed and widely-available data collection and reporting system. Over the past several years, DPI has worked to expand Wisconsin’s longitudinal data system and make more data accessible directly to district staff. Recent data system efforts are driven by intent to get up-to-date, easy-to-understand, and relevant data into the hands of classroom educators.

The result of the DPI’s efforts, beyond improved access to data that informs instruction, is reduced duplication and data reporting burden for districts. This is discussed further below.

Reducing Duplication and Unnecessary Burden

While DPI has made significant strides over the past decade to increase district-level access to secure student data, and to educate users across the state about how to access and interpret that data in ways that result in better-informed school and district decisions, shortcomings in the structure of DPI’s existing data collection system result in unfortunate consequences that dramatically impact access to high-quality, timely data. In order to improve upon data quality and timeliness in Wisconsin, as well as to grow DPI’s reporting capacity to include more relevant indicators in DPI’s reporting systems (e.g., daily attendance as opposed to annual attendance), DPI will contract for a single, statewide student information system to be implemented over the next five years. This system will link to the Wisconsin Information System or Education dashboard (WISEdash)—DPI’s response to the need for a single reporting portal—resulting in almost real-time reporting for the public as well as more relevant school- and district-level reporting through secure portals.

Through advances such as these in data collection and reporting systems, DPI will be able to provide districts with access to data and reports that provide timely information about student (individual and group) progress toward graduation. This includes the all-important early warning system, the technology for which has been outside DPI’s grasp for some years. Recent approval and funding of a statewide student information system, however, will allow DPI to provide districts across the state with access to relevant, almost real-time data.

The two major technology and data reporting initiatives mentioned above, a Statewide Student Information System (SSIS) and WISEdash, are key to provision of these reports. These initiatives will significantly impact districts. WISEdash will provide districts with direct access to aggregate student-level data in a secure format. Reports and dashboards will be available on a variety of topics. Initial implementation of WISEdash will be with secure access only, for school- and district-level staff authorized to see non-redacted or suppressed data, and possibly authorized to view student-level information. Eventually, WISEdash will not only replace DPI’s current, myriad public reporting systems, updating and locating those reports in a single portal, but will add to the types and topics of available public reports. Accountability reporting will be completed through WISEdash, but so will other public reporting including information about postsecondary transitions, literacy, and other important statewide...

Currently, with many different student information systems in districts across the state, districts must submit data they already maintain through separate, time-consuming methods. As data collection requirements only increase in magnitude and number, the burden has a negative impact on districts. In a year in which schools have seen the largest state cuts to education ever, districts are forced to parse staff time from direct education toward data entry. This does not improve education and is not acceptable. The transition from individual, disconnected data management systems to a statewide system will:

- save personnel time by requiring zero duplicate data entry,
- create financial savings for districts via lower cost-per-pupil fees as part of a statewide contract,
- improve timeliness of data reporting (from several months to a number of days or hours),
- improve data quality by reducing duplicative data entry and translation errors,
- allow schools to focus on accessing, interpreting, and using data to inform decisions, and
- address data issues related to an increasingly mobile student population whose records lag as those students move from one district to another.

More information about the statewide student information system project is available here: http://dpi.wi.gov/ssis/.

Ultimately, the availability of data management and data reporting systems from a single location will allow any interested data consumer to have easier access to important data that can play a part in many decisions.

### 1.C Develop and Administer Annual, Statewide, Aligned, High-Quality Assessments That Measure Student Growth

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

**Option A**
- The SEA is participating in one of the two State consortia that received a grant under the Race to the Top Assessment competition.
  - i. Attach the State’s Memorandum of Understanding (MOU) under that competition. (Attachment 6)

**Option B**
- The SEA is not participating in either one of the two State consortia that received a grant under the Race to the Top Assessment competition, and has not yet developed or administered statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.
  - i. Provide the SEA’s plan

**Option C**
- The SEA has developed and begun annually administering statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.
  - i. Attach evidence that the SEA has submitted these assessments and academic achievement standards to the Department for peer
| to develop and administer annually, beginning no later than the 2014–2015 school year, statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs, as well as set academic achievement standards for those assessments. | review or attach a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review. (Attachment 7) |

For Option B, insert plan here
**PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT**

<table>
<thead>
<tr>
<th>2.A</th>
<th>DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.A.i</td>
<td>Provide a description of the SEA’s differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA’s plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA’s differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.</td>
</tr>
</tbody>
</table>
Theory of Action

The Wisconsin Department of Public Instruction (DPI) is in the midst of a strategic planning process that centers on college and career readiness. Specifically, the strategic plan contains three state goals:

- Raise Wisconsin’s graduation rate
- Close graduation and career- and college-readiness gaps
- Increase Wisconsin graduates’ career and college readiness

DPI is driven by the belief that increasing rigor across the standards and assessments (see Principle 1), and the new, statewide accountability system (detailed in the following sections of Principle 2), will result in improved instruction and student outcomes. This focus on increased rigor is the core of the three goals above, and is supported by the resources, supports, and interventions outlined throughout this application.

This waiver opportunity provides DPI the ability to implement new initiatives, policies, and practices to meet these goals within an environment that recognizes each school and district exists within unique circumstances and exhibits unique strengths and weaknesses, by moving beyond the uniform, one-size-fits-all policies mandated by No Child Left Behind (NCLB). This understanding is evident within the development of a new, differentiated system of accountability that values a comprehensive system of education; prioritizes the closing of achievement gaps; and increases rates of college- and career-readiness. Wisconsin’s system uses multiple measures, including improved assessments (Principle 1), as well as an enhanced and expanded system of rewards, recognition, and customized, differentiated systems of support. These supports will be the direct result of findings from diagnostic reviews designed to target strategies around areas of greatest need. In short, DPI has initiated bold systemic changes at the state, district, and school level.

A Statement about Systems Change

Accountability systems, even well designed ones, cannot alone improve education in a systemic, sustainable way. Wisconsin’s accountability plan is a step forward, but only a part of a much larger effort to incorporate the myriad critical components of a well-rounded education that effectively prepares all Wisconsin students for success in college and career. Such an education prioritizes high performance, while valuing personalized approaches to learning and different pathways to graduation and beyond, and ensures student wellness and safety. The table below illustrates just some of the high-impact initiatives DPI engaged in on a statewide level to improve the college- and career-readiness of each and every student in Wisconsin.

Table 2.1. Accountability and Statewide Support Systems: Part of the Whole

<table>
<thead>
<tr>
<th>Key Questions</th>
<th>Related Efforts</th>
</tr>
</thead>
<tbody>
<tr>
<td>What and how should kids learn?</td>
<td>Common Core State Standards implementation Standard, Instruction, and Assessment Center Early Learning Standards Implementation Individualized Learning Plans and Programs of Study Moodle technology</td>
</tr>
<tr>
<td>How do we know if they learned it?</td>
<td>Smarter Balanced Assessment Dynamic Learning Maps Assessment ASSETS for English Learners District benchmark assessments The Wisconsin Information System for Education (WISE) – a statewide data reporting system available spring 2012</td>
</tr>
<tr>
<td>How do we support improvement?</td>
<td>Wisconsin State Accountability System School and district report cards Statewide System of Support for Schools Educator Effectiveness System WISE Moodle technology</td>
</tr>
<tr>
<td>How should we pay for schools?</td>
<td>Fair Funding for our Future (Appendix 7)</td>
</tr>
</tbody>
</table>

Updated February 10, 2012
Alone, any of the initiatives in the table—however well devised or well intended—will ultimately not achieve desired goals. Isolation suffocates sustainable improvement. The same is true for Wisconsin’s statewide accountability system; it is but part of DPI’s work to support and improve education across the state, work that is clearly focused on DPI’s three strategic goals (increasing graduation rates, closing graduation and career- and college-readiness gaps, and increasing Wisconsin high school students’ career- and college-readiness). That work is comprised of individual efforts that range from reforming school finance to providing nutritious school meals, from increasing academic rigor to fostering a vibrant digital learning environment. Alone, the accountability plan described in this Principle will have limited traction or focus. As part of integrated efforts that share a common goal of ensuring the college- and career-readiness of individual students, this accountability system contributes to something greater and, in doing so, becomes more meaningful and sustainable.

Reprioritization and Systemic Changes at the State Level
This ESEA Flexibility Request has provided DPI an opportunity to increase communication and collaboration with key stakeholders regarding how best to enhance existing educational initiatives, develop new initiatives designed to improve student outcomes, increase rates of students graduating college- and career-ready, and close achievement gaps. DPI worked in collaboration with the School and District Accountability Design Team (Accountability Design Team) to design the framework for a new statewide system of accountability and support. The Accountability Design Team developed thirteen principles to guide this work, which directly align to DPI’s strategic plan to raise graduation rates, close graduation gaps, and graduate all students ready for college and career. As such, DPI is advancing the following systemic changes.

Raising Expectations, Increasing Rigor
As noted in Principle 1, DPI has significantly raised expectations for schools and the proportion of students who graduate ready for college and career, as indicated by the adoption of rigorous academic standards, higher cut scores based on National Assessment of Educational Progress (NAEP) as the state transitions to the Smarter Balanced Assessment System, increasingly rigorous and adaptive assessment systems, and increased graduation requirements. New accountability report cards and the new system of support, rewards, and recognition will reflect these higher expectations.

While Wisconsin has previously emphasized graduation rates (and boasted one of the highest in the nation), the state has significant achievement and graduation gaps. The accountability index prioritizes achievement and attainment using measures which emphasize not only graduation, but also the proportion of students graduating college- and career-ready. Additionally, the system examines achievement gaps within and across schools as a means to address the state’s existing gaps. Using a multifaceted index will help pinpoint areas of need within a school, as well as areas of strength, and help schools track their progress at meeting the needs of all student subgroups. Within the system of support, identified schools will participate in diagnostic reviews and needs assessments (Priority and Focus Schools, respectively), to identify the instructional policies, practices, and programming that have impacted student outcomes and to differentiate and individualize reforms and interventions. While planning and implementing reforms, schools and districts will have access to increasingly expansive and timely data systems to monitor progress. Additionally, DPI will require Priority and Focus Schools to implement Response to Intervention (RtI, with the support of the Wisconsin RtI Center and its resources) to ensure that all students receive customized, differentiated services within a least restrictive environment, including additional supports and interventions for students with disabilities and English language learners as needed, or extension activities and additional challenges for students exceeding benchmarks.

Developing a Statewide System for Accountability and Support
Currently, Wisconsin’s system of support for schools identified for improvement serves Title I schools. Due to funding and capacity, the state’s system currently classifies the performance of all traditional public schools and charter schools as required by No Child Left Behind (NCLB), but only requires interventions for Title I schools and districts. Wisconsin’s persistently low-performing schools do not experience sanctions or implement targeted interventions prescribed by the state unless they receive Title I funding.
To address these issues, the Accountability Design Team developed a statewide accountability framework that specifically includes all state schools, including traditional public schools and charter schools, regardless of Title funding, as well as private schools participating in Parental Choice Programs (PCP). All schools receiving state funds will be part of the state accountability and support system. DPI will use this opportunity to not only include all schools, but also to increase accountability through the implementation of aggressive policies designed to address persistently low-achieving schools in the state.

**Aligning Relevant State Initiatives**

DPI is committed to aligning existing and developing new state initiatives to inform each process and avoid duplication of efforts. Accordingly, DPI is aligning agency work to support the recommendations made by task forces regarding three current statewide educational reforms: 1) Early literacy; 2) Educator Effectiveness; and 3) School and District Accountability. This alignment is informed by collaboration and cooperation with key stakeholders, including the Governor and the chairs of legislative education committees. Task forces for each statewide educational reform met throughout 2011 and have all concluded their meetings. DPI has begun development of appropriate cross-agency workgroups to support the coordinated implementation for each set of recommendations. The work of each of these groups and their members is and will continue to inform the Statewide System of Support (SSOS).

DPI’s approach to aligning these key initiatives is driven by the prioritization of statewide goals established through a strategic planning process. Specifically, DPI has identified the three goals mentioned above and five priority areas around which the agency will braid different initiatives and efforts:

- Streamline the pathways from high school to career and college
- Increase reading and mathematics performance
- Improve student wellness and safety
- Personalize learning
- Build a statewide infrastructure to support learning

**Addressing Capacity**

The Accountability Design Team also indicated the state system should be developed based on reasonable and realistic implementation goals that address capacity at the state, district, and school levels. Informed by this recommendation, DPI’s request for flexibility identifies the most efficient yet effective means to effect change. For example, the proposal to focus reforms at the district level if a district exhibits systemic barriers to improvement was informed by findings from school improvement grant (SIG) monitoring visits. DPI deemed district level intervention more effective and efficient, and also more likely to create change. The flexibility created through this ESEA Flexibility Waiver opportunity will allow DPI to address these district-level needs to best serve schools and students.

**Making Improvements as Necessary**

A guiding principle of the Accountability Design Team was to remain open to feedback and findings about potential system improvements. To ensure maximum effectiveness of the system, DPI will elicit feedback from a variety of stakeholders and remain open to findings during implementation and evaluation of the accountability system. In particular, DPI will work with its Technical Advisory Committee (TAC) to validate the technical aspects of accountability determinations and other psychometric components of the system, and make adjustments where advised. DPI will also benefit from ongoing dialogue with the United States Department of Education (USED), the Council of Chief State School Officers (CCSSO), and other states applying for flexibility.

In addition to changes made during the evaluation and initial implementation, the proposed system will undergo regular impact analysis and evaluation, identifying strengths and weaknesses in both the measures used and the supports and interventions required, and will be adjusted appropriately. This dedication to ongoing improvement will continue to hone in on the goal of a fair system that accurately applies multiple measures, and provides a statewide system of support that results in improved performance for all students.
**Newly Developed Statewide System of Accountability**

The Accountability Design Team provided helpful guidance and recommendations concerning the accountability system presented in this ESEA Flexibility Request. For example, the group not only specified generally that growth and achievement should be factors in school accountability, but proposed four sub-score areas of the accountability system: Student Achievement, Student Growth, Closing Gaps, and On-track to Graduation (for elementary and middle schools) or Postsecondary Readiness (for high schools). These sub-score areas form the foundation of an accountability index system that incorporates multiple measures including achievement, growth, attendance, and graduation rates. The accountability index results in a school-level score (on a scale from 0-100) that is used to place schools on a six-level continuum. The index system is also used to identify the highest need schools based on overall performance and gaps between subgroups, and to identify schools that demonstrate high performance overall. Finally, the index system incorporates annual measurable objectives (AMOs) that reflect Wisconsin’s focus on high expectations and balanced attention to achievement and improvement.

The accountability index system is currently under development. Over the coming months, DPI will work with the TAC and use a standard-setting process to determine the specific cut points for each of the six accountability levels.

New school and district report cards will be developed over the coming year, in consultation with Wisconsin’s TAC, school and district staff, and other stakeholders. Report cards based on the accountability index will be publicly reported beginning in summer 2013. DPI will set differentiated expectations (AMOs) based on each school’s overall performance on the index. Schools further behind will have more aggressive AMOs, requiring all schools to be at an acceptable level within four years, regardless of their starting point. Reports highlight areas in need of improvement so schools can target interventions to focus on specific indicators like improving graduation rates (the key indicator in the postsecondary readiness sub-scale area) or closing achievement gaps. Additional AMOs for test participation, dropout rates, and absenteeism will be the same across the state and represent that it is important for all schools to achieve certain standards in these areas that impact each of the index’s sub-scale areas.

**Customized and Differentiated System of Rewards, Recognition, and Support**

The Accountability Design Team recognized that systems of accountability must be aligned to systems of support in order to effect change. The Design Team recommended that the new statewide accountability system provide differentiated, targeted systems of support to improve student outcomes. Additionally, the Accountability Design Team recommended the state recognize high-performing schools to incentivize improved outcomes and to disseminate exemplary practices statewide. These recommendations represent a commitment to a statewide system of support (SSOS) aimed at providing differentiated recognition, rewards, and interventions. Interventions will be built upon the core of high quality instruction, collaboration, balanced assessments, and culturally responsive practices in order to successfully meet the state’s three strategic goals.

**Implementation of New Statewide Accountability System: 2013-Ongoing**

DPI recognizes that, in order to impact student outcomes, some schools will need comprehensive support, while others will require more targeted interventions. This application provides Wisconsin the opportunity to remove districts and schools from uniform, one-size-fits-all sanctions, and instead implement differentiated, individualized supports and interventions designed to improve processes and practices that are proven to directly impact student outcomes. Specifically, DPI proposes a SSOS that provides individualized support to districts and schools identified through a diagnostic review, and that promotes individualized support for students through commitment to high quality implementation of a multi-level system of support known as Response to Intervention (RtI).
Timeline for Implementation

Following a field-test of the accountability index at the end of the 2011-12 school year, DPI will begin implementation of its new accountability system with a Transition Year in 2012-13. During this year, DPI will begin distribution of the new report cards using the accountability index system to inform schools and districts of the new system (including reporting of assessment scores based on the NAEP scale), and their own strengths and weaknesses within the new system in order to prepare for full implementation of the system in 2013-14. Priority Schools currently implementing school improvement grants (SIGs) will continue implementation of the turnaround models, and therefore must meet the requirement for implementation of Priority School reforms in 2012-13. This transition year will represent the final year of SIG implementation for most of these schools, allowing the state to transition to its new accountability system, including plans targeted to the district and school level as appropriate. Additionally, schools currently required to implement supplemental educational services as a consequence of NCLB will be allowed to use this transition year to transition out of this program, provided support from appropriate key stakeholders is received and submission of a detailed plan for transition is approved by DPI. DPI will continue to implement its current system of recognition and rewards for the 2012-13 school year.

As presented in Table 2.2, the state will continue with full implementation of the proposed plan pending approval by USED beginning in 2013-14.
### Table 2.2. Timeline for Transition to Newly Developed State System of Differentiated Recognition, Accountability, and Support

<table>
<thead>
<tr>
<th>Event Description</th>
<th>Responsible Party</th>
<th>2011-12 School Year</th>
<th>2012-13 School Year</th>
<th>2013-14 School Year</th>
<th>2014-15 School Year</th>
<th>2015-16 School Year</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Communicating the New Accountability System</strong></td>
<td></td>
<td></td>
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<tr>
<td>ESEA waiver posted for public comment</td>
<td>LEA</td>
<td>January 21</td>
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<tr>
<td>ESEA waiver submitted to DOE</td>
<td>LEA</td>
<td>February 21</td>
<td></td>
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<tr>
<td>Disseminate state goals to LEAs</td>
<td></td>
<td>State goal 88%</td>
<td>State goal 87%</td>
<td>State goal 88%</td>
<td>State goal 89%</td>
<td>State goal 90%</td>
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<tr>
<td>~ increase graduation rate to 92% by 2018</td>
<td></td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>Reporting</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>New report cards</td>
<td>OEA</td>
<td>Pilot</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
<td>Required</td>
</tr>
<tr>
<td><strong>Supporting School Improvement</strong></td>
<td></td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>Release of SIG continuation applications for existing Cohort I and II schools</td>
<td>Title I and School Support Team</td>
<td>March</td>
<td>Spring</td>
<td>Spring</td>
<td>Spring</td>
<td>Spring</td>
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<tr>
<td>(pending USED timelines)</td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>Release of RFP for Diagnostic Review vendor</td>
<td>Title I and School Support Team</td>
<td>January</td>
<td></td>
<td>N/A</td>
<td>N/A</td>
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<tr>
<td>Development of state-approved turnaround expert list</td>
<td>Title I and School Support Team</td>
<td></td>
<td></td>
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<tr>
<td>Recruitment/training of SEA-district liaisons (assigned to Priority Schools)</td>
<td>Title I and School Support Team</td>
<td>November-</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Final determination of Priority and Focus Schools, as well as Schools of Recognition (3 year cohort)</td>
<td>Office of Educational Accountability</td>
<td>May</td>
<td>3 year cohort</td>
<td>3 year cohort</td>
<td>3 year cohort</td>
<td></td>
</tr>
<tr>
<td>LEAs notified of determinations and requirements of Priority and Focus Schools</td>
<td>State Superintendent's Office</td>
<td>May</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SEA-district liaison assigned to LEAs with priority school(s)</td>
<td>Title I and School Support Team</td>
<td>May</td>
<td>3-year cohort</td>
<td>3-year cohort</td>
<td></td>
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<tr>
<td>SEA selects diagnostic review vendor</td>
<td>Title I and School Support Team, Title I Committee of Practitioners Rti Center Title I Network</td>
<td>June-July</td>
<td></td>
<td>Continue contract with selected vendor</td>
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<td></td>
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<tr>
<td>SEA conducts school meetings and webinars with Priority and Focus</td>
<td>Title I and School Support Team</td>
<td>Ongoing beginning</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Action and Responsible Parties</td>
<td>2011-12 School Year</td>
<td>2012-13 School Year</td>
<td>2013-14 School Year</td>
<td>2014-15 School Year</td>
<td>2015-16 School Year</td>
<td></td>
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<tr>
<td>-----------------------------------------------------------------------------------------------</td>
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<tr>
<td>Schools, as well as their LEAs, to clarify expectations, timelines and grant opportunities.</td>
<td></td>
<td></td>
<td>June-July</td>
<td></td>
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<tr>
<td>SEA provides training to all Priority and Focus Schools and their LEA representatives on Indistar</td>
<td></td>
<td></td>
<td>June-July</td>
<td>June-July as needed</td>
<td>June-July as needed</td>
<td></td>
</tr>
<tr>
<td>Priority Schools participate in reviews of instructional practices (diagnostic review)</td>
<td></td>
<td></td>
<td>August-November</td>
<td>August-November as needed</td>
<td>August-November as needed</td>
<td></td>
</tr>
<tr>
<td>SES is waived. LEAs must submit plan for supplemental tutoring with parent input as part of the plan.</td>
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<tr>
<td>Consult with key stakeholders and parents when developing reform plans</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Priority and Focus Schools develop school reform plans aligned to findings from reviews of instructional practices</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Priority Schools assigned turnaround partner from state-approved list</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Priority and Focus Schools submit school reform plans to SEA via Indistar (annually)</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>SEA approves Indistar plans (year #1)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SEA monitors LEAs’ school reform plans (quarterly)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>LEA and SEA district liaison monitor school reform plans (weekly)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>LEAs begin implementation of approved school reform plans for Priority (non-SIG) and Focus Schools</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Priorities to Correct Deficiencies</td>
<td>Responsible Party</td>
<td>2011-12 School Year</td>
<td>2012-13 School Year</td>
<td>2013-14 School Year</td>
<td>2014-15 School Year</td>
<td>2015-16 School Year</td>
</tr>
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<td>-----------------------------------</td>
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</tr>
<tr>
<td>Priority Schools and Focus Schools participate in ongoing state-directed PD aligned to school reform plans</td>
<td>LEAs with Priority and Focus Schools CESA's, Title I network, RII Center, SEA, SIA Center Turnaround Vendors</td>
<td>Ongoing beginning March</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Indistar opens for Priority and Focus School Indistar plans due (annually)</td>
<td>Title I and School Support Team</td>
<td>April</td>
<td>April</td>
<td>April</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SEA approves Priority and Focus School Indistar plans (annual approval)</td>
<td>Title I and School Support Team</td>
<td>June</td>
<td>June-modified plan</td>
<td>June-modified plan</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Intervening to Correct Deficiencies</strong></td>
<td></td>
<td></td>
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<tr>
<td>Implement SEA-directed Corrective Action Requirements</td>
<td></td>
<td>Ongoing if applicable</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assist LEA in restructuring schools that fail to meet performance objectives</td>
<td></td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>July 2017</td>
</tr>
<tr>
<td><strong>Rewards</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Continue Title I Recognition Program</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Title I Beating the Odds Schools recognized publicly in State Ceremony</td>
<td>Title I and School Support Team</td>
<td>October</td>
<td>October</td>
<td>October</td>
<td>October</td>
<td>October</td>
</tr>
<tr>
<td>LEAs notified of Schools of Recognition grant approval</td>
<td>Title I and School Support Team</td>
<td>January</td>
<td>January</td>
<td>January</td>
<td>January</td>
<td>January</td>
</tr>
<tr>
<td>Teacher Fellowship applications due</td>
<td>LEAs with Schools of Recognition</td>
<td>January</td>
<td>January</td>
<td>January</td>
<td>January</td>
<td>January</td>
</tr>
<tr>
<td>Teacher Fellowship grantees announced</td>
<td>Title I and School Support Team LEAs with Schools of Recognition</td>
<td>March</td>
<td>March</td>
<td>March</td>
<td>March</td>
<td>March</td>
</tr>
</tbody>
</table>
### ESEA Flexibility – Request

**U.S. Department of Education**

<table>
<thead>
<tr>
<th>Event Description</th>
<th>Responsible Party</th>
<th>2011-12 School Year</th>
<th>2012-13 School Year</th>
<th>2013-14 School Year</th>
<th>2014-15 School Year</th>
<th>2015-16 School Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title I Spotlight Schools applications due</td>
<td>Spotlight Schools and their LEAs</td>
<td>March</td>
<td>March</td>
<td>March</td>
<td>March</td>
<td>March</td>
</tr>
<tr>
<td>Notification of Title I Spotlight School awards</td>
<td>Title I and School Support Team</td>
<td>May</td>
<td>May</td>
<td>May</td>
<td>May</td>
<td>May</td>
</tr>
<tr>
<td>SEA conducts onsite visits to Title I Spotlight Schools</td>
<td>Title I and School Support Team</td>
<td>September-October</td>
<td>September-October</td>
<td>September-October</td>
<td>September-October</td>
<td>September-October</td>
</tr>
<tr>
<td>Title I Spotlight Schools open visits to LEAs and schools statewide</td>
<td>Spotlight Schools and their LEAs</td>
<td>November-April</td>
<td>November-April</td>
<td>November-April</td>
<td>November-April</td>
<td>November-April</td>
</tr>
<tr>
<td>Ongoing network sessions with principals of Title I Spotlight Schools</td>
<td>Title I and School Support Team</td>
<td>September-May</td>
<td>September-May</td>
<td>September-May</td>
<td>September-May</td>
<td>September-May</td>
</tr>
</tbody>
</table>

**Expanding to a Statewide Recognition Program**

<table>
<thead>
<tr>
<th>Event Description</th>
<th>Responsible Party</th>
<th>2011-12 School Year</th>
<th>2012-13 School Year</th>
<th>2013-14 School Year</th>
<th>2014-15 School Year</th>
<th>2015-16 School Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Identify High-Progress and Exemplary Schools</td>
<td>Office of Educational Accountability</td>
<td>May</td>
<td>October</td>
<td>October</td>
<td>October</td>
<td>October</td>
</tr>
<tr>
<td>Rewards Schools recognized publicly in State Ceremony</td>
<td>Title I and School Support Team</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Identify small, representative sample of Rewards Schools to participate in a</td>
<td>Office of Educational Accountability</td>
<td>June</td>
<td>June</td>
<td>June</td>
<td></td>
<td></td>
</tr>
<tr>
<td>diagnostic review of successful practices</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conduct onsite review of practices in sample of Reward Schools</td>
<td>Title I and School Support Team</td>
<td>September-October</td>
<td>September-October</td>
<td>September-October</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disseminate best practices of Rewards schools</td>
<td>Title I and School Support Team</td>
<td>Ongoing</td>
<td>Ongoing</td>
<td>Ongoing</td>
<td></td>
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</tr>
</tbody>
</table>

*Includes Title I 'Beating the Odds' Schools, Statewide Gap Closing and Significantly Exceeding Expectations*
2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
</tr>
</thead>
<tbody>
<tr>
<td>✗ The SEA includes student achievement only on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.</td>
<td>If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system or to identify reward, priority, and focus schools, it must:</td>
</tr>
<tr>
<td></td>
<td>a. provide the percentage of students in the “all students” group that performed at the proficient level on the State’s most recent administration of each assessment for all grades assessed; and</td>
</tr>
<tr>
<td></td>
<td>b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.</td>
</tr>
</tbody>
</table>

Wisconsin’s School and District Accountability Design Team indicated interest in including content areas other than reading and mathematics as part of a statewide accountability system. This topic will be revisited as new, common standards and assessments are developed for other content areas.

2.B **SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES**

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
<th>Option C</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the “all students” group and in each subgroup who are not proficient within six years. The SEA must use</td>
<td>□ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide</td>
<td>✗ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups.</td>
</tr>
<tr>
<td></td>
<td>i. Provide the new AMOs</td>
<td></td>
</tr>
</tbody>
</table>
State Superintendent Tony Evers convened the School and District Accountability Design Team (Accountability Design Team) with other educational leaders because of a shared commitment to improve upon existing accountability structures and ultimately to improve outcomes for all students in Wisconsin. The Department of Public Instruction (DPI) is deep in the work of re-focusing its efforts in a way that braids together agency initiatives, including this accountability plan, to build college- and career-readiness for all students.

### An Index-Based Accountability System for Wisconsin

The Accountability Design Team put forth several recommendations for a statewide accountability system. One key recommendation was that the accountability system should use multiple measures and reflect the skills and knowledge students need to be successful in a variety of postsecondary opportunities. As a component of that recommendation, performance should be measured using both growth and achievement calculations.

In an effort to design a system that reflects this vision and holds schools accountable for high-leverage, measurable, fair indicators of student engagement, progress, and performance, DPI has developed an accountability index system that incorporates multiple measures, including student growth. This index system reflects the goals of high attainment and growth as well as other key priorities. In all, the accountability index incorporates four sub-scale areas: Student Achievement; Student Growth; Closing Gaps; and On-Track to Graduation (for elementary and middle schools) or Postsecondary Readiness (for high schools).

### Important Index Miscellany

#### Establishing Baselines

Overall accountability index scores will incorporate the revised NAEP-like Wisconsin Knowledge and Concepts Exam (WKCE) cut scores described in Principle 1. AMOs will be set using 2010-11 data to establish a baseline that incorporates the more rigorous cut scores. While 2010-11 data will inform the setting of baselines, timelines for meeting AMO trajectories will be set beginning in 2012-13, the first time the accountability index will be calculated for accountability determinations.
**Cell Size**
All accountability calculations will apply a minimum group cell size of 20, a change from DPI’s current use of a cell size of 40. This change represents a dedication to ensuring that accountability calculations are fair for all populations.

**Reporting**
This proposal brings many significant changes to Wisconsin’s accountability system. DPI has a keen desire to ensure an ample implementation period so that educators, the public, and other important stakeholders are well-informed about this new accountability system. As such, DPI intends to phase-in accountability report cards. District partners and other stakeholders have been and will continue to be consulted on the design of school report cards, particularly as the Wisconsin Accountability Index is field tested following the 2011-12 school year, giving schools and districts time to adapt to the new system.

Following evaluation of the field-tested accountability index, official school and district report cards will be provided for the 2012-13 school year, in the spring of 2013. The index calculations in the 2013 reports will be used for determinations that will result in the categorization of schools into one of the six categories, and identification of Priority, Focus, and Reward Schools from within those categories. These identifications will drive the resulting differentiated rewards, supports, and interventions provided by DPI to schools and districts, which will begin in the 2013-14 school year.

**Factoring in Subgroups**
One of the major systemic issues with No Child Left Behind (NCLB) is that large, diverse schools can miss Adequate Yearly Progress on any one of 64 separate determinations. Balancing an appropriate focus on subgroups—one that does not hide subgroup performance—while acknowledging the importance of achievement and growth among all students is crucial to addressing this issue. DPI will continue to incorporate the performance of all NCLB-defined subgroups throughout the accountability system. For determinations, subgroup performance forms the basis of the Closing Gaps sub-scale area, as well as multiple components of the On-Track to Graduation/Postsecondary Readiness areas and the Red Flags, introduced below. Determinations of Student Achievement and Student Growth will be based upon all students. DPI believes this is a fairer system that appropriately prioritizes subgroup performance within the context of college- and career-readiness for all students.

**A Subgroup for Combined Small, High-Need Groups**
Wisconsin’s 424 districts are mostly small and rural. As such, many districts have very small numbers of students, and subgroup populations are below even the proposed new minimum group size of 20 required for inclusion in accountability calculations. In order to ensure that more schools without sufficient subgroup size have an opportunity to evaluate performance calculations, DPI will create a high-need supergroup to factor into the accountability index described below. The high-need supergroup combines the students with disabilities, English language learners, and economically disadvantaged subgroups. In instances where a school’s individual subgroup populations in those three areas are all below minimum cell size requirements, the high-need supergroup will be used as recognition of the need to closely monitor the performance of these traditionally high need student populations. When one or more of these subgroups have 20+ students, the high-need supergroup will not be used, and subgroups will be analyzed separately.

Further information about the change in cell size as well as the high-need subgroup is presented in Appendix 8.

**A Subgroup for Low Performers**
The School and District Accountability Design Team specifically recommended use of an additional subgroup, one that groups the lowest 25 percent of performers together. The goal for including such a subgroup is to prioritize moving all low performers up, regardless of demographic characteristics. Use of the lowest 25 percent as an additional subgroup is not incorporated into the accountability index at this time, but will be considered for inclusion upon implementation of the SMARTER Balanced Assessment System in the 2014-15 School Year.
Accountability Rating Category Placement

When constructing simulations of the accountability index and its components, it became clear that certain proposed components of the index were not functioning in ways that were intended. For example, DPI attempted to incorporate a school’s test participation rate into its achievement index, with the goal being to acknowledge the importance of high test participation and not allow schools to inappropriately skew their measure by selectively testing students. However, simulations indicated that incorporating participation into the calculation of the Achievement Index diluted test participation as part of the overall index score. Consequently, DPI staff sought an alternative way to include certain key indicators in the composite index.

Red Flags

The concept of “red flags” is Wisconsin’s solution to incorporating measures that dilute the index if included within the sub-scale areas, but are high leverage indicators that impact the reliability of components of the index, into the new accountability system. These flags exist outside of the mathematical calculation of the index, and instead carry overarching weight in determining where on the accountability scale a school falls.

A combination of overall scores and red flags places schools and districts within one of six categories, and these categories inform and potentially trigger rewards, supports, and interventions.

Note: Labels, in combination with comprehensive report cards, are intended to provide schools with information that will guide local improvement efforts and inform state intervention planning. Schools falling in the Meeting Some or Meeting Few Expectations categories may be identified as Focus Schools. Schools in the Persistently Failing to Meet Expectations category may be identified as Priority Schools, based on overall achievement.

Schools receiving one or more red flags cannot be placed higher than the Meeting Some Expectations category. Composite index scores will not be changed, but receipt of red flags shows that a school has not met expectations in any of these three areas: test participation, dropout rates, or absenteeism.

Test Participation. This possible red flag reflects the impact of participation rates on the accountability index. Schools will receive a red flag if their “All Students” group or any subgroup misses the target in either mathematics or reading test participation. The target test participation rate is 95 percent.

Dropout Rate. Schools will receive a red flag if their dropout rate is above six percent. This threshold was calculated based on recent statewide data, and was determined as a sufficient threshold for placing focus on the schools contributing heavily to Wisconsin’s overall dropout rate.
**Student Absenteeism.** Schools will receive a red flag if their rate of student absenteeism is above 13 percent. This threshold was calculated based on recent statewide data, and was determined as a sufficient threshold for placing focus on the schools contributing heavily to Wisconsin’s overall absenteeism, an indicator highly correlated with lower achievement and low growth. Future versions of the accountability index, enabled by advances in data collection, may factor truancy (which is currently a local determination based on state statute that incorporates more real-time data) rather than absenteeism (which is the percentage of students below an attendance threshold – a snapshot of attendance) as a red flag.

**Index Improvement Goal.** Schools are expected to make ongoing improvement toward or past the Meeting Expectations school rating category. Schools not making adequate progress (determined based on a four-year timeframe) on an annual basis will receive a red flag for not making continual improvement.

See Appendix 8 for information the analyses that informed goal-setting for the indicators above and Appendix 9 for sample report cards that demonstrate the full accountability index system.

**Stars**
An accountability system should not only identify performance below expectations; it should also highlight positive progress or work being done in schools and districts. In addition to flags, report cards may include stars for certain indicators for which DPI will not hold schools accountable, but that are important enough to highlight as a significant positive accomplishment for that school or district. Determination of these areas will be made through the standard-setting process.

**Expectations for Wisconsin Schools**
The state plans to couple these accountability determinations with differentiated interventions and supports for certain schools and development of school improvement tools and resources available statewide. The goal is for all schools in the state to be at or above the Meeting Expectations level within four years. To meet this goal, annual expectations (annual measurable objectives (AMOs)) must be made clear.

**Expectations for Schools**
As mentioned above, red flags serve as an overall goal in three areas: test participation, dropout rates, and absenteeism. Schools that receive red flags in any area will not be classified as Meeting, Exceeding, or Significantly Exceeding Expectations in the school performance categories.

In order to set targets on track with meeting the goal of all schools reaching the Meeting Expectations category or above, DPI will set differentiated AMOs that ensure all schools are on track to meet, exceed expectations within four years of system implementation. Specifically, school-level AMOs will require an increase in overall index scores at a rate that each school’s score (and lack of red flags) places it in the Meeting Expectations category or above within four years. This approach reflects a level of individualization not allowed in NCLB. It also acknowledges that schools with lower overall scores will need to improve at a faster rate in order to achieve the Meeting Expectations category.

**Expectations for Districts**
While school-level accountability expectations are based on a trajectory toward Meeting Expectations, district-level expectations focus on how a district performs at each of three grade-band levels: grades K-5, 6-8, and 9-12. The overall accountability index is calculated at each level, using the On-Track to graduation sub-scale area in grades K-5 and 6-8, and the Postsecondary Readiness sub-scale area in grade 9-12. Red flags for test participation, dropout rate, and absenteeism may be assigned at each level. Additionally, a district will receive a red flag if any of its schools fall into the lowest category, Persistently Failing to Meet Expectations. As with schools, district performance compared to expectations will inform potential required interventions.
### Table 2.3: The Accountability Index, Performance Category, and Identification Process

<table>
<thead>
<tr>
<th>Steps</th>
<th>Step 1: Calculate Sub-scale Area Scores</th>
<th>Step 2: Aggregate Sub-scale Area Scores Into Overall Accountability Score</th>
<th>Step 3: Apply Red Flags if Necessary</th>
<th>Step 4: Place School into Performance Category</th>
<th>Step 5: Identify Schools of Recognition and Schools/Districts in Need of Interventions and Supports</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notes</td>
<td>Four Sub-scale Areas:</td>
<td>Weighting process to be determined in consultation with Wisconsin's Technical Advisory Committee by May 2012. Overall score scale: 0-100</td>
<td>Red flag categories: 1) Test Participation (&lt;95%) 2) Dropout Rate (&gt;6%) 3) Absenteeism (&gt;13%) Red flag(s) are applied if a school misses the goal for all students or any individual subgroup, depending on the category</td>
<td>Schools with zero red flags are placed into one of six categories: 1) Significantly exceeding expectations 2) Exceeding expectations 3) Meeting expectations 4) Meeting some expectations 5) Meeting few expectations 6) Persistently failing to meet expectations</td>
<td>Schools of Recognition acknowledge high performance, high progress, and Title I schools that are &quot;beating the odds&quot; Schools identified as Persistently Failing to Meet Expectations require Priority Interventions and Supports Focus schools are those with the largest gaps or low subgroup performance in reading achievement, math achievement, or graduation rates; these schools may fall in any performance category</td>
</tr>
<tr>
<td>Result</td>
<td>Sub-scale Area scores inform school improvement efforts and public reporting</td>
<td>Overall score reflects school performance on multiple indicators in a meaningful way</td>
<td>Integrity of accountability index is maintained Attention to subgroups prioritized</td>
<td>Categories place schools along a continuum of performance. Categories are included on school report cards and inform school, district, and parental decisions</td>
<td>Schools are identified for interventions based on measures that reflect DPI’s strategic goals. Identification is differentiated, as are resulting interventions and supports.</td>
</tr>
</tbody>
</table>
Sub-scale Areas and Overall Scores
Within this multiple-measures accountability index, sub-scale area scores will be combined into an overall score. The exact methodology for how each sub-scale area is weighted and combined into the overall score will be determined through a standard setting process overseen by DPI’s Technical Advisory Committee: Dr. Brian Gong of the National Center for the Improvement of Educational Assessment, Dr. Andrew Porter from the University of Pennsylvania, and Dr. Robert Linn from the University of Colorado. A description follows of how each sub-scale area score is calculated.

Sub-scale Area 1: Student Achievement
The student achievement sub-scale is a composite of proficiency rates in reading and mathematics for the “all students” group on the Wisconsin Student Assessment System (WSAS). Proficiency rates will be calculated using a weighted average of the three most recent years of performance data, and will also factor in the number of full academic year students tested in the school each year. The weighting system gives a weight of 1.5 to the current year, a weight of 1.25 to the prior year, while two years prior receives a weight of 1.0. If a school has test data available for only the two most recent years, the most recent year is given a weight of 1.5, while the prior year is given a weight of 1.0, and the divisor becomes 2.5 rather than 3.75. If a school has only the most recent year of data available, only a single year of data is used to calculate the proficiency rate. Each year’s proficiency rate will also be weighted by the number of students tested in the school in that year. These steps are taken for two reasons: to give more weight to a school’s most recent performance and, to ensure that the weighting scheme follows sound statistical principles by weighting based on the number of students taking the test each year. This calculation is done separately for mathematics and reading. Each school’s attainment score is an average of its weighted reading and mathematics proficiency rates.

Sub-scale Area 2: Student Growth
On Target to Move Up. The growth measure proposed, On Target to Move Up, is an adaptation of the principles behind Colorado’s “Catch Up, Keep Up, Move Up” measures across multiple levels of achievement. It is a 0-100 index score that combines subject scores for reading/English language arts and mathematics. On Target to Move Up is a self-differentiating, growth-to-standards measure accounting for schools with high achievement while allowing lower-achieving schools to gain credit for high growth, a priority for this accountability system. Wisconsin is not yet adopting a high school growth measure because students are not tested in the 9th, 11th, or 12th grades; however, DPI intends to request funds for EXPLORE, PLAN, ACT, and WorkKeys which would enable an appropriate growth measure to be calculated for high school students (in addition to providing important college-pathway information to students, parents, and educators).

Background
Student Growth Percentiles (SGP) were originally developed for the Colorado Department of Education.1 A SGP is a number derived from a statistical comparison of a student’s growth on an assessment to students with similar performance histories, assigning the amount of growth a percentile rank. An advantage of SGPs is that they characterize growth without regard to student demographics; every student (with enough data) receives a growth percentile. Colorado developed a set of aggregate measures based on SGPs known as “Catch Up, Keep Up, Move Up.” In this method, the statistical program that calculates each student’s SGP also projects the SGP they need to achieve the next year in order to grow to a higher proficiency level within a number of years. The next year, their actual SGP is compared to the projection.2 Using SGPs in this manner is a growth-to-standard measure with the advantage that it evaluates growth relative to how a student is achieving and

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where they need to go to meet proficiency standards, rather than by a fixed number of scale score points as with a value table.

On Target to Move Up avoids the drawback of aggregating SGPs by school median, which is that a median SGP is normative and is affected by the achievement of other students at other schools. On Target to Move Up uses a normative tool in a criterion-based manner to create a unique growth-to-standards measure drawing on the power of SGPs.

**Methodology**

On Target to Move Up uses the tools developed for Colorado’s “Catch Up, Keep Up, Move Up” measures. The difference is that, rather than expressing separate values for different types of growth among different groups of students, On Target to Move Up is a single score that encompasses growth across all levels of student achievement. The process to determine a school’s score is:

5. A student is included in the set of students for calculation of the On Target to Move Up measure if DPI is able to calculate their SGPs in two consecutive years.
6. Because Wisconsin currently tests its students in the fall, the school accountable for a student’s growth is the school at which they were enrolled in the first year.
7. Students in the set are separated into two groups, those who achieve at the Advanced level in the first year, and those who do not. The percentage of students in the first group, compared to the entire set, is the school’s percentage advanced, PA. Students in the second group comprise a subset used to calculate the school’s growth factor, GF.
8. To calculate the growth factor, in the first year a student’s SGPs needed to reach the Basic, Proficient, and Advanced achievement levels over 1, 2, or 3 years are projected for each subject. At each level, the lower of the 1-, 2-, or 3-year projections is their target for that level.
9. In the second year, the student’s SGPs, describing their growth from the first year to the second, are compared to their targets for each subject. The student receives one point for each higher level’s target they meet or exceed (e.g., a student starting at the Minimum Performance level could receive 1 point for reaching the Basic target, 2 points for reaching the Proficient target, or 3 points for reaching the Advanced target). If the student starts at the Proficient level in the first year and does not meet or exceed the Advanced target, but they meet or exceed the Proficient target, they receive ½ point as credit for maintaining proficiency.
10. A school’s growth factor (GF) for each subject is the sum of its students’ points divided by the number of students in the growth factor subset, multiplied by 0.5.
11. The school’s subject score is (GF + PA – [GF × PA]) × 50, rounded to the nearest whole number.
12. The school’s On Target to Move Up score is the sum of its reading/English language arts and mathematics subject scores.

In the latest simulations DPI found that 48 percent of students who took the WKCE in 2009-10 (203,771 of 425,494) had two consecutive years of SGP data. As in other aspects of Wisconsin’s proposed accountability system, DPI uses 20 as the minimum cell size required for a school to have a score calculated; in the simulations this omitted 4 percent of schools (57 of 1,476 with two or more consecutive grades tested grade levels) tested in 2009-10. Given the large number of small schools in Wisconsin, DPI considers this rate acceptable.

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3 Wisconsin’s four student achievement categories are, in increasing order: Minimal Performance, Basic, Proficient, and Advanced.
4 Usually, the three-year projection will be lowest and thus the target, but since DPI’s cut score progression is not linear there will be times where a student is near an achievement level cut and the one- or two-year projections are lower.
5 The multiplier of 0.5 is used to scale the growth factor to a value between 0 and 1, as with a percentage.
6 Adding the growth factor and percentage advanced and then subtracting the product of those two values has the effect of scaling growth with achievement at the advanced level. The floor of the subject score, where a school starts with 0% advanced students (PA=0), is simply the growth factor times 50; the ceiling, where 100% of students are advanced (PA=1), is 50.
**Discussion**

On Target to Move Up moves beyond a simple consideration of growth-to-proficiency and contributes to a system that differentiates accountability determinations. Wisconsin believes that growth is important at all levels of student achievement. This measure credits growth across the full range of achievement, while weighting most heavily the growth of Wisconsin’s lowest-achieving students to proficiency or better. It credits students who are already proficient for showing growth to the highest level. It recognizes that schools ought to be rewarded, not punished, for making progress with their most challenging students.

The creation of On Target to Move Up began by looking at Colorado’s “Catch Up” measure, which uses SGPs to characterize student growth to the proficient level. DPI initially developed and evaluated a simplified “On Target to Proficient” measure, which took the percentage of below-proficient students meeting targets to proficiency, and scaled it with the percentage of proficient students. The On Target to Move Up measure is a compromise that recognizes USED’s stress on growth to proficiency, while reflecting the Accountability Design Team’s strong desire to recognize growth among low- and high-achieving students, in addition to those near the proficiency cutoff. However, the Accountability Index proposed in this application is a work in progress, and DPI will consult with our Technical Advisory Committee and the US Department of Education to determine the most appropriate measure for an accountability system that informs improved performance for all students. The “On Target to Proficient” method, which is less sensitive to cell size concerns for subgroups, is currently used as the Growth Gap measure in the Closing Achievement Gaps Sub-scale Area.

On Target to Move Up also has the particular advantage of being a self-differentiating measure. Lower-achieving schools can earn higher scores by showing more growth, since the one-point-per-level scoring system allows lower-achieving students to gain more points. Meanwhile, the measure essentially gives automatic credit for students at the Advanced level, rewarding schools for high achievement rather than punishing them because there is no level to which DPI can compare their highest-performing students. Further, gaps in rates of growth are addressed in the Closing Achievement Gaps sub-scale area, ensuring that schools with high performers cannot mask low growth of low-performing students.

**Sub-scale Area 3: Closing Achievement Gaps**

State Superintendent Evers has established a vision of Every Child a Graduate, College and Career Ready, a vision that drives efforts to close gaps in access and opportunities as well as in achievement. In his opening comments at a School and District Accountability Design Team meeting, Superintendent Evers specifically mentioned the importance of ensuring that all students, regardless of economic status, race/ethnicity, or disability status, have equal opportunities to pursue fulfilling college and career lives following graduation from Wisconsin schools.

Closing achievement gaps is a priority for Wisconsin, burdened by the dubious distinction of having one of the largest black-white achievement gaps in the nation. The design of this accountability system, while it aims to eradicate existing gaps across subgroups, also focuses on moving up all low performers. Wisconsin’s accountability system reflects this priority by including a specific sub-scale area for closing gaps in the index calculation for accountability determinations, and by including several measures of existing gaps within this index.

**Subgroups Included**

The system will compare each of the five race/ethnicity subgroups to the highest performing racial/ethnic subgroup in the school; English language learners to English proficient students; students with disabilities to students without disabilities; and economically disadvantaged students with non-economically disadvantaged students.

The Closing Gaps component of Wisconsin’s new accountability index evaluates subgroups within a school in order to make an accountability determination for that school. As a result of impact analyses, DPI determined that inclusion of a high-need supergroup is an appropriate additional step when there are insufficient numbers for separate subgroup evaluation to ensure that more schools are represented in the accountability system and to closely monitor the performance of traditionally high needs student groups.
Consequently, all gaps are calculated using the high-need supergroup in instances in which the English language learner, economically disadvantaged, and students with disabilities populations are each below the minimum of 20 students. In these cases, the high-need subgroup is compared to its counterpart, an aggregate group representing English proficient students without disabilities who are not economically disadvantaged.

The overall Gap Closure calculation will be a combination of gap measures of achievement, rates of growth, and graduation rates. Current measures within the system strike a balance of characterizing existing gaps and acknowledging progress in closing those gaps.

**The Achievement Gap**

Annual *within school* achievement gaps will be determined for each demographic subgroup using weighted proficiency rates calculated for each subgroup using the same methodology that is employed in the creation of the Achievement sub-scale area mentioned above. The weighted proficiency rate of each subgroup is then compared to its counterpart, an aggregate group representing English proficient students without disabilities who are not economically disadvantaged.

After each gap is calculated, the gaps are then averaged to produce a school's overall average gap. Gaps are not weighted by student enrollment in each group in order not to marginalize at-risk subgroups with low enrollment. Instead, this system places equal emphasis on all at-risk groups, regardless of their representation within the student population. Each group must meet the minimum cell size of 20 students in order to be given a gap calculation.

Schools will receive a numerical score on a scale of 0-100 within this sub-scale area based on their within-school average subgroup gap. Although the Achievement Gap score is an average of all gaps in a school, each gap will also be reported individually on the new school report cards, allowing schools to see which specific subgroups are falling behind the most and provide focused interventions to raise the achievement of these subgroups.

**The Growth Gap**

Another component of the Closing Gap sub-scale area is a growth measure, On Target to Proficient. Because Wisconsin students are not tested in the 9th, 11th, or 12th grades, it will not be used for high schools at this time, although high school growth measures could be included in a future version of the system with statewide availability of the EXPLORE, PLAN, and ACT tests.

On Target to Proficient is similar to the On Target to Move Up growth measure, applying Colorado’s “Catch Up, Keep Up, Move Up” concepts, except that it looks at growth of each subgroup to the Proficient level. Cell size considerations kept DPI from incorporating the more complex method to all subgroups. The process to determine a school's score, similar to that for the growth index, is:

1. A student is included for calculation if he/she has data to calculate their student growth percentiles (SGPs) in two consecutive years in reading/English language arts and mathematics.
2. Because Wisconsin tests its students in the fall, the school accountable for a student's growth is the school at which they were enrolled in the first year.
3. In the first year, a student's SGPs needed to reach the Proficient achievement level over 1, 2, or 3 years are projected for each subject. The lower of the 1-, 2-, or 3-year projections is their target.
4. In the second year, the student’s SGPs, describing their growth from the first year to the second, are compared to their targets in each subject area. The student is flagged as On Target to Proficient in a subject if they meet or exceed their target.
5. For each racial/ethnic group in a school, and for the ESEA binary and comparison groups (e.g., students with disabilities vs. students without disabilities), in that school, a subgroup score is determined in each subject. The subgroup score is calculated from the percentage of students included in the subgroup On Target to Proficient (OTP) and the percentage of its included students in the subgroup reaching the Proficient level in the first year, PP, as follows: OTP + PP – (OTP × PP).
6. The gap for a subgroup in a subject is the difference between the subgroup’s score and its comparison group’s score, if the subgroup’s score is lower. For racial/ethnic subgroups, the comparison group is the highest-scoring racial/ethnic subgroup.
7. The school’s gap score in each subject is 1 minus the average of all the gaps present in that school, multiplied by 50 and rounded to the nearest whole number.
8. The school’s overall gap score is the sum of the reading/English language arts and mathematics gap scores.

The Graduation Gap
Decreasing Wisconsin’s graduation gap is a particular focus of DPI’s strategic plan. The agency is focusing efforts to decrease gaps in graduation rates in addition to setting a goal of improving Wisconsin's statewide graduation rate to 92 percent by 2018.

Within-school gaps in graduation rates between demographic subgroups will be evaluated annually using four-year adjusted cohort graduation rates and six-year adjusted cohort graduation rates. Schools will receive a numerical score for this sub-scale area on a scale of 0-100, based on the average gap in graduation rates when placing equal weight on each subgroup gap.

Creating the Closing Gaps Sub-scale Area Score
At this time, DPI plans to weight each gap measure equally to establish a sub-scale area index score. Because growth is only measured in elementary and middle school, and graduation only measured for high schools, 50 percent of the Closing Gaps sub-scale area will be determined by achievement gap measures and the other 50 percent will be determined based on available growth and graduation gap measures.

In cases when there is insufficient data to calculate a gap sub-scale score, weighting of other sub-scale areas will be adjusted. Weighting within sub-scale areas and for the overall index will be finalized in consultation with DPI’s Technical Advisory Committee.

Sub-scale Area 4: On-Track to Graduation/Postsecondary Readiness
The On-Track to Graduation/Postsecondary Readiness measures proposed consist of a number of variables designed to identify whether schools are meeting benchmarks in preparing students for postsecondary success. The On-Track to graduation indicator, for schools with grades Kindergarten through eight, includes attendance, reading performance for third grade, and mathematics performance in eighth grade. The Postsecondary Readiness indicator includes attendance, graduation rates, and ACT participation and performance.

Subgroups Included
As with the closing gaps sub-scale area, measures of On-Track to Graduation and Postsecondary Readiness will be incorporated in the accountability index using individual subgroups. Like the Closing Gaps sub-scale area, the On-Track to Graduation/Postsecondary readiness sub-scale areas will compare each of the five race/ethnicity subgroups to the highest performing racial/ethnic subgroup in the school; English language learners to English proficient students; students with disabilities to students without disabilities; economically disadvantaged students to non-economically disadvantaged students; and, when necessary, the high-need supergroup to its comparison group.

On-Track to Graduation Indicator
The On-Track to Graduation sub-scale area calculation is applied to schools with grades Kindergarten through grade eight. The sub-scale area includes attendance, third grade reading achievement, and eighth grade mathematics achievement indicators.

Attendance (33 percent of On-Track sub-scale area index score). Attendance is highly correlated with rates of high school graduation. In an attempt to raise the graduation rates of at-risk populations, DPI is leveraging this high-impact measure by tying a school’s attendance score to its lowest-attending subgroup.

To determine a student’s attendance rate, the number of days attended divided by the total possible days is calculated. These numbers are summed together to provide both an overall school attendance rate and
a subgroup attendance rate (for each subgroup with at least 20 students). Each school’s Attendance score will be calculated based on an average of the school’s overall attendance rate and the lowest attendance rate of the subgroups present in the school. For example, if a school’s overall attendance rate is 95 percent, but its attendance rate for its lowest-attending subgroup is only 75 percent, the school’s Attendance score will be 85 out of 100 (i.e., \((95 + 75)/2 = 85\)).

**Third Grade Reading Performance (33 percent of On-Track sub-scale area index score).** In adhering to DPI’s overall goals of improving high school graduation and college readiness for all Wisconsin students, DPI has included third grade reading as a specific area of focus in Wisconsin’s index. Empirical evidence has consistently shown reading performance in third grade to be a significant predictor of future success (See Appendix 10). Students who have a solid reading foundation in third grade are better able to build their skills around this foundation throughout their academic career. Reading ability in the third grade has been empirically linked to high school performance, high school graduation, and college enrollment; students who read at or above grade level in third grade tend to have better outcomes in all of these areas.

**Methodology.** A school’s Third Grade Reading Score is calculated in the same way that the Achievement indicator is calculated. For each school, a three-year weighted average reading proficiency rate is calculated for all third graders who took the test in those years, applying the “all students” group. Schools that don’t meet the cell size are dropped from the calculations. All remaining schools are given a score based on their third grade reading proficiency rate. For example, if a school has a weighted average third grade reading proficiency rate of 84 percent, the school receives a Third Grade Reading Score of 84.

**Eighth Grade Mathematics Performance (33 percent of On-Track sub-scale area index score).** Like its third grade reading counterpart, eighth grade mathematics is being leveraged as a high-impact measure because of its importance in predicting success in secondary mathematics. Eighth grade mathematics performance is also an important measure in current early-warning research. As this is an evolving system, DPI fully intends to explore additional indicators to include in the on-track sub-scale area, but in the meantime plans to address appropriate weighting for schools without these grades as part of the standards setting process.

**Methodology.** A school’s Eighth Grade Mathematics Score is calculated in the same way that the Achievement indicator is calculated. For each school, a three-year weighted average reading proficiency rate is calculated for all eighth graders who took the test in those years, applying the “all students” group. Schools that don’t meet the cell size are not included in the calculations and a different weighting system, determined through a standards setting process in spring 2012, will apply. All remaining schools are given a score based on their proficiency rate. For example, if a school has a weighted average eighth grade mathematics proficiency rate of 92 percent, the school receives an Eighth Grade Mathematics Score of 92.

**Postsecondary Readiness Indicator**

The postsecondary readiness sub-scale area is applied to schools with grades 9-12. This sub-scale area includes measures of attendance, participation and performance on the ACT, and graduation rates.

**Attendance (20 percent of sub-scale area index score).** The attendance calculation is based on the number of days attended out of the total possible days for each student. These rates are summed together to provide both an overall school attendance rate and a subgroup attendance rate (for each subgroup with at least 20 students). As mentioned above, each school’s Attendance score will be calculated based on an average of the school’s overall attendance rate, and the lowest attendance rate of all subgroups present in the school.

**ACT performance and participation (20 percent of sub-scale area index score).** The ACT assessment is a well-respected assessment accepted by institutions of higher education as a measure of collegiate readiness. While not all schools currently administer the ACT, in 2010-11, 60.4 percent of Wisconsin
twelfth graders took the ACT. DPI recognizes ACT results as a high-leverage indicator and will include a proposal to fund ACT in the next (2013-15) biennial budget.

**Methodology.** Participation: This measure is calculated by first identifying twelfth grade students with a composite ACT score. The number of students with a score is divided by the total number of twelfth grade students in the school to arrive at the ACT participation score. Schools must meet the minimum cell size of 20 for twelfth grade students.

Performance: ACT performance is calculated by identifying the number of students classified as meeting the College Readiness Benchmark established by ACT for each test area (English, reading, mathematics, and science) and dividing by the total number of tested students. The ACT participation rate and the four ACT performance areas are combined and all are weighted equally to arrive at the overall ACT score.

**Graduation (60 percent of sub-scale area index score).** Graduation from high school must be a priority for every school and student; it is a seminal event that has dramatic impact on an individual’s career and higher education options.

**Methodology.** Graduation rates are calculated using two separate timeframes: the four-year adjusted cohort rate and the six-year adjusted cohort rate.

The four-year adjusted cohort rate is calculated by taking the number of students in the cohort who graduate within four years or less with a regular high school diploma and dividing by the number of students who form the four-year adjusted cohort for the graduating class. The six-year adjusted cohort graduation rate is calculated by taking the number of students in the cohort who graduate within six years or less with a regular high school diploma and dividing by the number of students who form the six-year adjusted cohort for the graduating class.

The graduation index score is calculated by adding the four-year adjusted cohort rate for the “all students” group to the six-year adjusted cohort rate for the lowest performing subgroup and dividing by two. While the goal of graduating from high school within four years of entry into ninth grade is appropriate for most students, DPI acknowledges that graduating from high school in five or six years may in some cases also be appropriate and, in fact part of a detailed Individualized Education Plan established by a student, his or her family, and educators. It is important that the accountability calculation recognize graduation beyond a fourth year in high school as an appropriate goal and a potential success for some students.

Graduation data is collected well after the school year has ended and the process for cleaning and loading the data into our data system also takes time in order to ensure the integrity of the data. Because of these challenges to data collection, graduation data for schools from the prior year is used, meaning that a school’s Graduation and Graduation Gap scores are lagged by one year.

**Future Postsecondary Indicators**

The School and District Accountability Design Team supported the idea of evolving accountability systems that incorporate additional meaningful measures when the data are available in a reliable, high-quality manner. DPI intends to include other postsecondary data, including (but not necessarily limited to) college enrollment, industry certification, and military enlistment, when these data are widely available.
Table 2.4. Overview of Wisconsin Accountability Index by School Level

<table>
<thead>
<tr>
<th>School Level</th>
<th>Relevant Sub-scale Area(s)</th>
<th>Measures Used</th>
<th>Subgroups</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elementary (K-5)</td>
<td>Student Achievement</td>
<td>Reading Achievement Mathematics Achievement</td>
<td>All Students</td>
</tr>
<tr>
<td></td>
<td>Student Growth</td>
<td>Reading Growth Mathematics Growth</td>
<td>All Students</td>
</tr>
<tr>
<td></td>
<td>Closing Gaps</td>
<td>Reading Achievement Mathematics Achievement Growth Rates</td>
<td>ESEA Subgroups High-Need Supergroup when applicable</td>
</tr>
<tr>
<td></td>
<td>On-track to Graduation</td>
<td>Attendance 3rd Grade Reading Possible Future Indicators: Science Achievement Social Studies Achievement</td>
<td>ESEA Subgroups High-Need Supergroup when applicable</td>
</tr>
<tr>
<td>Middle (6-8)</td>
<td>Student Achievement</td>
<td>Reading Achievement Mathematics Achievement</td>
<td>All Students</td>
</tr>
<tr>
<td></td>
<td>Student Growth</td>
<td>Reading Growth Mathematics Growth</td>
<td>All Students</td>
</tr>
<tr>
<td></td>
<td>Closing Gaps</td>
<td>Reading Achievement Mathematics Achievement Growth Rates</td>
<td>ESEA Subgroups High-Need Supergroup when applicable</td>
</tr>
<tr>
<td></td>
<td>On-track to Graduation</td>
<td>Attendance 8th Grade Mathematics Possible Future Indicators: Science Achievement Social Studies Achievement</td>
<td>ESEA Subgroups High-Need Supergroup when applicable</td>
</tr>
<tr>
<td>High (9-12)</td>
<td>Student Achievement</td>
<td>Reading Achievement Mathematics Achievement</td>
<td>All Students</td>
</tr>
<tr>
<td></td>
<td>Student Growth</td>
<td>Reading Growth Mathematics Growth</td>
<td>All Students</td>
</tr>
<tr>
<td></td>
<td>Closing Gaps</td>
<td>Reading Achievement Mathematics Achievement Growth Rates Graduation Possible Future Indicators: Postsecondary Enrollment gap Industry Certification gap</td>
<td>ESEA Subgroups High-Need Supergroup when applicable</td>
</tr>
<tr>
<td></td>
<td>Postsecondary Readiness</td>
<td>Attendance Graduation ACT Participation and Performance Possible Future Indicators: Postsecondary Enrollment Industry Certification Rates of college credit earned in high school</td>
<td>ESEA Subgroups High-Need Supergroup when applicable</td>
</tr>
</tbody>
</table>

Note: Items shown in gray italics are not currently included in accountability calculations, but may be in future versions of the accountability index given advances in data collection systems.
Work to be Done
This index system is a work in progress. This proposal provides DPI the opportunity to gain valuable feedback early in the development of Wisconsin’s statewide accountability system to ensure not only that the system meets federal requirements, but also that it will contribute to the best outcomes for all students.

DPI has several next steps in continued work on the accountability index. First, submission of this request for flexibility offers an important opportunity for ongoing improvement through feedback from expert peer reviewers and the United States Department of Education, not to mention those who participated in the public review and comment period and in other stakeholder meetings. Second, DPI will consult with the Wisconsin Technical Advisory Committee (TAC) on key components of the Index: namely, standards setting to ensure the index identifies and characterizes schools in a valid way. Third, Wisconsin will field test the system (including use of the new, higher WKCE cut scores) in consultation with the TAC, with schools and districts, and through evaluations conducted by the University of Wisconsin System.

Standards Setting
The standards setting process is integral to operationalization of the Accountability Index. This will take place in consultation with Wisconsin’s TAC before the end of April in order to inform the development of field test reports. More information about this process is available in Appendix 11.

This index is an accountability tool and it reflects components of the rich, high-quality educational experiences offered by schools across Wisconsin as well as the specific challenges that schools face. It is a step forward from prior accountability structures, but not the full picture of the accountability system that will evolve in Wisconsin. The index will undergo regular review and evaluation to ensure statistical reliability and validity as well as to identify statewide impact. These reviews will inform ongoing changes to the system.

In addition, while some changes will be informed by the review process, DPI believes there are measures not included in the current Index that may result in a more sensitive, accurate system. Examples of such measures include:

- student postsecondary readiness (such as postsecondary enrollment, credit-earning, and remediation rates),
- information about performance on assessments in additional subject areas like science and social studies, and
- school characteristics that point to the importance of rich, varied curricula that include course offerings such as art, music, physical education, world language, career and technical education, and other non-tested subjects as well as varied co-curricular activities.

Advances in DPI’s technology and data system will allow for some of these indicators to be factored into the Index in the future and such additions will be evaluated as soon as the data are available.

Expected Outcomes
By identifying four key sub-scale areas, and high-leverage measures within those sub-scale areas, DPI is creating an index-based accountability system that places schools on a continuum to inform differentiated interventions and supports. Ambitious but achievable annual measurable objectives (AMOs) that value all of the four sub-scale areas and honor their representation of college- and career-ready expectations will inform improvement for all schools on the continuum, and result in a significant number of students being on track for college and career. Additional AMOs for test participation, dropout rates, and absenteeism are established at set levels. Schools missing these AMOs receive a red flag, impacting their overall performance category placement.
Summary and Timeline
Wisconsin is making dramatic changes in how we think about accountability across the state. While work remains, this waiver request represents a significant commitment from DPI as well as a public statement that building and implementing a meaningful, transparent, statewide accountability system, while complicated and time-consuming, must continue to move quickly and must reflect the priorities of the state to move toward college and career readiness for every Wisconsin student.

As mentioned above, work on the Accountability Index continues. A timeline for this continued work is provided in Appendix 11.

2.C Reward Schools

2.C.i Describe the SEA’s methodology for identifying highest-performing and high-progress schools as reward schools. If the SEA’s methodology is not based on the definition of reward schools in ESEA Flexibility (but instead, e.g., based on school grades or ratings that take into account a number of factors), the SEA should also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department’s “Demonstrating that an SEA’s Lists of Schools meet ESEA Flexibility Definitions” guidance.

Reward

Reward schools are identified annually and fall into one of three categories: High Performance (Exemplary) Schools, High-Progress Schools, and schools that are Beating the Odds.

High Performance schools are those schools that earn an index label of Significantly Exceeding Expectations. These schools have earned a high index score and done so without any red flags; they are models for the state and will be acknowledged as such.

High Progress Schools are those schools that are making the most progress in the state, identified as those schools that most improve their Student Achievement Sub-Scale Score (which looks at the “all students” group only) over a five-year time period, not including schools that have significant gaps between subgroups. Schools with graduation rate measures will also have an opportunity to be identified as a High-Progress School. Graduation rate change over up to a five-year period will be compared and schools with the most significant improvement will be identified. (Note: DPI was first able to compute a four-year adjusted cohort graduation rate for the class of 200. Comparisons will start from that year forward.)

Beating the Odds schools are calculated using current, Title I Schools of Recognition methodology. Only Title I receiving schools in the top quartile for poverty qualify for this reward.

The final list of Reward Schools will include 10 percent of Title I schools across the three categories above, and may also include additional, non-Title I schools.

2.C.ii Provide the SEA’s list of reward schools in Table 2.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.
Wisconsin has long understood the importance and benefit of publicly recognizing and rewarding high performing Title I schools, as evidenced by the introduction of Schools of Recognition (SOR) in 2003. In recent years, the Department of Public Instruction (DPI) has expanded and enhanced these opportunities to create a comprehensive program of public recognition and rewards to positively incentivize schools to improve student achievement and maintain high levels of performance. DPI designed the system of rewards and recognition to align with elements of the state Strategic Plan:

- Providing rewards and recognition based on student achievement represents a strategy designed to increase reading and mathematics performance using incentives.
- The programs rely on various statewide infrastructures to inform and support the dissemination of best practices.

This application for flexibility of implementation within ESEA legislation provides Wisconsin the opportunity to enhance and expand the existing rewards and recognition program in order to implement more rigorous identification requirements of participants and expand the current Title I accountability and support system to a Statewide System of Support (SSOS) that includes all Wisconsin schools. Wisconsin will also use this flexibility to add recognition for High-Progress schools making significant improvement in closing their in-school achievement gap and schools Significantly Exceeding Expectations which demonstrate overall high achievement.

Wisconsin’s Existing Recognition and Rewards Program - Schools of Recognition

For the past nine years the Wisconsin Title I and School Support team has implemented the Schools of Recognition (SOR) program to recognize high-poverty Title I schools “Beating the Odds,” as demonstrated by meeting the following criteria:

- Title I schools;
- Serving a larger proportion of students receiving free and reduced lunch than at least 75 percent of state public schools;
- Exceeding the average student academic performance in reading and mathematics, as measured by the Wisconsin Knowledge and Concepts Exam (WKCE), when compared to similar schools; and
- Meeting all AYP objectives for two or more consecutive years.

SOR Ceremony. The SOR ceremony is a one-day event during which DPI publicly recognizes identified schools on a statewide level in front of an audience which includes the state superintendent, his cabinet, and legislators of recognized school districts. The SOR receive a monetary reward and a plaque commemorating the achievement. The ceremony provides an opportunity for district administrators and teachers to network and share their success stories with their peers.

SOR grants. Once identified as a SOR, schools have the opportunity to apply for a competitive SOR grant to develop new and innovative programs or scale-up successful, existing programs which support the state’s strategic goals to close the achievement gap and increase the rates of college- and career-ready graduates. Schools receiving the grants receive additional statewide public recognition.

Spotlight Schools. Any school identified as a SOR for three or more consecutive years can apply for competitive grant funding to become a Spotlight School. Potential Spotlight Schools must complete a rigorous self assessment with documented evidence demonstrating success in two spotlighted domains which include Teaching and Learning, as well as one of the following: 1) Vision, Leadership, and Governance; 2) Decision Making and Accountability; 3) Professional Development and Teacher Quality; or 4) Family, School, and Community Partnerships.

Spotlight Schools must host at least three visits to their school from school teams across the state in order to demonstrate and disseminate successful practices. Visiting teams observe classrooms, participate in discussions with administration and staff, and reflect upon the experience. Grantees must
also develop a plan to communicate their spotlighted practices to schools unable to participate in visits within their region and across the state.

Spotlight Schools may use grant funds to continue reforms and improve school practices. DPI also hosts two annual networking meetings for all Spotlight Schools. These meetings include opportunities for professional development, sharing of spotlighted practices, and the dissemination of DPI-developed materials to support dissemination of spotlighted practices. Finally, Spotlight Schools are featured on DPI’s Spotlight Schools website as well as in a statewide searchable database featuring spotlight practices.

**Teacher Fellowships.** Teachers in SORs can apply for a competitive fellowship grant program to fund personalized professional development opportunities designed to impact their practice, students, and school communities. Successful applications describe opportunities that will result in fresh perspectives, expertise, and broad-world knowledge which will enhance instruction in their classrooms. DPI selects approximately 30 teachers annually as Wisconsin SOR Fellows. This program is a partnership between DPI and a national organization, Fund for Teachers, which assists in the administration of these fellowships.

Basic eligibility requirements include the following:

- Teach in a Wisconsin SOR;
- Teach in a Pre-Kindergarten through 12th grade classroom;
- Minimum of three years classroom teaching experience;
- A full-time teacher spending at least 50 percent of the time in the classroom or a classroom-like setting; and
- Intention to return to teaching in their school/district in the following school year.

Teacher Fellows develop blogs (posted and promoted via DPI’s website) that articulate their experiences in order to extend the learning opportunity to other educators statewide and disseminate best practices to a larger audience. Additionally, Fellows must present at professional development opportunities, conferences, and other regional and statewide meetings to continue to share their experiences beyond their classrooms and local communities.

**Enhancements to Wisconsin’s Existing Recognition and Rewards Program**

This application provides DPI an opportunity to enhance its existing recognition and rewards program to include more rigorous identification criteria using the new Wisconsin Accountability Index system (as described in Section 2.C). DPI will introduce two new categories:

- High-Progress Schools; and
- Exemplary Schools earning the highest scores across multiple measures of achievement (as measured by the overall Wisconsin Accountability Index score described in Section 2.C).

Additionally, this flexibility provides DPI the opportunity to expand its existing system of public recognition to include non-Title I schools in an effort to develop a statewide school and district accountability system aligned to recommendations provided by the School and District Accountability Design Team (Accountability Design Team). For more information regarding the Accountability Design Team recommendations, see Appendix 2.

Non-Title I schools identified within these new categories will receive public recognition and become eligible to participate in state-conducted diagnostic reviews to help inform practices statewide, pending additional state resources. DPI will conduct diagnostic reviews within a small, representative sample of schools identified as Exemplary Schools in order to provide a comprehensive model of effective instruction and educational policies to all Wisconsin schools. Additionally, DPI will prioritize diagnostic reviews in a small, representative sample of High-Progress schools, which can inform statewide practice by providing strategies proven to rapidly improve school outcomes. The diagnostic review process and dissemination of best practices in non-Title I schools will require additional state resources, including staffing and funding.
Timeline for Implementation of Proposed Enhancements

Table 2.5 presents DPI’s timeline for implementing enhancements to the current system of recognition and rewards. As previously noted, expansion of recognition opportunities for Wisconsin schools include all Wisconsin public schools, charter schools, and private schools participating in Parental Choice Programs as recommended by the Accountability Design Team and will require DPI to allocate funding towards these initiatives.

Table 2.5. Timeline for Implementation of Wisconsin’s System of Recognition and Rewards: Title I and Statewide

<table>
<thead>
<tr>
<th>Year</th>
<th>Activity</th>
<th>Responsible Parties</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012-13</td>
<td>Continue Current Title I Schools: Beating the Odds (based on 2011-12 data)</td>
<td>Title I and School Support Team</td>
</tr>
<tr>
<td></td>
<td>Identify Title I Schools: Beating the Odds (based on 2012-13 data)</td>
<td>Office of Educational Accountability</td>
</tr>
<tr>
<td></td>
<td>Identify High-Progress Schools Using Wisconsin Accountability Achievement Index (based on 2012-13 data)</td>
<td>Office of Educational Accountability</td>
</tr>
<tr>
<td>2013-14</td>
<td>Identify Exemplary Schools Using Wisconsin Accountability Achievement Index (based on 2012-13 data)</td>
<td>Office of Educational Accountability</td>
</tr>
<tr>
<td></td>
<td>Recognize all Rewards Schools at Schools of Recognition Ceremony (Beating the Odds Schools, High-Progress Schools, and Exemplary Schools, if applicable)</td>
<td>Title I and School Support Team; State Superintendent</td>
</tr>
<tr>
<td>2014-15</td>
<td>Identify Representative Sample of 2013-14 High-Progress Schools Statewide to Participate in Diagnostic Reviews</td>
<td>Office of Educational Accountability</td>
</tr>
<tr>
<td></td>
<td>Conduct Diagnostic Reviews in High-Progress Schools and Disseminate Findings</td>
<td>Title I and School Support Team</td>
</tr>
</tbody>
</table>
Rationale for School Rewards and Recognition

In the development of Wisconsin Title I rewards and recognition programs, DPI consulted a number of collaborative partners, including the State Superintendent’s Collaborative Council, State Superintendent’s Parent Advisory Committee, Title I Committee of Practitioners, the 12 regional cooperative educational service agencies (CESAs), Title I Network, teachers, administrators, and parents. The input from the collaborative partners collected during various meetings and networking sessions, as well as a statewide Title I Needs Assessment conducted by DPI, helped to shape each program in order to best meet the needs of the field. Additionally, the collaborative partners continually participate in annual grant application reviews and provide funding recommendations to the state superintendent for each of the Title I rewards and recognition programs. For more information regarding these stakeholders, see the Consultation section of the waiver.

These programs remain popular with stakeholders across the state. While participating in informational sessions and presenting at key conferences across the state to inform stakeholders of the Elementary and Secondary Education Act (ESEA) waiver opportunity, multiple representatives from SOR expressed concerns regarding the potential discontinuation of SOR programming.

These stakeholders have directly informed the inclusion of future recognition initiatives through the Accountability Design Team process, as well. Accountability Design Team members, (Appendix 2A), supported the recognition of high-performing schools identified using indices under the New Statewide Accountability System that will be implemented in 2013-14. (See Section 2.C for more information regarding these processes)

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA’s methodology for identifying a number of lowest-performing schools equal to at least five percent of the State’s Title I schools as priority schools. If the SEA’s methodology is not based on the definition of priority schools in ESEA Flexibility (but instead, e.g. based on school grades or ratings that take into account a number of factors), the SEA should also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department’s “Demonstrating that an SEA’s Lists of Schools meet ESEA Flexibility Definitions” guidance.

Priority schools, as the lowest performing schools in the state, are identified using the Student Achievement sub-scale area of the accountability index. Title I schools will be rank ordered by Student Achievement sub-scale score. The cut point that includes the bottom 5 percent of Title I schools (i.e., 60 schools) will then be applies statewide and all schools, regardless of title I status, that fall below the cut point will be identified as Priority Schools. As per SIG methodology, no alternative schools are included in Priority calculations.

Another option to identify Priority Schools as those high schools with a graduation rate of less than 60 percent over a number of years was not selected because Wisconsin does not have any High Schools (other than dropout recovery high schools) that meet this criterion.

Wisconsin has been working to build a statewide accountability system, one that includes all traditional public schools as well as charter schools and private schools participating in Parental Choice Programs. The list of Priority Schools will include the bottom five percent of Title I schools using the methodology above, but may also include additional, non-Title I schools. Current supports (presented in section 2.D.iii), however, will be provided to Title I schools only until further funding is available.

2.D.ii Provide the SEA’s list of priority schools in Table 2.
2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.
Transition Year: 2012-13

Current Title I Sanctions/Requirements

The Department of Public Instruction (DPI) intends to use the 2012-13 school year as a transition year between the current Title I sanctions and the proposed system of supports to ensure full implementation of the new accountability system beginning in 2013-14. DPI will continue to require parental school choice, district-level corrective action requirements, and restructuring as required under the current Elementary and Secondary Education Act (ESEA) through the 2012-13 school year. Title I schools identified for improvement and districts identified for improvement will no longer be required to set aside 10 percent of funds allocated at the school level and at the district level (respectively) for the purpose of professional development.

Supplemental Educational Services

While current Title I sanctions will remain for 2012-13, DPI will use the ESEA flexibility as an opportunity to waive Supplemental Educational Services (SES) from its current accountability system. The primary basis for this request is tied directly to the limited evidence of positive impact on student achievement. Specifically, analyses of SES programs in Wisconsin districts conducted by the Wisconsin Center for Research and Evaluation suggest that SES has minimal impact on student outcomes. For more information about these reports, please refer to the following website: http://sesiq2.wceruw.org/.

Additionally, DPI and district staff could use the time required to implement, maintain, and monitor SES programs much more effectively to target the needs in low-performing schools in developing an alternate plan with specific elements around extended learning opportunities aligned with current best practices.

In developing an alternative plan to SES as part of this waiver, DPI has consulted with Milwaukee Public Schools (MPS), who has been implementing SES since the 2003 school year. Given this long history with the program, DPI consulted district staff to identify specific advantages and disadvantages of waiving SES, as well as guidelines and criteria they recommend for consideration in an alternative plan. Based on their input, DPI believes districts would benefit by waiving the current provisions around SES and receive flexibility in developing and implementing extended learning opportunities that more closely align with local school and district reading and mathematics curricula. In addition, there was significant support based on the feedback received from the waiver survey, where 52 percent of respondents agreed to waive SES from the current accountability system.

The cornerstone of this flexibility would be significant consultation with parents and expanding parental choice. DPI proposes districts must engage parents to assist in shaping the extended learning opportunities that would best meet the needs of their child. Parents will also play a pivotal role in providing key recommendations around the types of instructional supports and interventions that would be made available. Lastly, as a result of this flexibility, DPI would no longer maintain a DPI-approved SES provider list. However if a district, through consultation with parents chooses to continue to contract with current SES providers, they would have that option. Currently, four districts (representing 32 schools) are required to provide SES statewide.

Districts, with Title I schools identified for improvement (SIFI), will be required to submit a district plan outlining the additional extended learning opportunities that will be implemented in those schools. DPI must approve the district’s plan, which must include four main elements:

1) Parental Involvement
   • Evidence documenting district’s consultation with parents of eligible students in the plan to waive SES, which could include, but is not limited to, meeting agendas, phone contacts or logs, revisions to the plan based on parental input, posted information on a website, survey results, and letters of parental support,
   • Evidence of a minimum of two face-to-face meetings with parents in developing the plan,
   • A description of how the district will communicate extended learning opportunities to parents of eligible students,
   • Specific strategies used to engage parents, and
   • Specific plans to involve parents in setting student and program achievement goals.
2) Program Design

- A description of how the district will assess student gains, including specific student learning outcomes targeted to reading and mathematics,
- A description of how the services align with individual student need based on instructional assessment results in reading and mathematics,
- A description of how the program is consistent with the school and district reading and mathematics curricula and instruction,
- The frequency, duration, and timing of the extended learning opportunities. The district must describe how proposed extended learning opportunities supplement the regular school day. Options include before-school, after-school, Saturday school, summer school, or maintain SES as it is currently implemented.

   - In aligning with current standards based on approval of high-quality SES providers, DPI recommends districts consider the following guidelines when developing this portion of the plan:
     - a student-to-tutor ratio of no more than 6:1, and
     - a minimum of 45 hours programming per student.

3) Budget

Districts must submit a budget to support the extended learning opportunities as part of their district Title I application. Districts may use up to 15 percent, but no less than five percent, of the required 20 percent Title I set-aside to cover costs of the extended learning plan. The following items are allowable expenses:

- student transportation,
- teacher salary and fringe,
- educational materials to support the extended learning opportunity,
- parental involvement activities (e.g., face-to-face meetings, parent outreach), and
- administrative costs (Note: No more than five percent of the total amount set aside can be allocated to administrative costs).

Funds may not be used for student incentives or rewards.

4) Assurances

As part of the plan, the district must sign off on the following assurances.

- The district assures that the identification of students being served through extended learning opportunities are low-income students (those qualifying for free or reduced lunch) and low-achieving as determined by school or district based assessments. The district must align the SES with the identified student need(s).
- The district assures it will identify a school level parent contact to promote services.
- The district assures certified teaching staff will provide the instructional services.
- The district assures it will require parental signatures or approval of the student’s instructional learning plan, which outlines learning goals, progress, and the frequency and method of ongoing parental communication.

School Improvement Grants

In 2012-13, School Improvement Grants (SIG) Cohort I and Cohort II schools will continue implementation of their reform plans, aligned to the turnaround principles as planned. DPI will continue to provide comprehensive support and intensive monitoring for the SIG schools as described below.

DPI has assigned each district with a SIG school a liaison. The role of the liaison is to work closely with district and school leadership to observe and provide feedback on reform plan implementation. The liaison does not act as a monitor; the liaison assists the district in identifying and removing district or DPI barriers (e.g., licensure, funding) that may hinder rapid reform in the Priority School.
DPI staff monitors SIG reform plan implementation via Indistar (for a description of Indistar, see Section 2.F) and onsite visits. Each SIG school receives quarterly onsite monitoring visits, the results of which are reported to the state superintendent. Each month, SIG schools report achievement data to DPI via Indistar. DPI conducts regular data reviews to ensure that schools and districts make progress towards their goals. DPI will provide ongoing fiscal oversight of expenditures submitted by Title I districts serving SIG schools to ensure claims match activities included within approved budgets.

**Implementation of a New Statewide Accountability System: 2013 - Ongoing**

DPI will provide targeted support to newly identified Title I Priority Schools to improve student outcomes. The same support and requirements will also apply to all schools identified as *Persistently Failing to Meet Expectations*, pending availability of additional state resources. DPI will apply the same identification methodology to all schools that receive public funding, *traditional public schools*, *charter schools*, and schools that participate in *Parental Choice Programs*. See Appendix 12 for an outline of the required interventions for all schools Persistently Failing to Meet Expectations.

**School Requirements**

*School Improvement Diagnostic Reviews*

DPI will contract with external experts to conduct an onsite diagnostic review of each Priority School’s core instructional program (specifically reading and mathematics) resulting in recommendations to systematize high-quality instruction, balanced assessment systems, collaboration, and supports for struggling learners. The recommendations will address the needs of all students, including equal access to resources and support for their long-term academic success. In addition, the recommendations will include effective collaborative systems among educators as well as using data to make informed decisions about students, staff, and resources. The diagnostic review will evaluate the fidelity of implementation and efficacy of each school’s curriculum in reading and mathematics, including core instruction (such as curricular alignment with the Common Core State Standards), universal screening methods, and processes to identify students in need of interventions, selected interventions, and progress monitoring. Additionally, the review will evaluate staff capacity to implement a system of early intervening services aligned to the turnaround principles schoolwide, including systems that provide meaningful data about student performance and collaborative planning time for staff.

*Traditional Public Schools*

If a traditional public school is identified, the district must ensure the school implements one of two options:

1) **Contract for a mandatory onsite diagnostic review to identify the factors contributing to poor performance at the school.** After participation in the DPI-contracted diagnostic review, the school must contract with a DPI-approved turnaround partner to implement a reform plan based on the recommendations of the diagnostic review. The school will have three years to implement DPI-driven actions and demonstrate improved performance. The reform plan must include:
   - Response to Intervention,
   - extended learning time,
   - highly skilled educators,
   - highly skilled leaders,
   - positive and safe learning environments, and
   - family engagement.

2) **Close the school.** Closure will take effect the school year following the initial identification of the school.
   - If a traditional public school is identified again after three years of targeted, DPI-directed intervention and has not demonstrated adequate improvement, the state superintendent may utilize his or her intervention authority under Ch. 118.42 to appoint a special master to direct the activities of the school. These activities could include, but are not limited to, directing that the school board
reopen the school under a contract with a charter management organization that has a proven track record of success in turning around low-performing schools, is selected after a rigorous review process by DPI, and is approved by the state superintendent; or closure of the school.

Charter Schools and Parental Choice Program Schools

If a charter school or a school participating in a Parental Choice Program is identified, the school must implement similar requirements as traditional public schools as outlined above.

- If a charter school is identified again after three years of targeted interventions and has not demonstrated adequate improvement, the charter will be revoked.

- If a Parental Choice Program School is identified again after three years of targeted interventions and has not demonstrated adequate improvement, the school will be removed from the Parental Choice Program.

District Requirements

As part of Wisconsin’s Accountability System, district accountability will be calculated in two ways:

- if the aggregate scores for elementary, middle, and high school levels fail to meet expectations at all three levels, or
- if the district has one or more schools in Persistently Failing to Meet Expectations.

District Improvement Diagnostic Review

The state superintendent may direct districts identified for improvement to conduct a district-level diagnostic review. A DPI-contracted expert will conduct the diagnostic review to evaluate critical systems and structures within the district’s central office including human resources, curriculum and instruction, finance, allocation of resources, and leadership. Based on the diagnostic review, the state superintendent may direct reform at the district level in addition to reforms at the school level. The district will work closely with a DPI-approved turnaround partner in implementing the required reforms. This intensive intervention at the school and district level, led by DPI and national experts, is described in detail in 2.G.

Department of Public Instruction Support and Monitoring

Turnaround Partner

Districts electing to implement a turnaround plan must contract with a turnaround partner to assist in the development and implementation of the reform plan. The districts must select a partner from the DPI-approved list. Turnaround partners will be recruited and approved by DPI. Districts may use the 20 percent set-aside of their district’s Title I allocation, the school’s Title I allocation, funds transferred from other Titles, School Improvement Grants (if applicable), or if available, may use DPI reform funds to secure the services of a turnaround partner. Methods for approving DPI-approved turnaround partners are described in detail in Question 2.G, Capacity.

School Reform Plans

Beginning in the fall of 2012, all districts with Priority Schools that opt to implement a turnaround model must develop and implement a single reform plan for each Priority School via submission in Indistar. Indistar is a web-based system implemented by DPI for use with district or school improvement teams to inform, coach, sustain, track, and report improvement activities. Indistar requires activities within plans to align with indicators of evidence-based practices at the district, school, and classroom levels. The tool’s pre-populated indicators draw upon the vast turnaround literature and, once embedded in the aligned school reform plan, will ensure that Priority Schools progress through a continuous cycle of assessment, planning, implementation, and progress monitoring. In collaboration with their turnaround partner, school staff will complete the needs assessment included within Indistar and begin developing a plan aligned to the weaknesses illustrated within the diagnostic review and needs assessment. When approving reform plans, DPI will ensure that the plans meet the following turnaround principles:
• **Response to Intervention.** Identified as a strategy to effectively implement differentiated and customized instruction in order to improve individual and student subgroup outcomes, Priority Schools must implement Response to Intervention (RtI) for academics and behavior. The reform plan must describe in detail how the school will utilize RtI as a strategy to meet the individualized needs of all students, as well as student subgroups, including Students with Disabilities and English language learners.

• **Extended learning time.** Due to the extensive research suggesting that schools providing high quality, extended learning time experience greater student outcomes, Priority Schools must add a minimum of 300 hours of instruction for all students. This may be achieved through alternative schedules, extended day, Saturday school, or extended year/calendar. Reform plans must articulate how schools will redistribute resources and time in order to add 300 hours.

• **Highly skilled educators.** The reform plans must describe how the district’s systems and structures will ensure all teachers are not only highly qualified for their assignment, but also demonstrate effectiveness. Specifically, the plan must demonstrate that the district will implement an educator evaluation system by 2014-15 that aligns to the statewide framework (refer to Principle 3). Additionally, the district must create opportunities for continuous learning through job-embedded professional development designed to increase all teachers’ capacity to implement their school’s reform plan. Administrators must describe the systems and structures in place which will support alignment of findings from the newly implemented educator evaluation system to specific, differentiated professional development and training opportunities.

• **Highly skilled leaders.** If a district wishes to retain the current principal in a Priority School, the district must produce data which demonstrates the principal has improved student learning in the school. The district must create opportunities for continuous learning through job-embedded professional development to increase the principal’s capacity to implement the reform plan, as well as to lead change with his/her staff. Additionally, the district must communicate its plan to implement a leadership evaluation as part of its newly developed Educator Evaluation system. Principals must be given operational flexibility over budgets, staffing, schedules, and curriculum.

• **Positive and safe learning environments.** The reform plans must include methods to provide a safe and disciplined learning environment. The districts must prioritize the distribution of pupil services staff (e.g., school social workers, nurses, psychologists, and guidance counselors) to each Priority School, and staff schedules must allow for adequate time to serve students. Districts must also ensure Priority Schools implement Positive Behavioral Intervention and Supports (PBIS) for students across multiple domains (e.g., social, emotional, behavioral) in order to increase positive academic outcomes. For more information regarding PBIS, see Section 2.E.

• **Family engagement.** The plan must include strategies to meaningfully engage family members in the education of their children. Schools must align family engagement plans with the research of Dr. Joyce Epstein, Johns Hopkins University, Baltimore, MD. Activities must address each of the following strategies: 1) increasing frequency and variety in communication with parents, specifically regarding their child’s academic progress; 2) providing resources to encourage learning at home; 3) developing meaningful volunteer opportunities; 4) increasing the participation and effectiveness of parent representation in school governance; 5) implementing strategies to strengthen and support effective parenting; and 6) strengthening community partnerships to support parents. To demonstrate this level of engagement, Priority Schools must implement parent training programs to help all parents understand the school’s screening methods, how to interpret universal screening data, criteria for entering and exiting interventions based on need, progress monitoring methods, and progress monitoring data.

DPI will implement its recently enhanced system of monitoring and support for SIG schools in all Priority Schools. The system will consist of onsite diagnostic reviews by contracted experts, the Indistar online system, a DPI liaison, fiscal monitoring, data reviews, and site visits. For more information regarding the monitoring and support of Priority Schools, see Appendix 12.
2.D.iv  Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA’s choice of timeline.

<table>
<thead>
<tr>
<th>Timeline</th>
<th>Activity</th>
<th>Person(s) Responsible</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011-12</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spring</td>
<td>Develop application criteria for state-directed diagnostic review partner/expert</td>
<td>DPI</td>
</tr>
<tr>
<td></td>
<td>Develop application criteria for state-approved external turnaround partners</td>
<td>DPI</td>
</tr>
<tr>
<td></td>
<td>Run “Mock” reports with Priority School identifications using 2011-12 data to communicate new expectations and prepare schools at risk of identification</td>
<td>Office of Educational Accountability</td>
</tr>
<tr>
<td>Summer</td>
<td>Begin communication of identification processes and reform plan requirements associated with Priority Schools</td>
<td>Title I and School Support Team</td>
</tr>
<tr>
<td>2012-13</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fall</td>
<td>Release diagnostic review partner application</td>
<td>DPI</td>
</tr>
<tr>
<td></td>
<td>Release external turnaround partner application</td>
<td>DPI</td>
</tr>
<tr>
<td></td>
<td>Continue development and finalization of agency and statewide RtI initiatives to support future Priority Schools</td>
<td>DPI</td>
</tr>
<tr>
<td></td>
<td>Continue communication of identification processes and reform plan requirements associated with Priority Schools</td>
<td>Title I and School Support Team</td>
</tr>
<tr>
<td>Winter</td>
<td>Select diagnostic review partner</td>
<td>DPI</td>
</tr>
<tr>
<td></td>
<td>Select state approved list of turnaround partners</td>
<td>DPI</td>
</tr>
<tr>
<td>Spring</td>
<td>Final determination of Priority Schools using 2012-13 data</td>
<td>Office of Educational Accountability</td>
</tr>
<tr>
<td>Spring</td>
<td>Diagnostic reviews are conducted at Priority Schools and MPS</td>
<td>Title I and School Support Team</td>
</tr>
<tr>
<td>Summer</td>
<td>DPI provides training of Priority Schools and local educational agency (LEA) representatives on Indistar</td>
<td>Title I and School Support Team, Center on Innovation and Instruction</td>
</tr>
<tr>
<td>Summer</td>
<td>Priority Schools contract with state-approved vendor</td>
<td>Priority Schools; LEA Representatives; DPI</td>
</tr>
<tr>
<td>2013-14</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fall</td>
<td>Priority Schools’ reform plans due to DPI via Indistar</td>
<td>Priority Schools and LEA Representatives</td>
</tr>
<tr>
<td></td>
<td>Indistar reform plans approved by DPI</td>
<td>Title I and School Support Team</td>
</tr>
<tr>
<td>Winter</td>
<td>DPI begins monitoring implementation via site visits, Indistar plans, data reviews, and fiscal reviews</td>
<td>Title I and School Support Team</td>
</tr>
</tbody>
</table>
### Spring
- DPI continues monitoring implementation via site visits, Indistar plans, data reviews, and fiscal reviews  
  - Title I and School Support Team
- Indistar opens for 2014-15 reform plans  
  - Title I and School Support Team

### Summer
- Indistar reforms plans for 2014-15 due  
  - Priority Schools and LEA Representatives
- DPI approves Indistar reform plans  
  - Title I and School Support Team

### 2014-16
- Annually
  - Continue implementation of reform plans aligned to annual schedule as detailed above  
  - Priority Schools and LEA Representatives

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

DPI will identify Priority schools every three years. If, after three years, a school no longer satisfies the criteria for identification, they will be removed from the list. Schools that are identified consecutively are subject to more intense interventions, discussed above.
2.E  **FOCUS SCHOOLS**

2.E.i  Describe the SEA’s methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as “focus schools.” If the SEA’s methodology is not based on the definition of focus schools in *ESEA Flexibility* (but instead, e.g. based on school grades or ratings that take into account a number of factors), the SEA should also demonstrate that the list provided in Table 2 is consistent with the definition, per the Department’s “Demonstrating that an SEA’s Lists of Schools meet ESEA Flexibility Definitions” guidance.

### Identification of Focus Schools

DPI will identify Focus Schools based on large within-school achievements gaps between demographic subgroups and large gaps in graduation rates between subgroups within the school. Schools with low-performing subgroups will also be identified as Focus Schools. An additional option to identify Focus Schools based on identification of High Schools with a graduation rate of less than 60 percent over a number of years was not selected as a method to identify Focus Schools, because Wisconsin does not have any high schools (other than dropout recovery high schools) that meet this criterion.

Schools may be identified as a Focus School six ways:

- Large subgroup gaps in math achievement
- Large subgroup gaps in reading achievement
- Large subgroup gaps in graduation rates
- Low-performing subgroups in math achievement over a number of years
- Low-performing subgroups in reading achievement over a number of years
- Low subgroup graduation rates over a number of years

To identify schools with large *within-school achievement gaps*, proficiency rates for each demographic subgroup and their comparison group will be evaluated for each school. A Reading Gap Index and Mathematics Gap Index will be calculated and a bottom cut point for both indices will be identified. Any Title I school that has a Reading Gap or Mathematics Gap Index score that falls within the bottom 10 percent may be identified as a Focus School.

To identify schools with large *gaps in graduation rates* between subgroups, a Graduation Gap Index will be calculated and a bottom percentage cut point will be identified. Any Title I receiving school with a graduating class may be identified as a Focus School if its Graduation Gap Index score falls within this bottom percentage of the Graduation Gap Index.

Identification of schools with low performing subgroups will be based on reading and mathematics performance as well as graduation rates. Specifically, proficiency rates for each demographic subgroup will be evaluated over multiple years and the schools with the lowest performing subgroups that are not making progress may be identified as a Focus School. Schools with the lowest subgroup graduation rates may also be identified as a Focus School.

The final list of Focus Schools will include 10 percent of Title I schools across the categories above, but may also include additional, non-Title I schools. Current supports, however, will be provided to Title I schools only until further funding is available.

2.E.ii  Provide the SEA’s list of focus schools in Table 2.

2.E.iii  Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA’s focus schools and their students and provide examples of and justifications for the interventions focus schools will
be required to implement to improve the performance of students who are the furthest behind.
Implementation of a New Statewide Accountability System:
2013-Ongoing
The Department of Public Instruction (DPI) will provide targeted support to Focus Schools to improve student outcomes. Other schools in the state which are identified as Meeting Some Expectations, or Meeting Few Expectations, will be required to implement the same, or more intensive, supports and monitoring. DPI will apply the same identification methodology to all schools that receive public funding - traditional public schools, charter schools, and schools that participate in a Parental Choice Program. See Appendix 12 for an outline of the requirements for all schools Meeting Some Expectations and Meeting Few Expectations.

School Requirements
The Department of Public Instruction (DPI) will require districts to ensure that identified schools do the following:

Self-assess core instruction and interventions in reading and mathematics
School staff will conduct an online self assessment review of the schools’ Response to Intervention (RtI) implementation practices. This review will be conducted via Indistar, provided by the Center for Innovation and Instruction (CII). Indistar is a web-based system used with school improvement teams to inform, coach, sustain, track, and report improvement activities. The tool’s pre-populated indicators draw upon the vast turnaround literature, including RtI (65 specific RtI indicators), as well as indicators supporting success for individual student populations, such as English language learners (ELLs) (19 indicators), Students with Disabilities (SwD) (10 indicators), and various levels (e.g., high school). (Refer to Appendix 13 to review the specific indicators) In addition, Indistar allows for customization, and DPI intends to enhance the system with additional indicators aligned to DPI’s vast understanding of effective practices and interventions. Staff at DPI and the RtI Center (the RtI Center is explained in detail below) will receive training from CII in order to provide expertise, training, and ongoing technical assistance to Focus Schools in the use of Indistar. Additionally, staff from each school and district will be required to be trained and utilize Indistar.

Develop and implement a school reform plan to ensure RtI is implemented with fidelity in reading and mathematics
Following completion of the annual self assessment, districts must ensure each school develops and submits a reform plan aligned to identified needs necessary to improve RtI implementation and academic outcomes for identified student populations via Indistar. The Indistar application will ensure each school's progress through a continuous cycle of assessment, planning, implementation, and progress monitoring across the three-year implementation timeline.

To receive approval from DPI, the reform plans must address how each Focus School will implement a schoolwide RtI system and must include the following components:

- **Coordination of RtI Initiatives.** The reform plan must address how districts will coordinate the readiness and professional development of the school’s leadership and staff to implement the Wisconsin RtI Framework. This must include ongoing analysis of RtI implementation via Indistar as well as ongoing training and support around universal curriculum and instructional practices.

- **Positive Behavioral Interventions and Supports.** The reform plan must address implementation of a school-wide, systematic implementation of Positive Behavioral Interventions and Supports (PBIS). Districts will have access to consultation, training, and ongoing technical assistance from Wisconsin’s PBIS Network. The Wisconsin PBIS Network will provide necessary support to high schools struggling to establish a positive school culture, increase academic performance, improve safety, and decrease negative behaviors. The Wisconsin PBIS Network, in collaboration with the Wisconsin RtI Center, will provide support to Focus Schools regarding PBIS implementation and methods for sustainability.
• **Collaborative Planning Time.** If necessary, schools must modify the current school schedule to allow grade-level and/or reading and mathematics teachers and support staff to meet frequently in order to review student data and modify instruction and interventions.

• **Professional Development.** The reform plan must include a calendar of professional development aligned to identified needs. The district must create opportunities for continuous learning through job-embedded professional development to increase all teachers’ capacity to implement the reform plan. Training and support must be targeted to universal curriculum and instructional practices, universal screening, and processes or tools for progress monitoring. If necessary, the district may need to revise the teacher and principal evaluation systems and hiring processes to ensure that staff in the school(s) can effectively implement the reform efforts.

• **Early Warning Systems.** Each district must ensure its Focus Schools implement an early warning system, using available data to target interventions that support off-track students. Through the implementation of an early warning system, specific patterns and school climate issues that may contribute to disproportionate dropout rates will be identified. The early warning system will rely on student information that exists at the school level and that will exist within the statewide student information system (SSIS). Districts will connect to the SSIS over the next few years, beginning in fall 2012.

**Reporting RtI implementation progress and student achievement data**

DPI will use monitoring practices to hold the district accountable for adequate, ongoing progress within Focus Schools. Ongoing DPI monitoring of Focus School reform plans will take place through Indistar. Indistar allows DPI to collect and monitor student outcome data. In collaboration, the Wisconsin RtI Center and DPI will monitor the reform plans and data reports on a quarterly basis, allowing DPI to assess the implementation of interventions and progress of outcomes at individual schools. If DPI recognizes significant delays or areas of concern, DPI staff will conduct on-site monitoring visits and, if necessary, assist the district and school in developing plans for rapid compliance.

In evaluating struggling schools and districts, DPI will ensure that proven practices are used in the classroom. DPI will also encourage the use of the federal What Works Clearinghouse and more stringently enforce the federal definition for scientific-based practices. Additionally, DPI will facilitate improved communication about effective strategies so all schools can learn from one another.

**Statewide Data Collection**

DPI is currently developing a Statewide Student Information System (SSIS). Districts will begin transitioning to this system in the fall of 2012 and, as a result, will increase the timeliness of access to reported school level data allowing districts more time to focus on using data to inform important educational decisions. The implementation of the SSIS will greatly enhance districts’ ability to implement effective early warning systems, as it will provide school level student information in a timely manner.

DPI is currently developing WISEdash, a single reporting system which will include reports on student growth percentiles, enrollment, postsecondary enrollment, literacy, and other measures, to replace DPI’s current public data reporting systems. This new system will provide more comprehensive data in a more transparent, accessible, and pliable format to allow teachers, schools, and districts to utilize data to inform and differentiate instruction for all students with greater consistency and ease, well beyond identification as a Focus School.

**Flexibility in the use of Title I funds**

DPI will provide support for implementation of meaningful interventions in Focus Schools through all available funding sources, including Title I, Part A, 1003(a), districts’ 20 percent set-aside of its Title I dollars, and other federal funds as permitted to fund the school reform plan. This option will ensure resources can be allocated to improvement efforts of these schools.
After Three Years of Implementation

If, after three years of reform and Focus School status, the school is identified again, DPI will increase the specificity of DPI-prescribed school requirements. Rather than requiring schools to conduct a self-assessment, DPI will conduct an onsite diagnostic review in collaboration with the Wisconsin RtI Center to thoroughly evaluate the level and quality of RtI implementation. Upon completion of the review, DPI will provide specific requirements for training, student interventions, assessments, and instructional methods which directly align to findings from the review and are consistent with needs identified in the data for specific student groups. For example, DPI consultants with expertise in ELL educational programs will provide expertise and technical assistance to schools identified due to low performance of ELL students. Additionally, all RtI practices must be approved by the appropriate DPI expert (special education, ELL, reading, mathematics).

State Support for Focus Schools

**Wisconsin RtI Center**

DPI, in collaboration with the 12 regional cooperative educational service agencies (CESAs), developed and funds a statewide RtI Center. The Wisconsin RtI Center provides high quality professional development and technical assistance and will play a critical role in providing training, expertise, and support to each school and their district. The DPI established the Wisconsin RtI Center to support schools through the phases of RtI implementation to increase success, as well as sustainability. Wisconsin is one of a small number of states to establish, develop, and utilize a comprehensive, statewide RtI Center. The Wisconsin RtI Center exists to develop and provide high quality professional development and training opportunities, as well as to gather, analyze, and disseminate DPI’s implementation data to enhance RtI implementation statewide (see Figure 2.1).

**Figure 2.1**
The Wisconsin RtI Center developed a continuum of technical assistance and training to implement RtI. Focus School staff will be required to attend the following training sessions:

- foundations of RtI,
- balanced assessment,
- scientifically based interventions in reading and mathematics,
- high-quality universal instruction (reading and mathematics),
- culturally responsive practices,
- family engagement,
- professional learning communities, and
- data analysis and progress monitoring.

The Wisconsin RtI Center also provides comprehensive online training materials, including “Success Stories” of model schools and evidence-based practices.

As the Wisconsin RtI Center matures and continues to gain implementation data from schools accessing its resources, it will also expand its services and resources at the high school level. DPI recognizes it is often more difficult to implement RtI with fidelity at higher grade levels where teachers typically teach multiple classes of 30 or more students, in different sections or courses. DPI and the Wisconsin RtI Center are developing workshops, trainings, and resources designed to increase the quality of implementation at the high school level, as well as increase the ease with which schools can achieve quality implementation. The Wisconsin RtI Center will draw upon findings from the National Center for High Schools to identify evidence-based practice. For example, the Wisconsin RtI Center developed a daylong RtI training event, Implementing Essential Components of RtI in High Schools, which provided a national perspective of implementation at the high school level. Currently, more than half of the schools accessing training and resources from the Wisconsin RtI Center are middle and high schools.

While developing more extensive high school training resources, the Wisconsin RtI Center also facilitates networking opportunities online with a cohort of approximately 30 high school principals working in schools implementing RtI aligned to the Wisconsin vision. The administrators share best practices, as well as support and encouragement as they work to increase the quality and level of RtI implementation in their schools. These sessions will continue as a means to support administrators, even after the workshops and training resources are finalized.

The Wisconsin RtI Center also employs regional technical assistance coordinators. Coordinator responsibilities include

- consultation with the school leadership team on the school’s RtI framework,
- consultation with the school leadership team and follow up technical assistance after Wisconsin RtI Center trainings, and
- abbreviated Wisconsin RtI foundational overview or sections of the overview to all staff.

The Wisconsin RtI Center will align coordinator activities to the schools’ needs and assist districts and their schools with RtI implementation, as well as school and district improvement efforts. For more information regarding the training and technical assistance provided by the Wisconsin RtI Center, refer to Appendices 14 and 15.

**Standards, Instruction, and Assessment Center**

Wisconsin is currently developing a Standards, Instruction, and Assessment (SIA) Center that will provide content experts focused on the development of high-quality, standardized resources and training plans. These resources will be available to all Wisconsin educators across the state at low- to no-cost. The SIA Center will serve as a separate, but connected, entity funded in part by DPI. The SIA Center serves the entire state on a regional basis. The key priorities of the Center include

- standardization of materials and fidelity of implementation,
- low- to no-cost resources,
- increased access to content expertise across the state,
• centralized leadership connected to DPI,
• agility, speed, and responsiveness to needs across the state, and
• partnerships with institutes of higher education.

Ultimately, the Center aims to produce resources that result in improved instructional practices that embed a deep understanding of the Common Core State Standards as well as assessment practices that improve learning and inform instruction.

**Rationale for Focus School Requirements**

Wisconsin envisions RtI as a means to appropriately serve *all* students. The systems to address the school’s achievement gaps (RtI) will be the same in each school, but the specific interventions, curricula, and strategies will differ based on unique need. The Wisconsin RtI Center will work collaboratively with identified schools to support implementation within their various environments. While the research is still emerging, studies over the past 10 years have indicated that RtI and school improvement are closely linked. The following sections provide a brief review of the national literature, as well as evidence collected locally by the Wisconsin RtI Center, suggesting that high-quality RtI programs implemented with fidelity positively impact student outcomes.

**English Language Learners**

The National Center on Response to Intervention's research shows that implementation of the RtI framework with ELLs, particularly those who are Spanish-speaking, improves English literacy. Brown and Sanford7 (2011) explain that “few intervention programs have included ELLs in their norming samples” (as cited in Hughes, C., & Dexter, D., 2010). Therefore, educators must use what we currently know regarding effective instruction in literacy for ELLs at all grade levels of the multi-level prevention system.

- Within Wisconsin, evidence suggests RtI has positively impacted instruction for ELLs and assisted in closing school achievement gaps. For example, one Wisconsin Title I school serving students from low income households (32 percent) and English language learners (21 percent) saw the percentage of students scoring proficient or advanced on the state standardized tests increase from 80 percent to 87 percent (representing an eight percent increase) across the previous five years.

Similarly, in another Title I school implementing RtI serving high poverty (25 percent) and limited English proficient (LEP) (10 percent) populations saw an 11 percent increase (from 84 percent to 94 percent) in the proportion of students scoring proficient or advanced across the past five years. Additionally, data from a Wisconsin district located in a different region of the state serving a diverse student population (73 percent poverty, 53 percent minority with 24 percent black and 29 percent Hispanic, and 15 percent LEP) suggests RtI is an effective practice in closing achievement gaps. As illustrated in Figure 2.2, this district successfully reduced the achievement gap between its low income, high minority, and LEP students and the state average from 28 percent to five percent across eight years due, in part, to high-quality RtI implementation.

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7 For a full literature synthesis of RtI, including citations, please see Appendix 16
Similarly, an elementary school serving a high poverty (93 percent), high minority (71 percent) student population as well as a substantial (28 percent) LEP population, not only reduced the proportion of students scoring minimal or basic on grade level benchmarks by 57 percent, but a substantial majority (78 percent) of students earned advanced scores after a year of high-quality instruction implemented within a systematic vision of RtI (see Figure 2.3).

Students with Disabilities
Six of the 16 studies analyzed by Hughes and Dexter\(^8\) reported data on the effects of their programs on special education referral and/or placement rates. Bollman and colleagues (2007) examined the “effect of the St. Croix River Education District (SCRED) model on the rate of identification for special education services” (as cited in Hughes, C., & Dexter, D., 2010) and reported that placement rates dropped from 4.5 percent to 2.5 percent over a 10-year period. They indicate that the statewide prevalence rate over the same time period dropped from 4 percent to 3.3 percent. Calendar (2007) reported that placements decreased by 3 percent for “districts with at least one RBM school,” whereas the state rate decreased by 1 percent. Marston and his co-authors (2003) “indicated that special education placement rates stayed constant over time for Minneapolis problem-solving model schools,”

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\(^8\) For a full literature synthesis of RtI, including citations, please see Appendix 16
as did the district as a whole (as cited in Hughes, C., & Dexter, D., 2010). Peterson, Prasse, Shinn, and Swerdlik (2007) reported similar information: Referrals and placements stayed relatively stable over time after RtI implementation. O’Connor et al. (2005) examined the “effect of the tiers of reading intervention model on placement rates” (as cited in Hughes, C., & Dexter, D., 2010). They found that during the four years of implementation, rates fell to 8 percent compared to an historical contrast group (same schools, same teachers) for which the rate was 15 percent. Finally, VanDerHeyden and colleagues (2007) reported that “for the four schools included in their study, there was a decrease in referrals and an increase in placements” (as cited in Hughes, C., & Dexter, D., 2010). The authors interpreted this pattern as an indication of more appropriate referrals.

- Similarly, one Wisconsin elementary school reduced the number of students identified as specific learning disability (SLD) as a proportion of the total number of students in the district by 83 percent (23 percent as compared to 4 percent) across the past nine years since the implementation of RtI (see Figure 2.4). Specifically, the proportion of SLD students increased temporarily after the implementation of a universal screening process. Upon the implementation of high-quality interventions and processes to monitor the progress of students identified using the screening assessment, the proportion of students identified as SLD reduced dramatically. These findings illustrate the inability to properly identify struggling students without an adequate screening system (represented with the 15 to 18 percent growth in the proportion of students identified after implementation of the screener). The findings also point to the overidentification of struggling students as students with disabilities (SwD) or SLD without implementation of a balanced assessment system aligned to appropriate resources/interventions as represented by the dramatic decrease (75 percent) in the proportion of identified students upon implementation of a balanced RtI system in 2005-06 (see Figure 2.4).

Secondary Schools

M. Burns, Ph.D., at the University of Minnesota, conducted a literature synthesis for the National Association of Secondary School Psychologists (NASSP) regarding the use of RtI in secondary school settings. Burns explained that the research has consistently found RtI initiatives “lead to gains in student achievement and schoolwide improvements, such as reduced referrals to and placements in special education and a higher rate of students scoring proficiently on state tests” (Burns, Appleton, and Stehouwer, 2005). Windram, Scierka, and Silbergliit (2007) described two secondary programs and found “a 66 percent proficiency rate on a group-administered accountability test among the 18 high school students who were considered at risk for failing the tests and who participated in the pilot RtI project” (as cited in Burns, M., 2010). In addition, “the average growth rate on a group-administered
test for those students was more than three times the national average among students in grade nine and more than five times their growth from the previous year” (as cited in Burns, M., 2010). A similar program for mathematics in grade eight led to growth rates that exceeded the national average by a factor of almost six (Windram, Scierka, and Silbergliit, 2007). Finally, the Heartland Area (Iowa) Education Agency 11 (2004) published extensive data regarding its well-known RtI approach and found “high rates of proficiency among middle level and high school students,” but perhaps more important, it reported a drop-out rate of less than 2 percent, which is well below the national average (as cited in Burns, M., 2010).

• Data from one Wisconsin high school supports the literature, suggesting that successful implementation of RtI improved outcomes for students in ninth grade and reduced the proportion of students falling behind and becoming over-age or under-credited. Specifically, the high school reduced the proportion of students with at least one failing grade by 72 percent due in part to earlier screening to identify struggling students and align them to appropriate resources and interventions as necessary (see Figure 2.5). Recognizing that failure rates in ninth grade have been correlated to higher dropout rates, this figure demonstrates that this school has made a positive step towards one of the state’s strategic goals - *increasing graduation rates* - through the implementation of RtI.

**Figure 2.5.**

![Proportion of Freshman with at Least One Failing Grade at End of Quarter](image)

**Academically Related Behaviors**

One study (Kovaleski, Gickling, Morrow, and Swank, 1999) examined academic performance, specifically “the academically related behaviors of time on task, task completion, and task comprehension” (as cited in Hughes, C., & Dexter, D., 2010). The authors wanted to see if students who were exposed to the Pennsylvania Instructional Support Teams (IST) model performed better on these variables than students at schools where the model was not in use. They found that “students who received high implementation of the model did better on all measured variables than did students in the low implementation framework as well as those students who were not exposed to IST services” (as cited in Hughes. C., & Dexter, D., 2010).

• The Wisconsin RtI Center is currently collecting data from its participants, including six demonstration sites, to evaluate its impact as schools increase their levels of implementation. Through this process, the RtI Center will be able to provide schools with data regarding best practices, lessons learned, and strategies to address common challenges proven successful within schools serving similar student populations.
### Timeline for Implementation

<table>
<thead>
<tr>
<th>Year</th>
<th>Activity</th>
<th>Assigned Responsibility</th>
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<tbody>
<tr>
<td>2011-12</td>
<td></td>
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<tr>
<td>Spring</td>
<td>Continue development and finalization of agency and statewide RTI initiatives to support future identified schools</td>
<td>DPI, Wisconsin Rti Center, SIA Center</td>
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<tr>
<td></td>
<td>Continue development and finalization of the Standards, Instruction and Assessment (SIA) Center to support schools</td>
<td>DPI</td>
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<td></td>
<td>Run “Mock” reports with school identifications using 2011-12 data to prepare schools at risk of identification</td>
<td>Office of Educational Accountability</td>
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<tr>
<td>Summer</td>
<td>Begin communication of identification processes and reform plan requirements associated with schools</td>
<td>Title I and School Support Team</td>
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<td>2012-13</td>
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<tr>
<td>Fall</td>
<td>Continue development and finalization of agency and statewide RTI initiatives to support future schools</td>
<td>DPI, Rti Center, SIA Center</td>
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<tr>
<td></td>
<td>Continue communication of identification processes and reform plan requirements associated with schools</td>
<td>Title I and School Support Team</td>
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<tr>
<td>Spring</td>
<td>Final determination of Focus Schools using 2012-13 data</td>
<td>Office of Educational Accountability</td>
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<td></td>
<td>School staff and representatives from their districts attend informational meetings and webinars conducted by DPI regarding Focus School reform requirements</td>
<td>Title I and School Support Team, Rti Center, SIA Center</td>
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<td></td>
<td>School staff and representatives from their districts attend Foundational Overview and Framework Mapping Rti training sessions</td>
<td>Wisconsin Rti Center</td>
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<td>Summer</td>
<td>Training of schools and district representatives on Indistar</td>
<td>Title I and School Support Team Center on Innovation and Instruction</td>
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<td>Schools begin developing reform plans aligned to identified areas of weakness during assessments of Rti implementation (i.e., Framework Mapping and Indistar Needs Assessment)</td>
<td>Focus School Staff and District Representatives</td>
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<td>Provide schools training regarding each of the six RTI components as necessary (i.e., identified as needing improvement during needs assessments)</td>
<td>Wisconsin Rti Center, SIA Center</td>
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<td>Fall</td>
<td>Schools reform plans due to DPI invasion</td>
<td>Indistar reform plans approved by DPI</td>
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<tr>
<td>Winter</td>
<td>Indistar reform plans approved by DPI</td>
<td>DPI begins online monitoring of RtI implementation via Indistar plans</td>
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<tr>
<td>Spring</td>
<td>Indistar reform plans approved by DPI</td>
<td>DPI begins online monitoring of RtI implementation via Indistar plans</td>
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<tr>
<td>Summer</td>
<td>Indistar reform plans approved by DPI</td>
<td>DPI begins online monitoring of RtI implementation via Indistar plans</td>
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</table>

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

Identification of Focus schools occurs every three years. Schools may be removed from the Focus schools list by no longer satisfying any of the identification criteria after three years.
**TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS**

Provide the SEA’s list of reward, priority, and focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, priority, or focus school.

**TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS**

<table>
<thead>
<tr>
<th>LEA Name</th>
<th>School Name</th>
<th>School NCES ID #</th>
<th>REWARD SCHOOL</th>
<th>PRIORITY SCHOOL</th>
<th>FOCUS SCHOOL</th>
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<tbody>
<tr>
<td>Please see Attachment 9 for School List</td>
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<td>TOTAL # of Schools:</td>
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</table>

Total # of Title I schools in the State: _1,193______
Total # of Title I-participating high schools in the State with graduation rates less than 60%: ___0___

**Key**

<table>
<thead>
<tr>
<th>Reward School Criteria:</th>
<th>Focus School Criteria:</th>
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<tbody>
<tr>
<td>A. Highest-performing school</td>
<td>F. Has the largest within-school gaps between the highest-achieving subgroup(s) and the lowest-achieving subgroup(s) or, at the high school level, has the largest within-school gaps in the graduation rate</td>
</tr>
<tr>
<td>B. High-progress school</td>
<td>G. Has a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate</td>
</tr>
</tbody>
</table>

**Priority School Criteria:**

| C. Among the lowest five percent of Title I schools in the State based on the proficiency and lack of progress of the “all students” group | H. A Title I-participating high school with graduation rate less than 60% over a number of years that is not identified as a priority school |
| D-1. Title I-participating high school with graduation rate less than 60% over a number of years | |
| D-2. Title I-eligible high school with graduation rate less than 60% over a number of years | |
| E. | Tier I or Tier II SIG school implementing a school intervention model |
2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

2.F Describe how the SEA’s differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA’s new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

In addition to recognizing and rewarding Title I schools and supporting immediate interventions and reforms in persistently low-achieving Title I schools, the Department of Public Instruction (DPI) encourages continuous improvement in other Title I schools with supports designed to improve successful implementation of Title I programming. The DP developed networks and collaborative partnerships in recent years with key stakeholders throughout the state to provide a statewide infrastructure of support while addressing staff capacity and resources at DPI. These initiatives aim to provide consistent, yet differentiated resources to Title I districts and schools in order to continually improve student achievement and address DPI’s Strategic Goals. DPI will continue to utilize these initiatives to support personalized learning and improved student achievement and school performance. The following sections describe these initiatives in greater detail.

**Title I Network**

In collaboration with the 12 regional cooperative educational service agencies (CESAs), the Title I Network provides increased access to technical assistance and professional development for Title I districts and schools. With financial support from DPI, each CESA provides free or reduced cost Title I services for all school districts in their CESA designed to increase student outcomes and close the achievement gap. Services currently provided by the Title I Network to support Title I districts and schools include the following:

- **Title I Application.** District Title I coordinators can consult with CESA staff regarding Title I law, programming, reporting requirements, and monitoring, as it applies to their program planning and grant application processes.

- **Title I Coordinator Leadership Development.** District Title I coordinators are provided information and resources through a Title I coordinator orientation, one-on-one technical assistance, and regional meetings. This support is designed to enhance the quality of Title I programs in all districts and ensure implementation of effective programming.

- **Professional Development.** Bi-annually, DPI conducts a statewide assessment of Title I professional development needs and uses that data to shape requirements for CESA services. The Title I Network provides multiple regional professional development opportunities based on an annual assessment of Title I school and district needs. Examples of professional development provided by the Title I Network include Leveled Literacy Interventions, Math Strategies that Motivate and Engage Students, Add+Vantage: Math Recovery, Matching Kids to Text: Choosing Appropriate Books for Students, and Title I Paraprofessional Development Series.

- **Response to Intervention.** Beginning in 2012-13, Title I Network contracts with DPI will require the CESAs to provide more targeted support to schools to improve student achievement or narrow achievement gaps. Network representatives will serve as "Trainer-of-Trainers" and provide the Wisconsin RtI Center trainings to districts in their respective CESA. Network contracts will specify that CESA Title I staff attend all applicable RtI trainings provided by the Wisconsin RtI Center.

- **Resources and Collaboration.** The Title I Network also connects district staff to pertinent information and resources regarding local and statewide initiatives and agencies supporting Title I programming to improve student outcomes.
Indistar
Beginning in the fall of 2012, all districts will have the option to develop and monitor their own school improvement plan via submission on Indistar. Indistar is a web-based system designed to inform, coach, sustain, track, and report improvement activities. Indistar requires improvement plan activities to align with indicators of evidence-based practices at the district, school, and classroom levels designed to improve student achievement. The tool’s pre-populated indicators draw upon the vast school improvement and turnaround literature and, once embedded in the aligned school reform plan, will ensure progress through a continuous cycle of assessment, planning, implementation, and progress monitoring. School staff can complete the needs assessment included within Indistar and begin developing a plan aligned to identified areas of need.

Wisconsin Response to Intervention Center
As previously noted, the Wisconsin RtI Center and the Wisconsin Positive Behavioral Interventions and Supports (PBIS) Network provide high-quality professional development and technical assistance across the state in collaboration with DPI and the 12 regional CESAs. Technical assistance includes advice, assistance, and training pertaining to the implementation, operation, evaluation, and sustainability of a district or school’s RtI system. While DPI identified the Wisconsin RtI Center as the locus for professional development and support for Title I Focus Schools, other schools will also have ongoing access to the Wisconsin RtI Center and its resources in order to improve outcomes for all students, as well as specific student populations such as English language learners (ELLs) and students with disabilities (SwDs). More specifics about the Wisconsin RtI Center are provided in 2.E.iii.

Standards, Instruction, and Assessment Center
Currently in development, the Standards, Instruction, and Assessment (SIA) Center, based on the successful model of the Wisconsin RtI Center, will centralize content expertise focused on development of high-quality, standardized resources and training plans available at low- to no-cost across the state in partnership with institutes of higher education. The SIA Center will create resources for classroom teachers and other educators with a focus on improving instructional practices via a deep understanding of Common Core State Standards, data-based decision making, and assessment practices that improve learning and inform instruction.

Spotlight Practices Website
In the future, the Spotlight Practices website will provide Wisconsin schools access to a comprehensive database of effective practices implemented across the state, as well as opportunities to learn from other Wisconsin educators. Educators will have access to hyperlinks for specific spotlight schools to view relevant videos and documents, and gain increased knowledge of innovative practices and implementation strategies in order to improve student achievement in their own schools. DPI, in collaboration with the Title I Network, will encourage schools with flat or declining student achievement to visit spotlight schools excelling in the same practices the struggling schools have identified as in need of improvement (e.g., adolescent literacy, data-driven decision-making, PBIS).

Common Core State Standards
In 2010, Wisconsin became the first of 40 states to adopt the Common Core State Standards (CCSS) in mathematics, language arts, and literacy across disciplines. Developed in collaboration with numerous stakeholders, the CCSS emphasize 21st Century Skills embedded within expectations for the understanding and application of rigorous core content knowledge. In collaboration with two multi-state consortia, Wisconsin is currently developing new CCSS for science and social studies.

To ensure districts and schools implement the CCSS with fidelity, DPI provides training, resources, and professional learning opportunities. DPI will also partner with the Title I Network, the Wisconsin RtI Center, and the SIA Center to provide CCSS professional development to Title I districts and schools.
**Parent Involvement**

DPI has a long and distinguished history of recognizing the importance of family involvement in improving student achievement through family-school-community partnerships in Wisconsin public schools. Wisconsin has been recognized as a Partnership State Award Winner six times since 2000 by the National Network of Partnership Schools for its exemplary efforts to promote family involvement among PreK-12 schools. Following are a few highlights of DPI family involvement efforts:

- DPI annually sponsors approximately 20 VISTAs (volunteers in service to America) in schools statewide who work to engage families in children’s learning. Since 2002, VISTA members have generated over $3.7 million in resources, volunteers, donations, and grants to Wisconsin schools, families, and communities.
- DPI family involvement staff offers comprehensive training in effective family involvement practices through an annual statewide parent leadership conference and regional workshops.
- State Superintendent of Public Instruction Tony Evers has appointed a Parent Advisory Council composed of 20 parent leaders statewide to provide a parent voice to DPI initiatives affecting children’s learning.
- The DPI Title I Community Learning and Partnerships website offers extensive family involvement publications, resources, strategies, and effective practices at: [http://www.dpi.state.wi.us/fscp/index.html](http://www.dpi.state.wi.us/fscp/index.html).
- DPI funded creation of the Dual Language Learners website of the Wisconsin Collaborating Partners. This website gives programs and practitioners easy access to information and practical tips for working with young dual language learners, Birth-5 years, and their families: [http://www.collaboratingpartners.com/dual-language-learners_about.php](http://www.collaboratingpartners.com/dual-language-learners_about.php).
- The DPI-sponsored Wisconsin Summer Library Reading Program is designed to help families keep children reading and prevent the “summer slide” loss of learning: [http://www.dpi.state.wi.us/pld/slp.html](http://www.dpi.state.wi.us/pld/slp.html).
- The DPI Early Childhood website offers extensive Resources for Parents to help get children ready for Kindergarten: [http://www.dpi.state.wi.us/ec/begin-sch-yr.html](http://www.dpi.state.wi.us/ec/begin-sch-yr.html).

The Special Education Team website includes a variety of resources to enhance parent involvement and ensure parents are informed of their rights: [http://www.dpi.state.wi.us/sped/parent.html](http://www.dpi.state.wi.us/sped/parent.html).

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2.G **BUILD SEA, LEA, AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING**

2.G Describe the SEA’s process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

- timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;
- ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA’s differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG
funds, and other Federal funds, as permitted, along with State and local resources); and

iii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools.

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

Turning around schools and districts requires a thoughtful, rigorous plan which includes both monitoring and support in order to build schools’ and districts’ capacity to improve student learning. DPI’s existing framework, modified to align with the experience and expertise developed across recent years, provides targeted interventions and supports that ensure long-term improvement and sustainability by building Department of Public Instruction district and school capacity.

In order to optimize local capacity, technical assistance and resources must be accessible to districts and schools. DPI will build the capacity of districts and their identified schools to successfully implement reform initiatives with a comprehensive system of support, which will include DPI-approved turnaround partners, a DPI liaison, the Wisconsin Response to Intervention (Rti) Center, and other networking opportunities. DPI will actively monitor districts and schools, particularly those with low performance and/or large achievement gaps, to ensure that schools and districts implement planned reforms effectively and with fidelity. DPI’s system also includes accountability measures for districts and schools that are not successful in improving student learning. This combination of additional resources and support, consistent monitoring, and accountability will lead to improved student outcomes, particularly in Priority and Focus Schools.

Comprehensive Monitoring of and Support for Priority Schools

DPI will implement its recently enhanced system of monitoring and support for school improvement grant (SIG) schools in all Priority Schools. The system will consist of onsite diagnostic reviews by contracted experts, assistance from turnaround partners, the Indistar online system, a DPI liaison, fiscal monitoring, data reviews, and site visits.

*Diagnostic Review.* Under contract with DPI, national experts will assess the schools’ core instructional program (specifically reading and mathematics), teacher collaboration, data systems, progress monitoring methods, and supports for struggling learners. This process will also include an analysis of district policies and practices which support or hinder positive student outcomes in the school(s). Based on the diagnostic review findings and in consultation with a turnaround partner, districts with Priority Schools will develop and submit for DPI approval a school reform plan for each Priority School in the district.

*Turnaround Partners.* DPI will approve turnaround partners for Priority Schools that demonstrate evidence of experience and expertise in successful reform initiatives. Prospective turnaround partners will be required to submit an application to DPI and participate in an interview with DPI staff. Proposals will be initially reviewed by external reviewers, including the Title I Committee of Practitioners. Review rubrics will be based on rigorous criteria developed through a comprehensive review of best practices and key indicators of turnaround partner success. Specifically, the criteria will rely on research produced by groups such as Mass Insight Education and the Center on Innovation and Improvement. DPI will also research the experiences of other states that have approved external providers in order to develop rigorous and effective criteria. Examples of states that will be consulted include Virginia, Indiana, and Illinois.

The criteria will include, but not be limited to, the following items:

- successful and effective work with low-performing schools or schools with comparable student populations and grade levels,
- instructional models that are comprehensive, yet aligned to the needs and contexts of individual schools and districts,
• a well-developed framework of leading success indicators, and
• a record of organizational and financial stability.

Districts with Priority Schools, with the consultation of DPI, will select an approved partner which best meets their individual needs. Turnaround partners must implement comprehensive school reform efforts that integrate structural and programmatic interventions, including daily onsite support and leadership, while building the Priority School’s and the district’s ability to successfully implement and sustain reform efforts after the partnership has ended.

**Indistar.** DPI will require districts with Priority Schools to submit their school reform plan using Indistar. Indistar is an online system aligned to the turnaround principles and designed to monitor the progress of the implementation of school reform plans. DPI Title I and School Support team staff will review plans submitted via Indistar and communicate with Priority Schools and their districts regarding missing, incomplete, or inadequate plans for each indicator of success. In addition to providing a means for DPI to monitor each district’s level of implementation of reforms, this process will facilitate the introduction of instructional program planning at the district and school level, resulting in modifications aligned to ongoing assessments of need and the implementation of reforms, which the district can sustain at no cost after exiting Priority status.

**DPI Liaison.** Each district with a Priority School will be assigned a liaison from DPI. The role of the liaison is to work closely with district and school leadership to observe and provide feedback on reform plan implementation. The liaison does not act as a monitor; the liaison is provided to the district to assist in identifying and removing district or DPI barriers (licensure, funding) that may hinder rapid reform in the Priority School.

**Fiscal monitoring.** DPI will provide ongoing fiscal oversight of expenditures submitted by Title I districts serving Priority Schools to ensure claims match activities included within approved budgets.

**Data reviews.** DPI will conduct monthly data reviews to ensure that schools and districts make progress towards their goals. DPI will require districts to submit student achievement and school climate data for each of their Priority Schools. DPI staff will discuss progress towards goals, as evidenced by data, as well as concerns regarding objectives illustrating stagnant or minimal progress. DPI will require district and school staff to identify and communicate strategies to modify existing plans and practices in order to address concerns and improve academic outcomes. This process will facilitate data reviews at the district level, resulting in modifications to instructional programming aligned to ongoing assessments of need, which the district can sustain at no cost after exiting Priority status.

**School monitoring visits.** DPI’s school improvement grant (SIG) monitoring system includes school visits in order to ensure districts and schools receiving SIG funds have implemented their approved reform plans with fidelity, identified areas of concern within their implementation, and developed appropriate plans to resolve these issues accordingly. DPI staff will continue this process and conduct four onsite school visits to each funded Priority School annually. Attendees will include the school’s principal, turnaround partner, and district representatives.

**District monitoring visits.** DPI currently implements a risk-based, onsite monitoring system of all Elementary and Secondary Education Act (ESEA) grants. Districts are selected for onsite monitoring by a DPI-organized team based on the size of the district allocations in Title I, II, and III, frequency of fiscal audit findings, and concerns about the district plans submitted in the ESEA application. Under the new accountability system, DPI will also prioritize districts with Priority Schools for ESEA monitoring. While a significant component of the district monitoring system is compliance with federal law, it also results in targeted technical assistance to improve the effectiveness of services provided to students, staff, and families.
Comprehensive Monitoring of and Support for Focus Schools

The DPI determined Focus Schools’ status based on specific criteria identifying the largest gaps across subgroups. Because Focus Schools are identified based on low performance of specific subgroups, DPI will require the implementation of RtI, which will provide differentiated, individualized instruction to meet the specific academic needs of prioritized student populations within schools. DPI will monitor the implementation of these practices to ensure that Focus Schools and their districts implement appropriate practices necessary to improve the academic outcomes of prioritized student subgroups. Through these practices, Focus Schools and their districts will build their capacity to align students to differentiated resources which meet individual student needs identified through extensive monitoring processes which can continue after exiting Focus School status to ensure that the academic performance of prioritized student subgroups continually improves.

*Indistar.* DPI will require districts with Focus Schools to submit their school reform plans for approval using Indistar, an online system designed to monitor the progress of the implementation of school reform plans. The DPI Title I and School Support team will review plans submitted via Indistar and communicate with Focus Schools and their districts regarding missing, incomplete, or inadequate plans for each indicator of success. DPI will also provide technical assistance for Focus Schools through Indistar’s coaching feature. This allows DPI coaches to provide feedback and commentary on the school’s plan. In addition to providing a means for DPI to monitor each district’s level of implementation of reforms, this process will facilitate the introduction of instructional program planning at the district and school level, resulting in modifications aligned to ongoing assessments of need and the implementation of reforms, which the district can sustain at no cost after exiting Focus status.

*RtI Center.* The Wisconsin RtI Center will be the primary source of technical assistance for Focus Schools. Regional experts in RtI implementation are available statewide to provide training and consultation. For a complete description of the services to be provided to Focus Schools, see 2.E.iii.

**Funding Flexibility**

Districts with Priority and/or Focus Schools will have the option, under this waiver, to transfer up to 100 percent of certain ESEA programs such as Title II A into Title I A in order to support schoolwide reforms. Transfers of funding must not reduce equitable services available to private school students and staff. Prior to making decisions affecting equitable services for private schools, districts must consult with private school representatives. In addition, any school identified as Priority or Focus may operate as a schoolwide school even if it has a poverty rate below 40 percent in order to use the Title I allocation to implement DPI-required reforms. Districts Identified for Improvement will no longer be required to reserve 10 percent of the district Title I allocation for professional development. This will increase the funds available to Title I schools.

**Comprehensive Monitoring of and Technical Assistance for all Title I Schools**

In 2012-13, DPI will introduce a new online ESEA application which will allow DPI staff to monitor and manage Title I grants efficiently and effectively to ensure that districts and their schools use federal funds appropriately to support continued academic improvement and school performance. In addition, all districts receiving Title I funds are subject to the risk-based onsite monitoring system described above. A complete description of the technical assistance provided to all Title I schools is provided in 2F.

**Districts Identified for Improvement**

DPI will maintain and enhance its existing accountability structures, including its authority to intervene in Districts Identified for Improvement (DIFI). DPI understands that a complete system of support includes a strong accountability component. The accountability system described in detail below will ensure that districts are responsible for improved achievement, particularly for Priority and Focus Schools.
In accordance with 2009 Wisconsin Act 215 which states, “The State Superintendent shall promulgate rules establishing criteria and procedures for determining whether a school or district is in need of improvement,” DPI will modify the criteria for identification as a DIFI. Districts will be identified for improvement if they have one or more schools persistently failing to meet expectations or if the district misses its annual measurable objectives (AMOs) at the elementary, middle, and high school levels. Any district identified for improvement under the provisions of this waiver may be subject to state interventions at the discretion of the state superintendent.

DPI currently requires corrective action in Milwaukee Public Schools (MPS), which has been identified as a District Identified for Improvement (DIFI) since 2005. The state superintendent will continue to require specific corrective actions of the district due to the evidence that these structures and interventions have positively impacted school performance and student achievement. The corrective actions emphasize three goals to ensure that all MPS students succeed academically. These goals are:

- ensuring every school is staffed with highly qualified teachers and leaders,
- improving student performance, and
- ensuring accountability at the district, school, and student levels.

To meet these goals, DPI has required MPS to implement RtI and Positive Behavioral Interventions and Supports (PBIS) in all schools by 2014. Historically, MPS has been a highly decentralized system which resulted in wide variations among schools in terms of reading and mathematics instruction, availability of effective interventions, and progress monitoring systems. Corrective action has resulted in the development of district-wide comprehensive literacy and mathematics plans. For the district’s Corrective Action Requirements, please see: http://www.dpi.state.wi.us/esea/pdf/2011-12_Corrective_Action_MPS.pdf.

To support MPS and its implementation of corrective action requirements (CAR), the state superintendent established the Committee on District and School Improvement (CoDSI), which sets annual benchmarks for MPS corrective action, reviews impact data, and directs agency resources to support improved core instruction in reading and mathematics, universal screening, data analysis, interventions, and progress monitoring. CoDSI will continue its work with MPS under its continued status as a DIFI. CoDSI is staffed by agency directors representing Title I, teacher education and licensing, content and learning, special education, and charter schools. The work with MPS is informed by consultation with national experts in reading, mathematics, and RtI.

DPI has appointed a federal funds trustee for MPS. This position is responsible for ensuring that all federal funds available to MPS are used appropriately to serve the district. The federal funds trustee meets quarterly with district fiscal and program staff to align financial resources with CAR, review balances of all entitlement and discretionary accounts, and advise MPS on effective budget management processes.

Under this waiver, DPI will maintain its authority to implement similar requirements in other Districts Identified for Improvement at the discretion of the state superintendent.

**DPI Will be Reducing Burden on Districts Based on this Wavier through a Number of Means:**

Districts with low-performing schools will have access to an online tool, Indistar, to develop, monitor, and communicate all reform efforts with DPI within a single plan. This electronic system will eliminate the need for periodic paper reports currently required for school improvement.

Requiring RtI implementation under the direction of the Wisconsin RtI Center will streamline the implementation of RtI. Districts are requesting more direction and guidance on specific interventions and best practices in implementing an effective RtI system, rather than developing these systems individually. The waiver would provide very specific expectations for RtI implementation and build additional resources and professional development.
The roll-out of the statewide Standards, Instruction, and Assessment (SIA) Center will ensure consistency around instruction and assessment. Districts and schools will have much greater access to best practices which will inform instructional practice. Additionally, the SIA Center will greatly enhance the collaboration with Wisconsin’s institutes of higher education, which in turn will positively impact the education and training of new teachers.

Providing alternatives to supplemental educational services (SES) providers will greatly reduce the amount of staff time, both at the DPI and district level, in terms of approving providers, contracting with providers, and tracking multiple provider programs. This flexibility will allow one program that will much more closely align with district and school improvement goals, as well as interests and expectations of parents.

Districts with low-performing schools will have greater flexibility in the use of ESEA dollars and will have the discretion to use them to meet the greatest local needs, while still ensuring equitable services to private school students and staff.
## Principle 3: Supporting Effective Instruction and Leadership

### 3.A Develop and Adopt Guidelines for Local Teacher and Principal Evaluation and Support Systems

Select the option that pertains to the SEA and provide the corresponding description and evidence, as appropriate, for the option selected.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
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<tr>
<td>☐ If the SEA has not already developed and adopted all of the guidelines consistent with Principle 3, provide:</td>
<td>☒ If the SEA has developed and adopted all of the guidelines consistent with Principle 3, provide:</td>
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<tr>
<td>i. the SEA’s plan to develop and adopt guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year;</td>
<td>i. a copy of the guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students;</td>
</tr>
<tr>
<td>ii. a description of the process the SEA will use to involve teachers and principals in the development of these guidelines; and</td>
<td>ii. evidence of the adoption of the guidelines (Attachment 11); and</td>
</tr>
<tr>
<td>iii. an assurance that the SEA will submit to the Department a copy of the guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance 14).</td>
<td>iii. a description of the process the SEA used to involve teachers and principals in the development of these guidelines.</td>
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</table>
Introduction of the Wisconsin Framework for Educator Effectiveness

The Wisconsin Framework for Educator Effectiveness is a performance-based evaluation system for teachers and principals that serves as the state guidelines for educator effectiveness. The primary purpose of the Wisconsin Framework for Educator Effectiveness is to support a system of continuous improvement of educator practice, from pre-service through service, that leads to improved student learning. The system will be designed to evaluate teachers and principals through a fair, valid, and reliable process using multiple measures across two main areas: educator practice and student outcomes. The framework (http://dpi.wi.gov/tepdl/edueff.html) described here will lead to the development of a state educator effectiveness system, which will be piloted and implemented throughout the state by the 2014-15 school year.

Theory of Action

The Wisconsin Framework for Educator Effectiveness (Attachment 10) was developed using the same principles that guide each of the state level reforms proposed in this waiver request, specifically personalization and increased rigor. The framework links educator evaluation with student achievement, and will ensure that all teachers and principals receive a comprehensive and rigorous evaluation that includes both formative and summative feedback. The new system provides individualized feedback, support, and professional development to every principal and teacher in the state. With this framework in place, Wisconsin’s educators will receive personalized support intended to raise the standard for educator excellence.

The Wisconsin Framework for Educator Effectiveness was designed to raise the quality and effectiveness of Wisconsin’s educators, and improve student outcomes across Wisconsin. The new evaluation system will work in combination with other state level reforms, specifically increased academic standards and assessments, and a new accountability framework, that increases rigor, leading to more students ready for college and careers.

Key Design Features of the Framework

The following design features are predicated on the understanding that the success of a performance-based evaluation system hinges on the development of a high-quality system that is implemented with fidelity and fully aligned with the individual educator’s professional development plan.

The framework necessitates both formative and summative processes. That is, educators must be engaged in evaluating their own practice and receive constructive formative feedback on an ongoing basis, as well as receive feedback on their summative evaluations. Both formative feedback and summative evaluations should be aligned to the district’s human resource practices (including staffing, mentoring, professional development, and performance management) in order to provide a consistent focus. Professional development plans, in particular, should be personalized and aligned with evaluation feedback to ensure Wisconsin educators are supported throughout their careers.

Guiding Principles

The Educator Effectiveness Design Team (EE Design Team) believes that the successful development and implementation of the new performance-based evaluation system is dependent upon the following guiding principles, which define the central focus of the entire evaluation system. The guiding principles of the educator evaluation system are:

- The ultimate goal of education is student learning. Effective educators are essential to achieving that goal for all students. It is imperative that students have highly effective teams of educators to support them throughout their public education. Effective practice leads to better educational achievement and requires continuous improvement and monitoring.
- A strong evaluation system for educators is designed to provide information that supports decisions intended to ensure continuous individual and system effectiveness. The system must be well-articulated, manageable, reliable, and sustainable. The goal of this system is to provide
students with highly qualified and effective educators who focus on student learning. An educator evaluation system must deliver information that
- Guides effective educational practice that is aligned with student learning and development.
- Documents evidence of effective educator practice.
- Documents evidence of student learning.
- Informs appropriate professional development.
- Informs educator preparation programs.
- Supports a full range of human resource decisions.
- Is credible, valid, reliable, comparable, and uniform across districts.

Development of the Framework
The Wisconsin Framework for Educator Effectiveness was designed in collaboration with leaders of state professional organizations representing teachers, principals, superintendents and school boards, as well as educator preparation programs, the Office of the Governor, and the Department of Public Instruction (DPI). Educator Effective Design Team members represented the following organizations:

- American Federation of Teachers-Wisconsin (AFT-WI)
- Association of Wisconsin School Administrators (AWSA)
- Department of Public Instruction (DPI)
- Office of the Governor
- Professional Standards Council (PSC)
- Wisconsin Association of Colleges of Teacher Education (WACTE)
- Wisconsin Association of Independent Colleges and Universities (WAICU)
- Wisconsin Association of School Boards (WASB)
- Wisconsin Association of School District Administrators (WASDA)
- Wisconsin Education Association Council (WEAC)

Representatives of these stakeholder groups formed an educator effectiveness workgroup and an educator effectiveness design team, both of which were informed by national experts, state research organizations, and regional technical assistance providers. The EE Design Team, the decision-making group, met monthly to reach consensus on the Wisconsin Framework for Educator Effectiveness. The workgroup also met monthly to generate recommendations, which informed design team deliberations and consensus building.

As a collaborative effort, both the workgroup and design team reviewed and discussed current education practice, research, and framework design. Both groups relied on technical assistance throughout the framework development process. Researchers from the Wisconsin Center for Education Research (WCER) helped frame the EE Design Team decision points, which structured the entire process; identified current educator effectiveness research, policies, and models; developed background material; and provided in-depth feedback during meetings throughout the process. The National Comprehensive Center for Teacher Quality (TQ Center) also helped provide information on current educator effectiveness research, policies, and models. Great Lakes West Regional Comprehensive Center (GLW) and Regional Educational Laboratory (REL) Midwest facilitated each meeting and extensively documented decisions. Members also participated in multiple national conferences, including those hosted by the Council of Chief State School Officers (CCSSO) and the National Governors Association (NGA).

Decision feedback was supported through stakeholder communication. An Educator Effectiveness Symposium was held in June 2011 to inform stakeholders and elicit feedback on the emerging framework design. Additionally, stakeholders sought feedback from their various constituent groups throughout the process.
Framework Foundation: Multiple Measures

Educator Practice: Measures of educator practice will account for 50 percent of the overall summative rating for educators. Dimensions of effective educator practice for teachers will be based on the 2011 Interstate Teacher Assessment and Support Consortium (InTASC) Model Core Teaching Standards and for principals, the 2008 Interstate School Leaders Licensure Consortium (ISLLC) Educational Leadership Policy Standards.

The InTASC and ISLLC standards were selected as they are widely recognized as rigorous and robust standards of professional practice. These research-based standards describe effective teacher and leadership practices that lead to improved student achievement. Both sets of standards have been endorsed by CCSSO and are envisioned as the foundation for a comprehensive framework that addresses each stage of an educator’s career. Numerous education organizations, unions, and institutes of higher education have endorsed the InTASC standards. In addition, the National Policy Board for Educational Administration (NPBEA) endorsed the 2008 ISLLC standards.

The following measures of educator practice will be used:

- For teachers, the domains and components of Charlotte Danielson’s *A Framework for Teaching* will be used to provide definition and specificity to the InTASC standards. Rubrics for observing teacher practice will be developed, adapted, or identified to address each component. Danielson’s work and other models based on InTASC will be used as a starting point in rubric development. The domains and components identified in the educator effectiveness system will be required by school districts. Each domain represents a distinctive area of effective teaching practice. The components provide a detailed, but manageable, list of teaching skills that are consistent with the 2011 InTASC standards.

  Appropriate adaptations to the domains and components will be developed for certified professional staff that have out-of-classroom assignments as part or all of their duties, or for those who work with special populations.

- For principals, the 2008 ISLLC standards will be used. The ISLLC subordinate functions under the standards will form the components. Rubrics for observing principal practice will be developed, adapted, or identified at the component level. Models based on ISLLC will be used as a starting point for rubric development.

- Multiple observations of educator practice are required during summative evaluations. Observations must be supplemented by other measures of practice. Multiple sources of evidence must be collected to document the evaluation of practice. Particular attention should be paid to evidence of instructional practices that support students with disabilities and English language learners.

- Districts will have the flexibility to create their own rubrics of educator practice. Districts that choose to do so must apply to the state superintendent through an equivalency review process. The rubrics (and related training, tools) for teacher practice must be based on the InTASC standards and Danielson’s four domains of teaching responsibility, but may combine components into fewer categories.

Student Achievement: Measures of student achievement will comprise 50 percent of the overall evaluation system. Multiple measures of student outcomes will be used. State and district achievement data with both individual and school components will be included.

All teachers’ evaluations will be based on multiple measures of student outcomes. The measures used and their relative weights will vary based on availability of measures. For example, value-added data are available for a limited number of grades and subjects (currently grades 3-7 reading and mathematics, the “covered grades and subjects” where growth data is available). Individual value-added data will be used as one of several measures of student outcomes for teachers of covered
grades and subjects. Value-added data will take into account the instructional time spent with students, also known as “dosage” in the value-added model to be developed by the Value-Added Research Center (VARC) at the Wisconsin Center for Education Research (WCER). The VARC model will also examine differential effects, or the varying effects a school/teacher has on student subgroups such as economically disadvantaged, English language learners, and students with disabilities.

The following measures of student outcomes will be used for teachers of covered grades and subjects:

- Individual value-added data on statewide standardized assessments (currently possible for grades 3-7 reading and mathematics)
- District-adopted standardized assessment results where available. The selection of assessments will be informed by district and school goals, the Common Core State Standards and 21st Century Skills, and meet APA/AERA criteria for tests that are used for high-stakes decisions.
- Student learning objectives (SLOs) agreed upon by teachers and administrators that move students toward mastery of applicable content or skills. SLOs must be rigorous and meet the following criteria: specific, measurable, attainable, relevant, and timely. The SLOs will be informed by district and school goals, the Common Core State Standards, and 21st Century Skills. The district will establish a process for the development and oversight of the student learning objective component. The state will provide guidelines and tools to support districts in this process prior to full statewide implementation. Particular attention should be paid to SLOs that support students with disabilities and English language learners.
- District choice of data based on improvement strategies and aligned to school and district goals within the state accountability system.

School-wide student achievement on state assessments in reading will account for 2.5 percent of the student outcome component of PK-8 teacher evaluations. In lieu of school-wide reading, for 9-12 grade teachers, 2.5 percent of student outcomes will be graduation rate. If a successor state assessment system allows, a similar school-wide measure based on reading will be phased in at the high school level.

The following measures of student outcomes will be used for teachers of non-covered grades and subjects:

- District-adopted standardized assessment results where available as described above.
- Student learning objectives as described above.
- District choice of data based on local improvement strategies and aligned to school and district goals within the state accountability system.
- For principals, the following data when available will be used:
  - School-wide value-added data from statewide standardized assessments taken by students in the school(s) to which the principal is assigned.
  - District-adopted standardized assessment results where available. The selection of assessments will be informed by district and school goals, the Common Core State Standards and 21st Century Skills, and meet APA/AERA criteria for tests that are used for high-stakes decisions.
  - School performance outcomes, agreed upon by principals and administrators, which move students toward mastery of applicable content or skills. The school performance objectives must be rigorous and meet the following criteria: specific, measurable, attainable, relevant, and timely. The school performance objectives will be informed by district and school goals, the Common Core State Standards, and 21st Century Skills. The district will establish a process for the development and oversight of the school performance objectives component. The state will provide guidelines and tools to support districts in this process prior to full statewide implementation.
- District choice of data based on local improvement strategies.
School-wide student achievement on state assessments in reading will be considered as five percent of the student outcome component of PK-8 principal evaluations. In lieu of school-wide reading for high school principals, 5 percent of student outcomes will be graduation rate until a statewide reading assessment is available.

**The Evaluation Process**

The evaluation process will include multiple forms of evidence, and will serve both formative and summative evaluation needs. A manual describing formative and summative evaluation, detailing evidence sources, the frequency of data collection, timelines, and procedures for collection and analysis of evidence will be developed by the Department of Public Instruction (DPI). Formative evaluation shall be ongoing. Summative evaluations shall follow the timelines specified in the manual and align to the following Effective Educator Design Team decisions.

New educators (first three years in a district) will be evaluated annually. Struggling educators (those whose summative performance rating is “Developing”) will be evaluated annually. Veteran, non-struggling educators will be evaluated once every three years, although these educators could be evaluated on a subset of performance dimensions each year, with the entire set covered over a three-year period. These specifications refer to summative evaluations. Formative evaluation shall be ongoing for all educators.

Ongoing formative evaluation processes will provide useful feedback to individual teachers in addition to school and district leadership. The formative evaluation process will identify needs within classrooms, and guide future professional development.

Educators will receive feedback on their performance in educator practice and student outcomes, both of which will be combined into an overall performance rating. Three or more performance ratings will apply which include:

- **Developing**: this rating describes professional practice and impact on student achievement that does not meet expectations and requires additional support and directed action.
- **Effective**: this rating describes solid, expected professional practice and impact on student achievement. Educators rated as effective will have areas of strength as well as areas for improvement that will be addressed through professional development.
- **Exemplary**: this rating describes outstanding professional practice and impact on student achievement. Educators rated as exemplary will continue to expand their expertise through professional development opportunities. In addition, these educators will be encouraged to utilize their expertise through leadership opportunities.

An educator will not be allowed to remain at the developing level and continue to practice indefinitely. If an educator is rated as developing over a time period, the educator will undergo an intervention phase to improve on the areas rated as developing. If, at the end of the intervention phase the educator is still developing, the district shall move to a removal phase. An appeals process shall be developed by the district.

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3.B **ENSURE LEAs IMPLEMENT TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS**

3.B Provide the SEA’s process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, including mechanisms to review, revise, and improve, high-quality teacher and principal evaluation and support systems consistent with the SEA’s adopted guidelines.
Design Phase (2010-2011)

The Wisconsin Educator Effectiveness Design Team (Design Team) and the Wisconsin Department of Public Instruction (DPI) recently completed the Wisconsin Framework for Educator Effectiveness (Attachment 10). While the proposed framework is subject to change based on findings of the pilot evaluations, its publication initiated the next phase of this process: development work leading into the piloting and full implementation statewide. DPI is responsible for developing, piloting, implementing, evaluating, and maintaining the high-quality evaluation system. Wisconsin’s educator effectiveness system will be fully developed, piloted, and implemented by 2014-15 to meet the Elementary and Secondary Education Act (ESEA) Flexibility requirements, and will coincide with Wisconsin’s school and district accountability reform efforts discussed in Principles 1 and 2. DPI will be responsible for this work and ensuring alignment within the broader accountability system.

Since releasing the state’s guidelines (the Wisconsin Framework for Educator Effectiveness, as discussed in 3A), DPI has convened an Educator Effectiveness Coordinating Committee representing diverse stakeholders. The Coordinating Committee will provide guidance and feedback throughout the piloting and initial implementation phases of the system, at least through the 2014-15 school year. Individual educators, districts, and Wisconsin’s regional cooperative education service agencies (CESAs) are also collaborating with DPI on the development, pilot, and training phases of this initiative. The state is encouraging districts to begin implementing the new system as soon as possible and will allow any district wishing to implement the new system early to do so.

Development Phase (2011-12)

During the development phase, many key tasks will be accomplished to prepare for the pilot phase. These key tasks include the development of rubrics for educator practice; defining evaluation sources (observations, surveys, portfolios); building the value-added data system that links to district student information systems and takes into account the instructional time spent with students (“dosage” in the value-added calculations); developing criteria for student learning objectives; training of evaluators and those being evaluated; and writing guidance documents for district implementation. Workgroups consisting of educators, researchers, and DPI staff will be convened to tackle each of these tasks.

Shortly after releasing the state guidelines found in the Wisconsin Framework for Educator Effectiveness, DPI assembled workgroups to immediately begin working on rubric development. Workgroup members include teachers, administrators, and representatives from school boards, CESAs, and higher education.

The workgroup developing processes for student learning objectives (SLOs) includes special education teachers; this group is specifically considering how SLOs impact students with disabilities. Guidance on SLO development for students taking the alternate assessment will be created as the new standards (Common Core Essential Elements) and assessment in production by the Dynamic Learning Maps Consortium, as detailed in Principle 1, are developed.

The SLO workgroup is also connecting with experts of English language instruction, particularly researchers at the Wisconsin Center for Education Research (WCER) who benefit from the in-house expertise of the WIDA Consortium. WIDA—World-Class instructional Design and Assessment Consortium—is dedicated to the design, implementation, and assessment of high standards for English language learners.

Internally, DPI has convened a cross-agency team to coordinate educator effectiveness work, and contracted with the Wisconsin Center for Education Research (WCER) to guide workgroup efforts and manage connections among workgroups. WCER was a key partner in the Design Phase offering pivotal research, perspectives, and technical advice, and will continue to lead this work through the development, piloting, and evaluation processes. DPI will align this effort with other state initiatives discussed in Principles 1 and 2, including development of the state accountability system, early childhood literacy, and new assessment and data systems initiatives.
Pilot Phase (2012-13 and 2013-14)

**Developmental Pilot (2012-13):**
The system will be piloted in school districts that will include urban, suburban, and rural district diversity. A sufficient number of school districts will pilot the educator effectiveness system to provide valid and reliable evaluation data. The pilot will be conducted for one full school year. Evaluators and those being evaluated will be trained before participating in the pilot test. The training program will describe the evaluation process including the use of formative feedback, value-added student outcomes, and performance rating categories. Special attention will be paid to teachers of students with disabilities and English language learners in the training program.

**System Pilot (2013-14):**
A statewide system pilot will follow in 2013-14 to test both principal evaluation and teacher evaluation, both components of the system—educator practice and student outcomes. Specific licensure areas for teachers will be included, namely those teaching English language learners and students with disabilities, as well as music, art, physical education, agriculture and early childhood educators.

**Pilot Evaluation:**
During the developmental and system pilots, an external evaluator will evaluate the pilot program that will include formative and summative feedback and will address, at a minimum:

- Implementation process: are evaluations carried out as intended, following appropriate procedures in completing the evaluations on time?
- Understanding: do district leaders, teachers, and principals understand what is to be evaluated, how evaluations are to occur, and how the results should be used?
- Acceptance: do district leaders, teachers, and principals accept the evaluation process and results; are the measures perceived as fair?
- Training: was the training program effective?
- Reliability: are evaluations being carried out in a consistent manner; is there evidence of inter-rater reliability?
- Impact: how is the evaluation process impacting practice? Does it vary by student subgroup?
- Frequency distribution of scores on component measures (i.e., student learning objectives, practice, other student outcome scores).

No high-stakes decisions will be made using pilot evaluation results (e.g., non-renewal, termination). This would not preclude districts from referring educators to an intervention process outside of the pilot evaluation approach if warranted.

**Pilot Feedback:**
Educators will have opportunities to provide ongoing feedback throughout the pilot processes (e.g., through department staff, external evaluator, trainers, and the department’s Educator Effectiveness website). Specific feedback will be sought from teachers who teach students with disabilities and those who teach English language learners.

Evaluation results and feedback from educators will inform the workgroups, WCER, and DPI as to what modifications may be required to the system before statewide implementation.

Implementation Phase (2013-14 and 2014-15)

**Roll-out (2013-2014):**
Districts will be supported through ongoing evaluator/educator training, resource tools, and communication. Resources will include rubrics, scoring protocols, technical assistance with analyzing student growth measures, protocols for combining multiple measures, department-supported training from evaluators, and professional development tailored to state system materials. The state system will address the following:
• Ongoing training for evaluators for teachers and principals.
• Evaluation results that are valid and reliable.
• Evaluation rubrics and tools that are fair, rigorous, and transparent.
• Timing and frequency of evaluations to ensure sufficient data is collected.
• Collaborative professional development time for educators to respond to student outcome data.
• Correlated data between student outcomes and educator effectiveness ratings.

Statewide Implementation (2014-15):
All districts will be required to begin implementation of the Educator Effectiveness system in 2014-15. School districts may apply to the state superintendent to develop their own rubrics (and related training, tools) provided they meet the system standards as defined in the development phase and the Wisconsin Framework for Educator Effectiveness. District principals and teachers will be trained before implementing the system.

The system will be adapted for the evaluation of other professional educators, including teachers in language instruction programs, special education teachers, pupil services, paraprofessionals, and other district administrators. Initial piloting and implementation will inform this further.

Continuous Improvement (Ongoing):
This request for flexibility is driven by the belief that increasing rigor across academic standards and assessments, while implementing a new statewide accountability system, will result in improved instruction and improved student outcomes throughout Wisconsin. The educator effectiveness system is designed to provide individualized support and professional development plans to every teacher and principal in the state. Regularly timed formative evaluations will inform educators’ individualized professional development plans. As such, ongoing improvement will be addressed through professional development.

The state system itself will continue to be evaluated for fidelity of implementation and impact on practice and student outcomes. Data collection and monitoring will be focused on increased educator effectiveness and the improvement of student outcomes. Particular attention will be paid to the outcomes of students with disabilities and English language learners. The effectiveness ratings of teachers and principals will be consistent with overall student and school performance.

The systems should provide individualized and useful feedback to educators. Educators should report that the evaluation process is providing information that assists them in improving their practice and positively affects student outcomes. Educators should work collaboratively to improve teaching and learning through an ongoing process of planning, instructing, assessing, and improvement.

However, as discussed in Principle 2 of this request, no one reform initiative will lead to change. Only coordinated efforts directed at systems change will improve outcomes statewide. The educator effectiveness system will require a portion of every educator’s evaluation to be based on growth in reading scores. The accountability system will identify schools and districts underperforming in reading, and they will be required to implement targeted improvements. Recommendations from Wisconsin’s Early Literacy Task Force include requirements to implement improvements to teacher preparation programs around early reading, including a new, more rigorous exam for reading educators. That task force also recommended that professional development plans of all new elementary educators explicitly focus on literacy; and that districts provide aggressive professional development opportunities to enhance the skills of current reading educators in order to raise the literacy and reading achievement in Wisconsin. This is an example of taken together, and when implemented with fidelity, how the state expects achievement of all students will be raised.
Below is one example of a format an SEA may use to provide a plan to meet a particular principle in the ESEA Flexibility.

<table>
<thead>
<tr>
<th>Key Milestone or Activity</th>
<th>Detailed Timeline</th>
<th>Party or Parties Responsible</th>
<th>Evidence (Attachment)</th>
<th>Resources (e.g., staff time, additional funding)</th>
<th>Significant Obstacles</th>
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Accountability Reform Overview

This overview describes the changes to Wisconsin’s accountability system outlined in the Department of Public Instruction’s (DPI) draft waiver proposal for ESEA flexibility.

ESEA Flexibility Waiver
The U.S. Department of Education (USED) has offered states the opportunity to apply for flexibility on certain provisions of the federal Elementary and Secondary Education Act (ESEA, currently known as NCLB, the No Child Left Behind Act). States’ proposals must demonstrate how they will use this flexibility to implement the following principles:

- College- and career-ready expectations for all students,
- State-developed differentiated recognition, accountability, and support,
- Support for effective instruction and leadership, and
- Reduced duplication and unnecessary burden.

DPI posted a draft waiver proposal on January 23 to elicit feedback over a two-week public comment period, after which DPI refined the proposal for submission to USED by February 22, 2012. Changes affecting schools and districts are included in this overview. Some specific changes or plans included in the final draft that are a direct response to stakeholder input include:

- In addition to raising the mathematics and science credit requirements needed for graduation, DPI is advocating for 6.5 elective credits as a graduation requirement across the state, so that art, music, world languages, and technical courses may be a part of every student’s high school experience. This is critical to Wisconsin teachers and families, and was a key finding of WEAC’s Speak Out for Wisconsin Public Schools.
- In order that more students are recognized and included in this accountability system, and to avoid the masking of small subgroup performance, DPI will change the cell size used for accountability calculations from 40 to 20. This was a priority for the disability advocacy groups in Wisconsin. Additionally, a combined subgroup will be used when the binary subgroups (ELL, SwD, economically disadvantaged) do not meet cell size, in recognition of the need to closely monitor the performance of these traditionally high-needs student groups.
- DPI will continue to incorporate Universal Design for Learning principles into planning and development of resources for standards implementation, assessments, and instructional practices.
- DPI will raise cut scores on current assessments to reflect higher expectations for students during the two-year transition between current and next generation assessment systems. DPI will also propose funding to make the ACT suite available across the state, a specific request from school administrators.
- DPI confirmed support for the plans to waive SES in lieu of other extended learning opportunities as well as having significant parental input as part of these plans.
In serving Focus Schools, DPI will be significantly increasing the capacity of Wisconsin’s RtI Center to ensure a high quality, multi system of support, including additional interventions/supports for students with disabilities and English language learners.

**College and career ready expectations for all students**

Expanding upon “Every Child a Graduate” to focus on increasing expectations that ensure Wisconsin graduates are prepared for success in college and career, DPI is raising standards and making changes to assessment and graduation requirements.

**Standards & Assessments**

- **Full implementation of Common Core State Standards (CCSS) and Common Core Essential Elements (CCEE):** Instruction based on CCSS and CCEE (alternate achievement standards) must be in place by the 2014-15 school year. Assessment of CCSS and CCEE proficiency will begin in the 2014-15 school year.

- **New Assessment Systems:** Proficiency on CCSS will be measured by new assessment systems being developed by the Smarter Balanced Assessment Consortium (replacing the Wisconsin Knowledge and Concepts Examination [WKCE]). Proficiency on the CCEE will be measured by the Dynamic Learning Maps Assessment (replacing the Wisconsin Alternate Assessment for Students with Disabilities [WAA-SwD]). Both assessments will be field tested in 2013-14 and required statewide in 2014-15. Beginning in 2014-15, these state assessments will move from fall to spring, and the high school assessment will move from grade 10 to grade 11. Both assessments will be given in grades 3-8 and 11. These online assessment systems will include end-of-year tests, as well as additional resources to help benchmark student progress throughout the year.

- **Raised Expectations:** The proficiency level on the Smarter test will be benchmarked against national and international standards. As a transition, the WKCE will use cut scores based on the more rigorous NAEP scale to calculate proficiency in reading and mathematics.
  - 2011-12: Current WKCE cut scores for proficiency remain in place for accountability. DPI will begin the process to convert WKCE cut scores, working collaboratively with DPI’s Technical Advisory Committee and testing vendor to field test NAEP-based cut scores on the WKCE.
  - 2012-13: Finalize NAEP-based cut scores following field test results. Make adjustments to accountability calculations if found to be necessary in the evaluation. NAEP-based cut scores on WKCE will be used for accountability determinations in spring 2013.

- **College and Career Readiness:** DPI is proposing use of the EXPLORE-PLAN-ACT + WorkKeys package (the ACT suite) and will request funds in the Wisconsin 2013-15 biennial budget to support administration of these assessments statewide. The data gathered from these assessments enable academic growth to be measured throughout high school. Results also inform students, parents, and educators about the extent to which students are on-track for college and career. These assessments are supplemental to the 11th grade Smarter assessment, which will be used to measure proficiency on the CCSS beginning in 2014-15.

- **English Language Proficiency:** DPI and World-Class Instructional Design and Assessment (WIDA), housed at the University of Wisconsin-Madison, lead a consortium to develop a new English language proficiency assessment for English Language Learners (ELLs). The project, *Assessment Services Supporting ELLs through Technology Systems (ASSETS)*, will develop an
online assessment system that measures student progress in attaining the English language skills needed to be successful in K-12 and postsecondary studies, and work. ASSETS will replace the ACCESS for ELLs assessment currently used in Title III accountability in 2015-16.

**Graduation Requirements**

- State graduation requirements will increase to include these specified 15 credits:
  - 4 credits of English language arts
  - 3 credits of mathematics (an increase from two credits)
  - 3 credits of science, engineering or technology with two of those years as traditional science or science equivalency courses (an increase from two credits)
  - 3 credits of social studies
  - 1.5 credits of physical education
  - 0.5 credit of health education

- In addition, DPI recommends putting into statute an additional 6.5 elective credits for graduation, as recommended by the State Superintendent last year. It is also recommends that innovative dual enrollment programs be increased.

- These recommended requirements would result in a total of 21.5 credits necessary for graduation, in alignment with national averages and current local practice. This is a floor requirement as many districts will continue to require more credits, and most graduates will complete more credits than the new requirement in statute.

- These requirements will be in effect for students in the four-year adjusted cohort expected to graduate in 2016-17, pending legislation on graduation requirements.

**State-developed differentiated recognition, accountability, and support**

*With the goal of developing a statewide accountability system that increases student achievement and promotes and supports school improvement across the state, DPI worked with a statewide school accountability design team, other stakeholders, and the Technical Advisory Committee to establish accountability measures that 1) are fair; 2) raise expectations; and 3) provide meaningful measures to inform differentiated recognitions, intervention, and support.*

**Comprehensive Statewide Accountability System**

- Wisconsin’s accountability system will include all schools receiving public school funds. This includes Title I schools, non-Title I schools; district, non-district, and non-instrumentality charter schools; and private schools participating in the state Parental Choice Programs.

- Full implementation of this accountability system beyond Title I schools is pending based on funding and legislative changes that may be required.

**Accountability Index**

- Beginning in 2012-13, a comprehensive accountability index will replace the current ESEA Adequate Yearly Progress (AYP) system. The index approach uses multiple measures and classifies schools along a continuum of performance.

- Schools and districts will be held accountable for outcomes in four priority areas that comprise sub-scales of the index:
  - Student achievement
- Student growth
- Closing achievement gaps
- On-track to graduation and postsecondary readiness

Index scores will be provided for each of the four sub-scale areas.

In addition to the index scores, schools and districts will be held accountable for three specific performance expectations:

- **Test Participation** (elementary, middle, high school) – when test participation rates fall below an acceptable level, it impacts the comparability of a school’s assessment results. Unacceptable test participation rates will result in a red flag for this specific performance expectation.
- **Dropout rates** (middle and high school) – the goal of all students graduating prepared for college and careers requires improved academic performance and retention of students in school. High dropout rates, regardless of school performance, will result in a red flag for this specific performance expectation.
- **Absenteeism** (elementary, middle, high school) – this indicator is highly correlated with low performance; if students are not in school they do not have access to important content and instruction. Absenteeism rates above the specified minimum will result in a red flag for this specific performance expectation.

Overall accountability scores will be a combination of priority area scores on an index of 0-100.

**Accountability Ratings**

Accountability index (0-100) will place schools and districts into one of six categories along the performance continuum:

- Significantly Exceeding Expectations
- Exceeding Expectations
- Meeting Expectations
- Meeting Some Expectations
- Meeting Few Expectations
- Persistently Failing to Meet Expectations

Cut points for each category will be established through a standard setting process recommended by DPI’s Technical Advisory Committee (TAC).

The State will require interventions in Title I schools that demonstrate the lowest performance in the state (Priority Schools) and in schools with the largest achievement gaps in reading, mathematics, or graduation rate, or in which certain subgroups are the lowest performing in the state (Focus schools).
Annual Measurable Objectives (AMOs)

- AMOs currently in place under NCLB will be used for 2011-12, including the scheduled increases for reading and mathematics:
  - 85% school attendance rate (elementary and middle schools)
  - 85% graduation rate, or 2% increase in graduation rate, or 5% increase if below 70% (high schools)
  - 87% of students scoring proficient or higher on WSAS reading
  - 79% of students scoring proficient or higher on WSAS mathematics
- Use of the accountability index, applying cut scores based on NAEP to the WKCE, and new baselines for AMOs will be in place for 2012-13 accountability determinations.
- Each school will have an individualized AMO to move them to meeting, exceeding, or significantly exceeding without any red flags (test participation, dropout rate, absenteeism).
- Schools that are not in the Meeting Expectations category will have AMOs that reflect the growth required to meet expectations within four years.
- A school or district cannot be in the top three categories if it missed its AMO or has any red flags (test participation, dropout rate, absenteeism). A school scoring low in any of the four sub-scale areas cannot be in the top category (Significantly Exceeding Expectations).

Subgroup Accountability

- A cell size of 20 students will be used for all accountability calculations, a change from 40 students. Reducing the cell size to 20 allows schools, districts, and the state to identify subgroups that may be struggling but would not be reported under larger cell size rules.
- A high-need supergroup that includes economically disadvantaged, English language learners, and students with disabilities only in cases in which each of these subgroups does not alone have the minimum group size of 20. This recognizes the importance of closely monitoring the needs of these groups and allows more schools to be included in accountability calculations.
- The accountability index is designed to emphasize the performance of every subgroup. The four sub-scale areas and index will prevent small subgroup performances from being masked.
Accountability Reporting

<table>
<thead>
<tr>
<th>Year</th>
<th>Assessment</th>
<th>Scale used for accountability</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011-12</td>
<td>WKCE</td>
<td>Final year for current WKCE performance levels; begin field testing of cut scores based on NAEP</td>
</tr>
<tr>
<td>2012-13</td>
<td>WKCE</td>
<td>Use cut scores based on NAEP on WKCE student reports, and for school and district accountability report cards</td>
</tr>
<tr>
<td>2013-14</td>
<td>WCKE</td>
<td>Continue using cut scores based on NAEP for WKCE and accountability report cards</td>
</tr>
<tr>
<td></td>
<td>Smarter Assessment Field Test</td>
<td>Field test Smarter and Dynamic Learning Maps assessments and define performance cut scores to be used across all participating states</td>
</tr>
<tr>
<td></td>
<td>Dynamic Learning Maps Field Test</td>
<td></td>
</tr>
<tr>
<td>2014-15</td>
<td>Smarter Assessment System</td>
<td>Fully implement Smarter and Dynamic Learning Maps assessment Smarter with consortia-defined performance cut scores</td>
</tr>
<tr>
<td></td>
<td>Dynamic Learning Maps</td>
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</tbody>
</table>

- DPI will field test new school and district report cards based on the accountability index, prior to implementing them statewide.

District Accountability

- Currently, district accountability is based on the aggregate of all district students within three separate levels: elementary, middle, and high school. This will continue, with an accountability index score calculated for each of the levels.
- The district AMO is to meet or exceed expectations at all three levels—elementary, middle and high school—and to have no schools in the Persistently Failing to Meet Expectations category.
  - If the aggregate scores for the district fail to meet expectations at all three levels, the district will miss the AMO. Additionally, districts that have any schools in the Persistently Failing to Meet Expectations category will receive a red flag and miss the AMO.
- For districts missing the AMO at all three levels—elementary, middle and high school—the state superintendent may require that a district-level diagnostic review must be completed to evaluate critical systems and structures within the central office, including but not limited to human resources, curriculum and instruction, finance, and leadership.

Support and Intervention

- **Overall Approach**
  - DPI will identify both high and low performing schools, but will focus interventions and supports on the lowest performing schools in the state.
  - Support and interventions will match the severity and duration of identified problems.
  - Districts will be the entry point for school improvement and district reform.
DPI will establish one statewide system of support for all public-funded schools, pending funding. This replaces the current system of supporting only the lowest-performing Title I schools.

- **Schools Persistently Failing to Meet Expectations**
  - This includes all Title I Priority Schools (at least 5% of all Title I schools in the state), and all other schools that receive public funding including non-Title I schools, charter schools and schools that participate in Parental Choice Programs as determined by the accountability index.
  - For Title I schools, beginning in Fall 2012, the mandate of Supplemental Education Services (SES) under NCLB will no longer be required. In lieu of these requirements, districts will be required to submit a plan detailing the extended learning opportunities for eligible students. Parent consultation in the development of the plan must be documented. The plan must be approved by DPI.
  - Traditional public schools have the following options:
    - Schools in this category participate in a comprehensive, on-site diagnostic review to pinpoint problem areas, followed by development of a reform plan aligned to the findings in the diagnostic review. The plan must be approved by DPI. Schools must contract with a state-approved turnaround partner to implement reform plans. Improvement plans must focus on improving core instruction in reading and mathematics.
    - Closure.
    - Charter schools and schools participating in Parental Choice Programs must implement similar requirements as traditional public schools.
  - For schools that fail to show demonstrable improvement after three years, the state superintendent will intervene.
  - Specific interventions will vary depending on school type (public, parental choice, charter) and on the needs of the school and their specific performance indicators. Examples include extended learning time, targeted reading and mathematics supports, professional development and implementation assistance.
  - Supports will include online resources, and technical assistance from the Wisconsin Response to Intervention (RtI) Center, Cooperative Education Service Agencies (CESAs), and DPI staff.
  - DPI will conduct quarterly onsite visits each year to monitor progress.

- **Schools Meeting Some Expectations or Meeting Few Expectations**
  - This includes all Title I Focus Schools (at least 10% of all Title I schools in the state), and all other schools that receive public funding including non-Title I schools, charter schools and schools that participate in Parental Choice Programs as determined by the index.
  - Schools must participate in an online state-directed self assessment of the current core reading and math curriculum including interventions for struggling students. The school must develop an improvement plan based on the diagnostic review, and implement RtI, working closely with the Wisconsin RtI Center. Specific interventions in the plan must address identified problem areas. The plan must be approved by DPI.
DPI will conduct electronic reviews of each school’s progress and monitor throughout the year.

- **Schools Exceeding Expectations and Significantly Exceeding Expectations**
  - Resources will be electronically available to all schools in the state that wish to conduct a self-assessment to establish a plan for continuous improvement.
  - Supports will include online resources, and technical assistance from the Wisconsin Response to Intervention (RtI) Center, CESAs, and DPI staff.

**School Recognition**

- The top performing schools will be publicly recognized.
- The Wisconsin *Schools of Recognition* Award will be expanded to include non-Title I schools, charter schools and schools that participate in Parental Choice Programs and will identify schools making significant progress. There will be three types of awards:
  - Schools that “beat the odds:” Title I receiving schools that are in the top quartile of poverty for the state and show high achievement
  - High-Performance Schools: schools falling into the *Significantly Exceeding Expectations* category (i.e., schools with a very high index score and no unacceptable-performance flags)
  - High-Progress Schools: schools that demonstrate the most growth on an annual basis
- The state will look to a sample of high performing schools to identify best practices and share statewide, particularly with those schools not meeting expectations.
- Schools selected for recognition must meet their AMO and not miss any of the three performance expectations (test participation, dropout rate, and absenteeism).

**Support for effective instruction and leadership**

The primary purpose of the Wisconsin Framework for Educator Effectiveness is to develop a system of continuous improvement of educator practice—from pre-service through service—that leads to improved student learning. The system established by the Educator Effectiveness Design Team was designed to evaluate teachers and principals through a fair, valid, and reliable process using multiple measures across two main areas: educator practice and student outcomes.

- All public school teachers and principals will be included in the evaluation system.
- Both principal and teacher evaluations will include multiple measures of educator practice and student outcomes. Educator practice will count for half of the evaluation; student outcomes will count for half of the evaluation.
- The evaluation system will include formative and summative elements, and will link directly to the educator’s professional development plan.
- The system will be fully implemented in the state by the 2014-15 school year.
- Individual educator ratings are confidential and will not be publicly reported.

**Reduced duplication and unnecessary burden**

DPI is aligning a number of efforts to reduce duplication and unnecessary burden on districts. District data collection will be streamlined as a result of the transition to a statewide student information system.
Methods of making data available directly to districts, as well as to the public, will be localized and made more timely through the SSIS and a new reporting system called the Wisconsin Information System for Education dashboard (WISEdash).

- **Single Statewide Student Information System**: Districts will begin transitioning to a single student information system in Fall 2012. There is a five-year implementation timeline for this system, which will reduce duplication of reporting efforts, increase timeliness of data access, and allow districts more time to focus on using data to inform important educational decisions.

- **Single Reporting System**: WISEdash, a single reporting system for school/district accountability reporting, will include a plethora of pre-defined and user-defined reports including student growth percentiles, enrollment, course-taking, postsecondary enrollment, literacy, and more. WISEdash will be released initially in secure format only (i.e., for authorized district personnel to use via a login); eventually WISEdash will also house public reports and replace DPI’s current public data reporting systems.

- **Consolidated Reporting Requirements**: School- and district-required performance reports will be replaced by new school and district report cards, allowing these reporting requirements to be met without the need for districts to create separate reports.

### Stakeholder Involvement

- **Involvement during Development**: Changes to Wisconsin’s accountability system described in this document are the result of much deliberation and collaboration with stakeholders. The work of the School & District Accountability Design Team, as well as input from various educational stakeholders, informed the design of this new accountability system. DPI will continue to engage stakeholders throughout the state as this system develops.

- **Public Survey**: The DPI survey that accompanied the waiver draft request during the two-week public comment period resulted in input and guidance from over 700 respondents including educators, parents and other key education stakeholders. Survey results were utilized to clarify and modify the waiver request.
Draft School Report Cards

This appendix includes two draft mock-ups of what a school report card would look like under Wisconsin’s new school accountability system. Data on these mock-ups are illustrative and do not represent actual Wisconsin schools. Details on these mock-ups such as score components, numerical values, weighting, labels, score ranges, titles, and web addresses are illustrative and do not represent final determinations or active systems.
Pine Creek School | K-8 Charter School
School Report Card | Summary | 2012-13 School Year

School Rating
82
Meeting Some Expectations

Significantly Exceeding 91-100 Expectations and no red flags
Exceeding 76-90 Expectations and no red flags
Meeting 61-75 Expectations and no red flags
Meeting Some 51-60 Expectations or >60 with ≥1 red flag
Meeting Few 41-50 Expectations
Persistently Failing to Meet Expectations 0-40

Student Achievement
91 / 100
Reading Achievement 46 / 50
Mathematics Achievement 45 / 50

Student Growth
89 / 100
Reading Growth 42 / 50
Mathematics Growth 47 / 50

Closing Achievement Gaps
70 / 100
Achievement Gaps 32 / 50
Growth Gaps 38 / 50

On-Track Indicators
79 / 100
3rd Grade Reading Achievement 24 / 30
8th Grade Math Achievement 22 / 30
Attendance 33 / 40

OVERALL SCHOOL SCORE
82 / 100
School score is the average of the four subscale area scores.

Recent Performance
School Scores Last 5 Years

<table>
<thead>
<tr>
<th>08-09</th>
<th>09-10</th>
<th>10-11</th>
<th>11-12</th>
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<tbody>
<tr>
<td>74</td>
<td>74</td>
<td>79</td>
<td>83</td>
<td>82</td>
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</tbody>
</table>

Enrollment
453

Demographics
Race/Ethnicity
American Indian 1%
Asian 7%
Black (not Hispanic) 25%
Hispanic 31%
White (not Hispanic) 36%

Student Groups
Students with Disabilities 27%
Economically Disadvantaged 55%
English Language Learners 31%

School Accountability Expectations

Index Improvement Goal
This Year’s Goal 75
School Score 82

Test Participation
Minimum Rate 95.0%
Lowest Subgroup 97.4%

Dropout Rate
Maximum Rate 6.0%
School Rate 0.4%

Absenteeism
Maximum Rate 13.0%
School Rate 13.3%

School Rating Determination
Overall School Score 82
Number of Red Flags 1
Meeting Some Expectations

DRAFT – 2/20/12
dpi.wi.gov/reportcard

Public schools, charter schools, and private schools participating in a Parental Choice Program operate under different structures. These different types of schools should not be directly compared.
Big Woods High | Public High School  
School Report Card | Summary | 2012-13 School Year

**School Rating**

- **Exceeding Expectations**
- **Significantly Exceeding** 91-100
- **Exceeding** 76-90
- **Meeting** 61-75
- **Meeting Some** 51-60
- **Expectations or >60 with ≥1 red flag**
- **Persistently Failing to Meet Expectations** 0-40

**School Accountability Index**

<table>
<thead>
<tr>
<th>Student Achievement</th>
<th>92 / 100</th>
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<tbody>
<tr>
<td>Reading Achievement</td>
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<tr>
<td>Mathematics Achievement</td>
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</table>

<table>
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<th>Closing Achievement Gaps</th>
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<td>31 / 50</td>
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<td>Graduation Gaps</td>
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</table>

<table>
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<tr>
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<tbody>
<tr>
<td>Graduation</td>
<td>58 / 60</td>
</tr>
<tr>
<td>ACT Performance/Participation</td>
<td>18 / 20</td>
</tr>
<tr>
<td>Attendance</td>
<td>18 / 20</td>
</tr>
</tbody>
</table>

OVERALL SCHOOL SCORE 86 / 100
School score is the average of the three subscale area scores.

**School Accountability Indicators**

**Index Improvement Goal**
This Year's Goal 77  
School Score 86

**Test Participation**
Minimum Rate 95.0%  
Lowest Subgroup 96.3%

**Dropout Rate**
Maximum Rate 6.0%  
School Rate 2.2%

**Absenteeism**
Maximum Rate 13.0%  
School Rate 8.3%

**School Rating Determination**
Overall School Score 86  
Number of Red Flags 0  
Exceeding Expectations

**Enrollment**
605

**Demographics**
Race/Ethnicity
- American Indian 2%
- Asian 8%
- Black (not Hispanic) 19%
- Hispanic 28%
- White (not Hispanic) 43%

Student Groups
- Students with Disabilities 29%
- Economically Disadvantaged 48%
- English Language Learners 28%

DRAFT – 2/20/12

dpi.wi.gov/reportcard

Public schools, charter schools, and private schools participating in a Parental Choice Program operate under different structures. These different types of schools should not be directly compared.
January 23, 2012

Dear Colleague:

I am writing today to share with you a draft of Wisconsin’s proposed waiver from certain elements of the Elementary and Secondary Education Act (ESEA), also known as No Child Left Behind (NCLB). With this posting, the Department of Public Instruction (DPI) opens the public comment period. Attached to this letter you will find:

- A summary of the key elements in the proposal (http://dpi.wi.gov/esea/pdf/summary.pdf);
- The initial full draft waiver proposal (http://dpi.wi.gov/esea/pdf/waiver.pdf);
- A survey through which you can submit your comments by February 3, 2012. (https://forms.dpi.wi.gov/se.ashx?s=56301B2D5BE3EF8D)

For the past decade, NCLB has forced one-size-fits-all mandates and labels on our schools and districts. Through this waiver process, the USED has offered states the opportunity to apply for flexibility on certain provisions of ESEA. Specifically, all state proposals must demonstrate how they will use this flexibility to implement the following principles:

- College- and career-ready expectations for all students;
- State-developed differentiated recognition, accountability, and support;
- Supporting effective instruction and leadership;
- Reducing duplication and unnecessary burden.

DPI’s proposal is, in part, based on the work of the statewide School and District Accountability Design Team that met over the last several months to design a fair and accurate accountability system that measures growth and attainment for all students. In addition, the proposal reflects the robust education investment agenda we’ve advanced together over the past two-and-a-half years, focused on improving student achievement and graduating students prepared for future success.

The DPI intends to submit its waiver application to the United States Department of Education (USED) by February 21, 2012. Through this comment period, we hope to further engage the citizens of Wisconsin in this discussion so critical to the future of education. We encourage you to share this draft of Wisconsin’s proposed waiver and the associated survey with others. Most importantly, we want broad input to ensure that our proposal best meets the needs of Wisconsin’s children.

After we receive feedback from you and other educators, parents, and citizens from across the state, we will be revising and refining this draft proposal. Please remember to provide your comments through the survey no later than February 3.

Sincerely,

Michael J. Thompson, PhD
Deputy State Superintendent

MJT:sjb

Attachments
FOR IMMEDIATE RELEASE
Wednesday, January 25, 2012
Contact: Patrick Gasper, DPI Communications Officer, (608) 266-3559

NCLB waiver will improve education
By Tony Evers, State Superintendent of Public Instruction

MADISON — The education we provide to our kindergarten through 12th-grade students must improve. Though change may sometimes be difficult, the future demands that we move forward.

This is why the Department of Public Instruction developed a plan to seek waivers from several provisions of federal education law, known as No Child Left Behind (NCLB). Simply, NCLB is broken. It is overly prescriptive and focuses too heavily on punishment rather than supporting improvement. Our draft waiver request, posted online for public comment, lays out an ambitious plan for increasing rigor across Wisconsin’s standards, assessment, and accountability systems. These changes will be challenging, but they will result in improved classroom instruction and higher student achievement.

Why are college- and career-ready expectations needed? Educational research and surveys of employers both find that the preparation needed for a one-, two-, or four-year college program is the same preparation needed for family-supporting jobs. Adopting higher standards for what our students should know and be able to do, developing better assessments to measure how well they are learning, and holding schools accountable for all students’ success is the right thing to do for our children, our communities, and our state. Our waiver request will help us reward schools that are doing well, share best practices so other schools can improve, and support schools that need to do better.

The quality of the teacher in the classroom and the principal in the school is vital to students’ educational success. Our waiver request calls for evaluations that will support teachers and principals in their job of educating students and help our educators improve throughout their careers. Evaluations will focus on multiple measures of student achievement and professional practice. These changes are based on recommendations from educators at the elementary, secondary, and postsecondary levels; school board members; and policymakers who worked together to develop an evaluation framework that is centered on student learning, fair, valid, and reliable.

Over and over we hear the importance of ensuring that students receive a well-rounded education. No one wants a curriculum narrowed to just what’s on the test. We want our students to enjoy the rich learning offered (more)
through art, music, foreign languages, and other coursework. We must develop ways to value these subjects as much as the state-assessed content areas.

How will we know if education is getting better? Taxpayers rightly want to know that their education tax dollars are producing results. Our waiver request will improve accountability through more sophisticated data collection and reporting. The DPI at one time sent and received thousands of paper forms to collect data. We’ve streamlined data requirements for schools through online reporting and are developing more robust systems to use this information for making educational decisions and reporting to the public. School and district report cards will be part of that reporting.

I know these are tough times for schools. Most cut their budgets this year and face additional budget cuts next year. It will take investments at the state and federal levels to make some of these reforms possible.

From increased standards and graduation requirements to better assessments and reporting of results, our waiver request covers a wide range of education reforms. We are looking forward and embracing change, while respecting the work and intent of those who developed recommendations for various parts of our plan. Through collaboration and mutual respect, we will improve education so our children will be successful in the future.

We want feedback from educators, parents, and citizens from across the state on our draft waiver request. Diverse opinions will help us make our plan better, which will make education in Wisconsin stronger. The public comment survey will be open until Feb. 3. After that time, we will revise our waiver request and submit it to the United States Department of Education by Feb. 21.

Please help us improve education in Wisconsin. Visit the state’s Elementary and Secondary Education Act webpage, http://dpi.wi.gov/esea/index.html. Click on “Public Notice of Intent to Seek Waiver - NCLB Accountability” for links to the Wisconsin Department of Public Instruction’s draft waiver request, a summary of key elements in the request, and the public comment survey. Together we will improve education for our children.

###

Tony Evers is the elected state superintendent of public instruction.

NOTES: A high-resolution photo of the state superintendent is available on the Department of Public Instruction “Media Contacts and Resources” webpage at http://dpi.wi.gov/eis/vm-media.html. This editorial is available electronically at http://dpi.wi.gov/eis/pdf/dpinr2012_22.pdf.
February 2, 2012

For Immediate Release

Contact: Cullen Werwie, 608-267-7303

**Governor Walker Statement on Proposed No Child Left Behind Waiver**

*Madison*—Today the Wisconsin Legislature is having a hearing on a proposed *No Child Left Behind (NCLB)* waiver. Below is Governor Walker’s statement related to the proposed NCLB waiver:

*Continued collaboration with Superintendent Evers and a wide range of education stakeholders including teachers, administrators, and school boards will be needed to refine and submit a waiver to the federal government that will allow us to continue to innovate the way we deliver education in Wisconsin. The proposed waiver is a good starting point.*

*It is important to continue to focus on setting high standards, ensuring transparency and measuring what matters to ensure that all students are ready for college or a career. This includes, but is not limited to rating all schools, be they public, charter, or choice, on multiple measures of student growth and proficiency.*

*Ultimately we want to empower parents to make educational decisions based on quantifiable performance data. The waiver will help fight complacency by replicating success and providing assistance to schools in need of improvement.*

###
February 3, 2012

Dr. Michael Thompson
Wisconsin Department of Public Instruction
PO Box 7841
Madison, WI 53707-7841

Dear Dr. Thompson,

The Executive Board of WCASS reviewed the ESEA waivers and has identified their concerns below:

Whereas the Wisconsin Council of Administrators of Special Services (WCASS) has read and reviewed the proposed Waiver of Flexibility for the Elementary and Secondary Education Act as prepared by the Wisconsin Department of Public Instruction (WDPI); and

Whereas WCASS has concerns for students with disabilities, English Language Learners and students in poverty; and

Whereas WCASS supports the concept of a growth model for evaluating school performance and high expectations; and

Whereas WCASS supports an accountability system that reviews all schools receiving public funding; and

Whereas WCASS supports financial assistance to the schools identified as Focus and Priority schools; and

Whereas WCASS supports a system that unites as opposed to divides the various student populations; and

Whereas WCASS wishes to express concerns regarding the current proposal;

Therefore be it resolved WCASS asks the WDPI to address the following issues:

1. Clarity of the growth model related to the students with disabilities, English Language Learners and students in poverty;
2. More emphasis on solutions as opposed to the emphasis on identification of problems;
3. Clarity regarding the method to be used for the evaluation of teachers outside of the core subject areas;
4. Seek our organizational assistance in developing criteria for diagnostic review and development of solutions for schools identified as Focus or Priority schools;
5. Clarity regarding the expanded graduation requirements and the role of the IEP teams
6. Any assessment required by ESEA should be administered to students with disabilities within the parameters specified in the students’ IEPs. Accommodations stated on the IEPs and used throughout the year should be allowed during testing.

Dave Kwiatkowski, WCASS President
Greg Nyen, WCASS President Elect

Timothy Gantz, WCASS Past President
Gary Myrah, WCASS Executive Director
Attachment 2C – School Choice Letter

219 North Milwaukee Street, Milwaukee, WI 53202

February 3, 2012

This document was prepared by School Choice Wisconsin, an advocacy organization that works with schools that participate in the Milwaukee Parental Choice Program and Private School Parental Choice Program in Racine. Our review of the 2012 ESEA Waiver prepared by the Wisconsin Department of Public Instruction resulted in the following notations:

**General Comments:**

**Close the achievement gap by incentivizing high-performing schools to expand.**

- The barrier to closing the achievement gap is not that we have too many low quality schools. The real problem is that we don’t have enough seats available in high-quality schools. This is true across all sectors.

- Closing poor-performing schools does nothing to increase high-quality seats. It just moves students from one poor-performing school to another because the high-performing schools are already full.

- Creating more regulations increases the burden on high-performing schools, slowing down their ability to add high-quality seats.

- The academic performance of government-run schools in Wisconsin over the past few decades (especially in urban centers) suggests that the government can’t increase school quality by adding more regulations. This approach has already proven not to work.

The solution to closing the achievement gap and making the best use of taxpayer resources is to add more high-quality seats by investing in the expansion of schools and/or school operators that already have a proven track record of success.
Introduction

“The Department invites interested SEAs to request this flexibility pursuant to the authority in section 9401 of the Elementary and Secondary Education Act of 1965 (ESEA), which allows the Secretary to waive, with certain exceptions, any statutory or regulatory requirement of the ESEA for an SEA that receives funds under a program authorized by the ESEA and requests a waiver. Under this flexibility, the Department would grant waivers through the 2013-2014 school year, after which time an SEA may request an extension of this flexibility.” (p iii of the ESEA Waiver)

School Choice Wisconsin requests that language be inserted in the ESEA Flexibility Request that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the private school Title I and Title IIA allocations prior to determining the funds it will dedicate to government school programs, including priority and focus schools.

Waivers

“5. The requirement in ESEA section 1114(a)(1) that a school have a poverty percentage of 40 percent or more in order to operate a schoolwide program. The SEA requests this waiver so that an LEA may implement interventions consistent with the turnaround principles or interventions that are based on the needs of the students in the school and designed to enhance the entire educational program in a school in any of its priority and focus schools, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.” (p 4 of the ESEA Flexibility Request)

School Choice Wisconsin requests that you include language in the ESEA Flexibility Request that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the private school Title I and Title IIA allocations prior to determining the funds it will dedicate to government school programs, including priority and focus schools.

6. The requirement in ESEA section 1003(a) for an SEA to distribute funds reserved under that section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its LEAs in order to serve any of the State’s priority and focus schools. (p 4 of the ESEA Flexibility Request)

School Choice Wisconsin requests that you include language in the ESEA Flexibility Request that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the private school Title I and Title IIA allocations prior to determining the funds it will dedicate to government school programs,
including priority and focus schools.

7. The provision in ESEA section 1117(c)(2)(A) that authorizes an SEA to reserve Title I, Part A funds to reward a Title I school that (1) significantly closed the achievement gap between subgroups in the school; or (2) has exceeded AYP for two or more consecutive years. The SEA requests this waiver so that it may use funds reserved under ESEA section 1117(c)(2)(A) for any of the State’s reward schools. (p 5 of the ESEA Flexibility Request)

School Choice Wisconsin requests that you include language in the ESEA Flexibility Request that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the private school Title I and Title IIA allocations prior to determining the funds it will dedicate to government school programs, including priority and focus schools.

9. The limitations in ESEA section 6123 that limit the amount of funds an SEA or LEA may transfer from certain ESEA programs to other ESEA programs. The SEA requests this waiver so that it and its LEAs may transfer up to 100 percent of the funds it receives under the authorized programs among those programs and into Title I, Part A. (p 5 of the ESEA Flexibility Request)

School Choice Wisconsin requests that you include language in the ESEA Flexibility Request that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the private school Title I and Title IIA allocations prior to determining the funds it will dedicate to government school programs, including priority and focus schools.

Consultation

“An SEA must meaningfully engage and solicit input from diverse stakeholders and communities in the development of its request.” (p 13 of the ESEA Flexibility Request)

School Choice Wisconsin provided regular input to the Department of Public Instruction noting serious concerns that the ESEA Flexibility Request had gone beyond its mandate regarding charter schools and private schools participating in parental choice programs. Seeking examples in other states’ ESEA Flexibility Requests, we could find no instance in which other states’ education departments sought to supplant existing state law relating to private and charter schools with fiat rules and regulations. And yet, that is exactly what we find contained in this ESEA Waiver.

The Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious
school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

Principle 2: State-Developed Differentiated Recognition, Accountability, And Support

2.A Develop And Implement A State-Based System of Differentiated Recognition, Accountability, And Support

“Wisconsin will differentiate how schools are characterized by accountability measures, expectations, and interventions that result from accountability determinations; an approach that is an extension of the belief in the power of differentiation and personalization.” (p 15 of the ESEA Flexibility Request)

School Choice Wisconsin in theory supports the inclusion of private schools participating in parental choice programs in the new Wisconsin State Accountability System. However, that system needs to be constitutional, equitable and functional.

There are a number of items in this section that conflict with these parameters.

Developing a Statewide System

Currently, Wisconsin’s system of support for schools identified for improvement serves Title I schools. Due to funding and capacity, the state system currently identifies the performance of traditional public schools and charter schools as required by NCLB, but only requires interventions for Title I schools and districts. The state’s persistently low performing schools do not experience sanctions or implement targeted interventions prescribed by the state unless they receive Title I funding.” (p 31 of the ESEA Flexibility Request)

The funding conflict inherent in the waiver places the equitable functionality of required interventions on future funding by the state legislature. While this is possible, that funding is not now available meaning the interventions are currently not financially equitable moving forward to the new State Accountability System.

Because of the unfortunate restrictions on taxpayer dollars going directly to private schools, interventions need to reflect the inability of those imposing sanctions to fund the interventions.
“Due to constitutional limitations in private schools, the State Superintendent cannot direct specific programming or interventions within a private school.” (p 33 of the ESEA Flexibility Request)

The previous statement regarding constitutionality is correct. Unfortunately, the DPI proposals listed on page 33 and 34 potentially violate that statement.

School Choice Wisconsin strongly believes that options need to be presented to private schools after being initially identified as “Persistently Low Performing” that do not involve direct DPI interventions. School Choice Wisconsin has presented these options to DPI during the input process. Private schools should be allowed to meet established and equitable benchmarks working those entities or authorizers which are the agent of school improvement within a private school, i.e. accreditation agency, jurisdictional authority, and or ecclesial authorizing body. As long as schools improve to meet established and equitable benchmarks, the mechanism by which they achieve those results should be flexible and constitutional.

The Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

“The choice school must enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years.” (p 33 of the ESEA Flexibility Request)

It is important to note that a “Choice school”, as such, does not exist. Rather there exist only private schools that participate in parental choice programs.

While the requirement of a performance agreement with DPI has potential constitutional issues, if a performance agreement with a private entity were an option, there are still problems with the requirement as “…annual state-approved performance targets that demonstrate substantial academic improvement…” is undefined. There is no detail as to what these standards are, if they are subject to change, what criteria was used for their creation and if they will be assigned equally to public, charter and choice sectors.

“These priority areas form the foundation of an accountability index system that incorporates multiple measures in calculating a school-level score (on a scale from 0-100) that is used to place schools on a six-level continuum.” (p 35 of the ESEA Flexibility Request)

School Choice Wisconsin does not support using a six-level continuum. The report card should implement a five-level continuum labeled with grades A through F. Creating a new syntax for a six-level continuum dramatically weakens its
effectiveness in comparison to a letter grade that is already understood by parents
and the public in general.

The goal is to give accurate, effective and impactful information on the report card. Using anything other than letter grades makes the report card less effective.

“Additionally, the Design Team recommended the state recognize high performing schools to incentivize improved outcomes, as well as disseminate practices statewide. These recommendations represent a commitment to a statewide system of support (SSOS) aimed at providing differentiated recognition, rewards, and interventions built upon the core of high quality instruction, collaboration, balanced assessments, and culturally responsive practices in order to successfully meet the state’s three strategic goals.” (p 35 of the ESEA Flexibility Request)

Unfortunately, except for public recognition, there are no tangible incentives and/or results for high performing schools. The end result of this process should be a higher percentage of students in high performing schools. This waiver and accountability system are based on directing resources to low performing schools only. Instead, this system should be directing resources to expanding high performing schools in areas where it makes geographic sense.

After all, closing a low performing school without providing seats at a high performing school accomplishes nothing. And funds directed at turning schools around have limited, if any, success.

The barrier to closing the achievement gap is not that we have too many low quality schools. The real problem is that we don’t have enough seats available in high-quality schools.

Closing poor-performing schools does nothing to increase high-quality seats. It just moves students from one poor-performing school to another because the high-performing schools are already full.

We support the dissemination of the best practices of high performing schools and other mechanisms designed to improve other schools. However, the focus needs to be on school improvement, not positive publicity alone.

1.B Transition to College- and Career-Ready Standards

Providing Measures of College and Career Readiness
“DPI will include funding in the next (2013-15) biennial budget request for schools to administer the EXPLORE, PLAN, ACT, and WorkKeys assessments. This assessment suite provides important information about college and career readiness for students. It also allows for analysis of academic growth during high school, data that are lacking in current assessments.” (p 24 ESEA Flexibility Request)
School Choice Wisconsin supports the use of the EXPLORE, PLAN, ACT assessments at the high school level especially as it relates to measuring academic growth. However, as with other state-mandated assessments, School Choice Wisconsin requests that past practice be followed and that the Department of Public Instruction provide these assessments, free of charge, to students in schools participating in parental choice programs.

Reducing Duplication and Unnecessary Burden

“Through advances such as these in data collection and reporting systems, DPI will be able to provide districts with access to data and reports that provide timely information about student (individual and group) progress toward graduation. This includes the all-important early warning system, the technology for which has been outside DPI’s grasp for some years. Recent approval and funding of a statewide student information system, however, will allow DPI to provide districts across the state with access to relevant, almost real-time data. Key to provision of these reports are the two major technology and data reporting initiatives mentioned above: a Statewide Student Information System (SSIS) and WISEdash. These initiatives will significantly impact districts. WISEdash will provide districts with direct access to aggregate and student-level data in a secure format. Reports and dashboards will be available on a variety of topics. Initial implementation of WISEdash will be with secure access only – for school- and district-level staff authorized to see non-redacted or suppressed data and possibly authorized to view student-level information. Eventually, WISEdash will not only replace DPI’s current, myriad public reporting systems, updating and locating those reports in a single portal, but will add to the types and topics of available public reports. Accountability reporting will be completed through WISEdash, but so will other public reporting including information about postsecondary transitions, literacy, and other important statewide initiatives.” (p 25 of the ESEA Flexibility Request)

In order to reduce unnecessary burden to private schools participating in parental choice programs, School Choice Wisconsin requests that private schools may voluntarily participate, free of charge, in the state data collection and reporting systems, specifically SSIS and WISEdash.

2.A Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support

“Within the system of support, identified schools will participate in diagnostic reviews and needs assessments (Priority and Focus Schools, respectively) to identify their instructional policies, practices, and programming that have impacted student outcomes and to differentiate, and individualize reforms and interventions. While planning and implementing reforms, schools and districts will have access to increasingly expansive and timely data systems to monitor progress. Additionally, the state will require Priority
and Focus Schools to implement RtI (with the support of the Wisconsin RtI Center and its resources) to ensure that all students are receiving customized, differentiated services within a least restrictive environment, including additional supports and interventions for SwDs and ELLs as needed, or extension activities and additional challenge for students exceeding benchmarks.” (p 31 ESEA Flexibility Request)

School Choice Wisconsin strongly believes that options need to be presented to private schools after being initially identified as “Persistently Low Performing” that do not involve direct DPI interventions. School Choice Wisconsin has presented these options to DPI during the input process. Private schools should be allowed to meet established and equitable benchmarks working those entities or authorizers which are the agent of school improvement within a private school, i.e. accreditation agency, jurisdictional authority, and or ecclesial authorizing body. As long as schools improve to meet established and equitable benchmarks, the mechanism by which they achieve those results should be flexible and constitutional.

The Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

To address these issues, the Wisconsin School and District Accountability Design Team developed a statewide accountability framework which [sic] specifically includes all state schools, including traditional public schools and charter schools regardless of Title funding, as well as private schools participating in the Parental Choice Program (PCP). All schools receiving state funds will be part of the state accountability and support system. The state will use this opportunity to not only include all schools, but also to increase accountability through the implementation of aggressive policies designed to address persistently low-achieving schools in the state. (p31-32 of the ESEA Flexibility Request)

It is important to note that private schools do not receive state funds. Parents receive funds that they may use to attend private schools that choose to participate in parental choice programs.

The Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

Private Schools in the Parental Choice Program
Unique to other states, Wisconsin is home to the largest and oldest voucher program in the United States. The Milwaukee Parental Choice Program (MPCP) provides low-income Milwaukee students the ability to attend private schools within the city using tax-
payer funded vouchers towards tuition. The state instituted the program as a means to provide educational options to Milwaukee students. The current Legislature has expanded MPCP to include students within a higher income bracket, as well as offering beyond the city of Milwaukee. (p 33 of the ESEA Flexibility Request)

In 2011, Wisconsin continued its tradition of progressive reforms by expanding parental choice in education to include families resident in the Racine Unified School District. In addition, any private school in the state may now participate in the parental choice programs in Milwaukee and Racine. Families within 300% of poverty now qualify for Wisconsin’s parental choice programs.

These schools have not participated in the state’s accountability system. Beginning in 2010-11, the state required Choice schools to administer the WKCE assessment to all Choice funded students and to publicly report their results. Including Choice schools in the statewide accountability system is the next step in providing transparent information about student achievement across the state. (p 33 of the WKCE Flexibility Request)

It is important to note that a “Choice school”, as such, does not exist. Rather there exist only private schools that participate in parental choice programs.

While private schools may not have participated in government accountability systems, private schools have other forms of accountability. The ultimate accountability for private schools is that every parent chooses to attend a private school. Parents choose to attend a private school, often with great sacrifice, rather than be compelled to attend their assigned government school.

Private schools participating in parental choice programs have administered nationally normed standardized tests for years and in most cases for decades and continue to do so in addition to the now mandated WKCE. In past years, private schools chose not to administer the WKCE exam for the very same reason that the DPI is now abandoning that test, i.e. the WKCE provided overly optimistic predictions of proficiency on standards that were not shared by the nation.

Due to constitutional limitations in private schools, the State Superintendent cannot direct specific programming or interventions within a private school. Therefore, when a choice school is initially identified as being among the persistently lowest performing schools in the state, it must implement one of the following three options:

- The choice school must enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years. If annual performance targets are not met, the school shall no longer participate in the Choice program; or
- DPI will conduct a mandatory on-site diagnostic review to identify the factors contributing to poor performance at the school, funded by the private school. After participation in the state-conducted review, the Choice school must implement one of two options with respect to the school consistent with the
findings and recommendations of the diagnostic review:
  o Contract with a state-approved independent expert/vendor to implement a turnaround model based on the recommendations of the diagnostic review.
  o Discontinue participation in the choice program; or
• In lieu of implementing either of these options, the choice school may elect to immediately discontinue participation in the program. (p 33-34 of the ESEA Flexibility Request)

It is important to note that a “Choice school”, as such, does not exist. Rather there exist only private schools that participate in parental choice programs.

School Choice Wisconsin strongly believes that options need to be presented to private schools after being initially identified as “Persistently Low Performing” that do not involve direct DPI interventions. School Choice Wisconsin has presented these options to DPI during the input process. Private schools should be allowed to meet established and equitable benchmarks working those entities or authorizers which are the agent of school improvement within a private school, i.e. accreditation agency, jurisdictional authority, and or ecclesial authorizing body. As long as schools improve to meet established and equitable benchmarks, the mechanism by which they achieve those results should be flexible and constitutional.

It is essential that the established benchmarks be equitable across sectors in terms of improvement expectations, timelines for improvement, and sanctions and rewards.

The Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

**Transition Year: 2012-13**
The 2012-13 school year will serve as a transition year as DPI pilots the major components of its new statewide accountability system. While the identification of Schools Identified for Improvement (SIFIs) under current adequate yearly progress (AYP) formula will continue for 2012-13. Title I SIFI schools will no longer be required to provide SES as currently defined in NCLB. Instead, districts may use their 20 percent Title I set aside to provide a broader range of supports to students. (p 35-36 of the ESEA Flexibility Request)

School Choice Wisconsin requests that you include language in the ESEA waiver that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the private school Title I and Title IIA allocations prior to determining the funds it will dedicate to government school programs, including priority and focus schools.
Budget. The district must submit a budget detailing funding sources and allocations to support the district’s plan. Districts may use the Title I 20% set aside, if they provide evidence of consultation with private schools, as these services will now be subject to equitable participation. (p 37 of the ESEA Flexibility Request)

School Choice Wisconsin requests that you include language in the ESEA waiver that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the private school Title I and Title II A allocations prior to determining the funds it will dedicate to government school programs, including priority and focus schools.

2.B. Set Ambitious but Achievable Annual Measurable Objectives

It is important to note that private schools participating in parental choice programs do not have the capacity nor do they currently collect most of the information identified in this section, e.g. student growth, achievement gaps, subgroups, test participation, dropout rates, graduation gaps, on-track/postsecondary status, etc. A plan to address private school capacity issues will be needed from the Department of Public Instruction in order for this system to not be overly burdensome on private schools participating in parental choice programs.

“The school and District Accountability Design Team put forth several recommendations for a statewide accountability system. One key recommendation was that the accountability system should use multiple measures and reflect the skills and knowledge students need to be successful in a variety of post-secondary opportunities. As a component of that recommendation, performance should be measured using both growth and attainment calculations (p 47 of ESEA Flexibility Request).

In all, the Wisconsin accountability index incorporates four priority areas: Student Achievement, Student Growth, Closing Gaps; and On-Track (for elementary and middle schools) or Postsecondary readiness (for high schools) (p 47 of ESEA Flexibility Request).”

School Choice Wisconsin believes that student growth over a period of time rather than snap shot test scores is the most accurate measurement of a school’s performance. Therefore, School Choice Wisconsin is fully supportive of a statewide accountability report card that measures student and school performance using all of these aspects and most importantly incorporates student growth over time.

School Choice Wisconsin asks that private schools may voluntarily include the results for all students in the school rather than just students participating in parental choice programs. Without the voluntary inclusion of all students, we will not have data on private schools but rather data on only a specific subset or
population of students in the private school obscuring comparisons.

However, while we are supportive of a report card that incorporates student growth, there are aspects within DPI’s proposed waiver that are unclear, undefined, and inequitable across sectors, and simply increases the bureaucracy of the Department of Public Instruction rather than uses established successful models already in place.

Factoring in Subgroups

“The School and District Accountability Design Team specifically recommended use of an additional subgroup, on that groups the lowest 25% of performers together…DPI has determined that it is not possible at this time give that the WKCE’s scale is not vertically aligned…Instead, inclusion of the lowest 25% as an additional subgroup will be considered for inclusion in the accountability system upon implementation of the SMARTER Balanced Assessment System in the 2014-15 School Year” (p 48 of the ESEA Flexibility Request).

The term “will be considered” leaves the inclusion of the subgroup uncertain. Rather, DPI should state that this subgroup will be included as soon as this information is available.

Priority Area and Overall Scores

“The exact methodology for how each category is weighted and combined into the overall score will be determined through a standard setting process overseen by DPI’s Technical Advisory Committee, Dr. Brian Gong of the National Center for the Improvement of Educational Assessment, Dr. Andrew Porter from the University of Pennsylvania, and Dr. Robert Linn from the University of Colorado” (p 48 of the ESEA Flexibility Request).

While School Choice Wisconsin supports including measures such as student growth, how each category is scored and weighted is still undefined and needs clarification. This process needs to be specifically determined and more thoroughly defined prior to the implementation of the accountability system.

Flags and Stars

“The concept of “unacceptable-performance flags” is Wisconsin’s solution to incorporating test participation and dropout rates into the new accountability system, as well as to highlight the importance placed on every child reading at grade level by 3rd grade. These flags exist outside of the mathematical calculation of the index, and instead carry overarching weight in determining where on the accountability scale a school falls…
An accountability system should not only identify performance below expectations; it
should also highlight positive progress or work being done in schools and districts. In addition to flags, report cards will include stars for certain indicators for which DPI will not hold schools accountable, but that are important enough to highlight as a significant positive for that school or district” (p 48-49 of the ESEA Flexibility Request).

School Choice Wisconsin supports the inclusion of dropout rates, 3rd grade reading, and test participation, rate of college credits earned in high school, postsecondary enrollment rates, and AP participation and performance in the accountability system. However, The “Flags” and “Stars” methods are still significantly undefined and need more clarification prior to their implementation.

“Final overall index scores will be an aggregation of scores in the four priority areas. Overall scores place schools and districts within one of six categories:
- Significantly Exceeding Expectations
- Exceeding Expectations
- Meeting Expectations
- Not Meeting Expectations
- Significantly Below Expectations
- Persistently Failing to Meet Expectations”
(p 49-50 of the ESEA Flexibility Request).

How these categories are measured and what growth a school must demonstrate to move up or down between categories is undefined and needs clarification prior to the implementation of the accountability system.

School Choice Wisconsin does not support using a six-level continuum. The report card should implement a five-level continuum labeled with grades A through F. Creating a new syntax for a six-level continuum dramatically weakens its effectiveness in comparison to a letter grade that is already understood by parents and the public in general.

The goal is to give accurate, effective and impactful information on the report card. Using anything other than letter grades makes the report card less effective.

Student Attainment

“The attainment priority area is a composite of proficiency rates in reading and mathematics for the “all students” group on the Wisconsin Student Assessment System (WSAS). Proficiency rates will be calculated using a weighted average of the three most recent years of performance data. The weighting scheme gives a weight of 1.5 to the current year, a weight of 1.25 to the prior year, while two years prior receives a weight of 1.0. If a school has test data available for only the two most recent years, the most recent year is given a weight of 1.5, while the prior year is given a weight of 1.0, and the divisor becomes 2.5 rather than 3.75. If a school has only the most recent year of data available, only a single year of data is used to calculate the proficiency rate. The weighted
proficiency rate is then put back onto a 0-100 scale by dividing the weighted proficiency rate by 3.75. This calculation is done separately for mathematics and reading. Each school’s attainment score is an average of its weighted reading and mathematics proficiency rates.” (p 51 of the ESEA Flexibility Request).

School Choice Wisconsin understands from its active participation in the Accountability Task Force that initial identification of a school should only take place after three years of growth data are available and not before. Prior to the release of this waiver it was understood that a school would only be included in the state accountability system that had three years of measureable growth data. This suggests that schools with one and two years of data will also be included. Comparing one year of snapshot test scores to a school with three years of growth data is inaccurate and potentially misleading. As such, the reporting of this data needs clarification and correction.

Student Growth On Target To Move Up

“The growth measure proposed, on Target to Move up, is an adaptation of the principles behind Colorado’s “Catch up, Keep up, Move up” measures across multiple levels of achievement” (p 51-52 of the ESEA Flexibility Request).

While School Choice Wisconsin supports using growth data to measure student achievement, the “adaptation” method proposed by DPI is undefined and needs further clarification.

Additionally, it is unclear why DPI is proposing an adaptation to Colorado’s method, when the Value-Added Research Center in Wisconsin already has the information and calculates student growth data using the value-added growth method. Additionally, SCW supports the Value-Added Growth method to measure student growth data because it controls for student background demographics and characteristics, which is important measuring the achievement of schools in diverse city such as Milwaukee.

Closing Achievement Gaps

Attainment Gap (p54), The Growth Gap (p 55), The Graduation Gap (p 56)

School Choice Wisconsin supports closing all of these gaps in Wisconsin. We are especially supportive of including graduation rates in the report card and closing the graduation gap as studies show that graduation from high school is a significant quality of life indicator.

However, more specifics as to the weighting of categories needs to be clarified. Additionally, for private schools participating in parental choice programs it needs
to be clarified whether all student data at a school will be included or only data from students who participate in the parental choice program.

On-Track Status/Postsecondary Readiness (p 56)

On track Status (dropout rate, 3rd grade readiness, dropout rate)
Postsecondary Readiness (Attendance, ACT Performance and Participation, Graduation Rate, Dropout Rate)

School Choice Wisconsin is supportive of including all of these measures. Specifically, we are very supportive of weighting Graduation Rates at 60% of the priority area index score. However, for private schools participating in parental choice programs it needs to be clarified whether all student data at a school will be included or only data from students who participate in the parental choice program.

Advanced Placement—Star consideration

The process to determine Advanced Placement exam performance and participation is:

For Participation – to identify the number of students completing an Advanced Placement exam in a given year and divide that number by the total number of 9th thru 12th grade students in the school to arrive at the participation rate.

For Performance – to identify the number of Advanced Placement exams taken in a given year and dividing that by the number of exams passed with a score of 3 or above.” (p 58 of the ESEA Flexibility Request).

This section needs more clarification. The participation rate for Advanced Placement testing is likely to be extremely small for all schools making this measurement relatively meaningless. Additionally, many private schools participating in parental choice programs are unable to offer AP classes due to limited funding. However, while School Choice Wisconsin has reservations about measuring participation, SCW is potentially supportive of including a marker that identifies the number of Advanced Placement exams taken in a given year and dividing that by the number of exams passed with a score of 3 or above. However, the flag/star system needs further clarification.

2.C Reward Schools

An important aspect to the proposed waiver is the reward and recognition programs for high-performing schools.

“Reward schools are identified annually and fall into one of three categories: Exemplary Schools, Gap Closing Schools, and schools that are Beating the Odds.
Exemplary schools are those schools that earn an index label of Significantly Exceeding Expectations. These schools have earned a high index score and done so without any flags; they are models for the state and will be acknowledged as such.

Gap Closing Schools are those schools that are making significant progress toward closing achievement gaps. Identification of these schools will be based on the Closing Gaps priority area of the index.

Beating the Odds schools are calculated using current, Title I Schools of Recognition methodology. Only Title I eligible or receiving schools in the top quartile for poverty qualify for this reward. (p 14 of ESEA Flexibility Request).”

We believe that identifying and rewarding the states highest-performing schools to increase performance, emphasize and develop innovative instruction, and inform and support the dissemination of best practices. Therefore, School Choice Wisconsin is fully supportive of a statewide reward system.

However, while we are supportive of a statewide reward system, we expect that all schools will equal access to rewards and recognition programs whether they are government-run schools, charter schools or private schools participating in a parental choice program. In the proposed reward scheme, private schools serving high percentages of Title I students will be excluded from participation in all Schools of Recognition rewards and recognitions as private schools may not be identified as Title I schools. In this case private schools are subject to all the sanctions and none of the corresponding rewards proposed in the ESEA waiver. Further clarification is needed as to how the waiver will provide full access to private schools and private school teachers to reward and recognition programs available to government-run and charter schools.

2.D Priority Schools

“Priority Schools, as the lowest performing schools in the state, are identified using the Student Attainment portion of the accountability index. While DPI will identify at least 5% of Title I schools in the state, is to appropriately identify all low-performing schools as defined by the Wisconsin Accountability Index. Schools with the lowest scores in this area will be rank ordered. Schools falling below a certain cut point, which will be established as part of a standards setting process and posted publically, are identified as Priority Schools.

Wisconsin has been working to build a statewide accountability system, one that includes all traditional public schools as well as charter schools and private schools participating in the Parental Choice Program. However, until State funding is made available, only Title I funds are currently available to provide the interventions mentioned in section 2.D.iii (below), and as such those interventions will only be available for Title I schools (p 66-67 of ESEA Flexibility Request).”
School Choice Wisconsin supports the practice of identifying the lowest performing schools in the state as priority schools.

However, while we are supportive of priority schools identification across sectors, we expect that all schools will have equal access to funding to implement interventions whether they are traditional public schools, charter schools or private schools participating in a parental choice program. In the proposed reward scheme, private schools identified as priority schools will be excluded from all funding to implement interventions as private schools are not allowed to be identified as Title I schools. In this case private schools will be subject to all the sanctions but none of the corresponding intervention funding proposed in the ESEA waiver. Further clarification is needed as to how the waiver will provide full access to intervention funding available to government-run and charter schools.

“DPI will be using the ESEA flexibility as an opportunity to waive choice and supplemental education services (SES) from its current accountability system…”(p 67 of the ESEA Flexibility Request)”

“The district must submit a budget detailing funding sources and allocations to support the district’s plan. Districts may use the Title I 20% set aside, if they provide evidence of consultation with private schools, as these services will now be subject to equitable participation. (p 69 ESEA Flexibility Request)”

School Choice Wisconsin supports using the ESEA flexibility to waive choice and supplemental education services (SES) for its current accountability system.

However, we request that you include language in the ESEA waiver that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the private school Title I and Title IIA allocations prior to determining the funds it will dedicate to government school programs, including priority and focus schools.

Implementation of New Statewide Accountability System: 2013-On-going

DPI will provide targeted support to newly identified Priority Schools and Districts to improve implementation quality and student outcomes. The following sections describe the targeted systems of support and interventions provided to the state’s persistently lowest-achieving (p 69-70 of the ESEA Flexibility Request)

As defined on page 70 of the ESEA Waiver by footnote the following sections of 2D within the ESEA Waiver “summarize interventions in traditional public schools and districts” within the statewide accountability system and do not speak to “the interventions required of charter schools and private schools participating in the Parent Choice Program”.

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School Choice Wisconsin would restate that the following sections of 2D do not apply to private schools and that the Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

After Three Years of Implementation

Implementation of the processes and practices described throughout Section 2.D in schools statewide (as opposed to Title I schools only) will require additional state resources, including staffing and funding. Without additional state funding, DPI will continue to implement the Priority School reform efforts in Title I schools only. (p 73 of the ESEA Flexibility Request)

Whether or not the “implementation of the processes and practices described throughout Section 2.D” are implemented statewide and beyond Title I schools, the ESEA Waiver defines by footnote that section 2D within the ESEA Waiver “summarize(s) interventions in traditional public schools and districts” within the statewide accountability system and do not speak to “the interventions required of charter schools and private schools participating in the Parent Choice Program”.

School Choice Wisconsin would restate that sections 2D does not apply to private schools and that the Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

2.E Focus Schools

School Choice Wisconsin requests that a footnote be inserted on page 79 of the ESEA Waiver stating that section 2E “summarize(s) interventions in traditional public schools and districts” within the statewide accountability system and do not speak to “the interventions required of charter school and private schools participating in the Parent Choice Program”.

School Choice Wisconsin would restate that section 2E does not apply to private schools and that the Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state
intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

Flexibility in the Use of Title I Funds

The LEA will have the option to set aside up to 20% of its Title I dollars to fund the school reform plan. This option will ensure resources can be allocated to these schools’ improvement efforts. (p 83 of the ESEA Flexibility Request)

School Choice Wisconsin requests that language be included in the ESEA waiver that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the private school Title I and Title IIA allocations prior to determining the funds it will dedicate to government school programs, including priority and focus schools.

2.F Other Incentives and Supports for Title I Schools

Does not apply to private schools.

2.G Building SEA, LEA, and School Capacity to Improve Student Learning

“Due to constitutional limitations in private schools, the State Superintendent cannot direct specific programming or interventions within a private school” (p 107 of the ESEA Flexibility Request).

School Choice Wisconsin maintains that the above statement regarding constitutionality is correct and applies to Section 2G in its entirety. Unfortunately, the DPI proposals listed on page 107 and the following sections violate that statement.

School Choice Wisconsin maintains that options need to be presented to private schools after being initially identified as “Persistently Low Performing” that do not involve direct DPI interventions. SCW has in fact presented alternative language to DPI as possible and workable options which, to date, have not been inserted into the ESEA Waiver by DPI. As long as private schools participating in parental choice programs, identified as persistently low performing, improve to meet established and equitable benchmarks with equitable timetables to do so, the mechanism by which they achieve those results should be flexible and constitutional.

The Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic
reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

“Therefore, when a choice school is initially identified as being among the persistently lowest performing schools in the state,..

It is important to note that a “choice school”, as such, does not exist. Rather there exist only private schools that participate in parental choice programs.

School Choice Wisconsin understands from its active participation in the Accountability Task Force that initial identification of a school should only take place after three years of growth data are available and not before. Prior to the release of this waiver it was understood that a school would only be included in the state accountability system that had three years of measurable growth data. This suggests that schools with one and two years of data will also be included. Comparing one year of snapshot test scores to a school with three years of growth data is inaccurate and potentially misleading. As such, the reporting of this data needs clarification and correction.

“The choice school must enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years.”

It is important to note that a “choice school”, as such, does not exist. Rather there exist only private schools that participate in parental choice programs.

While the requirement of a performance agreement with DPI has potential constitutional issues, if a performance agreement with a private entity were an option, there are still problems with the requirement as “…annual state-approved performance targets that demonstrate substantial academic improvement…” is undefined. There is no detail as to what these standards are, if they are subject to change, what criteria was used for their creation and if they will be assigned equally to the government-run, charter and choice sectors.

“Wisconsin’s new accountability system will provide a single statewide system that will impact all schools. Currently, the system is primarily linked to Title I, as there is no funding/consequences at the state level for non-Title I schools. The new system will look at all schools, including charter schools and schools participating in the Parental Choice Program, and hold the same standard of accountability for all schools, statewide” (p 110 of the ESEA Flexibility Request)

“Due to constitutional limitations in private schools, the State Superintendent cannot direct specific programming or interventions within a private school”, therefore a new accountability system must be created that seeks to achieve common improvements and common minimum results across sectors, but it is not possible or
constitutional to create single and standard statewide method of achieving those improvements and results across the sectors.

Again, School Choice Wisconsin maintains that options need to be presented to private schools after being initially identified as “Persistently Low Performing” that do not involve direct DPI interventions. SCW has in fact presented alternative language to DPI as possible and workable options which, to date, have not been inserted into the ESEA Waiver by DPI. As long as private schools participating in parental choice programs, identified as persistently low performing, improve to meet established and equitable benchmarks with equitable timetables to do so, the mechanism by which they achieve those results should be flexible and constitutional.

The Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.


Does not apply to private schools
January 13, 2012

Superintendent Anthony Evers
Wisconsin Department of Public Instruction
125 South Webster Street
Madison, WI 53703

Re: Wisconsin’s ESEA Flexibility Request - Students with Disabilities

Dear Superintendent Evers:

We are writing to provide input on the waiver request which the State of Wisconsin intends to submit to the U.S. Department of Education which will outline changes to our state’s accountability plan under federal education law. As a statewide coalition comprised of groups interested in quality education outcomes for all students, but particularly those with disabilities, we have been following Wisconsin’s Accountability Design Team process and have both suggestions and concerns. Note that our recommendations closely mirror those provided to you by Disability Rights Wisconsin and the Wisconsin Board for People with Developmental Disabilities on October 28, 2011.

As you are aware, the Elementary and Secondary Education Act (ESEA) has provided important accountability for the achievement of students with disabilities. Any new flexibility in Wisconsin’s system should continue to adequately protect the rights of students with disabilities. In addition, while this waiver plan is important, we continue to believe that well-trained teachers, robust curriculum and quality instruction, particularly in the area of reading, is the key to closing the achievement gap and improving outcomes for students with disabilities.

We hope you will consider and include our feedback in the waiver request as part of the state’s requirement for meaningful engagement from diverse communities, including those who represent critical subgroups.

State-Based System of Recognition, Accountability and Support

We support a strategic accountability evaluation tool that drills down to pinpoint the root of an achievement gap for an identified subgroup. Data for any subgroup must be disaggregated to the greatest degree (e.g. IDEA category) allowing for targeted evidence-based intervention.

Wisconsin’s waiver request should include a statement regarding how Wisconsin will provide meaningful access to the general education curriculum for students with disabilities, including targeted guidance by DPI to result in more accurate reporting of Indicator 5: Participation/Time in General Education Settings (LRE). Given the importance of the link between a student’s performance and his or
her access to the general education curriculum, Indicator 5 should not only reflect where a child is physically present, but how the child is given meaningful access to general education curriculum. Wisconsin’s guidance should make it clear that a child’s placement is defined through their program of study to reflect the content that peers without disabilities are learning at that time.

Plan to Improve Instruction
Universal Design for Learning should be a component of Wisconsin’s plan to address the needs of diverse learners across issues related to access to college and career ready standards; professional development; instructional materials and access and design of college preparatory courses.

High Quality Assessments
Wisconsin should ensure a 95% participation rate in state assessments, disaggregated by subgroup population. Wisconsin should continue its policy of not using the 2% flexibility which allows the shielding of performance of students with disabilities. Like Florida, Wisconsin’s application should include a statement ensuring that assessment items will be developed using universal design principles and provide for accommodated versions of items when necessary, allowing valid use of these measures for the broadest possible group of students, including English language learners and students with disabilities. Wisconsin’s application should adopt and implement the accommodations policy developed by the Race to the Top Consortia.

Growth Models
Wisconsin’s waiver request should include growth models with have the ability to demonstrate growth for all students, including those using alternative assessments. The models should support accelerated growth toward proficiency for students with disabilities to address the achievement gap.

Subgroup Size
Wisconsin’s current N size is far too large at 40 and is not appropriate for students with disabilities in smaller school districts. We appreciate your recent assurances that Wisconsin will now propose changing the accountability cell size from 40 to 20. However, we agree with Disability Rights Wisconsin and the Wisconsin Board for People with Developmental Disabilities that in a state like Wisconsin with many rural school districts, that an N size of 10 is actually a more accurate reflection of student performance and note that several states with more rural populations currently use an N size of 10.

Annual Measurable Objectives (AMOS)– Performance Targets
We recommend that the state consider a flexibility option which would allow Wisconsin to create AMOS which could allow for an accelerated proficiency plan for students with disabilities. A mere extension of the proficiency timeline is not appropriate for students with disabilities who have been experiencing the achievement gap.

Student Subgroups Reported for Accountability Purposes
We appreciate your intent to include disaggregated subgroup accountability for reporting purposes as opposed to moving to a system focused on a lowest-performing subgroup. We believe it is important to continue to disaggregate data by disability subgroup and we suggest that Wisconsin drill down to IDEA disability category. We share your concerns that without requiring accountability for specific subgroups the disability subgroup in some schools may be too small to trigger accountability concern.

Definition of Reward Schools
A high performing school should only be labeled as such when the school can demonstrate it is closing significant achievement gaps for all subgroups, including students with disabilities. DPI should include in its waiver request a plan to facilitate the intentional sharing of best practices and mentoring by high performing schools which serve students with disabilities well with those schools which are identified as needing support.

**Interventions when Subgroups are Not Performing**
A strategic accountability evaluation tool which identifies the root of an achievement gap within a clearly defined subgroup must trigger a set of questions accompanied by a set of evidence-based interventions. Interventions should be accessible to students with disabilities.

**Graduation Rates**
The definition used for Wisconsin’s graduation rate should continue to be calculated by those graduating under Sec. 118.33(1), Stats. Data collection for Indicator 14: Participation in Postsecondary Settings One Year After Graduation must be improved to secure a statistically relevant response rate for each disability subgroup and we should better understand outcomes for students based upon diploma/certificate category.

**School-Wide Reforms**
Wisconsin’s process for building school capacity should include the earlier referenced strategic accountability evaluation tool which would encourage and support the school-wide implementation of evidence-based practices which benefit all students – including those with disabilities: Universal Design for Learning; Response to Intervention; Positive Behavioral Intervention and Supports.

**Teacher and Principal Evaluation**
Any evaluation tool should include an evaluation of a general educator’s capacity to support a particular subgroup which is experiencing an achievement gap. Wisconsin accountability measures in this category will influence and incent teacher and administrator degree programs in higher ed.

**Items for Follow-up by DPI**
1. We note that the waiver proposal will be posted for public comment prior to January 21. QEC members request a meeting with DPI to discuss the proposal in-person, prior to formal submission. In particular, we would like to review and discuss DPI’s required implementation plan which will outline how the state intends to enhance the quality of instruction for students with disabilities.
2. QEC representatives request to be included in the development of any strategic evaluation tool that would highlight gaps which can be addressed through evidence-based practices.
3. QEC requests an update on Wisconsin’s assessment development, including alternative assessment development.
4. As a statewide coalition representing a variety of organizations, QEC not only requests that this feedback be included as a part of required stakeholder input, but that QEC members should be formally invited to participate in ongoing conversations as Wisconsin implements approved waiver provisions.

We look forward to continuing dialogue with you about this important issue.

Sincerely,
s/Jeffrey Spitzer-Resnick

Chairperson

The Quality Education Coalition (QEC) is Wisconsin’s only coalition of parents, educators and advocates, that works together to improve the quality of special education in Wisconsin on a systemic basis. QEC works on a wide variety of issues which affect the quality of special education delivered to children with disabilities in Wisconsin.
To: Wisconsin Department of Public Instruction
From: Peggy Krusick
Date: February 3, 2012
Subject: Wisconsin ESEA Waiver Proposal Recommendations

- **College Readiness**
  Students start applying to colleges in the first semester of their senior year. College admission departments are reviewing the acceptance of students based on their most recent test scores which is usually at the end of their junior year. Students can wait until after their first semester senior year grades are recorded to apply but by this time much of the scholarship and grant money has been delegated, at least for private colleges. The monies are given on a “first come, first serve” basis so it is prudent to apply early. The eleventh grade is too late to take the Smarter Test. Problem areas need to be assessed by the student’s sophomore year in order to make important changes for their crucial junior year GPA.

- **District Accountability**
  Parents need to have school accountability not only on the district level but for individual schools as well. Choices are made between specific schools within a school district at the elementary level. Performance data for each school would give parents the tools to decide where to enroll their child for their foundational years.

- **Life Skills**
  Practical life skills are critical. A required personal finance class would give a child a basic tool for balancing their finances. Also, obesity is becoming an epidemic for our youth. Keeping required physical education classes benefit the body as well as the mind.

- **Similar Standards for Voucher Schools**
  Require licensure for teachers in choice schools as required for public schools. Taxpayers pay for voucher schools. The voucher schools should be held to the same standards as public schools. Teacher evaluations (examining MAP assessments as well) should be required for choice schools for the same reason.

- **Test Results Reported as a Percentage**
  Redesign the way WKCE scores are reported to parents by including current information along with the percentage of questions each pupil answered correctly for each core subject and area under that core subject.
• Test Results in Paper Form
   Many parents are busy and need to have practical information that is easy to retrieve. The test scores must be made available in paper form to every parent twice during an academic school year and up to four times during an academic school year upon parent request. Test scores must be given in paper form to any other interested persons upon request within ten business days. Test results must be broken down by school, grade and subject and areas underneath subjects. Provide parents in paper form with the last five years of any standardized tests given including the medium/mean WKCE in percentiles for each subject/subject area and Iowa test scores in percentiles for each subject/subject area. There must not be any arbitrary categories. Also, provide parents ACT scores by grade and subject and percentage of students taking advanced placement classes and pass rate in paper form. And, provide parents MAP assessment or any other assessment test scores by grade and subject in paper form. Failure to comply with academic performance facts on a school would render the school or district ineligible for state and federal monies.

• Support Services for all Students
   Schools must provide intervention and support services for all students regardless of whether they are free or reduced lunch.

• Creative Skills
   Art, music and theater help students creatively problem solve in their future career. Cutting edge companies excel in creative intelligence.
The following pages include testimony from a joint hearing of the Wisconsin State Legislature, held on February 2nd, 2012. Documents and positions included here are in reference to the Department of Public Instruction’s waiver draft released for public comment on January 23, 2012.
I want to thank Chairperson Kestell and Chairperson Olsen for the opportunity to talk to you and members of your committees about the Department of Public Instruction’s (DPI) proposed Elementary and Secondary Education Act (ESEA) waiver request.

The last reauthorization of the ESEA, also known as the No Child Left Behind Act (NCLB), was in January of 2002. Since that time the legislation’s intent to increase student and school performance has not been realized due to overly prescriptive language which prohibits creative reforms that would help more students gain the skills needed for further education and the workforce. For instance, the ESEA’s main approach to accountability is very narrow in its limited examination of proficiency in a given year with no attention to growth and its creation of a single pass/fail measure of school performance. This pass/fail measure is called adequate yearly progress (AYP). It is a measure that does nothing to identify specific needs in low performing schools or exceptional success in high performing schools.

Since it is unclear when, or if, Congress will reauthorize ESEA, we feel it is imperative to seek a waiver from the U.S. Department of Education (USDE) for flexibility regarding aspects of the law so we can increase rigor across the standards, assessments, and an accountability system that will result in improved instruction and improved student outcomes.

USDE has laid out what provisions states must address in any waiver request. All requests must address how states will use flexibility to implement a statewide accountability system that addresses four principles:

- College- and career-ready expectations for all students.
- State-developed differentiated recognition, accountability, and support.
- Supporting effective instruction and leadership.
- Reducing duplication and unnecessary burden.

DPI posted a draft of our waiver proposal on January 23 for public review and comment. This draft is the based on months of work by the department with numerous stakeholders including the department’s work and involvement with the Accountability Design Team chaired by the State Superintendent, the Governor, Senator Olsen, and Representative Kestell and including Senator Cullen and Representative Pope-Roberts. We could not thank them more for their time and commitment to that process. The two week public comment period on the draft will end at the end of the day tomorrow, after which DPI will refine the proposal and submit to the United Stated Department of Education by February 21, 2012.

A primary reason for the federal Department of Education to offer an opportunity to apply for this flexibility is to allow states an opportunity to unify existing state and federal accountability systems. In Wisconsin, we are looking to build a statewide system, one that holds all schools that receive public funds accountable to the standards and expectations of the system. However, while our vision is for a statewide system encompassing all schools, it is important to note that the ESEA flexibility pertains to Title I schools only using Title 1 funds. There are no additional funding sources available from the Department
of Education for activities proposed by states in their waiver proposals, nor for state-developed accountability systems that reach beyond Title I schools.

Our waiver proposal is built around two key goals, raising rigor and personalizing learning. We need to be able to meet and exceed international standards and change expectations. In order to this we have to provide a statewide system of support for our schools and districts. In other words, our accountability planning is about more than just a labeling system. A labeling or rating system alone doesn’t do anything to move the needle. We need to provide the diagnostic tools and supports to provide schools with the additional capacity to make changes that lead to improvement.

As I mentioned earlier, the Accountability Design Team recommendations provided the critical foundations for much of what you see in the waiver request including input about what it means to be college and career ready; identification of four key priority areas for an accountability system; and specifications for reporting school performance, including reporting both student growth and student attainment in our system.

Going back to the four principles that USDE requires us to address, you will see some significant changes that will affect schools and districts.

**Principle 1: Adopting College and Career-ready Expectations for All**
In order to ensure Wisconsin graduates are prepared for success in college and career, DPI is raising standards and thinking differently about assessment and graduation requirements. Specifically:

- **We have adopted the Common Core State Standards (CCSS), which will be fully implemented and assessed starting in 2014-15 school year.**

- **Proficiency on CCSS will be measured by new assessment systems.**
  - These assessment systems are being developed by the SMARTER Balanced Assessment Consortium (replacing the WKCE) and the Dynamic Learning Maps Assessment (replacing the WAA-SwD).
  - The new assessments will be online, guaranteeing faster turnaround of results for teachers, students, and families. Both assessments will be field tested in 2013-14 and required statewide in 2014-15.

- **Until the SMARTER test is operational, we will be raising expectations by piloting a different way of evaluating WKCE proficiency.**
  - Specifically, we will use cut scores based on the National Assessment of Educational Progress (or NAEP)—the Nation’s report card—to measure proficiency on the WKCE.
  - This cut score change will result in a drop in proficiency rates, at least in the short term.
  - DPI fully intends to provide resources to support districts with this transition. Resources will include sample letters to parents explaining the change, press release info, and media outreach from DPI.

- **In order for growth to be measured at the high school level and to collect data that will inform students, parents, and educators about how on track they are toward college and career, DPI is recommending use of the EXPLORE-PLAN-ACT + WorkKeys package (the ACT suite) and will request funding to support administration of the assessments statewide in the 2013-15 biennial budget.**

- **Graduation requirements will be raised at the state level**
  - New graduation requirements will include 3 credits of mathematics; and 3 credits of science, engineering or technology (with 2 of those years as traditional science or science equivalency courses); and 6.5 elective credits.
This represents a change from requiring a minimum of 13 credits for graduation to requiring 21.5 credits for graduation, which is in line with national averages and current local practices regarding total credits required for graduation.

- DPI is developing plans for a Standards, Instruction, and Assessment Center that will produce high-quality, classroom-level instructional materials for teachers and educational leaders.
  - The resources the SIA Center produces will directly address instruction and assessment of the Common Core State Standards and will target support to classroom educators and educational leaders.

**Principle 2: State-developed Differentiated Recognition, Accountability, and Support**

The accountability system being proposed provides meaningful results to inform differentiated recognitions, intervention, and support. Specifically, the accountability system:

- Holds schools accountable according to the four Priority Areas identified by the School Accountability Design Team
  - **Student Achievement**
    - This area looks at performance on the WKCE and the alternate assessment for reading and mathematic for all students.
  - **Student Growth**
    - **DPI’s approach is based on individual student growth, looking at student growth percentiles.** Districts are awarded ‘credit’ for students’ growth within proficiency categories (like growth from the lower end of basic to almost-proficient), and between proficiency categories. As such, the growth calculation differentiates school performance in which schools with more low-performing students have more room to grow and can earn more points. Of course, schools still get credit for students who maintain proficiency and who move from the proficient to the advanced category. In other words, all growth is accounted for, but schools with the most room to grow can earn more credit.
    - **We are committed to providing reports to schools/districts that include both student growth percentiles, and value-added reports developed in collaboration with VARC.** We believe that multiple perspectives are important to understanding growth. The ESEA accountability waiver specifies that a growth model that controls for student characteristics, like value-added models, may not be used for federal accountability purposes. Basically, with what we have proposed, we're complying with current requirements and staying open to possible adjustments in the future.
  - **Closing Achievement Gaps**
    - **Here we are looking at three types of gaps that we know we have: attainment gaps; gaps in rates of growth (which acknowledges that lower attaining students must grow at higher rates in order to catch up); and graduation rate gaps.** In order to do this we will compare each race/ethnicity subgroup to the highest performing subgroup; students with disabilities to students without disabilities; economically disadvantaged students to non-economically disadvantaged students; and English language learners to non-English language learners.
  - **On-track to graduation and Postsecondary Readiness**
    - **This is primarily at attendance for elementary and middle schools, but in the future, we intend to include assessments in other content areas like science and course-taking.**
    - **For high schools, this includes attendance, graduation rates, and participation and performance on the ACT.**
• In the future, we’d like the postsecondary readiness indicator to include measures of postsecondary enrollment and retention, as well as important indicators about access to careers, the military, and industry certifications.

- The accountability system ensures that all students are counted by including smaller populations in our calculations.
  - Specifically, a cell size of 20 will be used for calculations. This is a change from 40. What this means is that more students will be accounted for in accountability calculations.

- Classifies schools along a continuum of performance that will replace our current AYP pass-fail system.
  - Schools will receive scores for each priority area and an overall index score of 0-100 that places schools within one of six categories:
    • Significantly Exceeding Expectations
    • Exceeding Expectations
    • Meeting Expectations
    • Not Meeting Expectations
    • Significantly Below Expectations
    • Persistently Failing to Meet Expectations

- DPI will intervene or require certain changes in schools that are persistently low-performing or have persistently significant achievement gaps. Interventions are based on a differentiated system whereby schools complete a diagnostic review of their practices to identify key needs and strategies for improvement.
  - The waiver requires us to identify the lowest performing Title I schools in the state, and those that have persistent gaps between subgroups. The accountability index will be used to make these Title I designations and meet this federal requirement.
  - Public schools that are identified as the lowest performing schools will be required to implement one of two options:
    1. They could conduct a diagnostic review with an external expert and develop a reform plan based on this review. The school must contract with a state-approved turnaround partner to implement reform plans that focus on improving core instruction in reading and mathematics.
    2. The school may choose to close.
  - Charter and Choice schools that fall into this designation will have three options.
    1. Have the same option as traditional public schools to conduct a diagnostic review.
    2. Charter schools can choose to close and choice schools to be removed from the program.
    3. Enter into a performance agreement with DPI to meet annual performance targets approved by the State.

- Schools that have persistent gaps between subgroups will be required to develop school reform plans and work closely with the Wisconsin Response to Intervention (RtI) Center to implement these improvement plans.

- DPI will build a Statewide System of Support for all schools.
  - This includes online resources, required in some instances of identification but available to any school wishing to conduct a self-assessment or continuous improvement planning.

- Districts will be identified for improvement in two ways: if the overall index scores fail to meet expectations at all three elementary, middle, and high school levels; or if the district has any schools with the Persistently Failing to Meet Expectations designation.
  - For districts identified for improvement, DPI may require a contracted expert to complete a diagnostic review at the district level to evaluate critical systems and structures within the district’s central office that include human resources, curriculum and instruction, finance, leadership.
Based on diagnostic review the State Superintendent may direct reform at the district level. Districts would work closely with the district assigned turnaround expert in implementing the required reforms.

In all cases, districts will be the entry point for school improvement and district reform.

- **In Priority schools failing to make adequate progress after three years, the State Superintendent will intervene to appoint a special master that may direct school board to open the school under a contract with a successful charter management organization, or close.**

**Principle 3: Supporting Effective Instruction and Leadership**

This portion of the waiver is based on the work of the Educator Effectiveness Design Team which produced the Wisconsin Framework for Educator Effectiveness, the primary purpose of which is to support a system of continuous improvement of educator practice—from pre-service through service—that leads to improved student learning. The system was designed to evaluate teachers and principals through a fair, valid, and reliable process using multiple measures across two main areas: educator practice and student outcomes.

Here are some main points of the system:

- All educators will be included in the evaluation system.
- Both principal and teacher evaluations will include multiple measures of educator practice and student outcomes. Educator practice will count for half of the evaluation; student outcomes will count for the other half of the evaluation.
- The measures used will differ for teachers of English language arts and mathematics than for teachers of other subject areas.
- The evaluation system will include formative (ongoing) and summative (once-a-year) elements, both to be directly linked to the educator’s professional development plan.
- The system will be fully implemented in the state by the 2014-15 school year.

The Department of Public Instruction has the goal of producing a waiver request that accurately reflects the thoughtful input, recommendations, and compromises of the many groups and individuals that have been involved in the accountability reform process. This includes the recommendations of the Educator Effectiveness Design Team, the School Accountability Design Team and other stakeholder groups representing parents, classroom educators, school and district administrators, students with disabilities, English language learners, business leaders, philanthropic organizations, and community groups.

Additionally, we want to make sure we also take into account input from the general public. To date, DPI has received nearly 600 survey responses on the waiver via our Web site. We look forward to adding any additional comments received here today into that public record. The final waiver request will then address ways in which public input resulted in changes to our proposal.

Thank you and I would be happy to answer any questions you may have.
Accountability Reform Overview

This overview describes the changes to Wisconsin’s accountability system outlined in the Department of Public Instruction’s (DPI) draft waiver proposal for ESEA flexibility.

ESEA Flexibility Waiver

The U.S. Department of Education (USED) has offered states the opportunity to apply for flexibility on certain provisions of the federal Elementary and Secondary Education Act (ESEA, currently known as NCLB, the No Child Left Behind Act). States’ proposals must demonstrate how they will use this flexibility to implement the following principles:

- College- and career-ready expectations for all students,
- State-developed differentiated recognition, accountability, and support,
- Support for effective instruction and leadership, and
- Reduced duplication and unnecessary burden.

DPI will post a draft waiver proposal on January 23 to elicit feedback. There will be a two-week public comment period, after which DPI will refine the proposal and submit to USED by February 21, 2012. Changes affecting schools and districts are included in this overview.

College and career ready expectations for all students

Expanding upon “Every Child a Graduate” to focus on increasing expectations that ensure Wisconsin graduates are prepared for success in college and career, DPI is raising standards and making changes to assessment and graduation requirements.

Standards & Assessments

- Full implementation of Common Core State Standards (CCSS): Instruction based on CCSS must be in place by the 2014-15 school year. Assessment of CCSS proficiency will begin in the 2014-15 school year.
- New Assessment Systems: Proficiency on CCSS will be measured by new assessment systems being developed by the SMARTER Balanced Assessment Consortium (replacing the Wisconsin Knowledge and Concepts Examination [WKCE]) and the Dynamic Learning Maps Assessment (replacing the Wisconsin Alternate Assessment for Students with Disabilities [WAA-SwD]). Both assessments will be field tested in 2013-14 and required statewide in 2014-15. Beginning in 2014-15, these state assessments will move from fall to spring, and the high school assessment will move from grade 10 to grade 11. Both assessments will be given in grades 3-8 and 11. These online assessment systems will include end-of-year tests, as well as additional resources to help benchmark student progress throughout the year.
Raised Expectations: The proficiency level on the SMARTER test will be benchmarked against national and international standards. As a transition, the WKCE will use cut scores based on the more rigorous NAEP scale to calculate proficiency in reading and mathematics.

- 2011-12: Current WKCE cut scores for proficiency remain in place for accountability. Begin process to convert WKCE cut scores, working collaboratively with DPI’s Technical Advisory Committee. Begin field testing NAEP cut scores on the WKCE.
- 2012-13: Finalize NAEP cut scores following field test results. Make adjustments to accountability calculations if found to be necessary in the evaluation. NAEP cut scores on WKCE will be used for accountability determinations in Spring 2013.

College and Career Readiness: DPI is proposing use of the EXPLORE-PLAN-ACT + WorkKeys package (the ACT suite) and will request funds in the Wisconsin 2013-15 biennial budget to support administration of these assessments statewide. The data gathered from these assessments enable academic growth to be measured throughout high school. Results also inform students, parents, and educators about the extent to which students are on-track for college and career. These assessments are supplemental to the 11th grade SMARTER assessment, which will be used to measure proficiency on the CCSS beginning in 2014-15.

English Language Proficiency: DPI and World-Class Instructional Design and Assessment (WIDA), housed at the University of Wisconsin-Madison, lead a consortium to develop a new English language proficiency assessment for English Language Learners (ELLs). The project, Assessment Services Supporting ELLs through Technology Systems (ASSETS), will develop an online assessment system that measures student progress in attaining the English language skills needed to be successful in K-12 and postsecondary studies, and work. ASSETS will replace the ACCESS for ELLs assessment currently used in Title III accountability in 2015-16.

Graduation Requirements

- State graduation requirements will increase to include these specified 15 credits:
  - 4 credits of English language arts
  - 3 credits of mathematics (an increase from two years)
  - 3 credits of science, engineering or technology with two of those years as traditional science or science equivalency courses (an increase from two years)
  - 3 credits of social studies
  - 1.5 credits of physical education
  - .5 credit of health education
- In addition, DPI recommends putting into statute an additional 6.5 elective credits for graduation, as recommended by the State Superintendent last year. It is also recommended that innovative dual enrollment programs be increased.
- These recommended requirements would result in a total of 21.5 credits necessary for graduation, which aligns to national averages and current local practice. This is a floor requirement as many districts will continue to require more credits, and most graduates will complete more credits than the new requirement in statute.
- These requirements will be in effect for students in the four-year adjusted cohort expected to graduate in 2016-17, pending legislation on graduation requirements.
State-developed differentiated recognition, accountability, and support
With the goal of developing a statewide accountability system that increases student achievement and promotes and supports school improvement across the state, DPI worked with a state-wide school accountability design team, other stakeholders, and the Technical Advisory Committee to establish accountability measures that 1) are fair; 2) raise expectations; and 3) provide meaningful measures to inform differentiated recognitions, intervention, and support.

Comprehensive Statewide Accountability System
- Wisconsin's accountability system will include all schools receiving public school funds. This includes Title I schools, non-Title I schools; district, non-district, and non-instrumentality charter schools; and private schools participating in the state Parental Choice Program.
- Full implementation of this accountability system beyond Title I schools is pending based on funding and legislative changes that may be required.

Accountability Index
- Beginning in 2012-13, a comprehensive accountability index will replace the current ESEA Adequate Yearly Progress (AYP) system. The index approach uses multiple measures and classifies schools along a continuum of performance.
- Schools and districts will be held accountable for outcomes in four priority areas:
  o Student attainment
  o Student growth
  o Closing achievement gaps
  o On-track to graduation and postsecondary readiness
- Index scores will be provided for each of the four priority areas.
- In addition to the index scores, schools and districts will be held accountable for three specific performance expectations:
  o Test Participation (elementary, middle, high school) – when test participation rates fall below an acceptable level, it impacts the comparability of a school's assessment results. Unacceptable test participation rates will result in missing this specific performance expectation.
  o Dropout rates (middle and high school) – the goal of all students graduating prepared for college and careers requires improved academic performance and retention of students in school. High dropout rates, regardless of school performance, will result in missing this specific performance expectation.
  o 3rd grade reading (elementary) – reading on-grade-level by third grade is considered a key transition point and essential to later academic success; low performance on this indicator will result in missing this specific performance expectation.
- Overall accountability scores will be a combination of priority area scores, adjusted for any missing performance expectations, on an index of 0-100.
Accountability Ratings

- Accountability index (0-100) will place schools and districts into one of six categories along the performance continuum:
  - Significantly Exceeding Expectations
  - Exceeding Expectations
  - Meeting Expectations
  - Not Meeting Expectations
  - Significantly Below Expectations
  - Persistently Failing to Meet Expectations

- Cut points for each category will be established through a standard setting process recommended by DPI’s Technical Advisory Committee (TAC).

- Rating categories will also include Priority, Focus and Reward schools, which are designations for subsets of Title I schools, as required in the waiver.

<table>
<thead>
<tr>
<th>Accountability Rating</th>
<th>School Type</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Significantly Exceeding Expectations</strong></td>
<td>Eligible to be a Reward School</td>
</tr>
<tr>
<td></td>
<td>Includes Title I, non-Title I, charter, and Parental Choice Program (private voucher) schools</td>
</tr>
<tr>
<td><strong>Exceeding Expectations</strong></td>
<td>Eligible to be a Reward School</td>
</tr>
<tr>
<td></td>
<td>Includes Title I, non-Title I, charter, and Parental Choice Program (private voucher) schools</td>
</tr>
<tr>
<td><strong>Meeting Expectations</strong></td>
<td>Eligible to be a Reward School</td>
</tr>
<tr>
<td></td>
<td>Includes Title I, non-Title I, charter, and Parental Choice Program (private voucher) schools</td>
</tr>
<tr>
<td><strong>Not Meeting Expectations</strong></td>
<td>Title I Focus Schools</td>
</tr>
<tr>
<td></td>
<td>Includes other Title I, non-Title I, charter, and Parental Choice Program (private voucher) schools</td>
</tr>
<tr>
<td><strong>Significantly Below Expectations</strong></td>
<td>Title I Focus Schools</td>
</tr>
<tr>
<td></td>
<td>Includes other Title I, non-Title I, charter, and Parental Choice Program (private voucher) schools</td>
</tr>
<tr>
<td><strong>Persistently Failing to Meet Expectations</strong></td>
<td>Includes Title I Priority Schools</td>
</tr>
<tr>
<td></td>
<td>Includes other Title I, non-Title I, charter, and Parental Choice Program (private voucher) schools</td>
</tr>
</tbody>
</table>

*Title I “Focus” schools, a requirement of the federal waiver, will be identified from within these two categories. Title I schools in these categories must represent a minimum of 10% of all state Title I schools.

**Current School Improvement Grant (SIG) schools will remain in this category and will be part of Title I “Priority” schools. The number of Title I schools identified as Priority must represent a minimum of 5% of all state Title I schools.
Annual Measurable Objectives (AMOs)

- AMOs currently in place under NCLB will be used for 2011-12, including the scheduled increases for Reading and Mathematics:
  - 85% school attendance rate (elementary and middle schools)
  - 85% graduation rate, or 2% increase in graduation rate, or 5% increase if below 70% (high schools)
  - 87% of students scoring proficient or higher on WSAS Reading
  - 79% of students scoring proficient or higher on WSAS Mathematics
- Use of the accountability index, applying cut scores based on NAEP to the WKCE, and new baselines for AMOs will be in place for 2012-13 accountability determinations.
- Each school and district will have an individualized AMO to move them to meet or exceed expectations and to not miss any of the three performance expectations (test participation, dropout rate, 3rd grade reading).
- For schools and districts that are not meeting expectations, their AMOs will reflect the growth required to meet expectations within four years.
- A school or district cannot be in the top three categories if it missed its AMO or has missed any of the performance expectations (test participation, dropout rate, 3rd grade reading). A school or district cannot be in the top category (Significantly Exceeding Expectations) if scoring low in any of the four Priority Areas.

Subgroup Accountability

- A cell size of 20 students will be used for all accountability calculations, a change from 40 students. (For public reporting not related to accountability, DPI applies a cell size of 10.) Reducing the cell size to 20 allows schools, districts, and the state to identify subgroups that may be struggling but would not be reported under larger cell size rules.
- The accountability index is designed to emphasize the performance of every subgroup. The four priority areas and index will prevent small subgroup performances from being masked.

Accountability Reporting

<table>
<thead>
<tr>
<th>Year</th>
<th>Assessment</th>
<th>Scale used for accountability</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011-12</td>
<td>WKCE</td>
<td>Final year for current WKCE performance levels; begin field testing of cut scores based on NAEP</td>
</tr>
<tr>
<td>2012-13</td>
<td>WKCE</td>
<td>Use cut scores based on NAEP on WKCE student reports, and for school and district accountability report cards</td>
</tr>
<tr>
<td>2013-14</td>
<td>WKCE</td>
<td>Continue using cut scores based on NAEP for WKCE and accountability report cards</td>
</tr>
<tr>
<td></td>
<td>SMARTER Assessment Field Test Dynamic Learning Maps Field Test</td>
<td>Field test SMARTER and Dynamic Learning Maps assessments and define performance cut scores to be used across all participating states</td>
</tr>
<tr>
<td>2014-15</td>
<td>SMARTER Assessment System Dynamic Learning Maps</td>
<td>Fully implement SMARTER and Dynamic Learning Maps assessment system with consortia-defined performance cut scores</td>
</tr>
</tbody>
</table>
- DPI will field test new school and district report cards based on the accountability index, prior to implementing them statewide.

**District Accountability**

- Currently, district accountability is based on the aggregate of all district students within three separate levels: elementary, middle, and high school. This will continue, with an accountability index score calculated for each of the levels.
- The district AMO is to meet or exceed expectations at all three levels—elementary, middle and high school—and to have no schools in the Persistently Failing to Meet Expectations category.
  - If the aggregate scores for the district fail to meet expectations at all three levels, the district will miss the AMO. Additionally, districts will receive an unacceptable-performance flag if they have any schools in the Persistently Failing to Meet Expectations category and will miss the AMO.
- For districts missing the AMO at all three levels—elementary, middle and high school—a district-level diagnostic review must be completed to evaluate critical systems and structures within the central office, including but not limited to human resources, curriculum and instruction, finance, and leadership. The State Superintendent may direct reform at the district level.
- If all three levels—elementary, middle and high school—fall into the Persistently Failing to Meet Expectations category, the State Superintendent will direct reform at the district level.

**Support and Intervention**

- **Overall Approach**
  - DPI will identify both high and low performing schools, but will focus interventions and supports on the lowest performing schools in the state.
  - Support and interventions will match the severity and duration of identified problems.
  - Districts will be the entry point for school improvement and district reform.
  - DPI will establish one statewide system of support for all public-funded schools, pending funding and legislation. This replaces the current system of supporting only the lowest-performing Title I schools.

- **Schools Persistently Failing to Meet Expectations**
  - This includes all Title I Priority Schools (at least 5% of all Title I schools in the state), and other non-Title I schools as determined by the accountability index.
  - For Title I schools, beginning in Fall 2012, the mandate of Supplemental Education Services (SES) under NCLB will no longer be required. In lieu of these requirements, districts will be required to submit a plan detailing the extended learning opportunities for eligible students. Parent consultation in the development of the plan must be documented. The plan must be approved by DPI.
  - Public schools must participate in a comprehensive, on-site diagnostic review to pinpoint problem areas, followed by development of an improvement plan aligned to the findings in the diagnostic review. The plan must be approved by DPI. Schools must contract with a state-approved turnaround expert/vendor to implement reform plans aligned to the
diagnostic review. Improvement plans must focus on improving core instruction in reading and mathematics.

- For public schools that do not participate in the diagnostic review, improvement planning and interventions with turnaround experts, they will close.
- For schools that do participate but fail to show demonstrable improvement after three years, the State Superintendent will intervene. Pending legislation, in the case of schools participating in the Parental Choice Program, the state will remove the school from the program. In the case of charter schools, the authorizer must revoke the charter.
- Specific interventions will vary depending on school type (public, parental choice, charter) and on the needs of the school and their specific performance indicators. Examples include extended learning time, targeted reading and mathematics supports, professional development and implementation assistance.
- Supports will include online resources, and technical assistance from the Wisconsin Response to Intervention (Rti) Center, Cooperative Education Service Agencies (CESAs), and DPI staff.
- DPI will conduct multiple onsite visits each year to monitor progress.

- **Schools Below Expectations, and Significantly Below Expectations**
  - This includes all Title I Focus Schools (at least 10% of all Title I schools in the state), and other non-Title I schools as determined by the index.
  - For Title I schools, beginning in Fall 2012, the mandate of Supplemental Education Services (SES) under NCLB will no longer be required. In lieu of these requirements, districts will be required to submit a plan detailing the extended learning opportunities for eligible students. Parent consultation in the development of the plan must be documented and provided upon approval by DPI.
  - Public schools must participate in an online district-directed diagnostic review of the current core reading and math curriculum including interventions for struggling students. The school must develop an improvement plan based on the diagnostic review, and implement Rti, working closely with the Wisconsin Rti Center. Specific interventions in the plan must address identified problem areas. The plan must be approved by DPI.
  - DPI will conduct electronic reviews of each school's progress and monitor throughout the year.

- **Schools Meeting Expectations, Exceeding Expectations, and Significantly Exceeding Expectations**
  - Resources will be electronically available to all schools in the state that wish to conduct a diagnostic review to self-assess or establish a plan for continuous improvement.
  - Supports will include online resources, and technical assistance from the Wisconsin Response to Intervention (Rti) Center, CESAs, and DPI staff.
School Recognition
- The top performing schools will be publicly recognized.
- The Wisconsin Schools of Recognition Award will be expanded to include non-Title I schools, and to include schools making progress in closing gaps. There will be three types of awards:
  - Exemplary Schools: schools falling into the Significantly Exceeding Expectations category (i.e., schools with a very high index score and no unacceptable-performance flags)
  - Schools that “beat the odds”: Title I eligible and receiving schools that are in the top quartile of poverty for the state and show high achievement
  - Progress Schools: schools that are successfully closing gaps
- The state will look to a sample of high performing schools to identify best practices and share statewide, particularly with those schools not meeting expectations.
- Schools selected for recognition must meet their AMO and not miss any of the three performance expectations (test participation, dropout rate, and 3rd grade reading).

Support for effective instruction and leadership
The primary purpose of the Wisconsin Framework for Educator Effectiveness is to develop a system of continuous improvement of educator practice—from pre-service through service—that leads to improved student learning. The system established by the Educator Effectiveness Design Team was designed to evaluate teachers and principals through a fair, valid, and reliable process using multiple measures across two main areas: educator practice and student outcomes.

- All public school teachers and principals will be included in the evaluation system.
- Both principal and teacher evaluations will include multiple measures of educator practice and student outcomes. Educator practice will count for half of the evaluation; student outcomes will count for half of the evaluation.
- The evaluation system will include formative and summative elements, and will link directly to the educator’s professional development plan.
- The system will be fully implemented in the state by the 2014-15 school year.
- Individual educator ratings are confidential and will not be publicly reported.

Reduced duplication and unnecessary burden
DPI is aligning a number of efforts to reduce duplication and unnecessary burden on districts. District data collection will be streamlined as a result of the transition to a statewide student information system (SSIS). Methods of making data available directly to districts, as well as to the public, will be localized and made more timely through the SSIS and a new reporting system called the Wisconsin Information System for Education dashboard (WISEdash).

- Single Statewide Student Information System: Districts will begin transitioning to a single student information system in Fall 2012. There is a five-year implementation timeline for this system, which will reduce duplication of reporting efforts, increase timeliness of data access, and allow districts more time to focus on using data to inform important educational decisions.
- **Single Accountability Reporting System:** WISEdash, a single reporting system for school/district accountability reporting, will include a plethora of pre-defined and user-defined reports including student growth percentiles, enrollment, course-taking, postsecondary enrollment, literacy, and more. WISEdash will be released initially in secure format only (i.e., for authorized district personnel to use via a login); eventually WISEdash will also house public reports and replace DPI's current public data reporting systems.

- **Consolidated Reporting Requirements:** School- and district-required performance reports will be replaced by new school and district report cards, allowing these reporting requirements to be met without the need for districts to create separate reports.

### Stakeholder Involvement

- **Involvement during development:** Changes to Wisconsin's accountability system described in this document are the result of much deliberation and collaboration with stakeholders. The work of the School & District Accountability Design Team, as well as input from various educational stakeholders, informed the design of this new accountability system. DPI will continue to engage stakeholders throughout the state as this system develops.

- **Public Survey:** A brief electronic survey is posted with the draft waiver request [insert URL]. DPI is conducting this survey to gather public feedback and guidance on Wisconsin's ESEA waiver request. Survey results will be summarized and included with the final waiver request. Where possible, adjustments and clarifications to the waiver request may be made as a result of this stakeholder feedback.
Wisconsin Legislative Hearing on NCLB Waiver
February 2, 2012

Allan Odden
Strategic Management of Human Capital (SMHC)
University of Wisconsin-Madison

Waiver Expectations

- Designed to modify several glitches with the NCLB accountability requirements, and
- Continued pressure to move states towards more aggressive education reforms and real accountability
- Fabulous that Wisconsin is at the table as it had been reluctant in recent past to embrace these new accountability issues
Cudos

- Collaboration among DPI, legislature and governor
- Many, many topics in document
- Terrific the state will move to the NAEP proficiency standards
- Terrific that there is a robust proposal for school-based accountability
- Terrific progress on educator effectiveness/evaluation elements and I will comment only on them

State Action on Teacher Evaluation

- About 2/3 of the states engaged in changing how teachers are to be evaluated
- All require a combination of indicators including:
  - Measures of instructional practice – at least 50%
  - Student achievement data
    - State accountability test data – 3+ years of data
    - Other test data, that usually can include short cycle assessment data
  - Short cycle can comprise up to 35% of the data on student learning, so are important options
Wisconsin' Proposal Similar

- Educator practice is 50% of the score
  - Multiple observations

- Student data is another 50% to include
  - State accountability tests – revision of WKCE, given spring to spring means need 4 years to get three years of growth
  - Other local assessments – benchmark (like NWEA MAP), short cycle, SLOs

Possible Changes for Efficiency

- Educator practice is 50% of the score
  - No need to start from scratch on the rubrics for the data – several rubrics have already been developed
    - Most also have been validated by the Gates Foundation MET study
  - Multiple live observations with pre- and post-observation conferences will be VERY expense and require a squadron of observers
For the Educator Practice Measures

- For rubrics:
  - Use a system that is part of the Gates study because they have been validated
- Consider videos instead of observations
  - Being developed both by TeachScape as part of the Gates MET program and by TNTP
  - Easy to obtain
  - Only need trained scorers
- Consider requiring fewer observations, like 3, but embedded in one integrated curriculum unit — so an observation/video at the beginning for direct instruction, one in the middle, and one at the end when the teacher is having students apply the concepts and knowledge to novel situations

Possible Changes for Efficiency

- Think hard about devolving details to each local district or consortia of districts
  - These systems are VERY hard to design and implement; most states struggling to design, pilot and implement
  - Few districts or regions have the expertise or resources to develop and implement these systems on their own
  - State should want a substantial common core so when the results are used for key decisions — licensure, tenure (continuing contract), promotion, dismissal, compensation — districts are using comparable metrics.
Use of the Evaluation Metrics

- Lots of language that the evaluation system is part of the development system – fine but:
  - Make sure there is an aligned robust educator development system that doesn’t depend on the evaluation system
  - Danger of using the evaluation results to pinpoint remediation for teachers – a concern
  - Difficulty of using the generic rubrics to imply training for content specific instruction
  - Think of the evaluation system as aligned with the development system but not a central part of it, because ...

Use of the Evaluation Metrics

- The evaluation system is meant to be used for key decisions and need more than 3 levels:
  - For key decisions about teachers (principals) such as licensure, tenure (continuing contract), promotion, dismissal, compensation, etc.
  - Level 1 – initial licensure
  - Level 2 – 3-4 years later, “developing,” professional licensure, and then the tenure clock starts
  - Level 3 – another 3-4 years, tenure, effective
  - Level 4 – Advanced Professional
  - Level 5 – Accomplished professional
Think Now About Combining Multiple Measures of Teaching Performance

- Standard Prescription:
  Instructional practice measure (e.g., teacher evaluation ratings) + Gain, growth, student growth percentiles, or value-added based on state standards-based assessments

Issues in Combining Practice & Student Achievement Measures

- But...... the practice measures and the student performance data have:
  - Different Distributions
  - Different Scales
  - Different Reference Points

- So much thought needs to be given to how they will be combined and into how many levels of effectiveness and used for what
### Scales, Distributions, & Reference Points for Value-Added vs. Practice

![Normal Distribution](image)

### Putting Practice Ratings and Student Achievement on the Same Scale

**Emerging Practice: Rescale growth, gain or value-added measure to match the practice rating scale**

- Standardize & set cut-off points in units of standard error, standard deviation or percentiles

<table>
<thead>
<tr>
<th>Category</th>
<th>In S.D. Units</th>
<th>Percentiles</th>
</tr>
</thead>
<tbody>
<tr>
<td>Extraordinary (5)</td>
<td>&gt;2.0 S.D. Above Mean</td>
<td>85th +</td>
</tr>
<tr>
<td>Advanced (4)</td>
<td>1.5-2.0 S.D. Above Mean</td>
<td>70th – 85th</td>
</tr>
<tr>
<td>Effective, Professional (3)</td>
<td>0.0-1.5 S.D. Above Mean</td>
<td>50th to 70th</td>
</tr>
<tr>
<td>Developing (2)</td>
<td>Up to 1.5 S.D. below Mean</td>
<td>31st to 50th</td>
</tr>
<tr>
<td>Basic (1)</td>
<td>1.5 - 2 S.D. Below Mean</td>
<td>15th to 30</td>
</tr>
<tr>
<td>Unsatisfactory</td>
<td>&gt; 2 S.D. Below Mean</td>
<td>Below 15th</td>
</tr>
</tbody>
</table>
### Conjoint Model for Combining 2 Measures

<table>
<thead>
<tr>
<th>Teaching Practice</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>4 = Advanced</td>
<td>2</td>
<td>2</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>3 = Proficient</td>
<td>2</td>
<td>2</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>2 = Basic</td>
<td>2</td>
<td>2</td>
<td></td>
<td>4</td>
</tr>
<tr>
<td>1 = Unsatisfactory</td>
<td></td>
<td></td>
<td>2</td>
<td>2</td>
</tr>
</tbody>
</table>

### Conjoint Model for Combining 3 Measures

<table>
<thead>
<tr>
<th>To Get a Summary Rating of</th>
<th>Need Scores of at Least:</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 = Accomplished</td>
<td>4 on all measures</td>
</tr>
<tr>
<td></td>
<td>2 on the practice measure and 4 on both the student achievement measures</td>
</tr>
<tr>
<td>3 = Effective</td>
<td>2 on the practice measure and 3 on both the student achievement measures</td>
</tr>
<tr>
<td></td>
<td>- or - 3 on the practice measure and 3 on at least one of the student achievement measures</td>
</tr>
<tr>
<td></td>
<td>2 on the practice measure and 2 on either of the student achievement measures</td>
</tr>
<tr>
<td></td>
<td>1 on the practice measure and 1 on either student achievement measure</td>
</tr>
</tbody>
</table>
Use Metrics for a New Salary Schedule

- Current salary structures are unaligned with current education goals
  - Years of experience not linked to greater effectiveness after the first 3 years
  - Nothing in the structure that signals the need to improve instructional practice
  - No pay element linked to student learning gains
  - So current pay system not linked to core system goals – improved learning and teaching

Create New Salary Structures

That trigger base pay increases on a validated metrics of teaching effectiveness:
- Link pay levels with teacher performance levels – levels of instructional performance to the system's view of effective instructional strategies
- Augment with bonuses based on student learning gains, for both teachers and principals
- Augment with incentives for teachers in subject shortage areas, and in high need schools
- Prime funding source is current teacher salary budget
Aspects of this New Structure

- Major pay increase is based on metrics of instructional effectiveness – 10, 15 and 20 % Some step increases, if wanted – 1.5 %
- Pay can top out at different effectiveness levels if instructional effectiveness does not increase
- Can include wage premiums for math, science, high need school, MA/Doctorate, and National Board Certification
- Needs operating and transition rules
  - Key principle: move everyone on at current pay level, i.e., no one loses pay in the transition
Summary

1. Measure teaching effectiveness with BOTH measure of teaching practice and impact on student growth
2. Produce 4-5 teacher performance levels
3. Have a multi-level state licensure system provide the rigorous external measures and combine more informal elements in the local evaluation system
4. Ensure all elements are linked to student growth
5. Use for licensure, tenure, promotion, measuring distribution, salary, dismissal
6. Make the system as efficient as possible

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Statement of
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Associate Dean for Research, School of Education
Director, Wisconsin Center for Education Research
University of Wisconsin-Madison

At the
Joint Informational Hearing of the
Wisconsin Senate and Assembly Committees on Education

February 2, 2012
Chairman Olsen, Chairman Kestell, and other members of the Senate and Assembly Committees on Education, thank you for this opportunity to discuss Wisconsin’s request for a waiver from certain requirements of the federal No Child Left Behind Law. My goals in these remarks are to explain why a waiver is essential for our state, and why this particular waiver, if achieved, would advance the cause of education reform in the State of Wisconsin.

My name is Adam Gamoran, and I served with Chairmen Olsen and Kestell on the Design Team for Wisconsin’s new school accountability system, a major source of input to the NCLB waiver request. My statement is based not only on that experience, but also on my expertise in education research over a career of 27 years at the University of Wisconsin-Madison, in which I have focused on efforts to improve performance and reduce learning gaps in U.S. schools from early education to the postsecondary level. I am an elected member of the National Academy of Education and have served on a variety of national education panels. Currently I am a member of the National Research Council’s Board on Science Education. Recently I chaired the Independent Advisory Panel of the National Assessment of Career and Technical Education, and I also served a term as an appointed member of the National Board for Education Sciences. At UW-Madison, I am the John D. MacArthur Professor of Sociology and Educational Policy Studies, director of the Wisconsin Center for Education Research, and Associate Dean for Research in the School of Education.

Why a Waiver is Needed

The No Child Left Behind Act (NCLB) had some successes, but it has fallen far short of its goals, and its demise is imminent. No Child Left Behind is failing because it set unrealistic expectations and failed to distinguish between effective and ineffective schools, and because its strategies for improvement were poorly and inconsistently implemented. Here in Wisconsin, we can do better.

Prior to NCLB, neither U.S. education policy nor Wisconsin state policy held schools accountable for students’ test results. NCLB, which required states to set achievement targets for students and to hold schools and school districts accountable for reaching these targets, was the culmination of two decades of increasing emphasis on higher standards in education. It was passed with strong bipartisan support, as Republicans and Democrats alike supported the twin goals of raising achievement overall and reducing achievement gaps.

Accomplishments of NCLB

Two important accomplishments were evident for NCLB early on. First, NCLB has highlighted inequalities among demographic groups. In the past, schools had been able to hide the low performance of disadvantaged groups behind a high overall average. That is no longer the case, as schools are held accountable for the success of all demographic groups. Of course, shining a spotlight on inequalities is not the same as reducing inequalities. Recognizing a problem, however, may be the first step towards addressing it.
Second, the increasing standards mandated by NCLB have apparently motivated teachers and principals to seek new ways of promoting higher achievement among their students. On surveys, teachers reported that they have responded to NCLB with efforts to identify new teaching methods and materials that will boost their students’ test scores. Also, educators have indicated that the curriculum has become more rigorous as a result of accountability pressures. This is precisely the sort of incentive that the designers of NCLB had hoped to create.

**Failures of NCLB**

Despite these accomplishments, NCLB has not come close to its goals. One reason is that NCLB’s strategies for improvement have been poorly implemented. To take one example, NCLB requires schools that missed their achievement targets for three successive years to offer tutoring to low-achieving students. Yet only about 20% of eligible students receive such tutoring, and even among those who do, attendance is poor, the size of groups being tutored is often large (e.g., 8-10 students instead of 1-3), there is inconsistent coordination between tutors and teachers, and the qualifications of tutors are variable and unregulated. As a result, even though tutoring can be a powerful strategy for helping low achievers catch up to their peers, tutoring has made little difference under NCLB. Other improvement strategies such as hiring highly qualified teachers, promoting school choice, selecting instructional strategies based on research evidence, and restructuring schools, have also been weakly implemented.

Another reason NCLB cannot meet its goals is that it is not designed to distinguish between effective and ineffective schools. Under NCLB, students in grades 3-8 are tested each year in reading and mathematics. Each state designs its own test and determines what score on the test counts as “proficient” in the subject area. Some states have adopted easy tests and some state tests are harder; these contrasts are evident when one compares performance on each state’s own test to performance on the National Assessment of Educational Progress (NAEP), a test given every two years in reading and math (and less frequently in other subjects) to a sample of students in grades 4, 8, and 12 in each state. NCLB requires states to increase year by year the percentage of students in each school who meet the proficiency threshold, so that by 2013-2014, 100% of students are proficient. Schools that fail to meet their proficiency targets are said to not make “Adequate Yearly Progress,” and are subject to an increasing regimen of sanctions the longer they fail to hit their increasingly difficult targets.

This approach identifies schools where test scores are low, but it does *not* identify schools that are ineffective. Achievement test scores are responsive to many conditions, some of which schools can control, and many of which they cannot. NCLB holds schools accountable for student performance *at a given point in time*, instead of focusing on *how much progress schools make with students over time*. So, a school whose students have low test scores when they enter may not be counted as making “Adequate Yearly Progress,” even if individual students are improving at a relatively high rate. In this way, NCLB mixes up effective and ineffective schools.

To illustrate this point, consider Figure 1, taken from a public report on school performance in Madison middle schools, compared to schools across Wisconsin. The vertical axis ranks Madison middle schools on the percentage of students scoring proficient, while the horizontal
axis ranks schools based on how much they contribute to *increases* in student performance. Some schools, with low average test scores have high levels of growth; these schools are being sanctioned under NCLB, when in fact they should be praised for their progress. James Wright Middle School stands out as an example in Figure 1: although it had the lowest percentage of students proficient among middle schools in the city, it was one of the most effective in elevating student performance from lower to higher levels.

**Collapse of NCLB**

Whatever the accomplishments of NCLB, its demise is imminent. This is because it is tied to the unrealistic goal of 100% of students performing at the "proficient" level by 2014. The goal is unrealistic for two reasons. First, only a portion of student performance is subject to the influence of educators. As many writers have explained, schools contribute to student performance, but so do families, neighborhoods, and any other experiences students have outside of school. Second, while student test scores have risen since the introduction of NCLB, the rise is not nearly steep enough to meet the pace demanded by NCLB. As of 2010-2011, about half of U.S. schools were failing to make Adequate Yearly Progress. The proportion varied greatly from state to state. Part of the state-to-state differences reflect how students are performing, but mostly they reflect differences in the difficulty of the state assessments and in how rapidly the states have escalated the percent of students who must be proficient in order for a school or district to be counted as having met AYP. Wisconsin, for example, had in 2010-2011 the lowest proportion in the nation of schools failing to make AYP. This is not because our students perform at high levels, but because the target for percent proficient was set at a relatively easy level and has advanced slowly.

Even in Wisconsin, however, virtually all schools will soon be failing AYP. Figure 2 shows the percent of students scoring proficient in grade 4 reading, alongside the percent required to be proficient to make AYP, between 2001-02 and 2009-10. About 80% of fourth graders statewide scored proficient on the reading assessment in 2002-2003, a figure that has hardly wavered during the past 7 years. Yet nearly all schools met the proficiency standard required for AYP because the target was set low enough, and has risen gradually enough, to accommodate this flat performance trend. From 2002 to 2010, the AYP standard rose by 6.5 percentage points every three years. Beginning in 2010, schools are required to increase their percent of students by 6.5 percentage points every year to reach the target of 100% by 2014. In light of past performance, this appears utterly unrealistic.

Figure 2 also depicts the performance of a sample of Wisconsin fourth graders on the NAEP. The percentage of students scoring proficient has remained flat on this assessment as well, but at a much lower level. The contrast between statewide percent proficient on the state test and on the NAEP reveals that Wisconsin has a relatively easy test, or sets its proficiency target at a relatively low level. Many other states – indeed, those with low numbers of schools that have failed AYP – exhibit the same pattern. But even states like Wisconsin will soon have nearly all schools failing AYP, because even their tests are not easy enough to have all students scoring proficient.
In contrast to reading, Figure 3 shows that the percentage of Wisconsin fourth graders scoring proficient in mathematics has risen over time, from 71% in 2002-2003 to 80.5% in 2009-2010. Nonetheless, the same phenomenon will occur as in reading, that is, virtually all schools will fail AYP due to NCLB’s artificial and unrealistic demands for percent proficient after 2010.

Thus, not only have the accomplishments of NCLB been limited, but the accountability system will shortly fail, as nearly all schools are unable to meet AYP. A system in which no participant can meet the standard is useless for accountability because it means that the rewards associated with success and the sanctions linked to failure no longer provide incentives for improving performance.

NCLB was scheduled for reauthorization in 2007. Congress has had five years to correct these problems, but it has yet to act. As a result, the Secretary of Education plans to use the authority given to him under the law to waive the unrealistic requirements of NCLB for states that agree to put into place a rigorous and in some ways more far-reaching accountability system, yet one that is more flexible and which focuses on the real problems of school improvement.

**Why This Waiver Will Advance Education Reform in Wisconsin**

Wisconsin’s Department of Public Instruction has taken advantage of this flexibility to propose a new accountability system for Wisconsin. Not only does the waiver request respond to the requirements of the U.S. Department of Education, but it proposes an approach that will serve the children and families of our state in a way that is far better than our current system of education accountability.

I will not review the entire waiver request, but I will make five points about its strengths that have led me to recommend that this waiver be pursued.

1. **Use of a Better Assessment**

   Any test-based accountability system is only as good as the test upon which it relies. Wisconsin’s waiver request proposes to move to the SMARTER Balanced assessment as soon as it becomes available in 2014. This will provide a deeper and richer assessment of student performance compared to our current assessment, the Wisconsin Knowledge and Concepts Examination. Perhaps more importantly, the new assessment will have higher standards for judging success than we are currently using, bringing Wisconsin in line with other states and with high-performing nations around the world in setting high standards for our students.

2. **Assessment of Educator Effectiveness**

   To obtain a waiver, states are required to devise an approach for measuring the performance of educators, and to hold educators accountable for results. Wisconsin’s approach will use test scores, but not only test scores. Under the waiver, Wisconsin would use a balanced approach to judging effectiveness, including observations of practice as well as impact on student achievement.
3. A Focus on Growth as well as Status

The school accountability system proposed for the NCLB waiver focuses on achievement growth as well as where students are at a given point in time (status). So, a school such as the James Wright Middle School in Madison, which serves a disadvantaged population, could demonstrate its success by making progress with low achievers, now that it will no longer have to reach completely unrealistic targets in an absolute sense. Schools will also get credit for closing achievement gaps and for keeping students on track to graduate high school on time.

For technical reasons which I have communicated separately to DPI and have included as an appendix to my written statement, I believe DPI has not chosen the best available approach to measuring achievement growth. But any approach that takes growth into account is much better than the approach we are currently using under NCLB.

4. Every Student’s Test Scores Matter

In a system solely focused on hitting an achievement target, the students who matter the most are those whose scores can be elevated from slightly below to slightly above the target. Wisconsin’s waiver request will make every student’s score important, because every student can contribute to the measure of achievement growth over time.

Many other states are proposing to drop their attention on student demographic categories to focus solely on low achievers. I think this is a poor decision and I am glad to see that Wisconsin is not pursuing that route. Achievement gaps by race, ethnicity, income level, language minority status, and disability status are the most challenging education issue of our time, and it is essential that we continue to focus on that challenge – as Wisconsin’s waiver request proposes.

5. Targeting Interventions to Where They Are Needed Most

NCLB mixes up effective and ineffective schools and as a result, schools that perform well may still be sanctioned if their students start out with low achievement levels. By focusing on achievement growth as well as status, Wisconsin’s waiver would sort this out. Moreover, the waiver request would target interventions to where they are most needed, that is, schools in which achievement is persistently low and little growth occurs.

Conclusion

With the collapse of NCLB on the horizon, we face a clear choice: develop a new approach to accountability, or abandon accountability altogether. In the absence of changes at the federal level, it is left to the states to devise an appropriate response. In my judgment, Wisconsin’s waiver request will allow us to maintain the advantages of education accountability while overcoming many of the flaws of NCLB.

The State of Wisconsin has a long history of leading the nation in designing innovative social programs. Our contributions to national welfare reform are well known, but the history is much

[Wisconsin] has become literally a laboratory for wise experimental legislation aiming to secure the social and political betterment of the people as a whole...The Wisconsin reformers have accomplished the extraordinary results for which the whole nation owes them so much, primarily because they have not confined themselves to dreaming dreams and then to talking about them. They have had power to see the vision, of course; if they did not have in them the possibility of seeing visions, they could accomplish nothing; but they have tried to make their ideals realizable, and then they have tried, with an extraordinary measure of success, actually to realize them.

With this waiver request, Wisconsin becomes a leader in designing an accountability system that is fairer, more accurate, and therefore more useful in advancing the cause of educational progress and equality. We should pursue it with all vigor.
Appendix: Approaches to Measuring Achievement Growth for School Accountability

Wisconsin proposes to assess achievement growth for school accountability using an approach known as Student Growth Percentiles (SGPs). SGPs identify differences among schools in changes in the percentile rankings of students who attend them. SGPs are a useful descriptive tool. However, they have three weaknesses that limit their value for an accountability system.

1. No adjustment for measurement error

Achievement tests are an imperfect gauge of student performance. Accuracy can be improved with statistical techniques that adjust for measurement error, that is, adjustments that incorporate uncertainty about how well student performance has been measured. Under the proposed waiver, achievement growth will become part of a high-stakes accountability system, and it should be as accurate as possible. Adjusting for measurement error improves the accuracy with which school contributions to student growth are assessed.

2. No standard errors

When measuring school contributions to achievement growth, it is important to estimate not only the effects of schools, but how precisely those effects are measured. Standard errors are the usual way to gauge precision. Without standard errors, educators are left without knowledge of how precisely their contributions have been measured. Is there a high or a low degree of accuracy? Absent this information it is hard to have confidence in an accountability system.

3. No accounting for large vs. small schools

In calculating changes in student percentile rankings, the SGP approach does not take account of whether a school estimate is based on many data points, or only a few data points (i.e. many students or few students). In a school with few data points, estimates can be pulled in one direction or another by just a few cases. SGPs try to deal with this problem by focusing on medians rather than means. A more sophisticated approach is to produce “shrinkage” estimators, which adjust each school’s estimate according to its precision. School effects that are especially imprecise (generally because they are estimated on few data points) are “shrunk” towards the overall mean as a way of adjusting for imprecision. This is a standard feature of multilevel statistical modeling (modeling achievement of students within schools) that helps improve precision, but SGPs do not incorporate this feature.

Value-Added Models to Measure Achievement Growth

Value-added models are a widely used alternative to SGPs. They do not share these weaknesses: sophisticated value-added models adjust for measurement error, generate standard errors, and adjust estimates of school effects according to their precision. Many value-added models also control for student demographics (e.g., race, free lunch, etc.), but that is not permitted under the NCLB waiver. It is important to note that (a) demographic controls are not necessary features of value-added models and (b) value-added models without demographic controls are superior, for the reasons above, to SGPs (which also do not use demographic controls).
Further Reading

Note: Portions of these remarks are adapted from A. Gamoran, The future of U.S. educational inequality: Will better measures and more accountability make a difference? Forthcoming in Revue Française de Pédagogie.

Also see:


Figure 1. Madison, WI Middle Schools Ranked on Growth (horizontal axis) versus Absolute Performance (vertical axis)

Quadrant Table from the State VA Model
Middle School Math, MMSD Schools vs. State Average

Figure 2. Adequate Yearly Progress and Proficiency Rates in Grade 4 Reading in Wisconsin

Percent Proficient

Sources: Wisconsin Department of Public Instruction; National Center for Education Statistics
Figure 3. Adequate Yearly Progress and Proficiency Rates in Grade 4 Mathematics in Wisconsin

Percent Proficient

Sources: Wisconsin Department of Public Instruction; National Center for Education Statistics
Testimony of Mary Bell, WEAC President,  
before the Senate and Assembly Education Committees  
February 2, 2012  
ESEA Waiver

Thank you for holding this hearing and inviting public testimony on Wisconsin’s request for a waiver from several provisions in the federal Elementary and Secondary Education Act (ESEA) commonly referred to as “No Child Left Behind.” My name is Mary Bell. I am a library media specialist and English teacher currently serving as the president of the Wisconsin Education Association Council, the largest union of education employees in the state.

Our union of educators supports efforts by State Superintendent Tony Evers to find a better way to measure how all of Wisconsin’s schools are performing to ensure accountability because all children should have outstanding educational opportunities. Through a series of forums around the state last fall, we were pleased to add the voices of educators and community residents offering input on how the state might approach increasing childhood literacy, developing a fair and reliable way to evaluate teachers and principals, and pursuing an accountability system that reflects what Wisconsin citizens value in their schools. Education policy proposals are strengthened when those who work in our classrooms and interact with students are part of the conversation.

This waiver application is an improvement over the No Child Left Behind (NCLB) Act with its overemphasis on student testing and impossible proficiency standards that set all schools up for failure. The waiver provides useful information for teachers and administrators to quickly identify and help struggling students. That’s important, because under the current system students are tested in the fall but educators do not see their results until the following spring. Under NCLB, schools that fail to make Adequate Yearly Progress face sanctions that are more focused on punishing than improving schools, like replacing staff and reconstituting schools, among other actions. Make no mistake, Wisconsin’s waiver application is aggressive, as schools that are persistently low-achieving and do not make improvements will be closed. But, in contrast to NCLB, the waiver is solutions-based, designed to make all schools better, and targets resources to where they are needed most.

Under NCLB, we have also seen schools and districts narrowing their curriculum to focus on tested subject areas at the expense of other areas – art, music, health, physical education, career and technical education, and other important components of a well-rounded education. Clearly, NCLB needs to be changed.

The plan by the Department of Public Instruction (DPI) for the NCLB Flexibility Waiver brings more balance to the state’s accountability system as it establishes an index to track schools in four priority areas: 1) student attainment; 2) student growth; 3) closing achievement gaps; and 4) on-track to graduate and post-secondary readiness. In addition, three performance expectations will be factored into the new accountability index: 1) test participation; 2) dropout rates; and 3) 3rd grade reading. The priority area scores will be factored together with the performance expectations to provide an accountability score for a school on an index from 1-100.

The waiver request also reduces the cell size from 40 students to 20 students for accountability calculations which will better identify groups of students who may be struggling but were not reported under the old system. The new reporting system will require school districts to better identify groups of students and areas where learning gaps may

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exist so that they address the learning needs of all students. With these changes, improved professional development is important. To be successful, teachers will need more common planning time where they can work together on strategies to ensure student success.

In addition, in the waiver request, Wisconsin will move away from the Wisconsin Knowledge and Concepts Exam (WKCE) and the Wisconsin Alternative Assessment and toward the new SMARTER Balanced Assessments and Dynamic Learning Maps. These new tests include a variety of assessments at the classroom, school and district levels to provide schools and educators with data throughout the academic year. Teachers will then be able to use this timely data to inform their instruction and guide learning interventions. School districts can use the data to target professional development and ensure an accurate measure of each student’s progress. Again, professional development will be important here.

Notably, all schools receiving public funds, including Title I schools, non-Title I schools, charter schools and voucher schools are subject to the proposed new state accountability system. Over the years, WEAC has advocated for holding all taxpayer-supported schools to the same standards and to assess them in the same way so it is easier for parents and the community to make "apples to apples" comparisons. If our state is serious about pursuing a comprehensive accountability system that assesses whether the education needs and achievement goals of all students are being met, voucher and charter schools must be included along with traditional public schools. To do anything less would shortchange students, parents, local communities, and our state.

Of course, student test scores and graduation rates are only one part of the picture. While these outputs are important markers, they do not tell us what we need to do to improve school performance. Efforts to improve school quality must identify variables internal to the process of education itself that are directly related to student learning. These inputs include teacher quality, professional development, the availability of subject-specific specialists, class size, tutoring and other academic supports, and a rich curriculum.

As we traveled the state last fall in our Speak Out for Public Education forums, parents told us that when it comes to measuring schools and holding them accountable, they wanted to know about programs in art, music, physical education, world languages, and similar opportunities. These programs contribute to student achievement and build a well-rounded education. (A summary report and video outtakes from our conversations with communities across the state can be found by visiting www.weac.org/speakout). An accountability system that only focuses on outputs and disregards inputs is unbalanced. We sincerely hope a holistic approach that includes both outputs and inputs will be included in the state’s final waiver application.

For an accountability system to be successfully implemented, resources must be available. For instance, it takes staff time and costs money to carry out the proposed on-site diagnostic reviews and targeted intervention. To fund data collection systems that trigger labeling of schools, but not invest in solutions and interventions, would only repeat past mistakes from the flawed NCLB.

I applaud State Superintendent Evers and the Department of Public Instruction for offering an NCLB waiver request that is thoughtful, honors and reflects the work of diverse taskforces, and seeks to improve instruction and student outcomes. I hope any potential legislation introduced in conjunction with the state’s waiver application equally embraces the deliberative work of the task forces and reflects what truly makes a difference for our children.
WEAC and AFT Recommendations to State Superintendent Tony Evers

November 21, 2011

The Wisconsin Education Association Council (WEAC) and the American Federation of Teachers, Wisconsin, (AFT) submit the following recommendations to the Governor’s School Accountability Task Force. The recommendations are informed by a series of eight public events held around the state entitled Speak Out for Public Schools: The ABC’s of School Accountability. The Speak Out events were promoted and open to the public. Local media were invited and attended each of the events. They occurred in Eau Claire, Weston (DC Everest), Superior, Reedsburg, Oshkosh, South Milwaukee, Kenosha and Green Bay. The events started on September 20th and concluded on November 8th.

More than 500 Wisconsin parents, community members, teachers, support professionals and school officials attended the events. The events were organized around four discussion areas: school programs and services, student achievement, teaching effectiveness and parent/community involvement in schools. The discussions were conducted in small groups of six to ten participants. Small group discussions were led by local volunteers. The format was designed to allow individuals ample opportunity to voice their opinions and to suggest ideas not specifically addressed by the discussion questions. Individual responses to questions were collected and tabulated.

Additional conversation and input was generated through an online Facebook page at www.facebook.com/SpeakOutWisconsin. Review of Facebook discussions served as an additional basis for the recommendations.

The recommendations offered by WEAC and AFT are:

- **Recommendation #1**: Wisconsin should create a holistic system of school accountability.
- **Recommendation #2**: Wisconsin should develop specific criteria for assessing non-tested subject areas.
- **Recommendation #3**: Wisconsin should assess key indicators of school quality, including class size, the quality and availability of staff professional development programs, the availability of vital student support services and school climate.
- **Recommendation #4**: Wisconsin should link educator evaluation systems to professional development programs that promote teaching effectiveness.
- **Recommendation #5**: Wisconsin should provide parents with access to meaningful information regarding the strengths and weaknesses of their schools.
Recommendation #1: Wisconsin should create a holistic system of school accountability.

Issues surrounding school and teacher accountability are being discussed with increasing frequency nationally, with many states contemplating and even enacting new systems and measures. When asked about accountability, Wisconsinites who attended the statewide series of listening sessions identified breadth of curriculum and student support services as some of the most important qualities they value in their schools. And, regarding school improvement and teacher effectiveness, participants identified class size, school environment (climate) and professional development as key areas that mattered most.

Many of these measures fall on the input side of the school equation, and stand in contrast to the standard set of outputs (test scores, disaggregated test scores and graduation rates) that have come to dominate school accountability. Outputs are important markers, but they do not tell us what we need to do to improve school performance. Efforts to improve school quality must identify variables internal to the process of education itself that are directly related to student learning. These inputs include teacher quality, professional development, the availability of subject-specific and developmental specialists, class size, tutoring and other academic support services for students, and effective school leadership, to name but a few.

The question before us today is how to build an accountability system that balances the measure of vital inputs (programs and services for children) with standard output measures. How, in other words, can we build an accountability system that actually measures the programs and services that the public values most?

Parents and community members attending the listening sessions identified art, music, foreign language, and career and/technical education specifically as classes that they are most concerned about losing—or that they want more of in districts where such programs were deemed insufficient.

Because student outcomes in these subjects are difficult to measure through the present regime of standardized testing, the state accountability system must incorporate school-based measures of student performance if they are to respect the integrity of these disciplines.

**Wisconsin can create a holistic assessment system that better informs strategies to improve achievement and better reflects what parents and community members value most by:**

- Balancing inputs (programs and services for children) with standardized outcome measures, and
- By incorporating school-based performance measures in non-tested subjects into the overall set of metrics used to assess education.

In order to incorporate non-tested subjects into the accountability system, Wisconsin must first identify the basic qualities it aspires to, specifically for art, music, foreign language and career and technical education. Then it can determine the extent to which school districts are meeting standards related to (1) opportunity to learn, and (2) quality. Do all students statewide have equal access to such programs?
At what grade levels should the different subjects be introduced? And how do we measure the quality of these programs in objective fashion?

**Recommendation #2: Wisconsin should develop specific criteria for assessing non-tested subject areas.**

Wisconsin has academic standards established in a number of areas, and they should be enhanced to include robust offerings in art, music, physical education, foreign language, and career and/technical education. Speak Out participants were most concerned about preserving these curricular offerings, and Wisconsin should develop a unique set of rubrics for each of these non-tested subjects.

WEAC and AFT recognize that assessing non-tested subjects such as art and music poses many challenges. Further inquiry and discussion are needed to develop an assessment model that will work for Wisconsin. Nevertheless, we believe that, at minimum, non-tested subjects can be assessed using the four sets of criteria outlined below.

(A) **Measure the quantity and duration of such programming (opportunities to learn)**—what are the minimum number of hours and days of instruction and number of course offerings that should be made available to students, what percentage of students should be able to participate at different grade levels, and are school districts meeting these requirements?

(B) **Use teacher qualifications as a measure of program quality**—quality measures should include the qualifications of staff teaching the different programs beyond basic licensure requirements. How do you measure a highly qualified foreign language teacher? How about a teacher of art? Are more robust experiences needed than traditional schooling that would allow teachers to be more effective in class? Are there specific certificate programs that better enrich teachers and help them be more effective? One possible measure of teacher qualification is National Board Certification, given its rigor and availability in almost all subject areas. Other criteria should also be explored.

(C) **Establish school-based performance measures**—the state also needs to establish simple and clear parameters outlining criteria for performance assessment that schools can use to measure student achievement in these programs. Performance is the ability of a student to exhibit actions that show understanding of a subject. In science, for example, a student’s knowledge of the experimental method is better measured by having them perform an actual experiment and assessing the process than by asking a series of questions on a standardized exam. Similar performance expectations should be developed for art, music, foreign language and career and/technical education.

In music, for example only, 10th grade students might be expected to play basic scales on their instrument, and successfully master compositions for band or orchestra performance. Different skills and expectations would be set for different grade levels.
In art, students might be expected to understand primary colors and color composition by the end of middle school. Art students in high school might be expected to establish rudimentary skills of creating dimension (depth) in sketches and paintings. In short, performance measures are those where students can demonstrate a level of mastery over a given topic, which is especially important for subjects that are not easily measured by standardized tests.

Other program performance measures might also be developed. For example, we know that music and art teachers value the role of families and the community and look for regular opportunities to build partnerships that extend beyond school (community music festivals, performances at nursing homes, community art fairs, etc.). Standards might be developed that measure the frequency and adequacy of such outreach programs.

School districts would be required to construct their assessments based on guidelines provided by the state, but implemented locally.

(D) Set participation goals and determine if these subjects improve graduation rates—the state should set goals that a minimum percentage of at-risk students participate in art, music, foreign language and career and/technical education in pilot districts and establish an ongoing study to determine any correlation with rates of graduation.

By assessing the extent to which students are offered these subjects by grade level, by establishing quality measures for teachers that are discipline specific, and by creating standards that allow school districts to score student performance, Wisconsin can create a rigorous and objective set of accountability measures in non-tested subjects, while ensuring their survival in an environment of ever-narrowing curricular offerings.

Recommendation #3: Wisconsin should assess key indicators of school quality, including class size, the quality and availability of staff professional development programs, the availability of vital student support services and school climate.

When asked about school improvement strategies, participants rated highly the importance of class size, professional development for staff, and a positive school climate, which includes relations between staff and administrators as well as those within the overall school. These topics account for more than a third of the responses to the question “How do we improve schools where the students are struggling?” Importantly, class size, professional development, and a positive school climate also ranked highly as strategies participants identified to support effective teaching.

Participants also identified student support services, which include academic support (tutoring and mentoring) in addition to guidance and psychological counseling, as highly valued programs.

Accordingly, the state’s accountability system should measure class size. It should also gauge the level and nature of support services for children. In addition, school climate should be assessed with annual state-developed surveys to ensure comparability between schools and districts.
Professional development poses a larger challenge. The frequency of professional development could be counted, but the quality of those programs—the extent to which they are targeted to specific needs of individual teachers—is more difficult to assess.

One strategy is for the state to establish a best practices guideline that it then asks school districts to adopt. Accountability would be a measure of the extent to which districts adhere to the guideline. A small number of expert teams could be created to work with low-performing schools to implement these practices. Other school districts could be randomly audited every few years to measure their progress.

Ultimately, the extent to which these input measures help student achievement will be checked by output measures, such as standardized tests in reading and math, which undoubtedly will remain as one component of any accountability system. The relationship between these input variables, school-based performance measures, and outcomes can then be better analyzed.

**Recommendation #4: Wisconsin should link educator evaluation systems to professional development programs that promote teaching effectiveness.**

If the purpose of accountability is to improve student achievement, then the role of teaching is integral. Expectations for teachers continue to increase and today’s teacher is required to have more knowledge than her/his predecessors about subject matter and the skills necessary to teach effectively. This requires knowledge of child development, learning styles and different methods of teaching to meet the needs of all students in our increasingly diverse state. Our teacher evaluation system needs to be aligned with what we know are the characteristics of effective teaching.

Speak Out participants cited, and WEAC and AFT agree, that teachers must know the subjects they teach, must understand child development as it pertains to learning, and must be able to adapt their lesson plans to children with different learning styles.

It is hoped that Wisconsin’s new teacher evaluation system being developed through the State Superintendent’s Educator Effectiveness Design Team will be an important step in appraising a teacher’s understanding of and ability to practice different teaching methods. Ideally, professional development programs (suggested above) would be aligned with these new teacher evaluations and offer development opportunities in areas identified through the evaluation process.

Participants, it should be noted, overwhelmingly reject the use of standardized test scores as a primary means to help improve teaching, although they do support using growth measures of student progress through the school year. They reject basing pay on standardized test scores and reject tying evaluation primarily to standardized test scores.

Instead, participants favor as the best strategies to help effective teaching: teacher mentoring, professional development, reasonable class sizes, and maintaining a positive school climate.
Participants, in other words, believe that strategies that promote the growth of teaching are the best means we have to improve overall academic quality and achievement.

Accordingly, as part of the state accountability system, Wisconsin should report by district: the percentage of new teachers with trained mentors, the percentage of teachers working toward master status, the percentage of teachers with master status, and rates of teacher retention not related to an individual’s inability to gain professional licensure (in which case they are forced to leave the profession).

Recommendation #5: Wisconsin should provide parents with access to meaningful information regarding the strengths and weaknesses of their schools.

Information collected at the state level from each of the assessments outlined in recommendations 1 through 4 should be available to parents, teachers, school officials and others through a transparent and easily understood system. Additional information, such as the hours and numbers of course offerings by district, teacher and staff expertise, and school performance standards for non-tested subjects, would be posted and made available to the public while maintaining current confidentiality protections afforded to students and staff. This information should become part of a new standard for school performance reports.

Conclusion

A holistic accountability system would (1) incorporate input variables (programs and services for children) linked to achievement, (2) incorporate school-based performance measures for non-tested subjects, and (3) put in place measures that promote teacher growth. A holistic system is more likely to promote student growth than an outputs-only accountability system because it measures what affects classroom teaching and the level of support services and programs for children. It would also have the advantage of reflecting what parents and the community value most in their schools.

-end-
Testimony for Public Hearing on ESEA Waiver

February 2, 2012

Chairman Olsen, Chairman Kestell, Committee members,

Thank you for the opportunity to present testimony in front of this joint hearing on the waiver to Elementary and Secondary Education Act. While this process has been ongoing for months, the first official act will be the application for this waiver.

We appreciate the opportunity to have participated in the Design Team for the new Wisconsin State Accountability System. We are strong proponents of accurately creating and disseminating data about schools of all sectors. Parents, in the end, need to be empowered with opportunity and useful information. To that end, the new measures in the report card are welcomed.

That being said, we believe the lack of focus on replicating high performing schools misses a golden opportunity. Instead, there is a disproportionate focus on turning around low-performing schools, an area where the results frankly have been quite limited. Simply disseminating best practices and sending out press releases thanking high performing schools is not enough. We should have created a system where we can quickly adapt other schools to their practices.

Still, the new accountability system has great potential…in theory. In practice, however, there are areas that cause us concern.

To start, compared with other states’ waiver applications, we have not found any that are trying to expand state governmental power over charter schools or private schools in school choice programs. Yet this application contains expansions of regulatory authority in those areas.

This waiver is for Title 1 public schools, meaning that private schools in choice programs have no bearing on its acceptance. We understand the desire to include an all-encompassing state accountability system. But with so much undefined, we do not see why DPI needs to have expanded regulatory powers granted to them by the legislature before the waiver is even approved.

Further, charter schools already have an authorizer and the power to remove a child from a private school already exists – with parents. While we are open to the possibility of changing the system to address low performing schools, we have not heard a convincing argument about how more government bureaucracy in the choice program improves education for anyone.
There are also serious equity issues that would need to be remedied prior to changes in the current system. For starters, the interventions for schools under sanctions are not equal on time, funding, or finality.

Traditional public schools would be eligible for Title funding and rolling three-year interventions with no hard end date for failure to improve. Private schools in the choice program would have state interventions into private operations, no funding, a single three-year window and a fixed time for removal from the program, according to the proposal. It is roughly the same for charters.

In brief, public schools get money and unlimited time without closure. Education reform entities are given one shot at improving, then closure.

Without a plan to create high performing seats, where are these children supposed to go? Moving a child from one low performing school to another improves nothing, unless your goal, at least in Milwaukee and Racine, is to move children from education reform entities back to the public schools.

Equity across all these sectors should be the starting point, the foundation of a truly transparent accountability system. The sanctioning system referenced in this waiver proposal is clearly not equitable and therefore, something we cannot support.

Attached to this letter are comments from School Choice Wisconsin on all aspects of the waiver application. We detail the sections we like, those that need more clarification and those we oppose. I hope you will review these items as your work continues on this process.

With legislative input I believe this waiver and new accountability system could provide parents with new freedoms and opportunities. However, the process of empowering parents and schools by gaining relief from federal mandates should not be used as a way for DPI to replace those mandates with new bureaucratic powers of their own.

Thank you,

Jim Bender
School Choice Wisconsin
Public Hearing on ESEA Waiver Application

This document was prepared by School Choice Wisconsin, an advocacy organization that works with schools that participate in the Milwaukee Parental Choice Program and Private School Parental Choice Program in Racine. Our review of the 2012 ESEA Waiver prepared by the Wisconsin Department of Public Instruction resulted in the following notations:

Principle 2: State-Developed Differentiated Recognition, Accountability, And Support

2.A Develop And Implement A State-Based System of Differentiated Recognition, Accountability, And Support

School Choice Wisconsin in theory supports the inclusion of private schools participating in parental choice programs in the new Wisconsin State Accountability System. However, that system needs to be constitutional, equitable and functional.

There are a number of items in this section that conflict with these parameters.

Developing a Statewide System

Currently, Wisconsin’s system of support for schools identified for improvement serves Title I schools. Due to funding and capacity, the state system currently identifies the performance of traditional public schools and charter schools as required by NCLB, but only requires interventions for Title I schools and districts. The state’s persistently low performing schools do not experience sanctions or implement targeted interventions prescribed by the state unless they receive Title I funding.” (p 31 of the ESEA Waiver)

The funding conflict inherent in the waiver places the equitable functionality of required interventions on future funding by the state legislature. While this is possible, that funding is not now available meaning the interventions are currently not financially equitable moving forward to the new State Accountability System.

Because of the restrictions for public dollars going directly to private schools, interventions need to reflect the inability of those imposing sanctions to fund the interventions.

“Due to constitutional limitations in private schools, the State Superintendent cannot direct specific programming or interventions within a private school.” (p 33 of the ESEA Waiver)
The previous statement regarding constitutionality is correct. Unfortunately, the DPI proposals listed on page 33 and 34 potentially violate that statement.

We strongly believe that options need to be presented to private schools after being initially identified as “Persistently Low Performing” that do not involve direct DPI interventions. As long as schools improve to meet established and equitable benchmarks, the mechanism by which they achieve those results should be flexible and constitutional.

The Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

“The choice school must enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years.” (p 33 of the ESEA Waiver)

While the requirement of a performance agreement with DPI has potential constitutional issues, if a performance agreement with a private entity were an option, there are still problems with the requirement as “…annual state-approved performance targets that demonstrate substantial academic improvement…” is undefined. There is no detail as to what these standards are, if they are subject to change, what criteria was used for their creation and if they will be assigned equally to public, charter and choice sectors.

“These priority areas form the foundation of an accountability index system that incorporates multiple measures in calculating a school-level score (on a scale from 0-100) that is used to place schools on a six-level continuum.” (p 35 of the ESEA Waiver)

School Choice Wisconsin does not support using a six-level continuum. The report card should implement a five-level continuum labeled with grades A through F. Creating a new syntax for a six-level continuum dramatically weakens its effectiveness in comparison to a letter grade that is already understood by parents and the public in general.

The goal is to give accurate, effective and impactful information on the report card. Using anything other than letter grades makes the report card less effective.

“Additionally, the Design Team recommended the state recognize high performing schools to incentivize improved outcomes, as well as disseminate practices statewide. These recommendations represent a commitment to a statewide system of support (SSOS) aimed at providing differentiated recognition, rewards, and interventions built upon the core of high quality instruction, collaboration, balanced assessments, and culturally responsive practices in order to successfully meet the state’s three strategic goals.” (p 35 of the ESEA Waiver)
Unfortunately, except for public recognition, there are no tangible incentives and/or results for high performing schools. The end result of this process should be a higher percentage of students in high performing schools. This waiver and accountability system are based on directing resources to low performing schools only. Instead, this system should be directing resources to expanding high performing schools in areas where it makes geographic sense.

After all, closing a low performing school without providing seats at a high performing school accomplishes nothing. And funds directed at turning schools around have limited, if any, success.

We support the dissemination of the best practices of high performing schools and other mechanisms designed to improve other schools. However, the focus needs to be on school improvement, not positive publicity alone.
2.B. Set Ambitious but Achievable Annual Measurable Objectives

An important aspect to the proposed waiver that would replace No Child Left Behind is the Wisconsin statewide Accountability System.

“The school and District Accountability Design Team put forth several recommendations for a statewide accountability system. One key recommendation was that the accountability system should use multiple measures and reflect the skills and knowledge students need to be successful in a variety of post-secondary opportunities. As a component of that recommendation, performance should be measured using both growth and attainment calculations (p 47 of ESEA Waiver).

In all, the Wisconsin accountability index incorporates four priority areas: Student Achievement, Student Growth, Closing Gaps; and On-Track (for elementary and middle schools) or Postsecondary readiness (for high schools) (p 47 of ESEA Waiver).”

We believe that student growth over a period of time rather than snap shot test scores is the most accurate measurement of a school’s performance. Therefore, School Choice Wisconsin is fully supportive of a statewide accountability report card that measures student and school performance using all of these aspects and most importantly incorporates student growth over time.

However, while we are supportive of a report card that incorporates student growth, there are aspects within DPI’s proposed waiver that are unclear, undefined, and inequitable across sectors, and simply increases the bureaucracy of the Department of Public Instruction rather than uses established successful models already in place.

Factoring in Subgroups

“The School and District Accountability Design Team specifically recommended use of an additional subgroup, on that groups the lowest 25% of performers together...DPI has determined that it is not possible at this time give that the WKCE’s scale is not vertically aligned...Instead, inclusion of the lowest 25% as an additional subgroup will be considered for inclusion in the accountability system upon implementation of the SMARTER Balanced Assessment System in the 2014-15 School Year” (p 48 of the ESEA Waiver).

The term “will be considered” leaves the inclusion of the subgroup uncertain. Rather when DPI is able to include this subgroup it should be included.

Priority Area and Overall Scores

“The exact methodology for how each category is weighted and combined into the overall score will be determined through a standard setting process overseen by DPI’s Technical Advisory Committee, Dr. Brian Gong of the National Center for the Improvement of Educational Assessment, Dr. Andrew Porter from the University of
Pennsylvania, and Dr. Robert Linn from the University of Colorado” (p 48 of the ESEA Waiver).

While SCW supports including measures such as student growth, how each category is scored and weighted is still undefined and needs clarification. This process needs to be specifically determined and more thoroughly defined prior to the implementation of the accountability system.

**Flags and Stars**

“The concept of “unacceptable-performance flags” is Wisconsin’s solution to incorporating test participation and dropout rates into the new accountability system, as well as to highlight the importance placed on every child reading at grade level by 3rd grade. These flags exist outside of the mathematical calculation of the index, and instead carry overarching weight in determining where on the accountability scale a school falls...

An accountability system should not only identify performance below expectations; it should also highlight positive progress or work being done in schools and districts. In addition to flags, report cards will include stars for certain indicators for which DPI will not hold schools accountable, but that are important enough to highlight as a significant positive for that school or district” (p 48-49 of the ESEA Waiver).

School Choice Wisconsin supports the inclusion of dropout rates, 3rd grade reading, and test participation, rate of college credits earned in high school, postsecondary enrollment rates, and AP participation and performance in the accountability system. However, The “Flags” and “Stars” methods are still significantly undefined and need more clarification prior to their implementation.

“Final overall index scores will be an aggregation of scores in the four priority areas. Overall scores place schools and districts within one of six categories:

- Significantly Exceeding Expectations
- Exceeding Expectations
- Meeting Expectations
- Not Meeting Expectations
- Significantly Below Expectations
- Persistently Failing to Meet Expectations” (p 49-50 of the ESEA Waiver).

How these categories are measured and what growth a school must demonstrate to move up or down between categories is undefined and needs clarification prior to the implementation of the accountability system.

School Choice Wisconsin does not support using a six-level continuum. The report card should implement a five-level continuum labeled with grades A through F. Creating a new syntax for a six-level continuum dramatically weakens its effectiveness in comparison to a letter grade that is already understood by parents and the public in general.
The goal is to give accurate, effective and impactful information on the report card. Using anything other than letter grades makes the report card less effective.

**Student Attainment**

"The attainment priority area is a composite of proficiency rates in reading and mathematics for the “all students” group on the Wisconsin Student Assessment System (WSAS). Proficiency rates will be calculated using a weighted average of the three most recent years of performance data. The weighting scheme gives a weight of 1.5 to the current year, a weight of 1.25 to the prior year, while two years prior receives a weight of 1.0. If a school has test data available for only the two most recent years, the most recent year is given a weight of 1.5, while the prior year is given a weight of 1.0, and the divisor becomes 2.5 rather than 3.75. If a school has only the most recent year of data available, only a single year of data is used to calculate the proficiency rate. The weighted proficiency rate is then put back onto a 0-100 scale by dividing the weighted proficiency rate by 3.75. This calculation is done separately for mathematics and reading. Each school’s attainment score is an average of its weighted reading and mathematics proficiency rates.” (p 51 of the ESEA Waiver).

School Choice Wisconsin understands from its active participation in the Accountability Task Force that initial identification of a school should only take place after three years of growth data are available and not before. Prior to the release of this waiver it was understood that a school would only be included in the state accountability system that had three years of measureable growth data. This suggests that schools with one and two years of data will also be included. Comparing one year of snapshot test scores to a school with three years of growth data is inaccurate and potentially misleading. As such, the reporting of this data needs clarification and correction.

**Student Growth On Target To Move Up**

"The growth measure proposed, on Target to Move up, is an adaptation of the principles behind Colorado’s “Catch up, Keep up, Move up” measures across multiple levels of achievement” (p 51-52 of the ESEA Waiver).

While School Choice Wisconsin supports using growth data to measure student achievement, the “adaptation” method proposed by DPI is undefined and needs further clarification.

Additionally, it is unclear why DPI is proposing an adaptation to Colorado’s method, when the Value-Added Research Center in Wisconsin already has the information and calculates student growth data using the value-added growth method. Additionally, SCW supports the Value-Added Growth method to measure student growth data because it controls for student background demographics and characteristics, which is important measuring the achievement of schools in diverse city such as Milwaukee.
Closing Achievement Gaps
*Attainment Gap* (p54), *The Growth Gap* (p 55), *The Graduation Gap* (p 56)

School Choice Wisconsin supports closing all of these gaps in Wisconsin. We are especially supportive of including graduation rates in the report card and closing the graduation gap as studies show that graduation from high school is a significant quality of life indicator.

However, more specifics as to the weighting of categories needs to be clarified. Additionally, for private schools participating in parental choice programs it needs to be clarified whether all student data at a school will be included or only data from students who participate in the parental choice program.

**On-Track Status/Postsecondary Readiness (p 56)**

*On track Status (dropout rate, 3rd grade readiness, dropout rate)*
*Postsecondary Readiness (Attendance, ACT Performance and Participation, Graduation Rate, Dropout Rate)*

School Choice Wisconsin is supportive of including all of these measures. Specifically, we are very supportive of weighting Graduation Rates at 60% of the priority area index score. However, for private schools participating in parental choice programs it needs to be clarified whether all student data at a school will be included or only data from students who participate in the parental choice program.

**Advanced Placement—Star consideration**

The process to determine Advanced Placement exam performance and participation is:

**For Participation** – to identify the number of students completing an Advanced Placement exam in a given year and divide that number by the total number of 9th thru 12th grade students in the school to arrive at the participation rate.

**For Performance** – to identify the number of Advanced Placement exams taken in a given year and dividing that by the number of exams passed with a score of 3 or above.” (p 58 of the ESEA Waiver).

This section needs more clarification. The participation rate for AP testing is likely to be extremely small for all schools making this measurement relatively meaningless. Additionally, many private schools participating in parental choice programs are unable to offer AP classes due to limited funding. However, while School Choice Wisconsin has reservations about measuring participation, SCW is potentially supportive of including a marker that identifies the number of Advanced Placement exams taken in a given year and dividing that by the number of exams passed with a score of 3 or above. However, the flag/star system needs further clarification.
2.C Reward Schools

An important aspect to the proposed waiver is the reward and recognition programs for high-performing schools.

“Reward schools are identified annually and fall into one of three categories: Exemplary Schools, Gap Closing Schools, and schools that are Beating the Odds.

*Exemplary* schools are those schools that earn an index label of Significantly Exceeding Expectations. These schools have earned a high index score and done so without any flags; they are models for the state and will be acknowledged as such.

*Gap Closing Schools* are those schools that are making significant progress toward closing achievement gaps. Identification of these schools will be based on the Closing Gaps priority area of the index.

*Beating the Odds* schools are calculated using current, Title I Schools of Recognition methodology. Only Title I eligible or receiving schools in the top quartile for poverty qualify for this reward. (p 14 of ESEA Waiver).”

We believe that identifying and rewarding the states highest-performing schools to increase performance, emphasize and develop innovative instruction, and inform and support the dissemination of best practices. Therefore, School Choice Wisconsin is fully supportive of a statewide reward system.

However, while we are supportive of a statewide reward system, we expect that all schools will equal access to rewards and recognition programs whether they are traditional public schools, charter schools or private schools participating in a parental choice program. In the proposed reward scheme, private schools serving high percentages of Title I students will be excluded from participation in all Schools of Recognition rewards and recognitions as private schools may not be identified as Title I schools. In this case private schools are subject to all the sanctions proposed in the ESEA waiver but do not qualify for the corresponding rewards proposed in the ESEA waiver. Further clarification is needed as to how the waiver will provide full access to private schools and private school teachers to reward and recognition programs available to traditional public and charter schools.
2.D Priority Schools

“Priority Schools, as the lowest performing schools in the state, are identified using the Student Attainment portion of the accountability index. While DPI will identify at least 5% of Title I schools in the state, is to appropriately identify all low-performing schools as defined by the Wisconsin Accountability Index. Schools with the lowest scores in this area will be rank ordered. Schools falling below a certain cut point, which will be established as part of a standards setting process and posted publically, are identified as Priority Schools.

Wisconsin has been working to build a statewide accountability system, one that includes all traditional public schools as well as charter schools and private schools participating in the Parental Choice Program. However, until State funding is made available, only Title I funds are currently available to provide the interventions mentioned in section 2.D.iii (below), and as such those interventions will only be available for Title I schools (p 66-67 of ESEA Waiver).”

School Choice Wisconsin supports the practice of identifying the lowest performing schools in the state as priority schools.

However, while we are supportive of priority schools identification across sectors, we expect that all schools will have equal access funding to implement interventions whether they are traditional public schools, charter schools or private schools participating in a parental choice program. In the proposed reward scheme, private schools identified as priority schools will be excluded from all funding to implement interventions as private schools may not be identified as Title I schools. In this case private schools are subject to all the sanctions proposed in the ESEA waiver but do not qualify for the corresponding intervention funding proposed in the ESEA waiver. Further clarification is needed as to how the waiver will provide full access to intervention funding available to traditional public and charter schools.

“DPI will be using the ESEA flexibility as an opportunity to waive choice and supplemental education services (SES) from its current accountability system...(p 67 of the ESEA Waiver)”

“The district must submit a budget detailing funding sources and allocations to support the district’s plan. Districts may use the Title I 20% set aside, if they provide evidence of consultation with private schools, as these services will now be subject to equitable participation. (p 69 ESEA Waiver)”

School Choice Wisconsin supports using the ESEA flexibility to waive choice and supplemental education services (SES) for its current accountability system.

However, we request that you include language in the ESEA waiver that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the
private school Title I and Title IIA allocations prior to determining the funds it will
dedicate to public school programs, including priority and focus schools.

**Implementation of New Statewide Accountability System: 2013-On-going**

DPI will provide targeted support to newly identified Priority Schools and Districts to
improve implementation quality and student outcomes. The following sections describe
the targeted systems of support and interventions provided to the state’s persistently
lowest-achieving (p 69-70 of the ESEA Waiver)

As defined on page 70 of the ESEA Waiver by footnote the following sections of 2D
within the ESEA Waiver “summarize interventions in traditional public schools and
districts” within the statewide accountability system and do not speak to “the
interventions required of charter school and private schools participating in the Parent
Choice Program”.

School Choice Wisconsin would restate that the following sections of 2D do not apply to
private schools and that the Department of Public Instruction (DPI) does not and may not
have management authority through active state intervention over a private or religious
school through “targeted interventions” or “school improvement diagnostic reviews”
whether that management authority through active state intervention is excised directly
by DPI or indirectly through DPI-contracted external vendors.

**After Three Years of Implementation**

Implementation of the processes and practices described throughout Section 2.D in
schools statewide (as opposed to Title I schools only) will require additional state
resources, including staffing and funding. Without additional state funding, DPI will
continue to implement the Priority School reform efforts in Title I schools only. (p 73 of
the ESEA Waiver)

Whether or not the “implementation of the processes and practices described throughout
Section 2.D” are implemented statewide and beyond Title I schools, the ESEA Waiver
defines by footnote that section 2D within the ESEA Waiver “summarize(s) interventions
in traditional public schools and districts” within the statewide accountability system and
do not speak to “the interventions required of charter school and private schools
participating in the Parent Choice Program”.

School Choice Wisconsin would restate that sections 2D does not apply to private
schools and that the Department of Public Instruction (DPI) does not and may not have
management authority through active state intervention over a private or religious school
through “targeted interventions” or “school improvement diagnostic reviews” whether
that management authority through active state intervention is excised directly by DPI or
indirectly through DPI-contracted external vendors.
2. E Focus Schools

School Choice Wisconsin requests that a footnote be inserted on page 79 of the ESEA Waiver stating that section 2E “summarize(s) interventions in traditional public schools and districts” within the statewide accountability system and do not speak to “the interventions required of charter school and private schools participating in the Parent Choice Program”.

School Choice Wisconsin would restate that section 2E does not apply to private schools and that the Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

Flexibility in the Use of Title I Funds

The LEA will have the option to set aside up to 20% of its Title I dollars to fund the school reform plan. This option will ensure resources can be allocated to these schools’ improvement efforts. (p 83 of the ESEA Waiver)

School Choice Wisconsin requests that language be included in the ESEA waiver that requires local educational agencies (LEAs) to provide equitable participation of eligible private school students and teachers in ESEA programs and further that LEAs shall determine the private school Title I and Title IIA allocations prior to determining the funds it will dedicate to public school programs, including priority and focus schools.
2.F Other Incentives and Supports for Title I Schools

Does not apply to private schools.
2.G Building SEA, LEA, and School Capacity to Improve Student Learning

"Due to constitutional limitations in private schools, the State Superintendent cannot direct specific programming or interventions within a private school" (p 107 of the ESEA Waiver).

School Choice Wisconsin maintains that the above statement regarding constitutionality is correct and applies to Section 2G in its entirety. Unfortunately, the DPI proposals listed on page 107 and the following sections violate that statement.

School Choice Wisconsin maintains that options need to be presented to private schools after being initially identified as “Persistently Low Performing” that do not involve direct DPI interventions. SCW has in fact presented alternative language to DPI as possible and workable options which, to date, have not been inserted into the ESEA Waiver by DPI. As long as private schools participating in parental choice programs, identified as persistently low performing, improve to meet established and equitable benchmarks with equitable timetables to do so, the mechanism by which they achieve those results should be flexible and constitutional.

The Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

“Therefore, when a [private school participating in a parental choice program] is initially identified as being among the persistently lowest performing schools in the state."

School Choice Wisconsin understands from its active participation in the Accountability Task Force that initial identification of a school should only take place after three years of growth data are available and not before. Prior to the release of this waiver it was understood that a school would only be included in the state accountability system that had three years of measureable growth data. This suggests that schools with one and two years of data will also be included. Comparing one year of snapshot test scores to a school with three years of growth data is inaccurate and potentially misleading. As such, the reporting of this data needs clarification and correction.

“The choice school must enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years.”

While the requirement of a performance agreement with DPI has potential constitutional issues, if a performance agreement with a private entity were an option, there are still problems with the requirement as “…annual state-approved performance targets that demonstrate substantial academic improvement…” is undefined. There is no detail as to what these standards are, if they are subject to change, what criteria was used for their creation and if they will be assigned equally to public, charter and choice sectors.
“Wisconsin’s new accountability system will provide a single statewide system that will impact all schools. Currently, the system is primarily linked to Title I, as there is no funding/consequences at the state level for non-Title I schools. The new system will look at all schools, including charter schools and schools participating in the Parental Choice Program, and hold the same standard of accountability for all schools, statewide” (p 110 of the ESEA Waiver)

“Due to constitutional limitations in private schools, the State Superintendent cannot direct specific programming or interventions within a private school” (p 107 of the ESEA Waiver), a new accountability system can be created that seeks to achieve common improvements and common minimum results across sectors, but it is not possible or constitutional to create single and standard statewide method of achieving those improvements and results across the sectors.

Again, School Choice Wisconsin maintains that options need to be presented to private schools after being initially identified as “Persistently Low Performing” that do not involve direct DPI interventions. SCW has in fact presented alternative language to DPI as possible and workable options which, to date, have not been inserted into the ESEA Waiver by DPI. As long as private schools participating in parental choice programs, identified as persistently low performing, improve to meet established and equitable benchmarks with equitable timetables to do so, the mechanism by which they achieve those results should be flexible and constitutional.

The Department of Public Instruction (DPI) does not and may not have management authority through active state intervention over a private or religious school through “targeted interventions” or “school improvement diagnostic reviews” whether that management authority through active state intervention is excised directly by DPI or indirectly through DPI-contracted external vendors.

Does not apply to private schools
Statement of Steven M. Kimball, Ph.D., before the Joint Hearing of the Senate and House Education Committees on the Wisconsin Department of Public Instruction ESEA Waiver Request

February 2, 2012

Senator Olsen, Representative Kestell, members of both Committees, I appreciate the invitation to speak with you today as you consider the Department of Public Instruction’s request for flexibility from provisions of the Federal Elementary and Secondary Education Act.

I present today as a researcher who has studied teacher and principal evaluation over the last decade with the Consortium for Policy Research in Education and the Value-Added Research Center at the Wisconsin Center for Education Research at UW-Madison. More recently, I have provided technical assistance to the DPI as the State Design Team developed the Wisconsin Educator Effectiveness Framework, which is the basis for the “Supporting Effective Instruction and Leadership” section of the waiver request. I am now working with a team from WCER that is supporting the statewide work groups tasked with developing the structure and process of a state system for evaluating teachers and principals. I have some brief remarks relevant to the effective teaching and leadership section and will be happy to answer your questions.
Teacher and principal evaluation policies are evolving rapidly across the nation. About half of the states have enacted teacher evaluation reforms in recent years. Several of those have also linked teacher licensure and tenure to the evaluation changes. In many cases, principal evaluation reforms are included in these new policies. One of the most common reforms is to add student achievement as a significant measure for educator evaluation. For educators and those who evaluate them, this alone will be a sea change. Decades old evaluation approaches that had little impact are now being replaced with complex systems for use in high stakes personnel decisions.

Although recent research on measures of teaching effectiveness provides some help in the evaluation design process, the research behind principal assessment is not as well developed. Overall, for both teacher and principal evaluation, the new policies and expectations for evaluation are moving ahead of the research.

However, we do know a number of important features to include in the process of designing principal and teacher evaluation systems. Many of these have been considered in the Wisconsin Educator Effectiveness Framework and
are outlined in the waiver request. Considerable work lies ahead to make the changes a reality for Wisconsin.

I want to highlight some of the considerations within the framework and the waiver elements that will be critical in the design and implementation process:

- **Stakeholder engagement and communication.** Teachers and principals must be involved in reforming the systems used to evaluate their performance. This is fundamental to garner acceptance of the major changes and to help with understanding of the new measures and processes. The engagement effort has begun, but the communication process needs to be stepped up and strategically managed.

- **Multiple outcome measures.** New, state of the art statistical approaches to measuring student achievement, including value-added modeling, have been created and tested. The Value-Added Research Center here at UW-Madison is a national leader in this work and has been involved with Wisconsin districts and CESAs for many years in the effort. Yet, value-added is not the cure-all. Measurement error is still an issue in any
assessment approach; most teachers do not teach in tested grades and subjects; and it takes several consecutive years of test data to reliably use value-added results – particularly if it is intended for high stakes decisions.

In addition to at least 3 years of test data, other measures, including district tests and student learning objectives, will both cover more teachers and help produce more reliable results.

- **New measures of educator practice.** Teacher and leader evaluation systems must be anchored to clearly articulated standards of practice. Detailed rubrics of leader and teacher behaviors in their work contexts are also needed to evaluate practice to the standards. In addition to evaluation, these standards and rubrics can then center other educator human capital management practices, including recruitment, selection, induction, professional development, performance management and compensation.

Like student outcome measures, multiple measures of educator practice are also called for. The recent Measures of Effective Teaching study suggests that multiple evidence sources, with several observations, and
more than one observer are needed to increase evaluation reliability and validity.

- **Formative and summative focus.** These reforms will quickly lose credibility if they are seen as a "gotcha" or punitive exercise. This shouldn’t be about building a better hammer. This is about better identifying teacher and principal effectiveness to support educator growth and ultimately improve student learning. Teachers and principals must know what they are expected to do to get a good evaluation rating, have opportunities to improve before their final evaluation, and obtain actionable feedback to help them develop their practice once the evaluation is completed. It should be an on-going, continuous improvement cycle.

- **Thorough evaluator training.** The Measures of Effective Teaching study also confirms that extensive training is required for evaluators to carry out their roles with consistency. The study suggests that over 2 days of training per evaluator is needed to reach an adequate level of consistency. Evaluator training is not something our principal preparation programs have done well and it is not something districts are prepared to do. It will require a substantial effort to scale up training
capacity across the state. The alternative - skimping on training - will lead to idiosyncrasies and potentially erroneous ratings. In addition to initial training, re-training and oversight will be required to maintain consistency over time.

- **Pilot testing.** Once the teacher and principal evaluation systems are developed, pilot testing will be carried out to examine whether the process is implemented as intended, whether evaluations are yielding reliable results, how the systems are impacting practice, and what improvements can be made prior to full implementation.

- **Adequate support and funding.** Education reform of this scale requires a champion. It is my sincere hope that this body, the Governor, and the State Superintendent can look beyond the near-term political strife and work together on the educator effectiveness initiative. But good will is not enough. If this effort is a priority of the State, and it should be, then it needs to be backed with adequate resources. Funding is needed to carry out the changes at the State level and to support districts as they build the capacity to implement the new systems. Without new resources to help districts with evaluator training, data systems, and potentially new personnel to manage the evaluation burden and
maximize evaluation reliability, this will either become a large unfunded mandate or will be implemented so weakly it will be ineffectual. We owe it to our educators, and most importantly, our children, to do this work and do it right.

The teacher and principal evaluation reforms outlined in this waiver request will require a tremendous effort from the state, local education agencies, school administrators, and teachers. With your support, there’s a good chance these changes can have a positive, lasting impact across Wisconsin.
WISCONSIN CATHOLIC CONFERENCE

TO: Senator Luther Olsen, Chair
    Members, Senate Committee on Education

    Representative Steve Kestell, Chair
    Members, Assembly Committee on Education

FROM: Kim Wadas, Associate Directo

DATE: February 2, 2012

RE: Elementary and Secondary Education Act Flexibility Request

The Wisconsin Catholic Conference (WCC) appreciates having the opportunity to provide testimony on the Elementary and Secondary Education Act (ESEA) Flexibility Request (hereinafter, waiver request).

There is much to be applauded in the waiver request. It encompasses a bold plan of action designed to improve the quality of education in Wisconsin. For example, not requiring school districts (local educational agencies) to reserve 10 percent of the Title I allocation for professional development allows the local school district to more adequately address the unique needs of their student population.

However, the WCC would like to take this opportunity to seek further clarification on elements of the waiver request. We also wish to raise concerns regarding the waiver’s impact on private schools, especially those schools participating in the State’s parental choice voucher programs.

As drafted, the ESEA waiver requests flexibility for local educational agencies (LEAs) by allowing LEAs to transfer 100 percent of the funds received under authorized programs (Title II, Part-A of the ESEA) into Title I, Part A. Additionally, LEAs may reserve up to 20 percent of the Title I, Part A funds for use in schools identified as “focus” and “priority” schools.

The Wisconsin Catholic Conference would like clarification that the waiver request and use of this flexibility regarding Title funds will not result in a detriment to private school students and that private schools will have access to Title funds in the manner they do today. In distributing funds under the various titles of the ESEA, federal law does not permit the equitable participation of private school students to be waived. Also, requirements on LEAs to participate in timely and meaningful consultation with private school representatives to determine how to best serve the eligible private school students remain. The WCC has concern that both the transfer of funds, and more importantly the set aside of funds under Title I, will ultimately result in private schools students having reduced access to Title services and funding.
The waiver request also includes a proposal to include choice participating schools in the new statewide accountability system. The WCC has supported efforts to promote transparency and accountability within the choice program in the past, recognizing the need for students, families, and the community to be informed on the performance of choice participating schools. Under the new accountability system, choice participating schools will be identified if the school is persistently a lowest performing school statewide. Choice schools identified as such will be required to meet annual performance targets and demonstrate substantial academic improvement within three years. If this does not occur, the school will no longer be allowed to participate in the choice program.

Private schools serving students under Title I of the ESEA cannot access funds set aside to assist focus and priority schools. Therefore, under the new accountability measures, choice participating schools will, for the State’s purposes, be identified as low performing, but such schools will not be able to access federal funds to improve performance. It is important, as the waiver request itself notes, that systems of support be established to make certain improvements are made for schools identified in the system of accountability. If permissible under DOE guidance, the waiver request should ask that choice participating schools have equitable access to all Title funds, including those set aside for focus or priority schools.

There are additional concerns raised by the accountability system reforms identified in the waiver as relates to choice participating schools. The waiver instructs that a lowest performing choice school “enter into a performance agreement with DPI” to attain academic improvement. As this represents a heavy involvement of DPI in the affairs of a private school, the WCC respectfully requests that the waiver include additional alternatives to DPI direct involvement, such as third party contractors or sponsor oversight (such as with a diocese or jurisdictional authority for religious schools).

There is also concern as to how this accountability system will accurately measure performance in choice participating schools when only those students who participate in the choice program are assessed within a choice school, and even those students may currently opt out of any assessment. There are several families who do take advantage of this opt out provision to avoid having their student identified as a voucher recipient by participating in the assessment process.

As there are still details and information to be supplied in the waiver request, the WCC recognizes that many of these concerns may be addressed in additional documentation. The WCC request that you seriously consider the concerns outlined in this testimony and act to make certain the waiver request adequately addresses the needs of private school students and schools affected by its provisions.

Thank you.
February 2, 2012

Dear Senate and Assembly Education Committee Members especially Ms. Vukmir who represents our School District,

We have reviewed the information from the Wisconsin Department of Public Instruction and the U.S. Department of Education NCLB Flexibility Waiver as well as the Accountability Reform Overview from the Wisconsin Department of Public Instruction. We are very pleased that someone had taken the time to prepare this information however, there are several areas of concern, questions, and suggestions which we have included in this document for you to review. We would ask that you please review these prior to making any decisions.

**Concerns**

- Using NAEP assessments to create new cut scores for next year will likely result in lower proficiency rates as the NAEP. This is providing districts less than one year to align benchmarks in accordance with NAEP before being held accountable.
- If the above is truly important to do right away, and change the cut scores immediately, then we should also change the testing window to the spring immediately in order to truly identify the student’s achievement at grade level.
- There needs to be greater weight and focus on annual learning and achievement through emphasis on the growth model rather then on point in time tests.
- Regarding the four-year adjusted graduation cohort: District credit requirements already exceed the new expectations but concern needs to be expressed regarding students transferring into districts severely credit deficient. There needs to be some sort of measure similar to Full Academic Year when measuring the 4-year cohort rate. How can we be held accountable for a student who transfers in from another district as a high school student and is severely credit deficient?
- In speaking to the graduation cohort. This is certainly taking our state back in time (a step backwards) when it comes to student learning. Our focus should be on graduating students….not graduating students in 4 years. State law uses the age of 21. There is nothing magical about 4 years. Post secondary does not limit or measure student learning in a 4 year window….why would/should we do this in K-12 education. Our major focus should be to make “every child a graduate”…and ready for life beyond high school. Students learn at different rates and have different needs….we should honor and value this. A four year graduation cohort does not.
- Value Added needs to be one of the multiple measures used to calculate a school/district performance along the 0-100 accountability continuum.
- Cell size for accountability dropping fro 40 to 10 will have significant impact on small schools or subgroups.
- Why would Title Schools Failing to Meet Expectations be required to use a state approved vendor to implement reform? This seems to fall into a very similar punitive venue as the current NCLB. An approved plan concept would be more appropriate.
- With regard to the Reading initiative, a longer window than one year prior to Grade 3 should be identified for students moving into a new school district, especially where assessment data demonstrates that they are not reading at or are well beyond grade level.
- A growth model or diagnostic tool should be used to demonstrate reading levels….not a standardized test.
(Page 2)

- Semantics: change "publicly funded schools" to all schools receiving public funds so there is no confusion and the meaning is not left open for interpretation or debate
- Semantics: If the term "beat the odds" is being used internally it probably is acceptable, however if this is a term that is going to be used in some type of public identification format....there is a concern as to the connotation this creates for a school or school district with regard to "who they are" outside of student achievement. (public stereotypes)

**Questions**

- Will ASSETS measure proficiency for ELL's in a different manner? Will this impact how AMAO is calculated?
- What are the cut scores to attain status as a Priority, Focus or Reward School and what formula will be used to calculate this?
- We know the priority areas but what formula will be used to calculate the accountability index used to rate schools.
- If district missed AMAO at all three levels is it realistic/appropriate for the state superintendent to direct the reform after only one year?
- Need more information about what the state evaluation system will look like for teachers and principals.
- Are Special Education Students, students with disabilities, being accounted for based upon their unique special needs as identified through their disability (unlike when NCLB currently does)?

**Step Forward**

- Funding to expand the use of the ACT suite (EXPLORE-PLAN) will assist schools in providing targeted instruction for students and help them get on track for college and career as well as increase proficiencies in reading and math. (as long as it is true and sustained funding)
- Positive that all schools are being evaluated and being held accountable to these standards, including Public/Private Choice, Voucher/Charter program schools.....any schools receiving public monies
- Positive that all schools will have the opportunity to be Schools of Promise Recognition program will be expanded to recognize all schools not just low poverty schools.
- Outstanding that Title schools will not have to demonstrate Supplemental Education Services but rather be allowed to submit a plan detailing extended learning opportunities for eligible students.

We would like to thank you for taking the time to review this information and please contact my office if you have any questions or need clarification on these matters.

Sincerely,

[Signature]

Kurt D. Wachholz,  
Superintendent of Schools  
West Allis-West Milwaukee School District, et. al
Thank you, Senator Olsen, Representative Kestell, and members of the committees, for the opportunity to testify on the Wisconsin ESEA Accountability Waiver.

My name is Tim Schell and I am the Director of Curriculum and Instruction for the Waunakee Community School District. We are a district that has participated in the value-added pilot you heard about in earlier testimony. I serve on CESA 2’s value-added advisory council. I am also a member of one of DPI’s Educator Effectiveness work teams, the one working on SLO’s (Student Learning Objectives) that have also been referenced in earlier testimony. I would be happy to answer any questions regarding these topics.

In Washington Irving’s classic short story, Rip Van Winkle is a well regarded member of his community who turns to idleness, falls asleep for twenty years, and awakes to a changed world. This is a metaphor for public education in Wisconsin, where once we were a leading state in most respects whether it was reading, career preparation, college and career readiness, and innovation. That was once upon a time.

Now we find ourselves no longer a leading state. Not because of our students. Not because of our teachers. Not because of a lack of support in our communities. Collectively, however, we have been complacent and have not made hard choices to maintain our leading position in public education and provide a world class education to our children. Until now.

We are talking today about the draft ESEA waiver that the Wisconsin DPI intends to submit to the federal government to move beyond the requirements of NCLB. Although NCLB was an important evolutionary step in raising student achievement and making achievement gaps more visible, it lacked useful middle mechanisms to improve learning for all students and the ultimate goal of 100% proficiency was unrealistic. Or at least unrealistic by any standard worth striving for. Further, NCLB is more than four years overdue for reauthorization. This proposed ESEA waiver, however, is a serious leap forward for our state. It represents our waking up from twenty years of slumber to catch up with leading states like Massachusetts and Minnesota. This is an important moment for Wisconsin’s students and we owe it to them to make this happen.

Three points I want to touch on regarding the federal waiver guidelines are:

1) We must have college and career-readiness expectations for all students,
2) We must have, or be developing, a comprehensive system of teacher and principal evaluation,
3) We must have a differentiated plan for assessment and accountability.

In Wisconsin, along with more than forty other states, we have moved on the adoption of the Common Core State Standards in English Language Arts and Mathematics and their implementation in our instructional and assessment systems by the 2014-2015 school year. This ensures that we have academic standards that prepare our students well for college and career.
We have discussed the challenges our students are facing transitioning from high school to two and four year higher education institutions. That is partly due to how our old Wisconsin model academic standards were designed in the 1990's. They were not specifically designed to be anchored to defined post-secondary readiness expectations. There was a gap in what students were expected to do in high school and what they needed to make a smooth transition to technical college, two year colleges, and four year colleges and universities. With the Common Core, there is a backwards design, so the Common Core begins with college and career readiness anchor standards and works back grade by grade. This minimizes the gap, but it also is like pulling on a slinky. The expectations at every grade level with the Common Core are ratcheted up by approximately a grade level of rigor in each year of schooling. It is important to recognize that and understand the connection to assessment and why the updated proficiency benchmarks are significant to schools and students. At Waunakee, as our teachers have been examining the Common Core Standards and the Smarter Balanced Assessment Consortium content specifications we see quality and rigor. We know we will need to continue to improve our instructional practices with our students.

As we look at students transitioning to the work force, either directly or via higher education, the inclusion of dual credit and industry certifications in the waiver proposal are also important. As we move forward with the increased graduation requirements in math and science, it will be important for districts to consider where it is appropriate to offer equivalency credits. For example, equating a Project Lead the Way pre-engineering course to science, an accounting course to mathematics, or an Ag Sciences course to biology.

Another item in the accountability waiver proposal is the note that we will soon have next generation science standards. If and when Wisconsin adopts the new science standards, we need to consider as a state how to incorporate science into our accountability framework. The DPI proposal envisions that.

I want to comment on NAEP benchmarking as significant step forward to higher standards and better information about college and career readiness to stakeholders. Just as the old model academic standards were not really designed to align with post-secondary expectations, our proficiency cut scores for accountability in Wisconsin are set at an extremely low level, a very low level. A student who scores proficient on the WKCE probably is not proficient in terms of college and career readiness. Scoring advanced is more aligned with college and career readiness. By recalibrating our proficiency standard on a NAEP-like standard, we are providing students and parents with a more accurate set of information about readiness for success beyond elementary school, middle school, and high school. All of us in our local schools will need to work with our school boards, parents, and the community at large to explain this change in how we report proficiency. It is not that students are performing more poorly, it is that the bar is being raised higher and it is being raised to where is should be set.
I want to draw attention to an area of the DPI accountability waiver proposal where as school districts we need your help in the Legislature. This has to do with the request to fund Explore, Plan, and ACT testing statewide in the next biennial budget. This is extremely important. Many districts, and Waunakee is one of these, use Explore and Plan to a degree. We find these assessments valuable because ACT works to align their assessments with what students need to succeed in college, succeed in technical school, and succeed in the workforce. They provide very good information for students and their families in planning for life beyond high school. These are valuable assessments, but to do them completely involves a money commitment. This should not be a Waunakee decision; this should be a Wisconsin decision to offer this for our students.

The other reason why these Explore, Plan, and ACT assessments are very important is their potential role in evaluating educator effectiveness. In the Educator Effectiveness design recommendations, half of an educator’s evaluation, for teachers and principals, is based on student learning. If you are a fifth grade teacher, that might be one-third on the state assessment, one-third on a local benchmark assessment like the MAP, and one-third on SLO’s. At the high school level you tend not to see many benchmark assessments. We can not measure student growth on the state assessment because we only administer that at 8th and 10th grade. There are not year to year pairings to obtain a growth measure. That means we are using SLO’s only for the student learning component of the evaluation. This is reasonable for special areas like Art, Music, Physical Education and Library Media, but in core subjects like English, Math, and Science we would like to have multiple measures of student learning. By adopting the Explore, Plan, and ACT, we will be able to measure growth on a year to year basis using proven assessments that are well-regarded and used by colleges and universities for high stakes decisions. I sincerely encourage you as our legislators to look favorably on this request in the next biennial budget.

There are a few areas where we need to develop implementation capacity that I want to discuss briefly.

One area all districts are looking at now is professional development. All of the key items in the accountability waiver proposal and the other initiatives (Common Core, Read to Lead) require time for use to train our teachers to implement them at an excellent level. All of this is challenging at the secondary level, but a Geometry teacher is a content specialist who only teaches math and common planning time is frequently in place in middle and high schools for teachers to work together on instructional improvement as math teachers, as science teachers, etc. But the elementary teacher in their classroom, he or she is the reading teacher, the math teacher, the writing teacher, the science teacher, and the social studies teacher. They are wearing multiple hats and their professional development needs to meet these new goals across the curriculum are much greater. Finding a way to improve the availability of professional development time for all teachers, but especially at the elementary level is important if we are to succeed.

Statewide technical support in implementing Common Core and the accountability proposal items is also important. One way the DPI accountability waiver proposal could
be improved would be to add a formal program evaluation component. Kentucky's waiver proposal includes a program evaluation element to assist schools in developing their instructional programs. Adding something similar where we not only look at a district's results, but how they go about arranging and delivering their instructional programs would strengthen an otherwise excellent DPI accountability waiver proposal.

Looking long term, we need to re-examine the school calendar. We have been on the same calendar in Wisconsin for a long time. To prepare our students to compete with any other young people, not only in the United States, but the world we need a different looking academic year. We only need to look to our neighbors to the north, the Canadian provinces. Their school year is typically ten days longer than ours. I am not asking for the moon, I am only asking that we look to our northern neighbors who are very like us and if that is what they feel their students need, perhaps we should consider doing the same.

In summary, the accountability waiver is an important step forward for our state and deserves legislative support. As we implement this initiative, we can adapt and improve it was move forward together.

I would be happy to answer any questions you might have. Thank you.
February 3, 2012

Dr. Tony Evers
State Superintendent
Department of Public Instruction
125 South Webster Street
Madison, WI 53707

Dear Dr. Evers:

RE: Response to ESEA Waiver

Thank you for the opportunity to comment on the Wisconsin Department of Public Instruction’s (DPI) draft NCLB waiver application. We very much appreciate the time and effort the participants put into creating a document that will significantly impact educational outcomes for students in the state.

There are many things in the application that Milwaukee Public Schools (MPS) supports. The move away from an attainment only measurement that does not accurately capture progress made within schools toward a growth measure will significantly increase the credibility of the state’s school accountability system.

Most specifically, MPS applauds the following key components of the waiver application:

- Institution of new state assessments
- Funding of EXPLORE, PLAN, ACT and WorkKeys
- Increasing proficiency expectations
- Including all publicly-funded schools
- Recognizing high-achieving schools
- Reducing duplication and unnecessary burden on districts
- Considering both achievement growth and proficiency in measuring educational effectiveness
- Emphasizing the importance of closing achievement gaps in individual schools and across the district.
- Provision of opportunities for extended learning days for students in low-performing schools.
- Support of effective instruction and leadership through the development and implementation of teacher and principal evaluation systems that take into account student outcomes and effective practice
- Encouragement of customized interventions for students
- Basing achievement gap analysis on the highest-performing subgroup, instead of defaulting to white student performance.
• Establishment of a Statewide Student Information System and WISEdash.

The district also supports an accountability system that includes the broad participation of a wide range of school types. Substantial Title I funding is currently dedicated to support non-MPS and non-public schools within the district’s boundaries.

In addition MPS very much supports the DPI’s declaration to “provide meaningful measures to inform differentiated recognitions, intervention and support.” The emphasis on flexibility and more accurately targeting resources to areas of specific need is welcomed and simply makes common sense. In the district’s experience, such flexibility is desperately needed.

Currently, the one size fits all approach hampers efforts to target resources and interventions to students who are in most need of assistance. Instead, schools are compelled to engage in professional development and other training that does not focus on their specific areas of concern. Such broad brush responses draw time, effort and resources away from interventions for students who are most in need of assistance and greatly weaken a school’s ability to make the type of progress called for by the corrective action plans themselves. It is imperative that if such flexibility is granted that MPS is afforded the opportunity to capitalize on it.

State and federal law provide for a variety of interventions and allow the State Superintendent to use his or her discretion in implementing such interventions. We believe that it is in the interest of schools, school districts, communities and the State Superintendent to retain that discretion in order to work cooperatively with school districts to ensure that improvement measures that are showing progress in schools are not aborted due to an arbitrary timeline. Further, the retention of such discretionary authority is critical given the unprecedented and unknown elements of the intervention.

There appears to be no flexibility in the waiver application language, the State Superintendent “will” take the unprecedented step of removing the school from the authority of the locally elected school board and the school district. The concerns here are many and given the dramatic nature of the intervention the State Superintendent must retain some authority to exercise his or her discretion before handing a school off to an unknown, untested, potentially unqualified “expert.”

While MPS supports many of the most significant aspects of the waiver application, the district also has some serious concerns about the process involved in creating it and some of its contents. MPS strongly feels that a two-week public comment period is inadequate for a full analysis of the waiver request. By way of this letter, we respectfully request that the United States Department of Education (ED) direct the Wisconsin DPI to open a new comment period to allow a reasonable amount of time for review of a proposal that would shake the educational foundations of K-12 education in this state and that has the potential to dramatically alter the relationship between the local citizenry, elected school boards and the schools within their districts.

It is unclear from the application what outreach efforts DPI made to encourage parental and community comment on the plan. Before the ED takes action on the waiver application, we are requesting that DPI publicly identify the steps it has taken to involve parents and community members around the state in the development of the waiver application and to encourage them to participate in the public comment period. The department also should identify the steps it took to explain the waiver application to parents and communities in terms they understand.

Other concerns the district has about the waiver application include, but are not limited to:
• Overall, the waiver application has multiple areas with placeholders for “plans” to be developed at a later time, making comment and feedback exceedingly difficult, if not impossible.

• It is unclear which subject areas are being targeted for instruction and assessment. The proposal speaks of English, language arts, mathematics and literacy across the content areas, yet mentions only English, language arts and mathematics in other sections, and only reading and mathematics in still other areas.

• The waiver application appears to be inconsistent in its approach on Districts Identified for Improvement given how it speaks to increased flexibility.

• Currently, the waiver application appears to lack a research base to indicate how the state taking over individual low-performing schools would improve academic outcomes for students.

• The application does not include basic qualification requirements for turnaround or takeover vendors.

• The application does not state what, if any, participating districts will have in selecting the consultants and vendors who will be tasked with assisting those districts.

• The extended learning opportunity provisions (in lieu of Supplemental Educational Services) likely would be more expensive than the current SES provisions, while funding available for district students will be reduced by 25% due to the requirement for equitable participation of non-public schools, which is not currently a requirement.

• The waiver application does not provide an alternative plan if EXPLORE, PLAN, ACT and WorkKeys funding again is denied by the Legislature, thereby weakening the accountability plan for high schools.

• The anticipated top priority of the proposed Standards, Instruction and Assessment Center, “standardization of materials and fidelity of implementation” appears to usurp the power of local school boards.

• If private schools continue to be allowed to use current admission standards and admission practices, the waiver may have the unintended consequence of encouraging private schools to reject or “counsel out” some students who seem less likely to achieve DPI’s standards.

• The waiver request is silent on how many aspects of the plan, including how contractors and schools removed from their Local Educational Agency (LEA), would be funded, thus presuming DPI is largely transferring the oversight obligation to unknown experts and compelling local school districts and local taxpayers to foot the bill.

• The exclusion of value added models – even ones that do not control for demographics – reduces the potential for most accurately measuring growth.

• The proposed growth metrics in the school accountability system are different from the proposed metrics in teacher accountability/evaluation system, thereby undermining system coherence.

• Last, but not least, aside from the unanswered questions and issues previously noted, MPS feels it is important for the DPI to address the following questions and issues which are specific to MPS so as to allow us to sufficiently comment on the waiver proposal.
We request that DPI address the following matters.

- Would the "statewide early warning system" with "almost real time" data for schools be duplicative of our current CAR-required systems?
- It is unclear when student subgroup progress does and doesn't count. It appears subgroups don't count in accountability/measures of student attainment or student growth on the test, but do count in post-secondary attainment.
- Clarity is necessary regarding the proposed state role in "direct[ing] reform at the LEA level, including staffing, programming, financing". Does this free us up from some contract restrictions?

Again, MPS appreciates the opportunity to comment on the DPI's draft NCLB waiver application. We are supportive of the state's effort to find a better way to structure and assess for strengthening the entire K-12 education system in the state of Wisconsin. There are many promising ideas in the application, and we believe, through meaningful collaboration, solutions exist to resolve the concerns delineated in this letter. We look forward to continuing this dialogue with the Department.

Sincerely,

Michael Bonds, Ph.D.
President, Milwaukee Board of School Directors

Gregory E. Thornton, Ed.D.
Superintendent of Schools
February 14, 2012

Superintendent Tony Evers
Dept. of Public Instruction
P.O. Box 7841
Madison, WI 53707-7841

Re: Comments on DPI’s Draft ESEA Waiver request

Dear Superintendent Evers:

As you are probably aware, the Survival Coalition of Disability Organizations is a broad based coalition of over 40 disability organizations in Wisconsin, which work on disability related public policy issues to improve the lives of people with disabilities throughout Wisconsin. Although some of our members did complete DPI’s on-line survey regarding its draft ESEA waiver, the Survival Coalition believes that the survey did not allow us to provide the comprehensive response that we feel is necessary to ensure accountability for students with disabilities. Therefore, we are sending these comments to you in the hope that you will amend certain aspects of the waiver. We would appreciate the inclusion of our comments, along with all other stakeholder comments, in your submission of the ESEA waiver request to the U.S. Dept. of Education.

Overall, we do want to make clear that we support DPI’s desire to obtain a waiver from the onerous provisions of the ESEA which will go into effect in 2013, and which we do not feel will help provide a better education to children with disabilities. In addition, there are many aspects of DPI’s draft waiver which we support. However, there are also many aspects that we either oppose or believe need to have far greater detail in order for us to consider supporting them. We have outlined both the aspects of the waiver which we support as well as those that concern the Survival Coalition below, in the order in which the waiver is drafted.
Overview of SEA’s Request for the ESEA flexibility

- We strongly support the emphasis on Universal Design for Learning (UDL) Principles.

- We support the proposed use of Dynamic Learning Maps as the alternate assessment based on alternate achievement standards (AA-AAS) and applaud Wisconsin’s participation in this national consortium. However, we believe that DPI should not emphasize that these alternative assessments should be used on 1% of all students, as this perpetuates a myth that there is no need to make individualized determinations for children with the most significant disabilities who should be involved in this type of assessment. In addition, in Wisconsin, 1% of students do not take the AA-AAS currently, in fact the number is lower and 1% should not become a new target. Current U.S. Department of Education (USDOE) WI data assessment data (2009-2010) shows the percent of students with disabilities (SWD) on AA-AAS: 8.8% in Reading; 8.9% in Math. It is also important that Wisconsin refer to this group of students who may take the AA-AAS consistently throughout the application as “students with the most significant disabilities.”


- We support the fact that one of the guiding principles that “drive the work of DPI”: “Every Student has the Right to Learn” includes reference to the essential elements of the Common Core Standards, which “will be the foundation of instruction and assessment for student with significant cognitive disabilities...”

- While we support the creation of a “Standards, Instruction and Assessment (SIA) Center,” we are concerned over the failure to identify the timeline during which it will be created. We also support the fact that the SIA Center will create materials to support teaching and learning for all students, including SWD. While we approve of the fact that DPI is interested in partnerships with higher ed. faculty, we are concerned that there is no detail as to how this partnership (which currently does not exist) will be created. We understand there is a model for DPI and institutions of higher education partnerships utilized by DPI’s State Personnel Development Grant (SPDG) that has demonstrated system change initiatives and promising outcomes.

- We support increasing Math and Science High School (HS) credit requirements from 2-3. However we are concerned about the failure to identify the need to obtain legislative approval and that this may not happen in waning days of the current legislative session.

- We are pleased that DPI is going to field test use of new cut scores, but we are concerned that draft waiver has not stated when this will happen or in what manner.
• While we support the concept of Reducing Duplication and Unnecessary Burden, there is no reference to including federally required IDEA (special education) data in this unified system. It is critical that IDEA data be included in any unified data system.

Principle 1.C–Develop and Administer Annual, Statewide, Aligned, High-Quality Assessments that Measure Student Growth

• We strongly support DPI’s participation in the SMARTER Balanced Assessment Consortium, which supports the concept of “regardless of disability” in referencing Common Core Standards Assessment.

• We support DPI’s decision to move toward “quick turnaround of results” for assessments.

• We offer qualified support for “Optional comprehensive and content-cluster measures that include computer adaptive assessments and performance tasks, administered at locally determined intervals.” This is because we do not understand why these are optional and the draft is unclear as to how or when this will be done and whether the computer adaptations are designed for SWD.

• Wisconsin’s waiver request should provide detail on how the state will transition students taking the alternate assessment on alternate academic achievement standards (AA-AAS) to common core standards. The application should also state that teachers of students who participate in the AA-AAS are specifically included in all training and rollout of the common core standards, and in every other facet of Wisconsin’s proposal that applies to all other students, including teacher evaluation.

• Any accommodations offered on these assessments should be the same as the national standards. Wisconsin’s’ waiver proposal should include a plan for reviewing and matching current accommodations policy with new accommodations which will be implemented with new assessments. This is particularly important because USDOE reported data shows 58% of Wisconsin SWDs using test accommodations on the general assessment in reading and 61% using accommodations in math - (2009-2010).

• Finally, the waiver application should be clear that the model being used to measure student growth for any purpose includes students who take the AA-AAS – i.e. students with the most significant disabilities.

Principle 2.A–Develop and Implement a State-Based System of Differentiated Recognition, Accountability and Support

• We strongly support an accountability system which will apply to schools, including charter and voucher schools which receive public funding, as DPI proposes.
• We support the draft options for priority schools including turnaround expert and targeted school reform or closing.

• We support the proposal calling for prioritizing improvements at the district level if the diagnostic review “demonstrates that systemic challenges at the LEA level contributed to identification as a Priority School.”

• We support charter schools entering into a performance agreement with DPI if identified as a priority school.

• While we support private voucher schools entering into performance agreement if identified as a priority school or exiting the program, we are concerned that the waiver is silent about disability participation or assessment in these schools, especially given the known dearth of SWD who participate in the current voucher program.

• We are very concerned that the draft waiver states that the overall accountability index system is currently under development and that School and District Report Cards will be developed over the coming year in consultation with stakeholders. We cannot support such a vague statement. If USDOE approves this waiver despite its vagueness, then we insist that parents, advocates and educators of SWDs be invited to be active participants in developing this accountability index.

• We are very concerned about the draft proposal to waive supplemental education services, which states that these services can be waived if a “majority” of parents wish to waive them, and that districts must show evidence of subgroup parent involvement, including parents of SWD. Our concern is that there is no mechanism identified for how a majority of parents can be obtained and what the nature of subgroup parent consultation must be. See also Sec. 2.D. regarding priority schools which has this same concern.

• While we support the draft waiver’s proposal for “individualized instruction and align with individual student needs identified through balanced assessments, including the needs of SWDs,” we are concerned that there is no mention of the necessary inter-relation with a student’s IEP. The same is true regarding the proposal for written parental consent on student’s “instructional learning plan” where there is no mention of inter-relation with student’s IEP. See also Sec. 2.D. regarding priority schools which has this same concern.

• We support the draft waiver’s call for DPI-contracted turnaround experts in persistently low performing schools to complete a School Improvement Diagnostic Review (SIDR), which includes identification of the processes and practices to serve SWDs. However, we are concerned that there is no mention of analysis of behavior management or
discipline practices required in this review which is critical to turning a school around. See also Sec. 2.D. regarding priority schools which has this same concern.

- While we support the identification of LEA level systemic challenges if “a large proportion of district schools are identified as priority schools,” we are concerned that the term “large proportion” is not defined in the waiver.

- Regarding Recognizing High Performing Schools, while we support, identification of increases in math and reading performance and closing achievement gaps, we do not believe that reading and math should be lumped together, and we are concerned that there is no reference to behavior and/or discipline practices.

2.B—Set Ambitious but Achievable Annual Measurable Objectives (AMOs)

- We are very concerned that while individual subgroup performance is reported, the waiver proposed not to use it for overall accountability calculation. Wisconsin’s proposal for accountability should not be watered down by reporting subgroups for some calculations and not others.

- We are concerned that a methodology has not yet been determined to calculate Priority Area and Overall Scores.

- We support the draft waiver’s proposal that schools may receive unacceptable-performance flags if any single subgroup misses the target in math or reading test participation rate and that the target test participation is 95%.

- We are very troubled that the draft waiver considers it acceptable to have any dropouts in elementary school, let alone not flagging those schools which have fewer than 2% dropouts. We also believe that flagging at 10% in high school is too high and that should be lowered to 5% if it is indeed the state’s goal to graduate every child. Finally, we believe it is extremely important that the calculation for dropouts be disaggregated by subgroup.

- Regarding the 3rd Grade Reading accountability, we believe that falling 2 standard deviations below the statewide average is insufficiently rigorous as that is the old methodology for determining if students had a significant learning disability. In addition, subgroup performance in this area should also be a cause for a flag.

- Regarding the “Stars” heading, we believe there is a typo when it states that stars awarded for rate of college credits in HS and postsecondary enrollment within 16 months of “college” (probably should be HS) graduation, and AP participation and performance. In addition, we believe stars should be awarded for a high post-HS employment rate.
• We support adding a district flag if 1 or more schools is persistently failing to meet expectations.

• While we strongly support the reduction of the “Cell Size” from 40 to 20 for accountability purposes, we remain concerned that a large number of small and rural schools will not be held accountable under this system, particularly for subgroups. We have requested previously that DPI report the number of Wisconsin schools that would not be reporting for accountability purposes on SWD with a cell size of 20. In addition, N size calculation parameters should not apply, and do not need to apply, to dropout and graduation rate calculations. The purpose of n-size is to get statistically relevant information but for these measures which have an absolute calculation there is no need for this caution. Smaller schools that cannot meet an n size of 20 for a subgroup should not be eliminated from these important calculations and review.

• We support that “DPI intends to request funds for EXPLORE, PLAN, ACT and WorkKeys,” but we are concerned that the draft waiver does not state from whom or how much.

• We fail to understand and therefore do not support the fact that students are not tested in 9th, 11th or 12th grades, so high schools won’t be included in the growth gap.

• We are concerned that in discussing “The Graduation Gap” there is no reference to the vocational diploma (Senate Bill 335) which has broad support in the Wisconsin Legislature and is pending passage this session.

• Wisconsin is right to give credit to the 6-year graduation rate, but the 4-year rate must be calculated to have priority. These rates must not be added together and divided to find an average. We want students to graduate in four years if this is possible.

• We are concerned that in the “On-Track Indicator,” the only priority measurement is attendance. Behavior and discipline should also be measured, especially as a component of attendance.

• Finally, it is extremely important that AMOs be set between schools verses between subgroups. A measure that is focused on comparing subgroups within a school may mean some students may never reach proficiency.

2.C.–Reward Schools

• We are concerned that in the proposed “ENHANCEMENTS TO WISCONSIN’S EXISTING RECOGNITION AND REWARDS” there is no mention of cost for “additional state resources, including staffing for funding” for Spotlight Schools Diagnostic Reviews (SPDR).
2.D.–Priority Schools

- See comment under Sec. 2.A. above discussing “Waiving Supplemental Education Services.”

- See comment under Sec. 2.A. above discussing “Alternative Requirements.”

- See comment under Sec. 2.A. above discussing “Parent Involvement.”

- While we support the “Assurances” statement on p. 3, we are concerned that there is no mention of the relationship to children’s IEP.

- Regarding School Improvement Diagnostic Reviews, we support inclusion of universal screening and progress monitoring. However, we are concerned that there is no mention of behavior management and discipline practices.

- We fully support the paragraphs on pp. 6-7, entitled -RtI, Extended Learning Time, Highly Skilled Educators, Highly Skilled Leaders, Positive and Safe Learning Environments, Family Engagement, and After 3 Years of Implementation.

- We are concerned that Tables 2.3 and 2.4–Timeline for Implementation of Priority School Activities all budget items listed TBD. Without a real budget, this is difficult to support.

- We cannot tell if high schools are included in the priority school program, and if not, this would concern us.

- We are concerned that exit criteria are not clearly articulated in the draft waiver proposal.

2.E.–Focus Schools

- We support subgroup proficiency rates in reading and math being used for Focus Schools. We are not in favor of a definition of a Focus School that includes the biggest gaps between subgroups within a school as a student then becomes a victim of where he/she resides. A better measure is to compare subgroups with the lowest achievement.

- We support the plan to “Access Core Instruction in Reading and Math.” However, we are concerned about the draft waiver proposal’s continued failure to focus on behavior.

- Given our comments regarding a need to focus on behavior and discipline, we are pleased to see the discussion of PBIS.
• We support the Increased Prescriptive and Directive Requirements section.

• While we support the stated “RATIONALE FOR FOCUS SCHOOL REQUIREMENTS” which calls for RtI as a means to “appropriately serve all students,” we believe the draft waiver needs to explain how RtI helps kids with disabilities. The intent of RtI should continue to be reducing inappropriate referral to special education.

• We have a grave concern that the Students with Disabilities section, pp. 10-11, only focuses on lowering identification rate and fails to mention increasing rates of learning.

• Once again, we are concerned that no exit criteria are listed.

• We are concerned that there is only a focus on schools because there also needs to be a focus on subgroup achievement.

• We strongly suggest that Wisconsin’s waiver proposal adopt a plan to move toward standards-based IEPs as a strategy to improve the performance of students with disabilities who are already determined as IDEA eligible. This is a highly effective way to ensure that SWDs are being educated in accordance with the statewide common core standards.

2.G.–Build SEA, LEA and School Capacity to Improve Student Learning

• We are concerned that there is no mention about subgroup specific expertise.

• We are concerned that Table 2.5–Monitoring Activities of School and Student Performance, describes SEA monitoring “as necessary” for priority schools and “yearly with more frequent communication as necessary” for focus schools which is too vague to support.

• We support prioritizing district level improvements if school diagnostic review demonstrates systemic LEA challenges.

• We are concerned that Principle 4: Reducing Duplication and Unnecessary Burden moves away from school plans to district-wide plans. Both are necessary.

3.A.-Develop and Adopt Guidelines for Local Teacher and Principal Evaluation and Support Systems

• We are concerned that in the Development of the Framework, no parent or special education groups were involved.
• We are concerned that in the section on Student Achievement discussing principal evaluation, there is no discussion of SWD.

• While we support that within the Evaluation Process an educator will not be allowed to remain at the developing level “indefinitely”, we are concerned that no time frame is identified for exiting such educators out of the profession.

We appreciate the opportunity to provide you with this feedback. Feel free to contact us if you have any questions or wish to discuss our concerns.

Sincerely,

Survival Coalition Co-Chairs

Beth Swedeen, WI Board for People with Developmental Disabilities; 608-266-1166; Beth.Swedeen@wisconsin.gov
Tom Masseau, Disability Rights Wisconsin; 608-267-0214; Tom.Masseau@drwi.org
Maureen Ryan, Wisconsin Coalition of Independent Living Centers, Inc; 608-444-3842; moryan@charter.net

(Primary Contacts on this issue area: Jeff Spitzer-Resnick & Lisa Pugh, Disability Rights Wisconsin (608) 267-0214)

CC: Senator Luther Olsen
Representative Steve Kestell
FOR IMMEDIATE RELEASE
Monday, January 23, 2012
Contact: Patrick Gasper, DPI Communications Officer, (608) 266-3559

DPI seeks comments on draft NCLB waiver request

MADISON — Wisconsin’s request for waivers from several provisions of federal education law creates the expectation that every child will graduate ready for college and careers by setting higher standards for students, educators, and schools.

“Education for today’s world requires increased rigor and higher expectations,” said State Superintendent Tony Evers. “The federal No Child Left Behind Act (NCLB) has shackled schools by being overly prescriptive and prohibiting creative reforms that would help more students gain the skills needed for further education and the workforce. Wisconsin’s request for flexibility from NCLB is driven by the belief that increasing rigor across the standards, assessment, and accountability system will result in improved instruction and improved student outcomes.”

To receive waivers, state education agencies must demonstrate how they will use flexibility from NCLB requirements to address four principles: transitioning to college- and career-ready standards and assessments; developing systems of differentiated recognition, accountability, and support; evaluating and supporting teacher and principal effectiveness; and reducing duplication. The Department of Public Instruction has posted its draft waiver request online and is asking for public comment through a survey. After the two-week comment period, the agency will revise the waiver request and submit it to the U.S. Department of Education by Feb. 21.

College and Career-Ready Expectations for All Students

Major provisions of the plan have been in progress through collaborative work throughout Wisconsin and with other states. Wisconsin, as part of several consortia projects, is developing new assessments to replace the Wisconsin Knowledge and Concepts Examinations (WKCE), the Wisconsin Alternate Assessment for Students with Disabilities (WAA-SwD), and the assessment for students who are learning English. The new assessments will be aligned with the Common Core State Standards. Wisconsin’s approach to standards implementation, which sets it apart from other states, includes an added focus on literacy in all subjects. Educators in science, social studies, history, and technical subjects will work as part of the state’s comprehensive literacy efforts to enrich students’ learning in all content areas.
The draft waiver request calls for higher expectations for student achievement by using proficiency levels based on the National Assessment of Educational Progress (NAEP) for new cut scores on statewide tests. This will provide an important transition to the higher expectations of the new assessment system. Results from the NAEP cut score evaluation will inform new baseline accountability measures and will be used for reporting student performance and school accountability in 2012-13.

“Increasing our expectations of what students need to know and be able to do, to match the reality of the 21st century, will not be easy,” Evers said. “Students who were proficient on the WKCE may no longer be proficient on the new assessment system as new, more important skills are measured. Schools that were making AYP under NCLB may no longer meet the expectations of our next generation accountability system. Also, schools growing student achievement will be recognized by this new system in ways that never happened with NCLB.”

To ensure that students will meet graduation requirements and be ready for postsecondary studies, the Department of Public Instruction will recommend the use of the assessments from ACT (EXPLORE, PLAN, ACT, and WorkKeys) and will again request funding in the 2013-15 biennial budget to support statewide administration. The agency also will seek an increase in graduation standards to include a minimum of three years of mathematics and three years of science, engineering, or technology coursework. Currently, graduates must have two credits each in mathematics and science.

**Differentiated Recognition, Accountability, and Support**

The draft waiver request incorporates work by the School and District Accountability Design Team to help Wisconsin establish accountability measures that 1) are fair; 2) raise expectations; and 3) provide meaningful measures to inform differentiated recognition, intervention, and support. Furthermore, the design team felt that any new system should not narrow options for students. As a result, the state will continue to find ways to place a value on important electives such as art, music, world languages, and physical education.

Wisconsin’s draft waiver request calls for schools to be held accountable for: student attainment, growth in student achievement, closing achievement gaps, and on-track to graduation and postsecondary readiness. An index system that uses multiple measures to classify schools along a continuum of performance and a new school report card will be developed. The state’s lowest performing schools and those with the largest achievement gaps will be identified. Interventions in identified schools will be based on a diagnostic review to improve core instruction. The state’s Response to Intervention Center (RtI) as well as a Statewide System of Support, which will be developed, will be entry points for school improvement and district reform.

New procedures for identifying schools and districts will replace the current Adequate Yearly Progress (AYP) determination and will establish recognition for high performing schools. The department intends to seek

(more)
authority to include all publicly funded schools in its accountability and support efforts. Under NCLB, only Schools Identified for Improvement (SIFI) that receive Title I funding must implement reforms.

“We are changing these systems to support struggling schools and to share what works,” Evers said.

Taxpayers rightly want to know that their education tax dollars are producing results. Our waiver request will improve accountability for publicly funded education in Wisconsin.”

Support for Effective Instruction and Leadership

Teachers and principals will be evaluated on their professional practice and student achievement in an educator evaluation framework that is part of the state’s waiver request. Evaluations will include multiple measures, with half based on educator practice and half on student outcomes. Evaluations will link to each educator’s professional development plan. Provisions in the draft waiver request are based on recommendations from the State Superintendent’s Educator Effectiveness Design Team.

“Centered on student learning, fair, valid, and reliable — these are core principles for our educator effectiveness framework,” Evers said. “Our performance-based evaluation system will support teachers and principals in their job of educating students and help our educators improve throughout their careers.”

Reduce Duplication and Unnecessary Burden

The department has been working on a Longitudinal Data System to reduce duplication and burden in school district reporting. Methods of collecting district data are changing as a result of the transition to a statewide student information system (SSIS). Additionally, methods of making data available directly to districts as well as to the public will be more timely through the SSIS and a new reporting system called the Wisconsin Information System for Education dashboard (WISEdash). WISEdash, a single reporting system for school and district accountability reporting, will be released initially in a secure format. WISEdash eventually will replace the DPI’s current data reporting systems.

“Wisconsin’s waiver request brings together a number of initiatives that have been in the works for some time. We are seeking public input on our draft waiver plan now so we can refine our reform efforts and ensure Wisconsin’s public education system is responsive to our citizens,” Evers concluded.

###

NOTE: The Wisconsin Department of Public Instruction’s ESEA Flexibility Request is posted online at http://dpi.wi.gov/esea/index.html. This page includes a link to a summary of the major provisions in the draft request and the public response survey. The survey will be open from Jan. 23 to Feb. 3. All responses will be kept confidential. This news release is available electronically at http://dpi.wi.gov/eis/pdf/dpinr2012_15.pdf.
Accountability Reform Overview

This overview describes the changes to Wisconsin’s accountability system outlined in the Department of Public Instruction’s (DPI) draft waiver proposal for ESEA flexibility.

ESEA Flexibility Waiver

The U.S. Department of Education (USED) has offered states the opportunity to apply for flexibility on certain provisions of the federal Elementary and Secondary Education Act (ESEA, currently known as NCLB, the No Child Left Behind Act). States’ proposals must demonstrate how they will use this flexibility to implement the following principles:

- College- and career-ready expectations for all students,
- State-developed differentiated recognition, accountability, and support,
- Support for effective instruction and leadership, and
- Reduced duplication and unnecessary burden.

DPI posted a draft waiver proposal on January 23 to elicit feedback over a two-week public comment period, after which DPI refined the proposal for submission to USED by February 22, 2012. Changes affecting schools and districts are included in this overview. Some specific changes or plans included in the final draft that are a direct response to stakeholder input include:

- In addition to raising the mathematics and science credit requirements needed for graduation, DPI is advocating for 6.5 elective credits as a graduation requirement across the state, so that art, music, world languages, and technical courses may be a part of every student’s high school experience. This is critical to Wisconsin teachers and families, and was a key finding of WEAC’s Speak Out for Wisconsin Public Schools.
- In order that more students are recognized and included in this accountability system, and to avoid the masking of small subgroup performance, DPI will change the cell size used for accountability calculations from 40 to 20. This was a priority for the disability advocacy groups in Wisconsin. Additionally, a combined subgroup will be used when the binary subgroups (ELL, SwD, economically disadvantaged) do not meet cell size, in recognition of the need to closely monitor the performance of these traditionally high-needs student groups.
- DPI will continue to incorporate Universal Design for Learning principles into planning and development of resources for standards implementation, assessments, and instructional practices.
- DPI will raise cut scores on current assessments to reflect higher expectations for students during the two-year transition between current and next generation assessment systems. DPI will also propose funding to make the ACT suite available across the state, a specific request from school administrators.
- DPI confirmed support for the plans to waive SES in lieu of other extended learning opportunities as well as having significant parental input as part of these plans.
In serving Focus Schools, DPI will be significantly increasing the capacity of Wisconsin’s RtI Center to ensure a high quality, multi system of support, including additional interventions/supports for students with disabilities and English language learners.

College and career ready expectations for all students
Expanding upon “Every Child a Graduate” to focus on increasing expectations that ensure Wisconsin graduates are prepared for success in college and career, DPI is raising standards and making changes to assessment and graduation requirements.

Standards & Assessments
- **Full implementation of Common Core State Standards (CCSS) and Common Core Essential Elements (CCEE):** Instruction based on CCSS and CCEE (alternate achievement standards) must be in place by the 2014-15 school year. Assessment of CCSS and CCEE proficiency will begin in the 2014-15 school year.
- **New Assessment Systems:** Proficiency on CCSS will be measured by new assessment systems being developed by the Smarter Balanced Assessment Consortium (replacing the Wisconsin Knowledge and Concepts Examination [WKCE]). Proficiency on the CCEE will be measured by the Dynamic Learning Maps Assessment (replacing the Wisconsin Alternate Assessment for Students with Disabilities [WAA-SwD]). Both assessments will be field tested in 2013-14 and required statewide in 2014-15. Beginning in 2014-15, these state assessments will move from fall to spring, and the high school assessment will move from grade 10 to grade 11. Both assessments will be given in grades 3-8 and 11. These online assessment systems will include end-of-year tests, as well as additional resources to help benchmark student progress throughout the year.
- **Raised Expectations:** The proficiency level on the Smarter test will be benchmarked against national and international standards. As a transition, the WKCE will use cut scores based on the more rigorous NAEP scale to calculate proficiency in reading and mathematics.
  - 2011-12: Current WKCE cut scores for proficiency remain in place for accountability. DPI will begin the process to convert WKCE cut scores, working collaboratively with DPI’s Technical Advisory Committee and testing vendor to field test NAEP-based cut scores on the WKCE.
  - 2012-13: Finalize NAEP-based cut scores following field test results. Make adjustments to accountability calculations if found to be necessary in the evaluation. NAEP-based cut scores on WKCE will be used for accountability determinations in spring 2013.
- **College and Career Readiness:** DPI is proposing use of the EXPLORE-PLAN-ACT + WorkKeys package (the ACT suite) and will request funds in the Wisconsin 2013-15 biennial budget to support administration of these assessments statewide. The data gathered from these assessments enable academic growth to be measured throughout high school. Results also inform students, parents, and educators about the extent to which students are on-track for college and career. These assessments are supplemental to the 11th grade Smarter assessment, which will be used to measure proficiency on the CCSS beginning in 2014-15.
- **English Language Proficiency:** DPI and World-Class Instructional Design and Assessment (WIDA), housed at the University of Wisconsin-Madison, lead a consortium to develop a new English language proficiency assessment for English Language Learners (ELLs). The project, Assessment Services Supporting ELLs through Technology Systems (ASSETS), will develop an...
online assessment system that measures student progress in attaining the English language skills needed to be successful in K-12 and postsecondary studies, and work. ASSETS will replace the ACCESS for ELLs assessment currently used in Title III accountability in 2015-16.

**Graduation Requirements**

- State graduation requirements will increase to include these specified 15 credits:
  - 4 credits of English language arts
  - 3 credits of mathematics (an increase from two credits)
  - 3 credits of science, engineering or technology with two of those years as traditional science or science equivalency courses (an increase from two credits)
  - 3 credits of social studies
  - 1.5 credits of physical education
  - 0.5 credit of health education

- In addition, DPI recommends putting into statute an additional 6.5 elective credits for graduation, as recommended by the State Superintendent last year. It is also recommends that innovative dual enrollment programs be increased.

- These recommended requirements would result in a total of 21.5 credits necessary for graduation, in alignment with national averages and current local practice. This is a floor requirement as many districts will continue to require more credits, and most graduates will complete more credits than the new requirement in statute.

- These requirements will be in effect for students in the four-year adjusted cohort expected to graduate in 2016-17, pending legislation on graduation requirements.

**State-developed differentiated recognition, accountability, and support**

With the goal of developing a statewide accountability system that increases student achievement and promotes and supports school improvement across the state, DPI worked with a statewide school accountability design team, other stakeholders, and the Technical Advisory Committee to establish accountability measures that 1) are fair; 2) raise expectations; and 3) provide meaningful measures to inform differentiated recognitions, intervention, and support.

**Comprehensive Statewide Accountability System**

- Wisconsin’s accountability system will include all schools receiving public school funds. This includes Title I schools, non-Title I schools; district, non-district, and non-instrumentality charter schools; and private schools participating in the state Parental Choice Programs.

- Full implementation of this accountability system beyond Title I schools is pending based on funding and legislative changes that may be required.

**Accountability Index**

- Beginning in 2012-13, a comprehensive accountability index will replace the current ESEA Adequate Yearly Progress (AYP) system. The index approach uses multiple measures and classifies schools along a continuum of performance.

- Schools and districts will be held accountable for outcomes in four priority areas that comprise sub-scales of the index:
  - Student achievement
Attachment 3A Accountability Reform Overview

- Student growth
- Closing achievement gaps
- On-track to graduation and postsecondary readiness

- Index scores will be provided for each of the four sub-scale areas.
- In addition to the index scores, schools and districts will be held accountable for three specific performance expectations:
  - **Test Participation** (elementary, middle, high school) – when test participation rates fall below an acceptable level, it impacts the comparability of a school’s assessment results. Unacceptable test participation rates will result in a red flag for this specific performance expectation.
  - **Dropout rates** (middle and high school) – the goal of all students graduating prepared for college and careers requires improved academic performance and retention of students in school. High dropout rates, regardless of school performance, will result in a red flag for this specific performance expectation.
  - **Absenteeism** (elementary, middle, high school) – this indicator is highly correlated with low performance; if students are not in school they do not have access to important content and instruction. Absenteeism rates above the specified minimum will result in a red flag for this specific performance expectation.

- Overall accountability scores will be a combination of priority area scores on an index of 0-100.

**Accountability Ratings**

- Accountability index (0-100) will place schools and districts into one of six categories along the performance continuum:
  - Significantly Exceeding Expectations
  - Exceeding Expectations
  - Meeting Expectations
  - Meeting Some Expectations
  - Meeting Few Expectations
  - Persistently Failing to Meet Expectations

- Cut points for each category will be established through a standard setting process recommended by DPI’s Technical Advisory Committee (TAC).

- The State will require interventions in Title I schools that demonstrate the lowest performance in the state (Priority Schools) and in schools with the largest achievement gaps in reading, mathematics, or graduation rate, or in which certain subgroups are the lowest performing in the state (Focus schools).
Annual Measurable Objectives (AMOs)

- AMOs currently in place under NCLB will be used for 2011-12, including the scheduled increases for reading and mathematics:
  - 85% school attendance rate (elementary and middle schools)
  - 85% graduation rate, or 2% increase in graduation rate, or 5% increase if below 70% (high schools)
  - 87% of students scoring proficient or higher on WSAS reading
  - 79% of students scoring proficient or higher on WSAS mathematics
- Use of the accountability index, applying cut scores based on NAEP to the WKCE, and new baselines for AMOs will be in place for 2012-13 accountability determinations.
- Each school will have an individualized AMO to move them to meeting, exceeding, or significantly exceeding without any red flags (test participation, dropout rate, absenteeism).
- Schools that are not in the Meeting Expectations category will have AMOs that reflect the growth required to meet expectations within four years.
- A school or district cannot be in the top three categories if it missed its AMO or has any red flags (test participation, dropout rate, absenteeism). A school scoring low in any of the four sub-scale areas cannot be in the top category (Significantly Exceeding Expectations).

Subgroup Accountability

- A cell size of 20 students will be used for all accountability calculations, a change from 40 students. Reducing the cell size to 20 allows schools, districts, and the state to identify subgroups that may be struggling but would not be reported under larger cell size rules.
- A high-need supergroup that includes economically disadvantaged, English language learners, and students with disabilities only in cases in which each of these subgroups does not alone have the minimum group size of 20. This recognizes the importance of closely monitoring the needs of these groups and allows more schools to be included in accountability calculations.
- The accountability index is designed to emphasize the performance of every subgroup. The four sub-scale areas and index will prevent small subgroup performances from being masked.
Accountability Reform Overview

### Accountability Reporting

<table>
<thead>
<tr>
<th>Year</th>
<th>Assessment</th>
<th>Scale used for accountability</th>
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<tr>
<td>2011-12</td>
<td>WKCE</td>
<td>Final year for current WKCE performance levels; begin field testing of cut scores based on NAEP</td>
</tr>
<tr>
<td>2012-13</td>
<td>WKCE</td>
<td>Use cut scores based on NAEP on WKCE student reports, and for school and district accountability report cards</td>
</tr>
<tr>
<td>2013-14</td>
<td>WCKE</td>
<td>Continue using cut scores based on NAEP for WKCE and accountability report cards</td>
</tr>
<tr>
<td></td>
<td>Smarter Assessment Field Test Dynamic Learning Maps Field Test</td>
<td>Field test Smarter and Dynamic Learning Maps assessments and define performance cut scores to be used across all participating states</td>
</tr>
<tr>
<td>2014-15</td>
<td>Smarter Assessment System Dynamic Learning Maps</td>
<td>Fully implement Smarter and Dynamic Learning Maps assessment Smarter with consortia-defined performance cut scores</td>
</tr>
</tbody>
</table>

- DPI will field test new school and district report cards based on the accountability index, prior to implementing them statewide.

### District Accountability

- Currently, district accountability is based on the aggregate of all district students within three separate levels: elementary, middle, and high school. This will continue, with an accountability index score calculated for each of the levels.
- The district AMO is to meet or exceed expectations at all three levels—elementary, middle and high school—and to have no schools in the Persistently Failing to Meet Expectations category.
  - If the aggregate scores for the district fail to meet expectations at all three levels, the district will miss the AMO. Additionally, districts that have any schools in the Persistently Failing to Meet Expectations category will receive a red flag and miss the AMO.
- For districts missing the AMO at all three levels—elementary, middle and high school—the state superintendent may require that a district-level diagnostic review must be completed to evaluate critical systems and structures within the central office, including but not limited to human resources, curriculum and instruction, finance, and leadership.

### Support and Intervention

- **Overall Approach**
  - DPI will identify both high and low performing schools, but will focus interventions and supports on the lowest performing schools in the state.
  - Support and interventions will match the severity and duration of identified problems.
  - Districts will be the entry point for school improvement and district reform.
Attachment 3A Accountability Reform Overview

- DPI will establish one statewide system of support for all public-funded schools, pending funding. This replaces the current system of supporting only the lowest-performing Title I schools.

**Schools Persistently Failing to Meet Expectations**
- This includes all Title I Priority Schools (at least 5% of all Title I schools in the state), and all other schools that receive public funding including non-Title I schools, charter schools and schools that participate in Parental Choice Programs as determined by the accountability index.
- For Title I schools, beginning in Fall 2012, the mandate of Supplemental Education Services (SES) under NCLB will no longer be required. In lieu of these requirements, districts will be required to submit a plan detailing the extended learning opportunities for eligible students. Parent consultation in the development of the plan must be documented. The plan must be approved by DPI.
- Traditional public schools have the following options:
  - Schools in this category participate in a comprehensive, on-site diagnostic review to pinpoint problem areas, followed by development of a reform plan aligned to the findings in the diagnostic review. The plan must be approved by DPI. Schools must contract with a state-approved turnaround partner to implement reform plans. Improvement plans must focus on improving core instruction in reading and mathematics.
  - Closure.
  - Charter schools and schools participating in Parental Choice Programs must implement similar requirements as traditional public schools.
- For schools that fail to show demonstrable improvement after three years, the state superintendent will intervene.
- Specific interventions will vary depending on school type (public, parental choice, charter) and on the needs of the school and their specific performance indicators. Examples include extended learning time, targeted reading and mathematics supports, professional development and implementation assistance.
- Supports will include online resources, and technical assistance from the Wisconsin Response to Intervention (RtI) Center, Cooperative Education Service Agencies (CESAs), and DPI staff.
- DPI will conduct quarterly onsite visits each year to monitor progress.

**Schools Meeting Some Expectations or Meeting Few Expectations**
- This includes all Title I Focus Schools (at least 10% of all Title I schools in the state), and all other schools that receive public funding including non-Title I schools, charter schools and schools that participate in Parental Choice Programs as determined by the index.
- Schools must participate in an online state-directed self assessment of the current core reading and math curriculum including interventions for struggling students. The school must develop an improvement plan based on the diagnostic review, and implement RtI, working closely with the Wisconsin RtI Center. Specific interventions in the plan must address identified problem areas. The plan must be approved by DPI.
Attachment 3A Accountability Reform Overview

- DPI will conduct electronic reviews of each school’s progress and monitor throughout the year.

- **Schools Exceeding Expectations and Significantly Exceeding Expectations**
  - Resources will be electronically available to all schools in the state that wish to conduct a self-assessment to establish a plan for continuous improvement.
  - Supports will include online resources, and technical assistance from the Wisconsin Response to Intervention (RtI) Center, CESAs, and DPI staff.

**School Recognition**

- The top performing schools will be publicly recognized.
- The Wisconsin *Schools of Recognition* Award will be expanded to include non-Title I schools, charter schools and schools that participate in Parental Choice Programs and will identify schools making significant progress. There will be three types of awards:
  - Schools that “beat the odds:” Title I receiving schools that are in the top quartile of poverty for the state and show high achievement
  - High-Performance Schools: schools falling into the *Significantly Exceeding Expectations* category (i.e., schools with a very high index score and no unacceptable-performance flags)
  - High-Progress Schools: schools that demonstrate the most growth on an annual basis
- The state will look to a sample of high performing schools to identify best practices and share statewide, particularly with those schools not meeting expectations.
- Schools selected for recognition must meet their AMO and not miss any of the three performance expectations (test participation, dropout rate, and absenteeism).

**Support for effective instruction and leadership**

The primary purpose of the Wisconsin Framework for Educator Effectiveness is to develop a system of continuous improvement of educator practice—from pre-service through service—that leads to improved student learning. The system established by the Educator Effectiveness Design Team was designed to evaluate teachers and principals through a fair, valid, and reliable process using multiple measures across two main areas: educator practice and student outcomes.

- All public school teachers and principals will be included in the evaluation system.
- Both principal and teacher evaluations will include multiple measures of educator practice and student outcomes. Educator practice will count for half of the evaluation; student outcomes will count for half of the evaluation.
- The evaluation system will include formative and summative elements, and will link directly to the educator’s professional development plan.
- The system will be fully implemented in the state by the 2014-15 school year.
- Individual educator ratings are confidential and will not be publicly reported.

**Reduced duplication and unnecessary burden**

DPI is aligning a number of efforts to reduce duplication and unnecessary burden on districts. District data collection will be streamlined as a result of the transition to a statewide student information system.
Attachment 3A Accountability Reform Overview

(SSIS). Methods of making data available directly to districts, as well as to the public, will be localized and made more timely through the SSIS and a new reporting system called the Wisconsin Information System for Education dashboard (WISEdash).

- **Single Statewide Student Information System**: Districts will begin transitioning to a single student information system in Fall 2012. There is a five-year implementation timeline for this system, which will reduce duplication of reporting efforts, increase timeliness of data access, and allow districts more time to focus on using data to inform important educational decisions.

- **Single Reporting System**: WISEdash, a single reporting system for school/district accountability reporting, will include a plethora of pre-defined and user-defined reports including student growth percentiles, enrollment, course-taking, postsecondary enrollment, literacy, and more. WISEdash will be released initially in secure format only (i.e., for authorized district personnel to use via a login); eventually WISEdash will also house public reports and replace DPI’s current public data reporting systems.

- **Consolidated Reporting Requirements**: School- and district-required performance reports will be replaced by new school and district report cards, allowing these reporting requirements to be met without the need for districts to create separate reports.

**Stakeholder Involvement**

- **Involvement during Development**: Changes to Wisconsin’s accountability system described in this document are the result of much deliberation and collaboration with stakeholders. The work of the School & District Accountability Design Team, as well as input from various educational stakeholders, informed the design of this new accountability system. DPI will continue to engage stakeholders throughout the state as this system develops.

- **Public Survey**: The DPI survey that accompanied the waiver draft request during the two-week public comment period resulted in input and guidance from over 700 respondents including educators, parents and other key education stakeholders. Survey results were utilized to clarify and modify the waiver request.
January 23, 2012

Dear Colleague:

I am writing today to share with you a draft of Wisconsin’s proposed waiver from certain elements of the Elementary and Secondary Education Act (ESEA), also known as No Child Left Behind (NCLB). With this posting, the Department of Public Instruction (DPI) opens the public comment period. Attached to this letter you will find:

- A summary of the key elements in the proposal (http://dpi.wi.gov/esea/pdf/summary.pdf);
- The initial full draft waiver proposal (http://dpi.wi.gov/esea/pdf/waiver.pdf);
- A survey through which you can submit your comments by February 3, 2012. (https://forms.dpi.wi.gov/se.ashx?s=56301B2D5BE3EF8D)

For the past decade, NCLB has forced one-size-fits-all mandates and labels on our schools and districts. Through this waiver process, the USED has offered states the opportunity to apply for flexibility on certain provisions of ESEA. Specifically, all state proposals must demonstrate how they will use this flexibility to implement the following principles:

- College- and career-ready expectations for all students;
- State-developed differentiated recognition, accountability, and support;
- Supporting effective instruction and leadership;
- Reducing duplication and unnecessary burden.

DPI’s proposal is, in part, based on the work of the statewide School and District Accountability Design Team that met over the last several months to design a fair and accurate accountability system that measures growth and attainment for all students. In addition, the proposal reflects the robust education investment agenda we’ve advanced together over the past two-and-a-half years, focused on improving student achievement and graduating students prepared for future success.

The DPI intends to submit its waiver application to the United States Department of Education (USED) by February 21, 2012. Through this comment period, we hope to further engage the citizens of Wisconsin in this discussion so critical to the future of education. We encourage you to share this draft of Wisconsin’s proposed waiver and the associated survey with others. Most importantly, we want broad input to ensure that our proposal best meets the needs of Wisconsin’s children.

After we receive feedback from you and other educators, parents, and citizens from across the state, we will be revising and refining this draft proposal. Please remember to provide your comments through the survey no later than February 3.

Sincerely,

Michael J. Thompson, PhD
Deputy State Superintendent

Attachments
ESEA Flexibility

Request

Revised September 28, 2011
This document replaces the previous version, issued September 23, 2011.
(The document was formatted to ease usability on October 14, 2011)

U.S. Department of Education
Washington, DC  20202

OMB Number:  1810-0708
Expiration Date: March 31, 2012

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1810-0708. The time required to complete this information collection is estimated to average 336 hours per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate or suggestions for improving this form, please write to: U.S. Department of Education, Washington, D.C. 20202-4537.
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INTRODUCTION

The U.S. Department of Education (Department) is offering each State educational agency (SEA) the opportunity to request flexibility on behalf of itself, its local educational agencies (LEAs), and its schools, in order to better focus on improving student learning and increasing the quality of instruction. This voluntary opportunity will provide educators and State and local leaders with flexibility regarding specific requirements of the No Child Left Behind Act of 2001 (NCLB) in exchange for rigorous and comprehensive State-developed plans designed to improve educational outcomes for all students, close achievement gaps, increase equity, and improve the quality of instruction. This flexibility is intended to build on and support the significant State and local reform efforts already underway in critical areas such as transitioning to college- and career-ready standards and assessments; developing systems of differentiated recognition, accountability, and support; and evaluating and supporting teacher and principal effectiveness.

The Department invites interested SEAs to request this flexibility pursuant to the authority in section 9401 of the Elementary and Secondary Education Act of 1965 (ESEA), which allows the Secretary to waive, with certain exceptions, any statutory or regulatory requirement of the ESEA for an SEA that receives funds under a program authorized by the ESEA and requests a waiver. Under this flexibility, the Department would grant waivers through the 2013–2014 school year, after which time an SEA may request an extension of this flexibility.

REVIEW AND EVALUATION OF REQUESTS

The Department will use a review process that will include both external peer reviewers and staff reviewers to evaluate SEA requests for this flexibility. This review process will help ensure that each request for this flexibility approved by the Department is consistent with the principles described in the document titled ESEA Flexibility, which are designed to support State efforts to improve student academic achievement and increase the quality of instruction, and is both educationally and technically sound. Reviewers will evaluate whether and how each request for this flexibility will support a comprehensive and coherent set of improvements in the areas of standards and assessments, accountability, and teacher and principal effectiveness that will lead to improved student outcomes. Each SEA will have an opportunity, if necessary, to clarify its plans for peer and staff reviewers and to answer any questions reviewers may have. The peer reviewers will then provide comments to the Department. Taking those comments into consideration, the Secretary will make a decision regarding each SEA’s request for this flexibility. If an SEA’s request for this flexibility is not granted, reviewers and the Department will provide feedback to the SEA about the components of the SEA’s request that need additional development in order for the request to be approved.
GENERAL INSTRUCTIONS

An SEA seeking approval to implement this flexibility must submit a high-quality request that addresses all aspects of the principles and waivers and, in each place where a plan is required, includes a high-quality plan. Consistent with ESEA section 9401(d)(1), the Secretary intends to grant waivers that are included in this flexibility through the end of the 2013–2014 school year. An SEA will be permitted to request an extension of the initial period of this flexibility prior to the start of the 2014–2015 school year unless this flexibility is superseded by reauthorization of the ESEA. The Department is asking SEAs to submit requests that include plans through the 2014–2015 school year in order to provide a complete picture of the SEA’s reform efforts. The Department will not accept a request that meets only some of the principles of this flexibility.

High-Quality Request: A high-quality request for this flexibility is one that is comprehensive and coherent in its approach, and that clearly indicates how this flexibility will help an SEA and its LEAs improve student achievement and the quality of instruction for students.

A high-quality request will (1) if an SEA has already met a principle, provide a description of how it has done so, including evidence as required; and (2) if an SEA has not yet met a principle, describe how it will meet the principle on the required timelines, including any progress to date. For example, an SEA that has not adopted minimum guidelines for local teacher and principal evaluation and support systems consistent with principle 3 by the time it submits its request for the flexibility will need to provide a plan demonstrating that it will do so by the end of the 2011–2012 school year. In each such case, an SEA’s plan must include, at a minimum, the following elements for each principle that the SEA has not yet met:

1. **Key milestones and activities:** Significant milestones to be achieved in order to meet a given principle, and essential activities to be accomplished in order to reach the key milestones. The SEA should also include any essential activities that have already been completed or key milestones that have already been reached so that reviewers can understand the context for and fully evaluate the SEA’s plan to meet a given principle.

2. **Detailed timeline:** A specific schedule setting forth the dates on which key activities will begin and be completed and milestones will be achieved so that the SEA can meet the principle by the required date.

3. **Party or parties responsible:** Identification of the SEA staff (e.g., position, title, or office) and, as appropriate, others who will be responsible for ensuring that each key activity is accomplished.

4. **Evidence:** Where required, documentation to support the plan and demonstrate the SEA’s progress in implementing the plan. This ESEA Flexibility Request indicates the specific evidence that the SEA must either include in its request or provide at a future reporting date.

5. **Resources:** Resources necessary to complete the key activities, including staff time and additional funding.

6. **Significant obstacles:** Any major obstacles that may hinder completion of key milestones and activities (e.g., State laws that need to be changed) and a plan to overcome them.
Included on page 19 of this document is an example of a format for a table that an SEA may use to submit a plan that is required for any principle of this flexibility that the SEA has not already met. An SEA that elects to use this format may also supplement the table with text that provides an overview of the plan.

An SEA should keep in mind the required timelines for meeting each principle and develop credible plans that allow for completion of the activities necessary to meet each principle. Although the plan for each principle will reflect that particular principle, as discussed above, an SEA should look across all plans to make sure that it puts forward a comprehensive and coherent request for this flexibility.

Preparing the Request: To prepare a high-quality request, it is extremely important that an SEA refer to all of the provided resources, including the document titled ESEA Flexibility, which includes the principles, definitions, and timelines; the document titled ESEA Flexibility Review Guidance, which includes the criteria that will be used by the peer reviewers to determine if the request meets the principles of this flexibility; and the document titled ESEA Flexibility Frequently Asked Questions, which provides additional guidance for SEAs in preparing their requests.

As used in this request form, the following terms have the definitions set forth in the document titled ESEA Flexibility: (1) college- and career-ready standards, (2) focus school, (3) high-quality assessment, (4) priority school, (5) reward school, (6) standards that are common to a significant number of States, (7) State network of institutions of higher education, (8) student growth, and (9) turnaround principles.

Each request must include:

• A table of contents and a list of attachments, using the forms on pages 1 and 2.
• The cover sheet (p. 3), waivers requested (p. 4-5), and assurances (p. 5-6).
• A description of how the SEA has met the consultation requirements (p. 8).
• An overview of the SEA’s request for the ESEA flexibility (p. 8). This overview is a synopsis of the SEA’s vision of a comprehensive and coherent system to improve student achievement and the quality of instruction and will orient the peer reviewers to the SEA’s request. The overview should be about 500 words.
• Evidence and plans to meet the principles (p. 9-18). An SEA will enter narrative text in the text boxes provided, complete the required tables, and provide other required evidence. An SEA may supplement the narrative text in a text box with attachments, which will be included in an appendix. Any supplemental attachments that are included in an appendix must be referenced in the related narrative text.

Requests should not include personally identifiable information.

Process for Submitting the Request: An SEA must submit a request to the Department to receive the flexibility. This request form and other pertinent documents are available on the Department’s Web site at: http://www.ed.gov/esea/flexibility.

Electronic Submission: The Department strongly prefers to receive an SEA’s request for the flexibility electronically. The SEA should submit it to the following address: ESEAflexibility@ed.gov.
**Paper Submission**: In the alternative, an SEA may submit the original and two copies of its request for the flexibility to the following address:

Patricia McKee, Acting Director  
Student Achievement and School Accountability Programs  
U.S. Department of Education  
400 Maryland Avenue, SW, Room 3W320  
Washington, DC 20202-6132

Due to potential delays in processing mail sent through the U.S. Postal Service, SEAs are encouraged to use alternate carriers for paper submissions.

**REQUEST SUBMISSION DEADLINE**

SEAs will be provided multiple opportunities to submit requests for the flexibility. The submission dates are November 14, 2011, a date to be announced in mid-February 2012, and an additional opportunity following the conclusion of the 2011–2012 school year.

**TECHNICAL ASSISTANCE MEETING FOR SEAS**

To assist SEAs in preparing a request and to respond to questions, the Department will host a series of Technical Assistance Meetings via webinars in September and October 2011.

**FOR FURTHER INFORMATION**

If you have any questions, please contact the Department by e-mail at ESEAflexibility@ed.gov.
### Table Of Contents

Insert page numbers prior to submitting the request, and place the table of contents in front of the SEA’s flexibility request.

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<td>Overview of SEA’s ESEA Flexibility Request</td>
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<td>1.A Adopt college-and career-ready standards</td>
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<td>1.B Transition to college- and career-ready standards</td>
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<td>1.C Develop and administer annual, statewide, aligned, high-quality assessments that measure student growth</td>
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<td><strong>Principle 2: State-Developed Differentiated Recognition, Accountability, and Support</strong></td>
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<td>2.A Develop and implement a State-based system of differentiated recognition, accountability, and support</td>
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<td>2.F Provide incentives and supports for other Title I schools</td>
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<td>2.G Build SEA, LEA, and school capacity to improve student learning</td>
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<td><strong>Principle 3: Supporting Effective Instruction and Leadership</strong></td>
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<td>3.A Develop and adopt guidelines for local teacher and principal evaluation and support systems</td>
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<td>3.B Ensure LEAs implement teacher and principal evaluation and support systems</td>
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**Table of Contents, continued**

For each attachment included in the *ESEA Flexibility Request*, label the attachment with the corresponding number from the list of attachments below and indicate the page number where the attachment is located. If an attachment is not applicable to the SEA’s request, indicate “N/A” instead of a page number. Reference relevant attachments in the narrative portions of the request.

<table>
<thead>
<tr>
<th>Label</th>
<th>List of Attachments</th>
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<tr>
<td>1</td>
<td>Notice to LEAs</td>
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<td>2</td>
<td>Comments on request received from LEAs (if applicable)</td>
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<td>3</td>
<td>Notice and information provided to the public regarding the request</td>
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<td>4</td>
<td>Evidence that the State has formally adopted college- and career-ready content standards consistent with the State’s standards adoption process</td>
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<td>5</td>
<td>Memorandum of understanding or letter from a State network of institutions of higher education (IHEs) certifying that meeting the State’s standards corresponds to being college- and career-ready without the need for remedial coursework at the postsecondary level (if applicable)</td>
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<td>6</td>
<td>State’s Race to the Top Assessment Memorandum of Understanding (MOU) (if applicable)</td>
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<td>7</td>
<td>Evidence that the SEA has submitted high-quality assessments and academic achievement standards to the Department for peer review, or a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review (if applicable)</td>
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<td>8</td>
<td>A copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups (if applicable).</td>
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<td>9</td>
<td>Table 2: Reward, Priority, and Focus Schools</td>
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<td>10</td>
<td>A copy of any guidelines that the SEA has already developed and adopted for local teacher and principal evaluation and support systems (if applicable).</td>
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<td>11</td>
<td>Evidence that the SEA has adopted one or more guidelines of local teacher and principal evaluation and support systems</td>
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<td>12</td>
<td><strong>NOTE: ATTACHMENTS AND APPENDICES WILL BE INCLUDED WITH THE FEBRUARY 21, 2011 SUBMISSION, BUT HAVE NOT BEEN INCLUDED WITH THIS POSTING.</strong></td>
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<td>Legal Name of Requester:</td>
<td>Requester's Mailing Address:</td>
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<th>State Contact for the ESEA Flexibility Request</th>
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<td>Name:</td>
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<td>Position and Office:</td>
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<td>Contact’s Mailing Address:</td>
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<td>Email address:</td>
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<td>Chief State School Officer (Printed Name):</td>
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<tr>
<td>Signature of the Chief State School Officer:</td>
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<td>Date:</td>
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The State, through its authorized representative, agrees to meet all principles of the ESEA Flexibility.
By submitting this flexibility request, the SEA requests flexibility through waivers of the ten ESEA requirements listed below and their associated regulatory, administrative, and reporting requirements by checking each of the boxes below. The provisions below represent the general areas of flexibility requested; a chart appended to the document titled *ESEA Flexibility Frequently Asked Questions* enumerates each specific provision of which the SEA requests a waiver, which the SEA incorporates into its request by reference.

1. The requirements in ESEA section 1111(b)(2)(E)-(H) that prescribe how an SEA must establish annual measurable objectives (AMOs) for determining adequate yearly progress (AYP) to ensure that all students meet or exceed the State’s proficient level of academic achievement on the State’s assessments in reading/language arts and mathematics no later than the end of the 2013–2014 school year. The SEA requests this waiver to develop new ambitious but achievable AMOs in reading/language arts and mathematics in order to provide meaningful goals that are used to guide support and improvement efforts for the State, LEAs, schools, and student subgroups.

2. The requirements in ESEA section 1116(b) for an LEA to identify for improvement, corrective action, or restructuring, as appropriate, a Title I school that fails, for two consecutive years or more, to make AYP, and for a school so identified and its LEA to take certain improvement actions. The SEA requests this waiver so that an LEA and its Title I schools need not comply with these requirements.

3. The requirements in ESEA section 1116(c) for an SEA to identify for improvement or corrective action, as appropriate, an LEA that, for two consecutive years or more, fails to make AYP, and for an LEA so identified and its SEA to take certain improvement actions. The SEA requests this waiver so that it need not comply with these requirements with respect to its LEAs.

4. The requirements in ESEA sections 6213(b) and 6224(e) that limit participation in, and use of funds under the Small, Rural School Achievement (SRSA) and Rural and Low-Income School (RLIS) programs based on whether an LEA has made AYP and is complying with the requirements in ESEA section 1116. The SEA requests this waiver so that an LEA that receives SRSA or RLIS funds may use those funds for any authorized purpose regardless of whether the LEA makes AYP.

5. The requirement in ESEA section 1114(a)(1) that a school have a poverty percentage of 40 percent or more in order to operate a schoolwide program. The SEA requests this waiver so that an LEA may implement interventions consistent with the turnaround principles or interventions that are based on the needs of the students in the school and designed to enhance the entire educational program in a school in any of its priority and focus schools, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.

6. The requirement in ESEA section 1003(a) for an SEA to distribute funds reserved under that section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its LEAs in order to serve any of the State’s priority and focus schools.
7. The provision in ESEA section 1117(c)(2)(A) that authorizes an SEA to reserve Title I, Part A funds to reward a Title I school that (1) significantly closed the achievement gap between subgroups in the school; or (2) has exceeded AYP for two or more consecutive years. The SEA requests this waiver so that it may use funds reserved under ESEA section 1117(c)(2)(A) for any of the State’s reward schools.

8. The requirements in ESEA section 2141(a), (b), and (c) for an LEA and SEA to comply with certain requirements for improvement plans regarding highly qualified teachers. The SEA requests this waiver to allow the SEA and its LEAs to focus on developing and implementing more meaningful evaluation and support systems.

9. The limitations in ESEA section 6123 that limit the amount of funds an SEA or LEA may transfer from certain ESEA programs to other ESEA programs. The SEA requests this waiver so that it and its LEAs may transfer up to 100 percent of the funds it receives under the authorized programs among those programs and into Title I, Part A.

10. The requirements in ESEA section 1003(g)(4) and the definition of a Tier I school in Section I.A.3 of the School Improvement Grants (SIG) final requirements. The SEA requests this waiver so that it may award SIG funds to an LEA to implement one of the four SIG models in any of the State’s priority schools.

Optional Flexibility:

An SEA should check the box below only if it chooses to request a waiver of the following requirements:

- The requirements in ESEA sections 4201(b)(1)(A) and 4204(b)(2)(A) that restrict the activities provided by a community learning center under the Twenty-First Century Community Learning Centers (21st CCLC) program to activities provided only during non-school hours or periods when school is not in session (i.e., before and after school or during summer recess). The SEA requests this waiver so that 21st CCLC funds may be used to support expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session.
### ASSURANCES

By submitting this application, the SEA assures that:

1. It requests waivers of the above-referenced requirements based on its agreement to meet Principles 1 through 4 of the flexibility, as described throughout the remainder of this request.

2. It will adopt English language proficiency (ELP) standards that correspond to the State’s college- and career-ready standards, consistent with the requirement in ESEA section 3113(b)(2), and that reflect the academic language skills necessary to access and meet the new college- and career-ready standards, no later than the 2013–2014 school year. (Principle 1)

3. It will develop and administer no later than the 2014–2015 school year alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities that are consistent with 34 C.F.R. § 200.6(a)(2) and are aligned with the State’s college- and career-ready standards. (Principle 1)

4. It will develop and administer ELP assessments aligned with the State’s ELP standards, consistent with the requirements in ESEA sections 1111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii). (Principle 1)

5. It will report annually to the public on college-going and college credit-accumulation rates for all students and subgroups of students in each LEA and each public high school in the State. (Principle 1)

6. If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and uses achievement on those assessments to identify priority and focus schools, it has technical documentation, which can be made available to the Department upon request, demonstrating that the assessments are administered statewide; include all students, including by providing appropriate accommodations for English Learners and students with disabilities, as well as alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2); and are valid and reliable for use in the SEA’s differentiated recognition, accountability, and support system. (Principle 2)

7. It will report to the public its lists of reward schools, priority schools, and focus schools at the time the SEA is approved to implement the flexibility, and annually thereafter, it will publicly recognize its reward schools. (Principle 2)

8. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later the deadline required under the State Fiscal Stabilization Fund. (Principle 3)

9. It will evaluate and, based on that evaluation, revise its own administrative requirements to
reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)

☐ 10. It has consulted with its Committee of Practitioners regarding the information set forth in its request.

☐ 11. Prior to submitting this request, it provided all LEAs with notice and a reasonable opportunity to comment on the request and has attached a copy of that notice (Attachment 1) as well as copies of any comments it received from LEAs (Attachment 2).

☐ 12. Prior to submitting this request, it provided notice and information regarding the request to the public in the manner in which the State customarily provides such notice and information to the public (e.g., by publishing a notice in the newspaper; by posting information on its website) and has attached a copy of, or link to, that notice (Attachment 3).

☐ 13. It will provide to the Department, in a timely manner, all required reports, data, and evidence regarding its progress in implementing the plans contained throughout this request.

If the SEA selects Option A or B in section 3.A of its request, indicating that it has not yet developed and adopted all guidelines for teacher and principal evaluation and support systems, it must also assure that:

☐ 14. It will submit to the Department for peer review and approval a copy of the guidelines that it will adopt by the end of the 2011–2012 school year. (Principle 3)
Consultation

An SEA must meaningfully engage and solicit input from diverse stakeholders and communities in the development of its request. To demonstrate that an SEA has done so, the SEA must provide an assurance that it has consulted with the State’s Committee of Practitioners regarding the information set forth in the request and provide the following:

1. A description of how the SEA meaningfully engaged and solicited input on its request from teachers and their representatives.

This section will carefully delineate the full scope of DPI’s consultation and outreach, specifically with teachers and their representatives, related to this waiver request. Details are not provided at this time, as the consultation effort is still underway.

2. A description of how the SEA meaningfully engaged and solicited input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes.

The Department of Public Instruction (DPI), Wisconsin’s state education agency, sought input from stakeholders from all areas of education in production of this Request for ESEA Flexibility. Input, questions, and comments were collected in a variety of formats, including: meetings over the last year of the Educator Effectiveness and School and District Accountability Design Teams; recommendations from the Read to Lead Task Force, which also met in 2011; a survey that accompanied a draft of this waiver request, which was posted for a two-week public review and comment period, and additional meetings, conversations, and written communications with myriad stakeholders.

School and District Accountability Design Team

DPI solicited specific feedback on a number of issues with the School and District Accountability Design Team, including:

- what it means to be college and career ready in today’s world;
- developing a definition of college and career readiness to guide the work;
- how to meaningfully report student performance (attainment and growth);
- how to meaningfully report on school and district performance;
- how to engage the public in school improvement;
- the design of new report cards including specific engagement over the contents of the school and district report cards;
- what the appropriate interventions would be for schools identified along the performance continuum;
- how interventions might differ based on school type (public, charter, choice);
- how to move forward in building, piloting, evaluating, and sustaining the accountability...
The remainder of this section will carefully delineate the full scope of DPI’s consultation and outreach related to this waiver application. Details are not provided at this time as the consultation effort is still underway.

**Evaluation**

The Department encourages an SEA that receives approval to implement the flexibility to collaborate with the Department to evaluate at least one program, practice, or strategy the SEA or its LEAs implement under principle 1, 2, or 3. Upon receipt of approval of the flexibility, an interested SEA will need to nominate for evaluation a program, practice, or strategy the SEA or its LEAs will implement under principles 1, 2, or 3. The Department will work with the SEA to determine the feasibility and design of the evaluation and, if it is determined to be feasible and appropriate, will fund and conduct the evaluation in partnership with the SEA, ensuring that the implementation of the chosen program, practice, or strategy is consistent with the evaluation design.

☑ Check here if you are interested in collaborating with the Department in this evaluation, if your request for the flexibility is approved.

**Overview of SEA’s Request for the ESEA Flexibility**

Provide an overview (about 500 words) of the SEA’s request for the flexibility that:

1. explains the SEA’s comprehensive approach to implement the waivers and principles and describes the SEA’s strategy to ensure this approach is coherent within and across the principles; and

2. describes how the implementation of the waivers and principles will enhance the SEA’s and its LEAs’ ability to increase the quality of instruction for students and improve student achievement.

**Theory of Action**

An education system will only impact every student’s future when it guarantees equal, yet individualized opportunities for all students. Driven by this knowledge, the Department of Public Instruction (DPI) will differentiate and personalize Wisconsin’s education system to transform teaching and learning across the state. Differentiation and personalization—for both student and teacher—mark the difference between successfully educating some and successfully educating all students.

Accordingly, DPI has committed to a robust, sensitive, and impactful statewide accountability system, as demonstrated in the State’s plans across the four Principles of this request.

- **Principle 1, Transition to College- and Career-Ready Expectations for All Students**
  - A detailed, high-quality plan for implementation of the Common Core State Standards (CCSS) that includes
  - Foundational Guiding Principles for Teaching and Learning;
Partnerships with educational leaders, regional service agencies, and institutions of higher education;
- Formation of an innovative Center for Standards, Instruction, and Assessment to develop rigorous, online instructional resources for the CCSS and assessment systems;
- Universal Design for Learning Principles;
- Lessons learned from a productive partnership with the Wisconsin Response to Intervention Center, which provides excellent methods for differentiation and personalization.

- Wisconsin is transitioning to next generation assessment systems through three assessment consortia.
  - SMARTER Balanced – developing an accessible, balanced assessment system with precision and adaptive differentiation at the heart of the assessment; implementation in Spring 2015
  - Dynamic Learning Maps – developing essential elements of the CCSS and an alternate assessment system; implementation in Spring 2015
  - ASSETS Consortium – developing new English Language Proficiency standards rooted in CCSS expectations and an English language proficiency assessment; implementation in 2015-16.

- Additional changes in college- and career-ready expectations
  - DPI will request funding for EXPLORE, PLAN, ACT, and WorkKeys to provide statewide implementation, in recognition that these assessments provide important information regarding a student’s trajectory toward college and career readiness, and allows flexibility in the trajectory by honoring different pathways to college or career.
  - DPI proposes changes to state graduation requirements to reflect an increased focus in STEM fields, in recognition of their importance for 21st century learning.

- Principle 2, State-Developed Differentiated Recognition, Accountability, and Support
  - Wisconsin will differentiate how schools are characterized by accountability measures, expectations, and interventions that result from accountability determinations; an approach that is an extension of the belief in the power of differentiation and personalization.
  - Wisconsin built an accountability index system using priority areas that factor in multiple measures—including attainment and growth—to place schools on a differentiated performance continuum while emphasizing the importance of continuous improvement for all students.
  - Rewards, interventions, and supports will begin with diagnostic reviews to personalize appropriate next steps using the most effective and efficient school improvement actions.

- Principle 3 – Supporting Effective Instruction and Leadership
  Wisconsin’s Educator Effectiveness Framework includes formative and summative elements and is intended to link each educator’s professional development to their individual strengths and weaknesses identified in the evaluation system.
The work outlined here is shaping DPI’s strategic plan to make Every Child a Graduate, and ensure every student in Wisconsin graduates ready for college and career.

**PRINCIPLE 1: COLLEGE- AND CAREER-READY EXPECTATIONS FOR ALL STUDENTS**

1.A **ADOPT COLLEGE- AND CAREER-READY STANDARDS**

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

<table>
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<tr>
<th>Option A</th>
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| ☒ The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that are common to a significant number of States, consistent with part (1) of the definition of college- and career-ready standards.  
  i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process.  
     (Attachment 4) | ☐ The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that have been approved and certified by a State network of institutions of higher education (IHEs), consistent with part (2) of the definition of college- and career-ready standards.  
  i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process.  
     (Attachment 4)  
  ii. Attach a copy of the memorandum of understanding or letter from a State network of IHEs certifying that students who meet these standards will not need remedial coursework at the postsecondary level.  
     (Attachment 5) |

1.B **TRANSITION TO COLLEGE- AND CAREER-READY STANDARDS**

Provide the SEA’s plan to transition to and implement no later than the 2013–2014 school year college- and career-ready standards statewide in at least reading/language arts and mathematics for all students and schools and include an explanation of how this transition plan is likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards. The Department encourages an SEA to include in its plan activities related to each of the italicized questions in the corresponding section of the document titled *ESEA Flexibility Review Guidance*, or to explain why one or more of those activities is not necessary to its plan.

Wisconsin’s approach to Principle 1: *Transition to College- and Career-Ready Standards,*
builds upon Wisconsin’s strong foundation of Common Core State Standards (CCSS) implementation plans, processes, infrastructures, and partnerships, while also building up from the foundation in innovative ways that will produce and make available high-quality instructional resources for teachers and other instructional leaders. Work in the College- and Career-Ready Standards arena is both far-reaching and long-term. It includes new standards, new assessments, and looks to the higher expectations (college- and career-ready) inherent in these standards and assessments to develop a rigorous transition plan that reaches beyond CCSS implementation.

**Proactive Steps Taken Prior to CCSS Adoption**
In the year prior to the release of the CCSS (2009), Wisconsin was deep into state-level revision of English language arts and mathematics standards. DPI was working with state-level leadership teams made up of expert educators from the two disciplines to revise Wisconsin’s academic standards with assistance from Achieve and the Partnership for 21st Century Skills. When CCSS discussions began midway through this project, what had initially seemed like bad timing turned into the first of a series of proactive steps the state was able to take to prepare Wisconsin for the CCSS. Given their previous charge, the statewide English language arts and mathematics teams were able to quickly shift gears from standards writing to CCSS standards reviewing, doing so with a clear perspective of what Wisconsin was looking for in new standards. They also turned their attention to considering the implementation of new standards, and began to locate the partnerships needed to best ready the field for the monumental task of shifting to the CCSS.

Throughout the winter and spring of 2010, DPI hosted a series of statewide meetings for education stakeholders including representatives from regional service providers, the Cooperative Educational Service Agencies (CESAs); the state’s largest teachers’ union; the superintendents’ and principals’ associations; parent groups; and content area (mathematics, English and reading) professional associations. The goal of these meetings was to craft common messages and approaches to the adoption and implementation of the CCSS and to uncover the best ways to leverage the state’s resources for success. The outcome of these early meetings was a jointly crafted plan for implementation that was co-developed and shared statewide prior to the release of the standards [Appendix 6]. This plan charted a path that prepared the field for standards implementation as well as the new SMARTER Balanced Assessment Consortium (SBAC) system. Phases of the CCSS implementation plan focused on Understanding, Curriculum, Instruction, and Assessment, and provided a consistent systems change approach. Given these proactive steps taken prior to the CCSS release, Wisconsin was well poised to be the first state to officially adopt the CCSS upon their June 2, 2010, release.

**Investigation Year (2010-2011)**
After adopting the standards, DPI worked closely with several groups, including the CESAs, the statewide English language arts and mathematics leadership teams, and a newly formed DPI CCSS implementation workgroup to address the “Investigation” year of the CCSS implementation plan. With assistance and feedback from DPI, the CESA School Improvement Services (SIS) statewide group (representing all 12 CESAs) created two important statewide
professional learning opportunities for the K-16 field. The first, called “Foundations,” provided a consistent one-day overview of the CCSS. Educators were encouraged to come in teams, and left with a local plan and resources for creating foundational awareness of the standards, and for on-going professional learning. The second series, called “Investigations,” was a deeper look at individual grade level standards in both mathematics and English language arts. Additional statewide implementation activities included learning opportunities available in every CESA; the learning was team-based and on-going. Over the course of one year, more than 70% of Wisconsin’s 424 districts participated in one of these series.

While CESAs were taking the lead with foundational professional learning for the field, DPI’s statewide English language arts and mathematics leadership teams (comprised of K-16 educators, instructional leaders and DPI staff) worked to draft discipline-specific guidance for implementation of the CCSS. This work was important for the Phase 2 work around curriculum and instruction (http://www.dpi.wi.gov/cal/pdf/ela-stds.pdf). Educators from districts and higher education worked together with assistance from DPI’s regional comprehensive center, Great Lakes West, to create Wisconsin-specific guidance documents for each discipline that addressed the question “What does effective English language arts/mathematics teaching and learning look like in Wisconsin?” During this content creation, English language arts and mathematics leaders echoed DPI’s forward-looking approach to the CCSS implementation process; the intent was not to connect the Common Core back to Wisconsin’s Model Academic Standards (which are not grade level standards) by conducting an alignment, but rather to identify the significant changes between the two sets of standards. This approach represented an intention to provide context for the major shift necessary in implementing the CCSS. These teams also met to discuss teaching and learning in each discipline.

During one meeting, the group realized that many of the state’s core beliefs about teaching and learning transcend English or mathematics; they are simply good practices for all classrooms. As a result, the teams continued to meet across disciplines to create the beginnings of a new resource called “Wisconsin’s Guiding Principles for Teaching and Learning,” six statements that help make clear the core beliefs intrinsic to high quality teaching and learning.

These guiding principles drive the work of DPI—particularly Principle #1: Every Student has the Right to Learn—and specifically guides the work on the Essential Elements of the Common Core State Standards, part of DPI’s participation in the Dynamic Learning Maps Consortium. (It also includes DPI’s work to align the CCSS with English language proficiency standards, discussed in detail below.) The Essential Elements will be the foundation of instruction and assessment for students with significant cognitive disabilities, comprising approximately one percent of the total student population, and Wisconsin is playing a key role in the development of those elements. Throughout this school year, DPI will partner with Wisconsin’s regional service agencies, special education leaders, institutions of higher education, and general education leaders to develop an implementation timeline and plan for the Essential Elements. A cadre of these representatives will guide development of this
plan between February and June of 2011. This implementation timeline will align with that for the alternate assessment, which is slated for initial implementation in the 2014-15 school year.

Framing CCSS and Essential Elements of the CCSS implementation within a full vision for improving education, and linking the effort to other key initiatives as part of a system of high-quality educational practices is a major focus for DPI. As such, the department has continued to work with a large internal CCSS implementation workgroup to further develop and connect major initiatives, and to create consistent language, materials, and presentations detailing the connections between standards, assessment, instruction and other key initiatives, including Response to Intervention. Notably, DPI has worked to ensure alignment of CCSS resources with early childhood standards, extended grade-band standards, and college- and career-readiness expectations defined by Institutions for Higher Education. As a result of this work, Wisconsin was selected to participate as one of the State Leadership Teams for the College Readiness Partnership with CCSSO, the American Association of State Colleges and Universities, and State Higher Education Executive Officers to promote broad implementation of CCSS in mathematics and English language arts, with a focus on those issues at the intersection of K-12 and higher education systems.

Furthering Wisconsin’s focus in making the CCSS accessible for all students, Wisconsin’s role as the lead state for the World-Class Instructional Design and Assessment (WIDA) Consortium, recently funded to build the next generation of English language proficiency (ELP) assessments, includes development of ELP standards that directly correspond to the Common Core. Development of these new standards will be a wide-reaching process that engages member states, the WIDA Consortium housed at the University of Wisconsin-Madison, regional educational labs, and other institutions of higher education.

These new, college- and career-ready English language proficiency standards and assessments represent higher linguistic expectations for Wisconsin’s over 49,000 English language learners. Together, the ELP standards and assessments will work to ensure this population is better prepared to access the content of the CCSS. All of this aligns with Wisconsin’s focus on ensuring greater college and career readiness for English language learners.

One additional decision made by Wisconsin’s CCSS Implementation Team that appears to set Wisconsin apart from other states is DPI’s approach to the CCSS for Literacy in Science, Social Studies, History, and the Technical Subjects. Quite simply, Wisconsin’s CCSS Implementation workgroup determined that all educators must see themselves as part of the CCSS literacy work. This decision compelled DPI to convene a new statewide leadership team for Literacy in All Subjects, or Disciplinary Literacy, in January of 2011. The Disciplinary Literacy team, made up of educators from career and technical education, the arts, health studies, and the four core content areas, was charged with broadening the scope of the grades 6-12 CCSS literacy standards to include all content areas and all grade levels. The resulting materials parallel DPI’s English language arts and mathematics guidance documents and send a strong
message about the need for every content area educator to identify the meaningful expressive and receptive skills students must learn in order to access deeper and richer content knowledge in that discipline (http://www.dpi.wi.gov/cal/pdf/las.pdf).

Currently, subgroups of educators from each content area are creating literacy-related Google sites (http://dpi.wi.gov/standards/disciplinaryliteracy.html) for educators in their specific content area. This “by us, for us” approach sets up Disciplinary Literacy as an initiative with more differentiation than other more generic literacy initiatives, and addresses the challenge for creating ownership for the CCSS literacy standards. At this point, Wisconsin’s career and technical educators are some of the most energetic proponents of this connected work.

This approach to disciplinary literacy recognizes that intentional consideration of content-specific literacy will in fact improve students’ access to the content. It also prioritizes content-specific knowledge and communication skills—beyond reading and mathematics skills—that enhance students’ readiness for college and career. In forcing a deeper connection to the content and focusing on thinking, reasoning, speaking, listening, reading and writing like an expert in any content area, students will be better prepared to succeed in work and higher education.

Moving Forward
As we move into Phases 2 and 3 of the CCSS Implementation plan, new strategies to leverage existing resources in ways that connect initiatives for student learning. Most notably, we are leveraging systems and structures we have successfully built over the past two years through the collaborative creation of a statewide center for Response to Intervention (RtI). The Wisconsin RtI Center is a DPI-CESA partnership that creates a statewide structure for equitable, high quality content creation and professional learning around Wisconsin’s vision for RtI (http://dpi.wi.gov/rti/index.html). Wisconsin’s vision for RtI includes all students. That is, Wisconsin’s model for RtI includes high-performing students needing additional challenge as well as low-performing students needing additional support.

The Wisconsin RtI Center employs several statewide experts, ten regional coaches that work with school districts, a statewide data coordinator, and a statewide coaching coordinator. The Wisconsin RtI Center is built on a professional learning community model. Wisconsin currently has 24 endorsed trainers with 24 additional trainers being trained in the 2011-12 school year. The RtI Center has also created an online School-Wide Implementation Review tool that encourages on-going data evaluation and continuous review for schools.

The model provided by the RtI Center for development and dissemination of high-quality, standardized materials across Wisconsin has guided DPI’s planning around the best process and organizational structure for meeting the needs of districts, namely, instructional resources directly related to the CCSS. Building upon this model, DPI will create [timeline in a Standards, Instruction, and Assessment Center. The Standards, Instruction, and Assessment (SIA) Center will centralize content experts focused on the development of high-quality,
standardized resources and training plans related to these resources that will be easily accessed at low to no cost across the state. The Center will serve as a hub of content experts to serve the whole state on a regional basis.

Design and plans for the SIA center reflect these priorities:

- Standardization of materials and fidelity of implementation
- Low to no cost resources
- Increased access to content expertise across the state
- Centralized leadership connected to DPI
- Agility, speed, and responsiveness to needs across the state and DPI direction
- Partnerships with IHEs

DPI’s planning for the SIA Center is underway, in conversation with institutions of higher education and Wisconsin’s CESA Statewide Network. The goal in building plans for the SIA Center is to focus on identifying the best organizational structure—one that brings together institutions of higher education, CESAs, and other content and instructional experts—that results in a fantastic source for CCSS and assessment-related resources, a structure that, with sufficient DPI oversight, is empowered to address needs related to high quality instructional practices by quickly developing excellent online resources, training plans, and virtual modules.

With the goal of raising the bar and resulting outcomes for all students, the SIA Center will create resources for classroom educators, principals, and other educational stakeholders with a focus on improving instructional practices. For example, resources for classroom educators will focus on how they can improve their practices; resources for principals will focus on how they can best support their classroom educators’ improvement. The SIA Center’s focus on improving instruction situates it well to provide resources that are focused on how they can serve as strong, instructional leaders in their schools to principals and other administrators.

Ultimately, the Center aims to produce resources that result in improved instructional practices that embed

- A deep understanding of the CCSS
- Consistent, appropriate attention to data to inform decisions
- Assessment practices that improve learning and inform instruction

The Center’s agility to respond to needs of districts and direction from DPI, combined with its process of including educators in the design and development of high quality resources and provision of those resources through easy-to-use technology platforms will result in access to instructional materials grounded in the Common Core State Standards for educators across Wisconsin.

As the primary source of statewide instructional materials aligned to Wisconsin’s college-
career-aligned standards, DPI will ensure the SIA Center’s work is grounded in the Guiding Principles for Teaching and Learning. As such, materials will support teaching and learning for all students, including students with disabilities and English language learners. This intention is one reason why DPI is interested in partnerships with the state’s institutions of higher education to produce high-quality, content-rich resources and to create connections with higher education faculty between CCSS and students outside the general education spectrum such as students with disabilities and English language learners. This partnership will provide the SIA Center access to a strong research-based institution rich with experts in fields including English language arts and mathematics, as well as special education and English as a second language, not to mention incorporating technology into education and differentiating instruction to reach the needs of both low and high performing students.

The Guiding Principles for Teaching and Learning also drive the intention for the SIA Center work, which will include Universal Design for Learning (UDL) principles – to ensure that resources are not just made accessible for all populations, but designed to be accessible.

Beginning with DPI’s vision of Every Child a Graduate Ready for College or Career and continuing with the beliefs in the Guiding Principles for Teaching and Learning, the proverbial rubber hits the road through focused support and resources available from DPI – resources related to CCSS implementation and guidance – the Rti Center for resources related to Rti implementation and practices – and the SIA Center for resources directly related to improving instruction and assessment of college- and career-ready standards. One component of the Every Child a Graduate vision involves two questions directly related to DPI’s planning. The first, “What and how should students learn?” relates directly to the CCSS and development of higher standards for Wisconsin’s students as well as providing guidance for educators in what great instruction of the CCSS looks like (the SIA Center). The second question points to transitions in the world of assessment, which is, after all, a key component of high quality instructional practices. That question, “How do we know if they’ve learned it?” along with specific recommendations from a Next Generation Assessment Task Force, convened in 2009, guide Wisconsin’s participation in three next generation assessment consortia: the SMARTER Balanced Assessment Consortium, Dynamic Learning Maps (DLM) Consortium, and ASSETS Consortium. These consortia, while developing assessments for different populations of students, share a common goal of developing innovative, informative, rigorous assessments to replace the current statewide assessment system, assessments that provide students varying opportunities to demonstrate what they know and can do through a combination of assessment types (formative strategies, benchmark, and summative) as well as item types (including performance tasks and technology enhanced items)

Participation in these consortia ushers in replacements of the current battery of statewide assessments:

**Table 1.1. Implementation of Statewide Assessments**
These transitions represent a new day for assessment in Wisconsin, one by which assessments that are used for accountability purposes are also designed in such a way as to provide useful, actionable, and timely data directly to educators to help inform classroom practices in an on-going manner. Further, these assessment consortia, which are designing assessments using Universal Design for Learning principles, are dedicated to considering accessibility issues before, during, and after assessment development to ensure the assessments provide all students opportunities to demonstrate what they know and can do.

However, the implementation dates for the new assessments (provided in the table above) leave a window that could easily slip by in the hurry to prepare for these big transitions. In Wisconsin, DPI has paid particular attention to these transition years, and proposes several important changes to prepare Wisconsin for full implementation of the CCSS and CCSS-based assessments, changes that also reflect DPI’s campaign to raise rigor in classrooms across the state (as well as within DPI). This focus on “moving the needle” toward higher rates of college and career readiness, and decreased graduation and achievement gaps, requires additional commitment from the State. As such, DPI has plans for three significant changes to Wisconsin’s current standard operating procedures:

- Change high school graduation requirements to reflect the changing demands of college and career;
- Make the EXPLORE, PLAN, ACT, and WorkKeys assessments available to schools and districts so that students, families, and educators can better understand a student’s progress toward college and career readiness;
- Make changes to the current statewide assessment system to prepare for upcoming transitions to the CCSS-based SMARTER Balanced Assessment System
Changing Expectations in High School
The Department of Public Instruction proposes to increase graduation requirements such that those requirements will place students in a position of success for whatever path they choose beyond high school. DPI proposes to require that statewide minimum graduation requirements include three years of mathematics and three years of science, engineering, or technology credits, with two of those credits required science or science equivalency courses, and the third year including the option to take an engineering or technology credit.

Table 1.2. Changes to Wisconsin’s High School Graduation Requirements.

<table>
<thead>
<tr>
<th>Subject Area</th>
<th>Requirement</th>
<th>Proposed Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mathematics</td>
<td>2 credits</td>
<td>3 credits</td>
</tr>
<tr>
<td>Science</td>
<td>2 credits</td>
<td>3 credits (2 of which would remain traditional science or science equivalency credits)</td>
</tr>
</tbody>
</table>

These changes have not yet taken place, but are a priority for the agency and are being reflected in the agency strategic planning process currently underway.

Providing Measures of College and Career Readiness
DPI will include funding in the next (2013-15) biennial budget request for schools to administer the EXPLORE, PLAN, ACT, and WorkKeys assessments. This assessment suite provides important information about college and career readiness for students. It also allows for analysis of academic growth during high school, data that are lacking in current assessments.

Further, DPI intends to change cut scores on the current state summative assessment, the Wisconsin Knowledge and Concepts Examination (WKCE), so that it provides an indication of student performance on more rigorous assessments, prepping the transition to the SMARTER Balanced Assessment System in 2014-15. Specifically, Wisconsin will statistically align the cut scores with NAEP cut scores. This interim measure will provide districts a sense of where cut scores may fall on the more rigorous SMARTER Balanced Assessment. The impact of this change will be dramatic and DPI intends to work with districts to field test use of the new cut scores, in comparison with current cut scores and as part of the state-developed accountability index, discussed in Principle 2.B.

Following evaluation of the field tested index with new cut scores, official reports will be provided for the 2012-13 school year, in the spring of 2013. The index calculations in the 2013 reports will factor in a new baseline that accounts for cut score changes and back-maps this change such that growth calculations are possible. The 2013 results will also be used for accountability determinations that will result in the categorization of schools along a continuum and identification of schools requiring specific interventions and support as well as rewards. This reporting timeline incorporates a year-long implementation that involves intensive communication and professional learning for schools, districts, and the public.
Additional Efforts to Raise Rigor and Improve Student Outcomes

DPI continues to invest significant effort not only to connect the dots between various initiatives at the department—from CCSS implementation to current and future assessments, from Response to Intervention to College and Career Pathways and 21st Century Skills—but in fact to braid those initiatives together and, where appropriate, change or re-focus staff time, resources, and organizational structures to create better efficiencies and improve the unity of Wisconsin’s approach to standards- and instruction-related initiatives, projects, and activities.

Reducing Duplication and Unnecessary Burden

While DPI has made significant strides over the past decade to increase district-level access to secure student data, and to educate users across the state about how to access and interpret that data in ways that result in better-informed school and district decisions, shortcomings in the structure of DPI’s existing data collection system result in unfortunate consequences that dramatically impact access to high-quality, timely data. In order to improve upon data quality and timeliness in Wisconsin, as well as to grow DPI’s reporting capacity to include more relevant indicators in DPI’s reporting systems (e.g., daily attendance as opposed to annual attendance), DPI will contract for a single, statewide student information system to be implemented over the next five years. This system will link to the Wisconsin Information System or Education (WISE) dashboard—DPI’s response to the need for a single reporting portal—resulting in almost real-time reporting for the public as well as more relevant school- and district-level reporting through secure portals.

Through advances such as these in data collection and reporting systems, DPI will be able to provide districts with access to data and reports that provide timely information about student (individual and group) progress toward graduation. This includes the all-important early warning system, the technology for which has been outside DPI’s grasp for some years. Recent approval and funding of a statewide student information system, however, will allow DPI to provide districts across the state with access to relevant, almost real-time data.

Key to provision of these reports are the two major technology and data reporting initiatives mentioned above: a Statewide Student Information System (SSIS) and WISEdash. These initiatives will significantly impact districts. WISEdash will provide districts with direct access to aggregate and student-level data in a secure format. Reports and dashboards will be available on a variety of topics. Initial implementation of WISEdash will be with secure access only— for school- and district-level staff authorized to see non-redacted or suppressed data and possibly authorized to view student-level information. Eventually, WISEdash will not only replace DPI’s current, myriad public reporting systems, updating and locating those reports in a single portal, but will add to the types and topics of available public reports. Accountability reporting will be completed through WISEdash, but so will other public reporting including information about postsecondary transitions, literacy, and other important statewide initiatives.
While the Statewide Student Information System will result in better data and better reporting from DPI, it will also save districts time and money by reducing duplicative and burdensome reporting requirements. Ultimately, the availability of data management and data reporting systems from a single location will allow any interested data consumer to have easier access to important data that can play a part in many decisions.

### 1.C Develop and Administer Annual, Statewide, Aligned, High-Quality Assessments That Measure Student Growth

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

<table>
<thead>
<tr>
<th>Option A</th>
<th>The SEA is participating in one of the two State consortia that received a grant under the Race to the Top Assessment competition.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>i. Attach the State’s Memorandum of Understanding (MOU) under that competition. (Attachment 6)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Option B</th>
<th>The SEA is not participating in either one of the two State consortia that received a grant under the Race to the Top Assessment competition, and has not yet developed or administered statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>i. Provide the SEA’s plan to develop and administer annually, beginning no later than the 2014–2015 school year, statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs, as well as set academic standards.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Option C</th>
<th>The SEA has developed and begun annually administering statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>i. Attach evidence that the SEA has submitted these assessments and academic achievement standards to the Department for peer review or attach a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review. (Attachment 7)</td>
</tr>
</tbody>
</table>
Assessments Informing the Path to College and Career Readiness

As mentioned above, DPI is actively engaged in the process of replacing all three of its current statewide standardized assessments: the Wisconsin Knowledge and Concepts Examination (WKCE), the Wisconsin Alternate Assessment for Students with Disabilities (WAA-SwD), and ACCESS for ELLs. Wisconsin is a governing state in the SMARTER Balanced Assessment Consortium, a member of the Dynamic Learning Maps Consortium, and the lead state for the WIDA Consortium, building ASSETS (Assessment Services Supporting ELs through Technology Systems). Transitioning to the next generation of assessments will strengthen instruction by providing classroom resources that support educators in planning instruction and interventions, students and families in setting and assessing progress on goals for learning, and administrators identifying strengths and weaknesses in curriculum and other programs. Results will be timelier and, in the case of the SMARTER Balanced assessment, the computer adaptive nature of the assessment will allow for greater precision at all levels of the proficiency scale.

SMARTER Balanced Assessment Consortium

The SMARTER Balanced Assessment Consortium (SBAC) is one of two multi-state consortia awarded funding from the U.S. Department of Education to develop an assessment system based on the new Common Core State Standards (CCSS). To achieve the goal that all students leave high school ready for college and career, SBAC is committed to ensuring that assessment and instruction embody the CCSS and that all students, regardless of disability, language, or subgroup status, have the opportunity to learn this valued content and show what they know and can do. The assessment system will be field tested in the 2013-2014 school year and administered live for the first time during the 2014-2015 school year.

With strong support from member states, institutions of higher education, and industry, SBAC will develop a balanced set of measures and tools, each designed to serve specific purposes. Together, these components will provide student data throughout the academic year that will inform instruction, guide interventions, help target professional development, and ensure an accurate measure of each student’s progress toward career and college readiness.

Wisconsin is a Governing State in the SMARTER Balanced Assessment Consortium. As defined in the Governance Document, each state is required to take an active role in supporting the work of the Consortium, and Wisconsin has indeed been an active member in SBAC. The department’s participation includes:

- A member of the Executive Committee
- A co-chair of two work groups
- A member of one additional work group

A SUMMARY OF CORE COMPONENTS
Summative Assessments

- Mandatory comprehensive accountability measures that include computer adaptive assessments and performance tasks, administered in the last 12 weeks of the school year in grades 3–8 and high school for English Language Arts (ELA) and mathematics;
- Designed to provide valid, reliable, and fair measures of students’ progress toward and attainment of the knowledge and skills required to be college and career ready;
- Capitalize on the strengths of computer adaptive testing, i.e., efficient and precise measurement across the full range of achievement and quick turnaround of results; and
- Produce composite content area scores, based on the computer-adaptive items and performance tasks.

Interim Assessments

- Optional comprehensive and content-cluster measures that include computer adaptive assessments and performance tasks, administered at locally determined intervals;
- Designed as item sets that can provide actionable information about student progress;
- Serve as the source for interpretive guides that use publicly released items and tasks;
- Grounded in cognitive development theory about how learning progresses across grades and how college- and career-readiness emerge over time;
- Involve a large teacher role in developing and scoring constructed response items and performance tasks;
- Afford teachers and administrators the flexibility to:
  - select item sets that provide deep, focused measurement of specific content clusters embedded in the CCSS;
  - administer these assessments at strategic points in the instructional year;
  - use results to better understand students’ strengths and limitations in relation to the standards; and
  - support state-level accountability systems using end-of-course assessments.

Formative Tools and Processes

- Provides resources for teachers on how to collect and use information about student success in acquisition of the CCSS;
- Will be used by teachers and students to diagnose a student’s learning needs, check for misconceptions, and/or to provide evidence of progress toward learning goals.

Accountability

- Fully committed to providing each member state reliable, valid, and comparable achievement and growth information for each student;
- Enables each state to implement its own approved state accountability system;
- Establishes achievement standards in 2014 following the administration of the field test in the 2013-2014 school year.

System Features
- Ensures coverage of the full range of ELA and mathematics standards and breadth of achievement levels by combining a variety of item types (i.e., selected-response, constructed response, and technology-enhanced) and performance tasks, which require application of knowledge and skills;
- Provides comprehensive, research-based support, technical assistance, and professional development so that teachers can use assessment data to improve teaching and learning in line with the standards;
- Provides online, tailored reports that link to instructional and professional development resources.
PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA’s differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA’s plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA’s differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

THEORY OF ACTION

As noted in the Overview, Wisconsin’s development of a strategic plan centers on college and career readiness. The department is driven by the belief that increasing rigor across the standards (see Principle 1), assessments (see Principle 1), and the new, statewide accountability system (detailed in the following sections of Principle 2), will result in improved instruction and student outcomes. Specifically, the strategic plan contains three state goals:

- Raise graduation rates
- Close graduation gaps
- Graduate students ready for college and career

This waiver opportunity provides Wisconsin the ability to implement new initiatives, policies, and practices to meet these goals within an environment that recognizes each school and district exists within unique circumstances and exhibits unique strengths and weaknesses, by opting out of the uniform, one-size-fits-all policies mandated by No Child Left Behind (NCLB). This understanding is evident within the development of a new, differentiated system of accountability that values a comprehensive system of education, prioritizes the closing of achievement gaps, and increases the rates of college and career readiness. Wisconsin’s system uses multiple measures—including improved, more informative assessments (see Principle 1), as well as an enhanced and expanded system of rewards, recognition, and customized, differentiated systems of support. These supports are the direct result of findings from diagnostic reviews designed to target strategies around areas of greatest need. In short, DPI has initiated bold systemic changes at the state, district, and school level.

Reprioritization and Systemic Changes at the State Level

This flexibility request has provided DPI an opportunity to increase communication and collaboration with key stakeholders regarding the enhancement of existing educational initiatives, and the development of new education initiatives designed to improve student outcomes, increase rates of college and career ready graduates, and close achievement gaps. The Wisconsin Department of Public Instruction (DPI) worked in collaboration with the School
and District Accountability Design Team to design the framework for a new statewide system of accountability and support. The Design Team developed thirteen principles to guide this work, which directly align to the department’s strategic plan to raise graduation rates, close graduation gaps and graduate all students ready for college and career. As such, the DPI is advancing the following systemic changes.

**Raising Expectations, Increasing Rigor**
As noted in Principle 1, DPI has significantly raised expectations for schools and the proportion of students who graduate ready for college and career, as indicated by the adoption of rigorous academic standards, higher cut scores based on NAEP as the state transitions to SBAC, increasingly rigorous and adaptive assessment systems, and increased graduation requirements. The new accountability report card and the new system of support, rewards, and recognition will reflect these new expectations. While the state has previously emphasized graduation rates (and boasted one of the highest in the nation), DPI also recognizes the state has significant achievement and graduation gaps. The accountability index prioritizes achievement and attainment using measures which emphasize not only graduation, but also the proportion of students graduating college and career ready. Additionally, the system examines achievement gaps within and across schools as a means to address the state’s existing gaps. Using a multifaceted index will help pinpoint areas of need within a school, as well as areas of strength, and help schools track their progress at meeting the needs of all student subgroups. Within the system of support, identified schools will participate in diagnostic reviews and needs assessments (Priority and Focus Schools, respectively) to identify their instructional policies, practices, and programming that have impacted student outcomes and to differentiate, and individualize reforms and interventions. While planning and implementing reforms, schools and districts will have access to increasingly expansive and timely data systems to monitor progress. Additionally, the state will require Priority and Focus Schools to implement RtI (with the support of the Wisconsin RtI Center and its resources) to ensure that all students are receiving customized, differentiated services within a least restrictive environment, including additional supports and interventions for SwDs and ELLs as needed, or extension activities and additional challenge for students exceeding benchmarks.

**Developing a Statewide System**
Currently, Wisconsin’s system of support for schools identified for improvement serves Title I schools. Due to funding and capacity, the state system currently identifies the performance of traditional public schools and charter schools as required by NCLB, but only requires interventions for Title I schools and districts. The state’s persistently low performing schools do not experience sanctions or implement targeted interventions prescribed by the state unless they receive Title I funding.

To address these issues, the Wisconsin School and District Accountability Design Team developed a statewide accountability framework which specifically includes all state schools, including traditional public schools and charter schools regardless of Title funding, as well as private schools participating in the Parental Choice Program (PCP). All schools receiving state funds will be part of the state accountability and support system. The state will use this
opportunity to not only include all schools, but also to increase accountability through the implementation of aggressive policies designed to address persistently low-achieving schools in the state.

**Traditional Public Schools and Districts**

**Schools.** If a traditional public school is identified as a Priority School, it must: 1) participate in a state-contracted school improvement diagnostic review (SIDR) and partner with a state approved turnaround expert to develop a targeted school reform plan aligned to findings from the review, as well as targeted, prescriptive directives from DPI, or 2) close. If the school elects to implement a reform plan aligned to the turnaround principles, as prescribed by the state, but does not make adequate improvement and is identified as a Priority School again after the three year cohort, the State Superintendent will utilize his or her intervention authority to appoint a special master to direct the activities of the school outside the limitations and boundaries created by policies and practices of the school’s local education authority (LEA).

**Districts.** DPI has historically utilized districts as the entry point for reform in order to address local capacity and build sustainability. Recent experiences implementing school reforms and interventions within the state suggest that school administrators often face barriers to rapid reform as a result of district practices, as opposed to their own. DPI believes that changing structures at the district level will more likely result in long-term reform than changing structures within a school without consideration of the impact the district has on the school. This flexibility request provides DPI the opportunity to affect systemic reform, and differentiate based on identified needs.

The state will prioritize improvement efforts at the district level if the school’s diagnostic review demonstrates that systemic challenges at the LEA level contributed to identification as a Priority School. DPI will appoint a state-contracted expert with proven expertise in supporting reform at the LEA level to conduct a diagnostic review of central administration’s critical systems and structures, including human resources, curriculum and instruction, finance, and leadership. Based on district improvement diagnostic review (DIDR), the State Superintendent will direct reform at the LEA level and require schools to continue implementing successful school reforms, including DPI Corrective Action Requirements (CAR). The state-contracted LEA expert will act as a liaison between DPI and the district, supporting the implementation of the State Superintendent’s directives, while also providing objective monitoring results to DPI regarding implementation status and outcomes.

**Charter Schools**

When a charter school is initially identified as being among the persistently lowest performing schools in the state, the charter school authorizer will implement one of three options:

- The charter school (or its authorizer) will enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years. If annual performance targets are not met, the charter is revoked.
- DPI will require an on-site diagnostic review conducted by a state-approved school
turnaround expert to identify the factors contributing to poor performance at the school. After participation in the state-conducted review, the charter school authorizer must implement one of two options with respect to the school consistent with the findings and recommendations of the diagnostic review:

- Contract with a state-approved independent expert/vendor to implement reform plan aligned to turnaround principles and based on the recommendations of the diagnostic review.
- Revoke the charter.

- In lieu of implementing either of these two options, the charter authorizer may instead elect to immediately revoke the charter.

If the persistently low-performing charter school has not demonstrated adequate improvement after three years of participating in a performance contract or implementing a reform plan, the authorizer must revoke the charter. No authorizer may renew a charter if the school is persistently low performing. Relevant state law and new or, to the extent permissible, existing charter school contracts will need to reflect these requirements.

**Private Schools in the Parental Choice Program**

Unique to other states, Wisconsin is home to the largest and oldest voucher program in the United States. The Milwaukee Parental Choice Program (MPCP) provides low-income Milwaukee students the ability to attend private schools within the city using tax-payer funded vouchers towards tuition. The state instituted the program as a means to provide educational options to Milwaukee students. The current Legislature has expanded MPCP to include students within a higher income bracket, as well as offering beyond the city of Milwaukee.

These schools have not participated in the state’s accountability system. Beginning in 2010-11, the state required Choice schools to administer the WKCE assessment to all Choice funded students and to publicly report their results. Including Choice schools in the statewide accountability system is the next step in providing transparent information about student achievement across the state.

Due to constitutional limitations in private schools, the State Superintendent cannot direct specific programming or interventions within a private school. Therefore, when a choice school is initially identified as being among the persistently lowest performing schools in the state, it must implement one of the following three options:

- The choice school must enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years. If annual performance targets are not met, the school shall no longer participate in the Choice program; or
- DPI will conduct a mandatory on-site diagnostic review to identify the factors contributing to poor performance at the school, funded by the private school. After participation in the state-conducted review, the Choice school must implement one of two options with respect to the school consistent with the findings and recommendations of the diagnostic review:
o Contract with a state-approved independent expert/vendor to implement a turnaround model based on the recommendations of the diagnostic review.

o Discontinue participation in the choice program; or

• In lieu of implementing either of these options, the choice school may elect to immediately discontinue participation in the program.

Aligning Relevant State Initiatives
DPI also committed to aligning existing and developing state education initiatives to inform each process and avoid duplication of efforts. Accordingly, DPI has aligned relevant initiatives, in existence and in development, across the agency to support the recommendations made by task forces regarding three current statewide educational reforms: 1) Early literacy, 2) Educator Effectiveness, and 3) School and District Accountability. Working in collaboration and cooperation with key stakeholders, including the Governor and the Chairs of the Education Committees. Each of these task forces has concluded their meetings. DPI has begun development of appropriate cross-agency workgroups to support the implementation phase for each set of recommendations. The work of each of these workgroups, and their members, will inform the Statewide System of Support (SSOS).

Addressing Capacity
The Design Team also indicated the state system should be developed based on reasonable and realistic implementation goals that address capacity at the state, district, and school levels. Informed by this recommendation, DPI’s request for flexibility identifies the most efficient yet effective means to affect change. For example, the proposal to focus reforms at the district level if an LEA exhibits systemic barriers was informed by findings from School Improvement Grant (SIG) monitoring visits. One district, with 12 SIG schools, was struggling to implement meaningful reforms and, under this new system of accountability, the same district would be expected to implement similar turnaround plans in approximately five times the number of schools. Therefore, DPI deemed district level intervention more effective and efficient, and also more likely to create change.

Making Improvements as Necessary
A guiding principle of the School Accountability Design Team was to remain open to feedback and findings about potential system improvements. To ensure maximum effectiveness of the system, DPI will elicit feedback from a variety of stakeholders and remain open to findings during implementation and evaluation of the accountability system. In particular, DPI will work with our Technical Advisory Committee (TAC) to validate the technical aspects of accountability determinations and other psychometric components of the system, and make adjustments where advised. The department will also benefit from ongoing dialogue with USED, the Council of Chief State School Officers (CCSSO) and other states applying for flexibility.

NEWLY DEVELOPED STATEWIDE SYSTEM OF ACCOUNTABILITY
The School and District Accountability Design Team provided helpful guidance and recommendations concerning the accountability system presented in this Request for ESEA
Flexibility. For example, the group not only specified generally that growth and attainment should be factors in school accountability, but proposed four priority areas of the accountability system: Student Attainment, Student Growth, Closing Gaps, and On-track (for elementary and middle schools) or Postsecondary Readiness (for high schools). These priority areas form the foundation of an accountability index system that incorporates multiple measures in calculating a school-level score (on a scale from 0-100) that is used to place schools on a six-level continuum. The index system is also used to identify the highest need schools based on overall performance and gaps between subgroups, and to identify schools that demonstrate high performance overall.

The overall accountability index system is currently under development. Over the coming months, DPI will work with the Technical Advisory Committee (TAC) and use a standard-setting process to determine the specific cut points for each of the six accountability levels.

New School and District Report Cards will be developed over the coming year, in consultation with Wisconsin’s TAC, school and district staff, and other stakeholders. Report cards based on the accountability index will be publicly reported beginning in summer 2013. DPI will set differentiated expectations (Annual Measurable Objectives) based on each school’s and district’s overall performance on the index. Schools further behind will have more aggressive AMO’s, requiring all schools to be at an acceptable level within four years, regardless of their starting point.

**CUSTOMIZED AND DIFFERENTIATED SYSTEM OF REWARDS, RECOGNITION, AND SUPPORT**

The School and District Accountability Design Team recognized that systems of accountability must be aligned to systems of support in order to affect change. The Design Team recommended that the new statewide system provide differentiated, targeted systems of support to improve student outcomes. Additionally, the Design Team recommended the state recognize high performing schools to incentivize improved outcomes, as well as disseminate practices statewide. These recommendations represent a commitment to a statewide system of support (SSOS) aimed at providing differentiated recognition, rewards, and interventions built upon the core of high quality instruction, collaboration, balanced assessments, and culturally responsive practices in order to successfully meet the state’s three strategic goals.

**Differentiated Systems of Support**

In collaboration with the Design Team, DPI committed to provide differentiated systems of support to the lowest performing schools and districts, including professional development targeted to their individual needs. The following sections briefly describe the transition to and implementation of the new SSOS.

**Transition Year: 2012-13**

The 2012-13 school year will serve as a transition year as DPI pilots the major components of its new statewide accountability system. While the identification of Schools Identified for Improvement (SIFIs) under current adequate yearly progress (AYP) formula will continue for...
2012-13. Title I SIFI schools will no longer be required to provide SES as currently defined in NCLB. Instead, districts may use their 20 percent Title I set aside to provide a broader range of supports to students.

**Waiving Supplemental Education Services**

DPI will be using the ESEA flexibility as an opportunity to waive supplemental education services (SES) from its current accountability system due to the limited impact on student achievement observed locally. DPI contracted with the Wisconsin Center for Educational Research (WCER) to conduct studies at the state and district level addressing the effect of SES. These studies conclude that SES has resulted in minimal impact on student outcomes. Due to the limited evidence regarding the effect of these programs, Wisconsin is requesting to reprioritize use of these funds towards other, more effective programs serving persistently low-achieving schools. After consulting with stakeholders, including Milwaukee Public Schools (MPS)--the largest LEA with an extensive history implementing SES--DPI determined districts would benefit from flexibility to develop and implement extended learning opportunities which more closely align with district and school curricula, programs, and philosophies.

**Alternative Requirements.** In collaboration with key stakeholders, DPI developed an alternative for districts interested in waiving SES (if applicable). For the 2012-13 school year, interested districts may submit a plan to DPI which identifies the requirements detailed in the following sections for approval. Upon approval from the state, the district can discontinue contracts with their current state-approved SES providers.

The state would require districts interested in waiving SES, as it is currently defined within NCLB, to submit a district-wide plan detailing the specific extended learning opportunities that will be provided in place of those currently required in identified schools. The plans must include:

*Parent involvement.* Significant consultation with parents must be the cornerstone of flexibility requests. Districts must first consult with parents to determine if a majority wish to waive SES as it is currently implemented. If parents express interest, the district must engage parents in shaping the newly defined extended learning opportunities in ways which would best meet the needs of their child, including the selection of instructional supports and interventions. Districts must provide evidence of these consultation processes, including representation of parents of all student subgroups served within the school (i.e., students with disabilities, English language learners, low-income students, and students of various races and ethnicities).

*Logistics.* District plans must describe in detail the following components for intervention strategies outside the regular school day:

- Instructional frequency, duration, and schedule of interventions supporting literacy and mathematics;
- Student-to-teacher ratios, with a maximum of six students to one teacher (or less if necessary when serving specific subgroups, such as SwDs and ELLs);
- Staffing. This flexibility will allow districts to contract with high quality, certified
teachers (including local staff) to enhance these opportunities and more closely align to district and school improvement goals;

- Duration. Per evidence provided by the What Works Clearinghouse, districts must provide a minimum of 45 hours of extended learning per student, to maximize the likelihood of increased student outcomes.

Supplemental instruction. The plan must still describe services which supplement instruction provided during the regular instructional day. Specifically, districts must provide the services:

- Before or after school;
- During Saturday school;
- During summer school; or
- Continue with SES in its current form with state-approved providers.

Curriculum and instruction. The plans must detail how the districts will evaluate the impact of the newly defined extended programs, as measured by specific, differentiated student learning outcomes. The plan must also describe how the services provide individualized instruction and align with individual student needs identified through balanced assessments, including the needs of SwDs and ELLs. Additionally, the plan must demonstrate that the new program aligns with current school and district curricula and instructional programming as a means to support student outcomes.

Assurances. As part of the plan, the district must make the following assurances:

- The district assures that the identification of students being served through additional and extended learning opportunities are low-income students (those qualifying for free or reduced lunch), and low-achieving as determined by school or district assessments.
- The district must align the services to identified student need(s).
- The district will identify a school-level parent contact to promote services.
- The services will be provided by certified teaching staff.
- The district will require parental signatures of consent on the student’s instructional learning plan that outlines learning goals, as well as the progress, frequency, and method of on-going parental communication.

Budget. The district must submit a budget detailing funding sources and allocations to support the district’s plan. Districts may use the Title I 20% set aside, if they provide evidence of consultation with private schools, as these services will now be subject to equitable participation.

As each of these components align with the turnaround principles and are also requirements of Priority School reform plans, this flexibility will support districts’ and schools’ transition to the new statewide system of accountability and support, which the state will fully implement in 2013-14.
Priority Schools
In 2012-13, SIG Cohort I and Cohort II schools will continue implementation of their reform plans, aligned to the turnaround principles, as planned.

Implementation of New Statewide Accountability System: 2013-On-going
DPI recognizes that, in order to impact student outcomes, some schools will need comprehensive support, while others will require more targeted interventions. This application provides the state the opportunity to remove districts and schools from uniform, one-size-fits-all sanctions, and instead implement differentiated, individualized supports and interventions designed to improve processes and practices which directly impact student outcomes. Specifically, DPI proposes a statewide system of support (SSOS) which provides individualized support to districts and schools identified through a diagnostic review, and promotes individualized support for students through commitment to high quality implementation of RtI.

Priority Schools
For persistently low performing schools, a DPI-contracted turnaround expert will complete a School Improvement Diagnostic Review (SIDR) to evaluate processes and practices, with specific emphasis on reading and mathematics instruction, to identify components of the instructional programming which will benefit from support and interventions (including identification of the processes and practices used to identify and serve SwDs and ELLs). Following the SIDR, the school must partner with a state-approved vendor with proven success in addressing the school’s specific areas of weakness within their instructional programming, as identified during the SIDR. In partnership with the vendor, the school must submit a detailed reform plan, aligned to the SIDR findings and the turnaround principles, via Indistar®. The vendors will serve as liaisons between DPI and the school, provide monitoring results to the State Superintendent, and relay directives from DPI while supporting implementation of reform plans.

The state will identify persistently low performing districts if systemic challenges at the LEA level contribute to a large proportion of district schools identified as Priority Schools (see rationale provided above). If identified, a DPI-contracted turnaround expert will complete a District Improvement Diagnostic Review (DIDR) at the LEA level to evaluate critical systems and structures within the district’s central office. The State Superintendent will work with the contracted turnaround expert to direct reform at the LEA level, including staffing, programming, and finances. The turnaround expert will also work closely with the district to support implementation of the required reforms. Additionally, identified schools within the district will continue to implement Corrective Action Requirements and SIG to drive reform at the school level (if applicable).

The SEA will provide targeted support to Priority Schools and Districts to improve implementation quality and student outcomes. Systems of support will include a list of

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1 The following sections summarize interventions in traditional public schools and districts if identified within the new statewide system of accountability. For information regarding the interventions required of charter schools and private schools participating in the Parent Choice Program, refer to the previous section: Reprioritization and Systemic Changes at the State Level.
turnaround experts identified through a state approval process (see Section 2.G), the use of Indistar® (the online system which allows schools and districts to develop and monitor a reform plan aligned to their individual needs) a DPI district liaison, and SEA monitoring (see Section 2.D for more detail).

**Focus Schools**
Focus schools will be identified using a subgroup gap measure. Specifically, schools with large subgroup gaps in reading attainment, mathematics attainment, or graduation rates will be identified as Focus Schools.

DPI will require all LEAs with schools identified as Focus Schools to ensure that those schools do the following:

- Assess core instruction and interventions in reading and mathematics, with specific emphasis on the processes and practices to identify and serve SwDs and ELLs;
- Develop and implement a school reform plan to ensure RtI is implemented with fidelity in reading and mathematics; and
- Report RtI implementation progress and student achievement data.

DPI will provide comprehensive and targeted systems of support to Focus Schools in order to improve the quality of implementation and student outcomes, including training, resources, and guidance from the Wisconsin RtI Center, as well as Indistar®.

**After Three Years of Implementation**
If, after three years of implementation a Priority School is identified as Priority status again, the State Superintendent will utilize his/her authority to intervene, as defined by legislation, to remove the school from its local LEA and place the school under the authority of a state identified turnaround expert. In exchange for the flexibility and autonomy associated with removal from the local LEA or jurisdiction of its school board, the state will hold the expert accountable for the improvement of school and student outcomes.

If, after three years of reform and Focus School status, a Focus School is identified again, DPI will increase the level of prescription and schools and their LEAs will lose flexibility and autonomy until evidence of on-going improvement. (For more detail regarding Priority and Focus School Interventions and Supports, see Sections 2.D and 2E, respectively.)

**Recognize High Performing Schools**
While the School and District Accountability Design Team prioritized state efforts and resources in low-performing schools and districts, there was agreement that the state should not only recognize Wisconsin’s high performing schools, but should also disseminate their practices statewide as a means to drive change in schools struggling to increase achievement.

DPI has long understood the importance and benefit of publicly recognizing and rewarding high performing Title I schools, as evidenced by the introduction of *Schools of Recognition* (SOR) in...
2003. Across recent years, DPI has expanded and enhanced these opportunities to create a comprehensive program of public recognition and rewards designed to positively incentivize schools to improve student achievement or maintain high levels of performance. DPI designed the system of rewards and recognition to represent the goals in the state strategic plan:

- Providing rewards and recognition based on student achievement represents a strategy designed to increase reading and mathematics performance.
- The programs rely on various statewide infrastructures to inform and support the dissemination of best practices.

The methodology used to identify Title I schools rewards schools “beating the odds” and increasing student achievement in schools with high poverty. This methodology allows the state to reward schools that specifically target closing the statewide achievement gap. Collectively, the state’s initiatives have heightened the awareness of best practices and quality instructional programs throughout Wisconsin Title I districts and schools.

This application for flexibility of implementation within ESEA legislation provides DPI the opportunity to enhance and expand the existing rewards and recognition program in order to implement more rigorous identification requirements of participants using the new statewide index system (see Section 2.B), expand the current Title I accountability and support system to a Statewide System of Support (SSoS) with the inclusion of all Wisconsin schools, and add recognition for schools making significant progress in closing their in-school achievement gap as a means to help address the achievement gaps across schools and across the state.

Additionally, the state will recognize schools identified as Significantly Exceeding Expectations (the highest level of determination within the new state system), as this determination represents an impressive and rigorous level of accomplishment also shown by high scores within all four priority areas (Achievement, Growth, College Readiness, and Gaps). This recognition incentivizes schools to emphasize improving scores for both high and low performing students, closing existing gaps (such as with ELLs and non-ELLs or SwDs and non-SwDs), and preparing students college or career.

**TIMELINE FOR IMPLEMENTATION**

DPI will begin implementation of its new accountability system with a Transition Year in 2012-13. During this year, the state will begin distribution of the new Report Cards aligned to the accountability index system, to inform schools and districts of the new system (including reporting of assessment scores aligned to NAEP) and their own strengths and weaknesses within the new system in order to prepare for full implementation of the system in 2013-14. Priority Schools currently implementing SIG will continue implementation of the turnaround models. Thus, these schools will meet the requirement for implementation of Priority School reforms in 2012-13. This transition year will represent the final year of SIG implementation for most of these schools, allowing the state to transition to its new accountability system, including plans targeted to the district and school level as appropriate. Additionally, schools currently required to implement supplemental educational services (SES) and school choice as a consequence of NCLB will be allowed to use this transition year to opt out of these programs, pending support from appropriate key stakeholders and submission of a detailed plan for
transition that is approved by DPI. DPI will continue to implement its current system of recognition and rewards for the 2012-13 school year.

As presented in Table 2.1, the state will continue with full implementation of the proposed plan pending approval by USDE beginning in 2013-14.

**TABLE 2.1. Timeline for Transition to Newly Developed State System of Differentiated Recognition, Accountability, and Support.**
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<th>Fiscal Year</th>
<th>Activity</th>
<th>Responsible Party</th>
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<td>2013-14</td>
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<td>2014-15</td>
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<td>2023-24</td>
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Note: The above table outlines the activities and responsible parties for fiscal years from 2013-14 to 2023-24.
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**Key Points**
- **July 2017**: Finalize performance objectives
- **N/A**: Not applicable
- **Implement SEA-directed CAR**: Critical Action Plan

**Important to Contact**

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ESEA FLEXIBILITY – REQUEST
U.S. DEPARTMENT OF EDUCATION
Select the option that pertains to the SEA and provide the corresponding information, if any.

<table>
<thead>
<tr>
<th>Year</th>
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- **School Year**: 2013-14
  - **April**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **June**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **July**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **August**: Select the option that pertains to the SEA and provide the corresponding information, if any.

- **School Year**: 2014-15
  - **April**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **June**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **July**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **August**: Select the option that pertains to the SEA and provide the corresponding information, if any.

- **School Year**: 2015-16
  - **April**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **June**: Select the option that pertains to the SEA and provide the corresponding information, if any.
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  - **August**: Select the option that pertains to the SEA and provide the corresponding information, if any.

- **School Year**: 2016-17
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  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **June**: Select the option that pertains to the SEA and provide the corresponding information, if any.
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  - **August**: Select the option that pertains to the SEA and provide the corresponding information, if any.

- **School Year**: 2017-18
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  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
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- **School Year**: 2018-19
  - **April**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **June**: Select the option that pertains to the SEA and provide the corresponding information, if any.
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- **School Year**: 2019-20
  - **April**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **June**: Select the option that pertains to the SEA and provide the corresponding information, if any.
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- **School Year**: 2020-21
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  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **June**: Select the option that pertains to the SEA and provide the corresponding information, if any.
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  - **August**: Select the option that pertains to the SEA and provide the corresponding information, if any.

- **School Year**: 2021-22
  - **April**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
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  - **August**: Select the option that pertains to the SEA and provide the corresponding information, if any.

- **School Year**: 2022-23
  - **April**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **June**: Select the option that pertains to the SEA and provide the corresponding information, if any.
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  - **August**: Select the option that pertains to the SEA and provide the corresponding information, if any.

- **School Year**: 2023-24
  - **April**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **May**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **June**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **July**: Select the option that pertains to the SEA and provide the corresponding information, if any.
  - **August**: Select the option that pertains to the SEA and provide the corresponding information, if any.
### Option A
- The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.

### Option B
- If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools, it must:
  a. provide the percentage of students in the “all students” group that performed at the proficient level on the State’s most recent administration of each assessment for all grades assessed; and
  b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

Wisconsin’s School and District Accountability Design Team indicated interest in including content areas other than English language arts and mathematics as part of a statewide accountability system. This topic will be revisited as new, common standards and assessments are developed for other content areas.

### 2.B Set Ambitious but Achievable Annual Measurable Objectives

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
<th>Option C</th>
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<tbody>
<tr>
<td>Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the “all students” group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates.</td>
<td>Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on</td>
<td>Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups.</td>
</tr>
<tr>
<td>i. Provide the new AMOs and an explanation of</td>
<td></td>
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Based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs.

i. Provide the new AMOs and an explanation of the method used to set these AMOs.

Assessments administered in the 2010–2011 school year as the starting point for setting its AMOs.

i. Provide the new AMOs and an explanation of the method used to set these AMOs.

ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below.

iii. Provide a link to the State’s report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups. (Attachment 8)

State Superintendent Tony Evers convened the School and District Accountability Design Team with other educational leaders because of a shared commitment to improving upon existing accountability structures and ultimately improving outcomes for all students in Wisconsin. The Department of Public Instruction (DPI) is deep in the work of re-focusing its efforts in a way that braids together agency initiatives to build college- and career-readiness for all students.

The School and District Accountability Design Team put forth several recommendations for a statewide accountability system. One key recommendation was that the accountability system should use multiple measures and reflect the skills and knowledge students need to be successful in a variety of post-secondary opportunities. As a component of that recommendation, performance should be measured using both growth and attainment calculations.

In an effort to design a system that reflects this vision and holds schools accountable for high-leverage, measurable, fair indicators of student engagement, progress, and performance, Wisconsin has developed an index system that incorporates multiple measures—including student growth—that the Department of Public Instruction, in consultation with key stakeholders. This index system reflects the goals of high attainment and growth as well as other key priorities. In all, the Wisconsin Accountability Index incorporates four priority areas: Student Attainment; Student Growth; Closing Gaps; and On-Track (for elementary and middle schools) or Postsecondary Readiness (for high schools).
Factoring in Subgroups

Under No Child Left Behind, large, diverse schools could miss AYP on up to 64 different indicators. In order to develop a system that appropriately focuses on subgroups—i.e., one that does not “hide” subgroup performance—but that also acknowledges the importance of overall performance and growth, the Wisconsin Accountability Index will factor in student subgroups in certain, but not all areas. Individual subgroup performance will be reported for all priority areas, but for accountability calculations, the “all students” group will be used to calculate index scores in the Student Attainment and Student Growth Areas. Individual subgroups will inform calculations for the remaining priority areas: Closing Gaps and On-Track/Postsecondary Readiness. These subgroups include each of the subgroups currently defined in NCLB. How specific subgroups are factored into these priority areas is dependent upon the measure within each area, which is delineated below. The purpose of this approach is to ensure a fair system that appropriately prioritizes progress toward college and career ready expectations for all students and every single subgroup.

The School and District Accountability Design Team specifically recommended use of an additional subgroup, one that groups the lowest 25% of performers together. The goal for including such a subgroup is to prioritize moving all low performers up, regardless of demographic characteristics. After attempts to create such a supplemental subgroup, DPI has determined that it is not possible at this time given that the WKCE’s scale is not vertically aligned. Creation of a developmental scale to be used in place of a vertical scale was considered, but requires costly changes to WKCE tests. Instead, inclusion of the lowest 25% as an additional subgroup will be considered for inclusion in the accountability system upon implementation of the SMARTER Balanced Assessment System in the 2014-15 School Year.

Priority Area and Overall Scores

Within this multiple measures index, scores earned for each priority area will be based on the measures used. Priority area scores will be combined into an overall score, which will contribute to a school’s placement in one of six categories along a continuum. The exact methodology for how each category is weighted and combined into the overall score will be determined through a standard setting process overseen by DPI’s Technical Advisory Committee, Dr. Brian Gong of the National Center for the Improvement of Educational Assessment, Dr. Andrew Porter from the University of Pennsylvania, and Dr. Robert Linn from the University of Colorado.

Flags

When constructing simulations of the index and its components, it became clear that certain proposed components of the index were not functioning in ways that were intended. For example, DPI attempted to incorporate a school’s test participation rate into its attainment index, with the goal being to acknowledge the importance of high test participation and not allow schools to inappropriately skew their measure by not testing all students. However, simulations indicated that incorporating participation into the calculation of the Attainment Index resulted in every school’s score in this area receiving a boost, even schools with low participation.
The concept of “unacceptable-performance flags” is Wisconsin’s solution to incorporating test participation and dropout rates into the new accountability system, as well as to highlight the importance placed on every child reading at grade level by 3rd grade. These flags exist outside of the mathematical calculation of the index, and instead carry overarching weight in determining where on the accountability scale a school falls.

**Test Participation.** Schools may receive unacceptable-performance flags if their “All Students” group or any single subgroup misses the target in either mathematics or reading test participation. The target test participation rate is 95%.

**Dropout Rate.** Schools will receive a flag if their dropout rate is above 2% for Elementary and Middle schools, and 10% for High Schools. These thresholds were calculated based on recent statewide data.

**3rd Grade Reading.** Reading proficiency in third grade was identified as a key indicator by the Read to Lead Task Force, a group convened by Governor Scott Walker, and vice-chaired by State Superintendent Tony Evers, to identify needs and establish recommendations that will result in improved reading skills for all students across the state, but with particular focus on early grades. To reflect the priority on 3rd grade reading, this accountability system will apply a flag to schools whose 3rd grade reading proficiency rates are more than two standard deviations below the statewide average.

**Stars**
An accountability system should not only identify performance below expectations; it should also highlight positive progress or work being done in schools and districts. In addition to flags, report cards will include stars for certain indicators for which DPI will not hold schools accountable, but that are important enough to highlight as a significant positive for that school or district. Specifically, stars may be awarded for

- Rate of college credits earned in high school;
- Postsecondary enrollment rates within 16 months of college graduation; and
- Advanced Placement participation and performance.

*The final submission of this waiver request will include sample report cards that demonstrate the index system with flags and stars included.*

Final overall index scores will be an aggregation of scores in the four priority areas. Overall scores place schools and districts within one of six categories:

- Significantly Exceeding Expectations
- Exceeding Expectations
- Meeting Expectations
- Not Meeting Expectations
Expectations for Wisconsin Schools
Wisconsin’s goal is to couple these accountability determinations with differentiated interventions and supports for certain schools and development of a statewide system of school improvement tools and resources available for all. The goal is for all schools in the state to be at the Meet Expectations level within four years. To meet this goal, annual expectations must be made clear.

Expectations for Schools
As mentioned above, flags serve as one overall goal in three areas: test participation, dropout rates, and 3rd grade reading performance. Schools that receive flags in any area cannot be to Meet, Exceed, or Significantly Exceed Expectations in the accountability system. In order to set targets on-track with meeting the goal of all schools at least Meeting Expectations, Wisconsin will set differentiated Annual Measurable Objectives (AMOs) that ensure all schools are on track to meet, continue to meet, or exceed expectations within four years of system implementation. Specifically, school-level AMOs will require an increase in overall index scores at a rate that each school’s score—as long as it does not earn any flags—places it in the Meeting Expectations category.

Expectations for Districts
While school-based accountability expectations are based on a trajectory toward Meeting Expectations, district-level accountability calculations are intended to focus annually on how a district performs at each of three levels: grades K-5, 6-8, and 9-12. Index calculations will be run for data aggregated to each of the levels (including possible flags for test participation, dropout rates, and 3rd grade reading performance). District-level report cards will include information about which of the six categories each school level performed, and at what category the district performed overall. Districts in which all three levels do not at least Meet Expectations—either based on index scores or flags—are identified as needing improvement.

District Flags. In addition to the three possible school-level flags mentioned previously, a district will receive a flag—and may require interventions discussed in later sections—if one or more schools in the district fall into the Persistently Failing to Meet Expectations category.

Important Index Miscellany
Cell Size
All accountability calculations will apply a cell size of 20, a change from Wisconsin’s current use of a cell size of 40. This change represents a dedication to “shining the light in the corners” and ensuring that accountability calculations are fair for all populations.

Establishing Baselines
In anticipation of the use of new, higher cut scores for the WKCE, overall index scores will be set using the new WKCE cut scores. Baselines for all AMOs will be established using the new
Given many significant changes to the accountability system, and a keen desire to ensure an ample implementation period so that educators, the public, and other important stakeholders are well-informed about this new Wisconsin accountability system, DPI intends to phase in accountability report cards. District partners and other stakeholders have been and will continue to be consulted on the design of school report cards, particularly as the Wisconsin Accountability Index is field tested following the 2011-12 school year.

Following evaluation of the field-tested index, official school and district report cards will be provided for the 2012-13 school year, in the spring of 2013. The index calculations in the 2013 reports will be used for determinations that will result in the categorization of schools into one of the six categories, and identification of Priority, Focus, and Reward schools from within those categories. These identifications will drive the resulting differentiated rewards, supports, and interventions provided by DPI to schools and districts, which will begin in the 2013-14 school year.

More detailed descriptions of the methodology for each priority area are provided below.

**Student Attainment**

The attainment priority area is a composite of proficiency rates in reading and mathematics for the “all students” group on the Wisconsin Student Assessment System (WSAS). Proficiency rates will be calculated using a weighted average of the three most recent years of performance data. The weighting scheme gives a weight of 1.5 to the current year, a weight of 1.25 to the prior year, while two years prior receives a weight of 1.0. If a school has test data available for only the two most recent years, the most recent year is given a weight of 1.5, while the prior year is given a weight of 1.0, and the divisor becomes 2.5 rather than 3.75. If a school has only the most recent year of data available, only a single year of data is used to calculate the proficiency rate. The weighted proficiency rate is then put back onto a 0-100 scale by dividing the weighted proficiency rate by 3.75. This calculation is done separately for mathematics and reading. Each school’s attainment score is an average of its weighted reading and mathematics proficiency rates.

Test participation was initially going to be included in a school’s attainment score as an indicator of student engagement. However, as previously mentioned, this indicator was not functioning as intended during initial simulations of the measure. Test participation will instead be included within the new accountability system as a flag that will be received if the school fails to test 95% of its students in the “all students” group or any subgroup with more than 20 students.

**Student Growth**

*On Target to Move Up*

The growth measure proposed, On Target to Move Up, is an adaptation of the principles
behind Colorado’s “Catch Up, Keep Up, Move Up” measures across multiple levels of achievement. It is a 1-100 index score that combines subject scores for reading/ELA and mathematics. On Target to Move Up is self-differentiating, accounting for schools with high achievement while allowing lower-achieving schools to gain credit for high growth, a priority for this accountability system. Wisconsin is not yet adopting a high school growth measure because students are not tested in the 9th, 11th, or 12th grades; however, DPI intends to request funds for EXPLORE, PLAN, ACT, and WorkKeys which would enable an appropriate growth measure to be calculated for high school students (in addition to providing important college-pathway information to students, parents, and educators).

Background
Student Growth Percentiles (SGP) were originally developed for the Colorado Department of Education.² An SGP is a number derived from a statistical comparison of a student’s growth on an assessment to students with similar performance histories, assigning the amount of growth a percentile rank. An advantage of SGPs is that they characterize growth without regard to student demographics; every student (with enough data) receives a growth percentile.

Colorado developed a set of aggregate measures based on SGPs known as “Catch Up, Keep Up, Move Up.” In this method, the statistical program that calculates each student’s SGP also projects the SGP they need to achieve the next year in order to grow to a higher proficiency level within a number of years. The next year, their actual SGP is compared to the projection.³ Using SGPs in this manner is a growth-to-standard measure with the advantage that it evaluates growth relative to how a student is achieving and where they need to go to meet proficiency standards, rather than by a fixed number of scale score points as with a value table.

On Target to Move Up avoids the drawback of aggregating SGPs by school median, which is that a median SGP is still normative and is affected by the achievement of other students at other schools. A related, school-level statistical method, Value Added Modeling, is also normative and dependent on other schools’ performance. On Target to Move Up addresses these concerns at the school level.

Methodology
On Target to Move Up uses the tools developed for Colorado’s “Catch Up, Keep Up, Move Up” measures. The difference is that, rather than expressing separate values for different types of growth among different groups of students, On Target to Move Up is a single score that encompasses growth across all levels. The process to determine a school’s score is:

- A student is included for calculation of a growth factor for a subject if DPI is able to

calculate the student’s SGP in two consecutive years and the student does not score at the Advanced level in the previous year.

- In the first year, a student’s SGPs needed to reach the Basic, Proficient, and Advanced achievement levels over 1, 2, or 3 years, are projected for each subject. At each level, the lower of the 1-, 2-, or 3-year projections is their target for that level.\(^4\)

- As an informational note, the WKCE proficiency categories, in order from lowest to highest performance are: Minimal Performance, Basic, Proficient, and Advanced.

- In the second year, the student’s SGPs, describing their growth from the first year to the second, are compared to their targets for each subject. The student receives one point for each higher level’s target they meet or exceed (e.g. a student starting at the Minimum Performance level could receive 1 point for reaching the Basic target, 2 points for reaching the Proficient target, or 3 points for reaching the Advanced target). If the student starts at the Proficient level in the first year and does not meet or exceed the Advanced target, but they meet or exceed the Proficient target, they receive \(\frac{1}{2}\) point as credit for maintaining proficiency.

- Because Wisconsin tests its students in the fall, the school accountable for a student’s growth is the school at which they were enrolled in the first year.

- A school’s growth factor for each subject, \(GF\), is the sum of its students’ points divided by the number of students included in the growth factor, multiplied by 0.5\(^5\).

- The school’s percentage of students with SGPs calculated in two consecutive years reaching the Advanced level in the subject in the first year, \(PA\), is determined.

- The school’s subject score is \((GF + PA - [GF \times PA]) \times 50^6\), rounded to the nearest whole number.

- The school’s On Target to Move Up score is the sum of its reading/ELA and mathematics subject scores.

In the preliminary simulations we found that 68 percent of students who took the WKCE in 2008-09 (287,539 of 425,839), and 67 percent in 2009-10 (286,418 of 425,494), had two consecutive years of SGP data. As in other aspects of Wisconsin’s proposed accountability system, we use 20 as the minimum cell size required for a school to have a score calculated; in the simulations this omitted 11 percent of schools (167 of 1,488) tested in 2008-09 and 10 percent (151 of 1,476) tested in 2009-10. Given the large number of small schools in Wisconsin, we consider this rate acceptable.

On Target to Move Up contributes to a system that differentiates accountability determinations. It has the particular advantage of being a self-differentiating measure, for two reasons: First, lower-achieving schools can earn higher scores by showing more growth...

\(^4\) Usually, the 3-year projection will be lowest and thus the target, but since our cut score progression is not linear there will be times where a student is near an achievement level cut and the 1-or 2-year projections are lower.

\(^5\) The multiplier of 0.5 is used to scale the growth factor to a value between 0 and 1, as with a percentage.

\(^6\) Adding the growth factor and percentage advanced and then subtracting the product of those two values has the effect of scaling growth with achievement at the advanced level. The floor of the subject score, where a school starts with 0% advanced students \((PA=0)\), is simply the growth factor times 50; the ceiling, where 100% of students are advanced \((PA=1)\), is 50.
since the one-point-per-level scoring system allows lower-achieving students to gain more points. Second, the measure essentially gives automatic credit for students at the advanced level. This rewards schools for high achievement, rather than punishing them because there is no higher level to which we can compare their advanced students.

Closing Achievement Gaps
State Superintendent Evers has a vision of Every Child a Graduate, College and Career Ready, a vision that drives efforts to close gaps in access and opportunities as well as in attainment. In his opening comments at a School and District Accountability Design Team meeting, Superintendent Evers specifically mentioned the importance of ensuring that all students, regardless of economic status, race/ethnicity, or disability status, have equal opportunities to pursue fulfilling college and career lives following graduation from Wisconsin schools.

Closing achievement gaps is a priority area for Wisconsin. Wisconsin has one of the largest black-white achievement gaps in the nation. The design of this accountability system, while it aims to eradicate existing gaps across current subgroups. Wisconsin’s accountability system reflects this priority by including a specific priority area for closing gaps in the index calculation for accountability determinations, and by including several measures of existing gaps within this index.

The overall Gap Closure Index will be a combination of gap measures of Attainment, Rates of Growth, and Graduation rates. Current measures within the system strike a balance of characterizing existing gaps and acknowledging progress in closing those gaps.

The Attainment Gap
Annual within school achievement gaps will be determined for each demographic subgroup using weighted proficiency rates calculated for each subgroup using the same methodology that is employed in the creation of the Attainment priority area mentioned above. The weighted proficiency rate of each subgroup is then compared to its comparison group. Specifically, the system will compare each of the five race/ethnicity subgroups to the highest performing racial/ethnic subgroup in the school; English language learners to English proficient students; students with disabilities to students without disabilities, and; economically disadvantaged students with non-economically disadvantaged students.

Each group must meet the minimum cell size of 20 students in order to be given a gap calculation. After each gap is calculated, the gaps are then averaged to produce a school's overall average gap. Gaps are not weighted by student enrollment in each group in order not to marginalize at-risk subgroups with low enrollment. Instead, this system places equal emphasis on all at-risk groups, regardless of their representation within the student population.

Schools will receive a numerical score on a scale of 0-100 within this priority area based on their within-school average subgroup gap. Although the Attainment Gap score is an average of all gaps in a school, each gap will also be reported individually on the new school report.
cards, allowing schools to see which specific subgroups are falling behind the most and provide focused interventions to raise the achievement of these subgroups.

The Growth Gap
Another component of the Closing the Achievement Gap index is a growth measure, On Target to Proficient. Like the index for the Student Growth priority area, it is an application of Colorado’s “Catch Up, Keep Up, Move Up” principles. Because Wisconsin students are not tested in the 9th, 11th, or 12th grades, it will not be used for high schools at this time, although high school growth measures could be included in a future version of the system with statewide availability of the EXPLORE, PLAN, and ACT tests.

On Target to Proficient looks at growth of each subgroup to the Proficient level. The process to determine a school’s score, similar to that for the growth index, is:

- A student is included for calculation if we are able to calculate their SGPs in two consecutive years in reading/ELA and mathematics.
- In the first year, a student’s SGPs needed to reach the Proficient achievement level over 1, 2, or 3 years are projected for each subject. The lower of the 1-, 2-, or 3-year projections is their target.
- In the second year, the student’s SGPs, describing their growth from the first year to the second, are compared to their targets in each subject area. The student is flagged as On Target to Proficient in a subject if they meet or exceed their target.
- Because Wisconsin tests its students in the fall, the school accountable for a student’s growth is the school at which they were enrolled in the first year.
- For each racial/ethnic group in a school, and for the ESEA binary and comparison groups (e.g. students with disabilities vs. students without disabilities), in that school, a subgroup score is determined in each subject. The subgroup score is calculated from the percentage of students included in the subgroup On Target to Proficient, OTP, and the percentage of its included students in the subgroup reaching the Proficient level in the first year, PP, as follows: OTP + PP – (OTP × PP).
- The gap for a subgroup in a subject is the difference between the subgroup’s score and its comparison group’s score, if the subgroup’s score is lower. For racial/ethnic subgroups, the comparison group is the highest-scoring racial/ethnic subgroup.
- The school’s gap score in each subject is 1 minus the average of all the gaps present in that school, multiplied by 50 and rounded to the nearest whole number.
- The school’s overall gap score is the sum of the reading/ELA and mathematics gap scores.

At this time, DPI plans to weight each gap measure equally to establish a priority area index score. Because growth is only measured in elementary and middle school, and graduation only measured for high schools, 50% of the Closing Gaps priority area will be determined by attainment gap measures and the other 50% will be determined based on either growth or
graduation gap measures.

**The Graduation Gap**
Reducing Wisconsin’s graduation gap is a particular focus of DPI’s strategic plan. The agency is focusing efforts to decrease gaps in graduation rates in addition to setting a goal of improving Wisconsin’s statewide graduation rate to 92% by 2018.

Within school gaps in graduation rates between demographic subgroups will be evaluated annually. Specifically, the system will compare graduation rates for each race/ethnicity subgroup to the race/ethnicity subgroup that has the highest graduation rate; economically disadvantaged students to non-economically disadvantaged students; students with disabilities to students without disabilities, and; English language learners to English proficient students. These comparisons will be made using four-year adjusted cohort graduation rates and six-year adjusted cohort graduation rates. Schools will receive a numerical score for this priority area on a scale of 0-100, based on the average gap in graduation rates when placing equal weight on each subgroup gap.

**On-Track Status/Postsecondary Readiness**
The On-Track/Postsecondary Readiness measures proposed consist of a number of variables designed to identify whether schools are meeting benchmarks in preparing students for postsecondary success. The On-Track indicator, for schools with grades pre-Kindergarten through grade 8, includes attendance, with reading performance for 3rd grade and the 7th and 8th grade dropout rates serving as flags for schools that fall below certain thresholds. The Postsecondary Readiness indicator includes attendance, ACT participation and performance, and graduation rates, with the 9th through 12th grade dropout rates serving as a penalty flag for schools that fall below certain thresholds.

**On-Track Indicator**
The On-Track priority area calculation is applied to schools with grades pre-Kindergarten through grade 8. At this time the priority area includes a measure of attendance only. Dropout rates and performance on the 3rd grade reading assessment were also deemed important indicators, but were removed from this priority area to serve as overall flags for the Index system.

**Dropout Rate (Flag).** The number of dropouts for each school with students from grade 7-8 is calculated by identifying the number of dropouts and dividing that total by the overall school population to establish a school dropout rate. A subgroup dropout rate percentage is calculated for subgroups with at least 20 students for each racial/ethnic subgroup, for students with disabilities, students who are economically disadvantaged, and English Language learners. If the overall dropout rate or the dropout rate of any subgroup exceeds 2% for elementary and middle schools, or 10% for high schools, the school will receive a flag.

**3rd Grade Reading Performance (Flag).** Wisconsin Student Assessment System (WSAS) reading proficiency rates for the all students (full academic year) group are calculated to
determine whether a school receives a flag for the 3rd grade reading performance. Third grade reading performance is calculated for subgroups with at least 20 students for each race/ethnicity subgroup, for students with disabilities, economically disadvantaged students, and English Language learners. If the overall proficiency rate for the school falls two or more standard deviations below the state wide average the school will be flagged.

**Attendance (100% of On-Track priority area index score).** To determine an attendance score, the number of days attended out of the total possible days for each student is calculated. These numbers are summed together to provide both an overall school attendance rate and a subgroup attendance rate (for each subgroup with at least 20 students). Subgroup attendance scores are calculated for the following demographic groups: race/ethnicity, disability status, economic status, and English language learner status.

Each school’s Attendance score will be calculated based on an average of the school’s overall attendance race and the lowest attendance rate of all subgroups present in the school. For example, if a school’s overall attendance rate is 95%, but its attendance rate for American Indian students is only 75%, the school’s Attendance score will be 85 out of 100 (i.e., \((95 + 75)/2 = 85\)). Attendance is highly correlated with rates of high school graduation. As such, DPI is leveraging this high-impact measure by tying a school’s score to its lowest-attending subgroup.

**Postsecondary Readiness Indicator**
The postsecondary readiness priority area is applied to schools with a grade 12. This priority area includes measures of attendance, participation and performance on the ACT, and graduation rates.

**Attendance (20% of priority area index score)**
The attendance calculation is based on the number of days attended out of the total possible days for each student. These rates are summed together to provide both an overall school attendance rate and a subgroup attendance rate (for each subgroup with at least 20 students). Subgroup attendance scores are calculated for the following demographic groups: race/ethnicity, disability status, economic status, and English language learner status.

As mentioned above, each school’s Attendance score will be calculated based on an average of the school’s overall attendance race, and the lowest attendance rate of all subgroups present in the school.

**ACT performance and participation (20% of priority area index score)**

**Participation.** This measure is calculated by first identifying 12th grade students with a composite ACT score. The number of students with a score is divided by the total number of 12th grade students in the school to arrive at the ACT participation score.

**Performance.** ACT performance is calculated by identifying the number of students classified as meeting the College Readiness Benchmark established by ACT for each test area (English, Reading, Mathematics and Science) and dividing by the total number of tested students.
The ACT participation score and the ACT performance score for each test area are combined and the total is divided by five to arrive at the ACT performance and participation score.

Graduation (60% of priority area index score)
Graduation rates are calculated using two separate formulas: the four-year adjusted cohort rate and the six-year adjusted cohort rate.

The four-year adjusted cohort rate is calculated by taking the number of students in the cohort who graduate within four years with a regular high school diploma and dividing by the number of students who form the four-year adjusted cohort for the graduating class. The six-year adjusted cohort graduation rate is calculated by taking the number of students in the cohort who graduate within six years with a regular high school diploma and dividing by the number of students who form the six-year adjusted cohort for the graduating class.

The graduation index score is calculated by adding the four-year adjusted cohort rate for the “all students” group to the six-year adjusted cohort rate for the lowest performing subgroup and dividing by two. While the goal of graduating from high school within four years of 9th grade is appropriate for most students, DPI acknowledges that graduating from high school in five or six years may also be appropriate—and in fact part of a detailed Individualized learning plan established by a student, his or her family, and educators—for some students. It is important that the accountability calculation recognize graduation beyond a fourth year in high school as an appropriate goal and a potential success for some students.

The School and District Accountability Design Team discussed the idea of short, long, and longer-term accountability systems that incorporate additional meaningful measures when the data are available in a reliable, high-quality manner. DPI does intend to include other postsecondary data, including (but not necessarily limited to) college enrollment, industry certification, and military enlistment, when these data are widely available.

Dropout Rate (Flag). The dropout rate for schools with students from grades 9-12 is calculated by identifying the number of dropouts and dividing that by the overall school population. A subgroup dropout rate percentage is calculated for subgroups with at least 20 students for each of the following subgroups: race/ethnicity, disability status, economic disadvantaged status, and English proficiency status. If the school dropout rate or any subgroup dropout rate exceeds 10% the school will be flagged.

Advanced Placement – Star Consideration
The process to determine Advanced Placement exam performance and participation is:
For Participation – to identify the number of students completing an Advanced Placement exam in a given year and divide that number by the total number of 9th thru 12th grade students in the school to arrive at the participation rate.
For Performance – to identify the number of Advanced Placement exams taken in a given year and dividing that by the number of exams passed with a score of 3 or above.
WORK TO BE DONE
This index system is a work in progress. As mentioned earlier in this document, DPI is excited by the momentum offered to the state’s accountability reform efforts through this waiver process, and the Department looks forward to gaining valuable feedback early in the development of Wisconsin’s statewide accountability system to ensure not only that the system meets federal requirements but ultimately that it will result in the best outcomes for all students.

Wisconsin has several next steps in continued work on the Wisconsin index. First, submission of this request for flexibility offers an important opportunity for ongoing improvement through feedback from expert peer reviewers and the Department of Education, not to mention those who participated in the public review and comment period and in other stakeholder meetings. Second, DPI will consult with the Technical Advisory Committee on key components of the Index: namely, standards setting to ensure the index identifies and characterizes schools in a productive way. Third, DPI will establish a partnership with the University of Wisconsin System (UWS) to develop a regular evaluation framework for the accountability system. Finally, Wisconsin will field test the system (including use of the new, higher WKCE cut scores) in consultation with the TAC, with schools and districts, and with UWS.

This index is an accountability tool and can only reflect components of the rich, high-quality educational experiences offered by schools across Wisconsin as well as the specific challenges that schools face. It is a step forward from prior accountability structures but not the full picture of the accountability system that will evolve in Wisconsin. The index will undergo regular review and evaluation to ensure statistical reliability and validity as well as to identify statewide impact. These reviews will inform ongoing changes to the system.

In addition, while some changes will be informed by the review process, DPI believes there are measures not included in the current Index that may result in a more sensitive, accurate system. Namely, more robust measures of student postsecondary readiness (like postsecondary enrollment, credit-earning, and remediation rates), information about performance on assessments in additional subject areas like science and social studies, and school characteristics that point to the importance of rich, varied curricula that include course offerings such as art, music, physical education, world language, career and technical education, and other non-tested subjects as well as varied co-curricular activities. Advances in DPI’s technology and data system will allow for some of these indicators to be factored into the Index in the future and such additions will be evaluated as soon as the data are available.

Expected Outcomes
By identifying four key priority areas, and high-leverage measures within those priority areas, DPI is creating an index-based accountability system that places schools on a continuum that informs differentiated interventions and supports. Ambitious but achievable AMOs that
value all of the four priority areas and honor their representation of college- and career-ready expectations will inform improvement for all schools on the continuum and result in a significant number of students being on track for college and career.

Summary and Timeline
Wisconsin is making dramatic changes in how we think about accountability across the state. While work remains, this waiver request represents a significant commitment from DPI and a public statement that building and implementing a meaningful, transparent, statewide accountability system, while complicated and time-consuming, must continue to move quickly and must reflect the priorities of the state to move toward college and career readiness for every Wisconsin student.

As mentioned above, work on the Accountability Index continues.

2.C  REWARD SCHOOLS

2.C.i  Describe the SEA’s methodology for identifying highest-performing and high-progress schools as reward schools.

_The draft release does not include the reward school lists. Because the Index standards setting process is not yet complete, only redacted school lists for reward, priority, and focus schools will be included in DPI’s final waiver submission. Final lists will be available in Spring 2013._

Reward
Reward schools are identified annually and fall into one of three categories: Exemplary Schools, Gap Closing Schools, and schools that are Beating the Odds.

Exemplary schools are those schools that earn an index label of Significantly Exceeding Expectations. These schools have earned a high index score and done so without any flags; they are models for the state and will be acknowledged as such.

Gap Closing Schools are those schools that are making significant progress toward closing achievement gaps. Identification of these schools will be based on the Closing Gaps priority area of the index.

Beating the Odds schools are calculated using current, Title I Schools of Recognition methodology. Only Title I eligible or receiving schools in the top quartile for poverty qualify for this reward.
2.C.ii Provide the SEA’s list of reward schools in Table 2.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

OVERVIEW
Wisconsin has long understood the importance and benefit of publicly recognizing and rewarding high performing Title I schools, as evidenced by the introduction of Schools of Recognition (SOR) in 2003. In recent years, the Department of Public Instruction (DPI) has expanded and enhanced these opportunities to create a comprehensive program of public recognition and rewards to positively incentivize schools to improve student achievement or maintain high levels of performance. DPI designed the system of rewards and recognition to represent the three academic components within the five strategies of the state strategic plan in order to help meet the three strategic goals:

- Providing rewards and recognition based on student achievement represents a strategy designed to increase reading and mathematics performance using incentives.
- DPI specifically developed the SOR grants to emphasize and develop innovative instruction.
- The programs rely on various statewide infrastructures to inform and support the dissemination of best practices.

Collectively, the state’s initiatives have heightened the awareness of best practices and quality instructional programs throughout Wisconsin Title I districts and schools.

This application for flexibility of implementation within ESEA legislation provides DPI the opportunity to enhance and expand the existing rewards and recognition program in order to implement more rigorous identification requirements of participants, expand the current Title I accountability and support system to a Statewide System of Support (SSOS) with the inclusion of all Wisconsin schools, and add recognition for schools making significant progress in closing their in-school achievement gap as a means to support the state strategic goal and address the achievement gaps across schools and across the state. However, DPI will not seek flexibility for Reward Schools as it is currently defined in section 2.C and related definitions within the Flexibility Guidance. Specifically, the definition of Reward Schools as identified within the guidance would require the state to modify its existing methodology for identification in a way which would skew outcomes and result in over-identification of low-poverty Title I schools in the state. As it currently exists, the methodology rewards Title I schools “beating the odds” and increasing student achievement in schools with high poverty, high minority student populations. This methodology allows the state to reward schools that help address the state’s achievement gap, which more closely aligns with the three strategic goals outlined in the state’s strategic plan, as previously noted.

The following sections describe Wisconsin’s plan to utilize this opportunity for flexibility to enhance its existing opportunities for recognition and rewards for Title I schools, as well as expand its recognition program to all schools statewide.
EXISTING OPPORTUNITIES FOR TITLE I SCHOOLS OF RECOGNITION

The following sections describe the four components that currently comprise Wisconsin’s Title I rewards and recognition program, which the state will continue to implement.

Schools of Recognition—Beating the Odds

For the past nine years the DPI Title I and School Support Team has implemented the Schools of Recognition (SOR) determination to recognize high-poverty Title I schools “Beating the Odds,” as demonstrated by meeting the following criteria:

- Title I schools;
- Serving a larger proportion of students receiving free and reduced lunch than at least 75% of state public schools;
- Exceeding the average student academic performance in reading and mathematics, as measured by the Wisconsin Knowledge and Concepts Examination (WKCE), when compared to similar schools; and
- Meeting AYP indicators for two or more consecutive years.

SOR ceremony. The SOR Ceremony is a one-day event during which the SEA publicly recognizes identified schools on a statewide level in front of an audience which includes the State Superintendent and his Cabinet, as well as legislators of recognized school districts. The SORs receive a monetary reward and a plaque commemorating the event. The ceremony provides an opportunity for district administrators and teachers to network and share their success stories with their peers.

SOR grants. Once identified as a SOR, schools have the opportunity to apply for a SOR grant to develop new and innovative programs or scale-up successful, existing programs which support the state’s strategic goals to close the achievement gap and increase the rates of college and career ready graduates. Schools receiving the grants receive additional statewide public recognition.

Spotlight Schools. Any school identified as a SOR for three or more consecutive years can apply to become a Spotlight Schools. Potential Spotlight Schools must complete a self assessment with documented evidence that demonstrates success in at least Teaching and Learning, as well as one of the following: 1) Vision, Leadership, and Governance; 2) Decision Making and Accountability, 3) Professional Development and Teacher Quality, or 4) Family, School, and Community Partnerships. Spotlight Schools may request grant funds.

Spotlight Schools must host at least three visits to their school from school teams within their region, as well as across the state in order to increase the replication of successful practices statewide. Visiting teams observe classrooms, participate in discussions with administration and staff, and reflect upon the experience. Grantees must also develop a plan to communicate their spotlighted practices to schools unable to participate in visits within their region and across the state.

Spotlight Schools may use grant funds to continue reforms and improve school practices.
The SEA also hosts two annual networking meetings for all Spotlight Schools. These meetings include opportunities for professional development, sharing of spotlighted practices, and the dissemination of SEA-developed materials to support dissemination of spotlighted practices. Finally, Spotlight Schools are featured on the SEA’s Spotlight Schools website as well as in a statewide searchable database featuring Spotlight Practices.

**Teacher Fellowships.** Teachers in SORs can apply for a competitive fellowship grant program to fund personalized professional development opportunities designed to impact their practice, students, and school communities. Successful applications describe opportunities that will result in fresh perspectives, expertise, and broad world knowledge which will enhance instruction in their classrooms. The SEA selects approximately 20 teachers as Wisconsin SOR Fellows.

Basic eligibility requirements include the following:
- Teach in a Wisconsin SOR;
- Teach in a Pre-Kindergarten through 12th grade classroom;
- Minimum of three years classroom teaching experience;
- A full-time teacher spending at least 50 percent of the time in the classroom or a classroom-like setting; and
- Must have the intention of returning to teaching in their school/district in the following school year.

Teacher Fellows develop blogs (posted and promoted via the SEA website) which articulate their experiences in order to extend the learning opportunity to other educators statewide and disseminate best practices to a larger audience. Additionally, Fellows must present at professional development opportunities, conferences, and other regional and statewide meetings to continue to share their experiences beyond their classrooms and local communities.

**ENHANCEMENTS TO WISCONSIN’S EXISTING RECOGNITION AND REWARDS PROGRAM**

This application provides the state an opportunity to enhance its existing recognition and rewards program to include more rigorous identification criteria using the new accountability index (as described in Section 2.B), introduce two new categories which recognize schools closing their in-school gaps (as measured by the Gaps Index of the new accountability index described in Section 2.B), as well as Exemplary Schools, or schools earning the highest scores across multiple measures of achievement (as measured by the overall index score within the new Statewide Index System described in Section 2.B).

Additionally, this flexibility provides the state the opportunity to expand its existing system of public recognition to include non-Title I schools in an effort to develop a Statewide School and District Accountability System aligned to recommendations provided by the School and District Accountability Design Team, as opposed to Wisconsin’s existing accountability system which only affects Title I schools due to its funding source.

Non-Title I schools identified within these new categories will receive public recognition and
become eligible to participate in state-conducted Spotlight Schools Diagnostic Reviews (SPDR). The state will conduct SPDRs to generate reports for statewide dissemination on high-quality practices utilized in Gap Closing and Exemplary schools. SPDRs will be based upon the criteria developed to identify Spotlight Schools and their spotlight practices. The state will prioritize diagnostic reviews within a small, representative sample of Gap Closing Schools in order to provide more applicable information to Wisconsin schools. Gap Closing Schools can inform statewide practice by providing strategies proven to rapidly improve achievement within each school’s unique existing conditions and improve the quality and implementation of instructional programs and practices designed to supplement the instruction of SwDs, ELLs, and other student populations facing achievement gaps.

The SPDR process and dissemination of best practices in non-Title I schools will require additional state resources, including staffing and funding. Without additional state funding, DPI will continue to implement the rewards and recognition efforts in Title I schools.

**TIMELINE FOR IMPLEMENTATION OF PROPOSED ENHANCEMENTS**

Table 2.2 presents Wisconsin’s timeline for implementing enhancements to the current system of recognition and rewards. As previously noted, expansion of recognition opportunities to include all Wisconsin public schools, charter schools, and private schools participating in the Parental Choice Program as recommended by the Design Team, will require the state to allocate funding towards these initiatives.

**Table 2.2.**
Timeline for Implementation of Wisconsin’s System of Recognition and Rewards: Title I and Statewide.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Person(s) Responsible</th>
<th>Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>2012-13 Continue Current Title I Rewards and Recognition Programs (Schools of Recognition)</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td>2013-14 Modify Identification Formula for Existing Title I Rewards and Recognition Programs Using New Achievement Index (Schools of Recognition)</td>
<td>Office of Educational Accountability</td>
<td>TBD</td>
</tr>
<tr>
<td>2013-14 Continue to Implement Current Title I Rewards and Recognition Programs</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td>2013-14</td>
<td>in Title I Schools Identified with Modified Formula (Schools of Recognition)</td>
<td></td>
</tr>
<tr>
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<td>---</td>
</tr>
<tr>
<td>Identify Gap Closing Title I Schools Using Gaps Index From New Statewide Accountability Index System (Schools of Recognition and Title I Gap Closing Schools)</td>
<td>Office of Educational Accountability</td>
<td>TBD</td>
</tr>
<tr>
<td>Identify Gap Closing Schools Statewide Using Achievement-Growth Index From New Statewide Accountability Index System (Includes non-Title Schools)</td>
<td>Office of Educational Accountability</td>
<td>TBD</td>
</tr>
<tr>
<td>Identify Exemplary Schools Statewide using Statewide Accountability Index System Overall Scores (Includes non-Title Schools)</td>
<td>Office of Educational Accountability</td>
<td>TBD</td>
</tr>
<tr>
<td>Recognize all Title I Rewards Schools at Schools of Recognition Ceremony (SOR Schools, Gap Schools, and Exemplary Schools if applicable)</td>
<td>Title I and School Support Team; State Superintendent</td>
<td>TBD</td>
</tr>
<tr>
<td>Publicly recognize all of Wisconsin’s Statewide Reward Schools</td>
<td>Governor; State Superintendent</td>
<td>TBD</td>
</tr>
<tr>
<td>Identify Representative Sample of 2013-14 Gap Closing Schools Statewide to</td>
<td>Office of Educational Accountability</td>
<td>TBD</td>
</tr>
</tbody>
</table>
| Participate in Diagnostic Reviews  
| (Includes Non-Title Public, Charter, and Private Schools Participating in Choice Program) |  
| Conduct Diagnostic Reviews in Gap Closing Schools and Disseminate Findings | TBD | TBD |

**RATIONALE FOR SCHOOL REWARDS AND RECOGNITION**

In the development of Wisconsin Title I rewards and recognition programs, DPI consulted a number of collaborative partners, including the State Superintendent’s Collaborative Council, State Superintendent’s Parent Advisory Committee, Title I Committee of Practitioners (CoP), the 12 regional Cooperative Educational Service Agencies (CESAs), Title I Network, teachers, administrators, and parents. The input from the collaborative partners collected during various meetings and networking sessions, as well as a statewide Title I needs assessment conducted by DPI, helped to shape each program in order to best meet the needs of the field. Additionally, the collaborative partners continually participate in annual grant application reviews and provide funding recommendations to the State Superintendent for each of the Title I rewards and recognition programs.

These programs remain popular with stakeholders across the state. While participating in informational sessions and presenting at key conferences across the state to inform stakeholders of the NCLB waiver opportunity, multiple representatives from Schools of Recognition expressed concerns regarding the potential discontinuation of SOR programming.

Additionally, stakeholders have directly informed the inclusion of future recognition initiatives through the School and District Accountability Design Team process. Design Team members, representing stakeholders across the state, supported the recognition of high performing schools identified using indices under the New Statewide Accountability System implemented in 2014-15 and the dissemination of their proven practices across the state.

### 2.D Priority Schools

2.D.i Describe the SEA’s methodology for identifying a number of lowest-performing schools equal to at least five percent of the State’s Title I schools as priority schools.

Priority Schools, as the lowest performing schools in the state, are identified using the Student Attainment portion of the accountability index. While DPI will identify at least 5% of...
Title I schools in the state, is to appropriately identify all low-performing schools as defined by the Wisconsin Accountability Index. Schools with the lowest scores in this area will be rank ordered. Schools falling below a certain cut point, which will be established as part of a standards setting process and posted publically, are identified as Priority Schools.

Wisconsin has been working to build a statewide accountability system, one that includes all traditional public schools as well as charter schools and private schools participating in the Parental Choice Program. However, until State funding is made available, only Title I funds are currently available to provide the interventions mentioned in section 2.D.iii (below), and as such those interventions will only be available for Title I schools.

2.D.ii Provide the SEA’s list of priority schools in Table 2.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

OVERVIEW

DPI is working to reprioritize its efforts to support persistently low-achieving schools at the state, district, and school level. Similar to Wisconsin’s vision for RtI in schools, DPI recognizes that challenges must be identified as early as possible in order to align districts and schools to available resources and interventions, and to ensure that these systems of support affect change. The state will continue reforms already in place under NCLB, as well as implement new reforms aligned with the priorities of the state accountability system, as opposed to waiting until a school or district is identified as “failing.” DPI envisions a statewide accountability system which supports its schools and, this requires early and aggressive intervention.

Transition Year: 2012-13

The 2012-13 school year will serve as a transition year as DPI pilots the major components of its new statewide accountability system. While the identification of Schools Identified for Improvement (SIFIs) under current adequate yearly progress (AYP) formula will continue for 2012-13. Title I SIFI schools will no longer be required to provide SES as currently defined in NCLB. Instead, districts may use their 20 percent Title I set aside to provide a broader range of supports to students.

Waiving Supplemental Education Services

DPI will be using the ESEA flexibility as an opportunity to waive choice and supplemental education services (SES) from its current accountability system due to the limited impact on student achievement observed locally. DPI contracted with the Wisconsin Center for Educational Research (WCER) to conduct studies at the state and district level addressing the effect of SES. These studies conclude that SES has resulted in minimal impact on student outcomes. Due to the limited evidence regarding the effect of these programs, Wisconsin is requesting to reprioritize use of these funds towards other, more effective programs serving persistently low-achieving schools. After consulting with stakeholders, including Milwaukee Public Schools (MPS)—the largest LEA with an extensive history implementing SES—DPI
determined districts would benefit from flexibility to develop and implement extended learning opportunities which more closely align with district and school curricula, programs, and philosophies.

**Alternative Requirements.** In collaboration with key stakeholders, DPI developed an alternative for districts interested in waiving SES (if applicable). For the 2012-13 school year, interested districts may submit a plan to DPI which identifies the requirements detailed in the following sections for approval. Upon approval from the state, the district can discontinue contracts with their current state-approved SES providers.

The state would require districts interested in waiving SES, as it is currently defined within NCLB, to submit a district-wide plan detailing the specific extended learning opportunities that will be provided in place of those currently required in identified schools. The plans must include:

*Parent involvement.* Significant consultation with parents must be the cornerstone of flexibility requests. Districts must first consult with parents to determine if a majority wish to waive SES as it is currently implemented. If parents express interest, the district must engage parents in shaping the newly defined extended learning opportunities in ways which would best meet the needs of their child, including the selection of instructional supports and interventions. Districts must provide evidence of these consultation processes, including representation of parents of all student subgroups served within the school (i.e., students with disabilities, English language learners, low-income students, and students of various races and ethnicities).

*Logistics.* District plans must describe in detail the following components for intervention strategies outside the regular school day:

- Instructional frequency, duration, and schedule of interventions supporting literacy and mathematics;
- Student-to-teacher ratios, with a maximum of six students to one teacher (or less if necessary when serving specific subgroups, such as SwDs and ELLs);
- Staffing. This flexibility will allow districts to contract with high quality, certified teachers (including local staff) to enhance these opportunities and more closely align to district and school improvement goals;
- Duration. Per evidence provided by the What Works Clearinghouse, districts must provide a minimum of 45 hours of extended learning per student, to maximize the likelihood of increased student outcomes.

*Supplemental instruction.* The plan must still describe services which supplement instruction provided during the regular instructional day. Specifically, districts must provide the services:

- Before or after school;
- During Saturday school;
- During summer school; or
- Continue with SES in its current form with state-approved providers.
**Curriculum and instruction.** The plans must detail how the districts will evaluate the impact of the newly defined extended programs, as measured by specific, differentiated student learning outcomes. The plan must also describe how the services provide individualized instruction and align with individual student needs identified through balanced assessments, including the needs of SwDs and ELLs. Additionally, the plan must demonstrate that the new program aligns with current school and district curricula and instructional programming as a means to support student outcomes.

**Assurances.** As part of the plan, the district must make the following assurances:

- The district assures that the identification of students being served through additional and extended learning opportunities are low-income students (those qualifying for free or reduced lunch), and low-achieving as determined by school or district assessments.
- The district must align the services to identified student need(s).
- The district will identify a school-level parent contact to promote services.
- The services will be provided by certified teaching staff.
- The district will require parental signatures of consent on the student’s instructional learning plan that outlines learning goals, as well as the progress, frequency, and method of on-going parental communication.

**Budget.** The district must submit a budget detailing funding sources and allocations to support the district’s plan. Districts may use the Title I 20% set aside, if they provide evidence of consultation with private schools, as these services will now be subject to equitable participation.

As each of these components align with the turnaround principles and are also requirements of Priority School reform plans, this flexibility will support districts’ and schools’ transition to the new statewide system of accountability and support, which the state will fully implement in 2013-14.

**Priority Schools**

In 2012-13, SIG Cohort I and Cohort II schools will continue implementation of their reform plans, aligned to the turnaround principles, as planned.

**Implementation of New Statewide Accountability System: 2013-On-going**

DPI will provide targeted support to newly identified Priority Schools and Districts to improve implementation quality and student outcomes. The following sections describe the targeted systems of support and interventions provided to the state’s persistently lowest-achieving

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The following sections summarize interventions in traditional public schools and districts if identified within the new statewide system of accountability. For information regarding the interventions required of charter schools and private schools participating in the Parent Choice Program, refer to the previous section: Reprioritization and Systemic Changes at the State Level.
School Improvement Diagnostic Reviews

DPI will contract with an external partner to conduct a school improvement diagnostic review (SIDR) of each Priority School’s core instructional program (specifically reading and mathematics) resulting in recommendations supporting effective implementation of RtI for academics, as well as behavior. DPI envisions RtI as a means to systematize high quality instruction, balanced assessment systems, collaboration and supports for struggling learners. It is this multi-level system of support that will ensure that all students have equal access to resources and support their long-term success. RtI will create collaborative systems among educators; assist in using data to make informed decisions about students, staff, and resources; and provide a framework for seeking success for all students. RtI will offer a process to examine gaps in opportunity and learning and assist in building systems so that every child is a graduate. (For greater detail regarding RtI in Wisconsin, refer to Section 2.E). The SIDR will evaluate the fidelity of implementation and efficacy of each school’s RtI program, including core instruction (such as curricular alignment with the Common Core State Standards), universal screening methods and processes to identify students in need of interventions, the selected interventions, and progress monitoring. Additionally, the review will evaluate staff capacity to implement a system of early intervening services aligned to the turnaround principles schoolwide including, but not limited to, systems and structures that provide meaningful data about student performance and collaborative planning time for staff.

Turnaround Experts

Upon identification, the state will require a Priority School to partner with a state-approved turnaround expert exhibiting proven expertise in reforming persistently low-achieving schools, as well as proven expertise in addressing the specific deficits of the Priority School, as identified by the SIDR (for state approval processes, refer to Section 2.G). Identification as a Priority School results in loss of autonomy, due to exhibited lack of capacity to improve student outcomes. Therefore, the turnaround expert will work, in cooperation with DPI, to direct reform at the school level.

The state will prioritize improvement efforts at the district level if the school identification processes, as well as the resulting SIDRs demonstrate systemic challenges at the LEA level that contribute to the Priority identification of a large proportion of the district’s schools or represent potential barriers to successful implementation of school reforms. DPI will appoint a state-contracted turnaround expert with proven expertise in supporting reform at the LEA level to conduct an additional diagnostic review of central administration’s critical systems and structures, including human resources, curriculum and instruction, finance, and leadership. Based on district improvement diagnostic review (DIDR), the State Superintendent will direct reform at the LEA level and require schools to continue implementing successful school reforms, including DPI Corrective Action Requirements (CAR) and School Improvement Grants (SIG), if applicable. The LEA expert will act as a liaison between DPI and the district, supporting the implementation of the State Superintendent’s directives, while also providing objective monitoring results to DPI regarding implementation status and outcomes.
**Plans for School Reform in Priority Schools and Districts**

Priority Schools must submit a reform plan, informed by recommendations from the diagnostic review and aligned to the turnaround principles, for state approval via submission in Indistar®. Indistar® is a web-based system implemented by a SEA for use with district or school improvement teams to inform, coach, sustain, track, and report improvement activities. Indistar® requires activities within plans to align with indicators of evidence-based practices at the district, school, and classroom levels designed to improve student achievement, including RtI implementation and strategies to successfully serve students with disabilities (SwDs) and English language learners (ELLs). The tool’s pre-populated indicators draw upon the vast turnaround literature and, once embedded in the aligned school reform plan, will ensure that Priority Schools progress through a continuous cycle of assessment, planning, implementation, and progress monitoring. In addition, to Indistar® allows for customization, and Wisconsin intends to enhance the system with additional indicators aligned to the state’s vast understanding of effective practices and interventions drawn from Wisconsin Title I schools.

Significant consultation with parents must be the cornerstone of districts’ reform plans. Districts must first consult with parents to communicate the Priority status. Schools must then engage parents in shaping the reform plan in ways which would best meet the needs of their child, including the selection of instructional supports and interventions. Districts must provide evidence of these consultation processes, including equal representation of parents of all student subgroups served within the school (i.e., students with disabilities, English language learners, low-income students, and students of various races and ethnicities). All LEAs with Priority Schools must commit to a single reform plan within each Priority School which will incorporate and expand upon all aspects of other state and local required plans (such as a Title I schoolwide plan, LEA required school improvement plan, or persistently dangerous school plan).

Reform plans, whether targeted at the school or district level, must include the following components:

**Response to Intervention (RtI)**. Identified as a strategy to effectively implement differentiated and customized instruction in order to improve individual and student subgroup outcomes, Priority Schools and Districts must commit to a detailed plan for implementation of RtI within their reform plan in coordination with the Wisconsin RtI Center (for more information regarding RtI or the Wisconsin RtI Center, see Section 2.E). These plans must describe in detail how the school will utilize RtI as a strategy to meet the individualized needs of all students, as well as student subgroups, including SwDs and ELLs.

**Extended learning time.** Due to the extensive research suggesting that schools providing high quality, extended learning time experience greater student outcomes, Priority Schools must articulate how staff will redistribute resources and time in order to increase the hours in the instructional day.

**Highly skilled educators.** The reform plans must describe the LEA’s systems and structures which ensure all teachers are not only highly qualified for their assignment, but effective.
Specifically, the plan must demonstrate that the LEA will implement an educator evaluation system by 2014-15 that aligns to the statewide framework. Additionally, the LEA must create opportunities for continuous learning through job-embedded professional development to increase all teachers’ capacity to implement their school’s reform plan. Administrators must describe the systems and structures in place which will support alignment of findings from the newly implemented educator evaluation system to specific, differentiated professional development and training opportunities.

**Implementation in Priority Districts.** DPI will require the district turnaround expert to demonstrate expertise recruiting, inducting, training, and retaining highly qualified, as well as highly effective staff. Additionally, the expert must demonstrate expertise in identifying educator needs, developing aligned professional development in an appropriate learning environment, and providing consistent and on-going support to ensure implementation of new strategies or practices.

**Highly skilled leaders.** If an LEA wishes to retain the current principal in a Priority School, the LEA must produce data which demonstrates the principal has improved student learning in the school. Additionally, the LEA must create opportunities for continuous learning through job-embedded professional development to increase the principal’s capacity to implement the reform plan, as well as lead change with his/her staff. Additionally, the LEA must communicate its plan to implement a leadership evaluation as part of its newly developed Educator Evaluation system.

**Implementation in Priority Districts.** Prior to contracting with DPI, a turnaround expert must demonstrate expertise identifying, recruiting, training, and retaining highly effective leaders and administrators to ensure effective and sustainable implementation of newly developed reforms. The district vendor will use this expertise to staff and develop leadership positions within the district. The expert must staff administrative positions in turnaround schools with leaders willing and able to create change, provide leaders adequate professional development aligned to needs, and create the flexibility within the LEA necessary for the school and its leaders to succeed.

**Positive and safe learning environments.** The reform plans must include methods to provide a safe and disciplined learning environment. LEAs must prioritize the distribution of pupil services staff (e.g., School Social Workers, Nurses, Psychologists, and Guidance Counselors) to each Priority School, and staff schedules must allow for adequate time to serve students. LEAs must also ensure Priority Schools implement Positive Behavior Intervention Systems (PBIS) to support students across multiple domains (e.g., social, emotional, behavioral) in order to increase positive academic outcomes. This requirement will also ensure that Priority Schools do not prioritize implementation of mathematics and ELA at the expense of other practices designed to help a student develop the habits and skills necessary to succeed in college and career (for more information regarding PBIS, see Section 2.E).

**Family engagement.** As previously noted, the reform plans must first document how parents were engaged in the decision-making process and how the new system will better meet their needs. The plan must include strategies to meaningfully engage family members in the
education of their children. Schools must align family engagement plans with the research of Dr. Joyce Epstein, John Hopkins University, Baltimore, MD. Activities must address each of the following strategies: 1) increasing frequency and variety in communication with parents, specifically regarding their child’s academic progress; 2) providing resources to encourage learning at home; 3) developing meaningful volunteer opportunities; 4) increasing the participation and effectiveness of parent representation in school governance; 5) implementing strategies to strengthen and support effective parenting; and 6) strengthening community partnerships to support parents. To demonstrate this level of engagement, Priority Schools must implement parent training programs to help all parents understand the school’s screening methods, how to interpret universal screening data, criteria for entering and exiting interventions based on need, progress monitoring methods, and progress monitoring data.

For approval, a school and its LEA must provide a detailed plan which includes each of the previously mentioned components in a customized manner which meets the individual and unique circumstances of that school, as identified within the Diagnostic Review and Needs Assessment processes. DPI will utilize an extensive rubric to ensure schools and districts understand and communicate what is expected of them within their plans.

**After Three Years of Implementation**

If, after three years of implementation a Priority School is identified as Priority status again, the State Superintendent will utilize the authority to intervene, as defined by modifications to legislation, to remove the school from its local LEA and under the authority of a state identified turnaround expert. In exchange for the flexibility and autonomy associated with removal from the local LEA or jurisdiction of its school board, the state will hold the expert accountable for the improvement of school and student outcomes.

Implementation of the processes and practices described throughout Section 2.D in schools statewide (as opposed to Title I schools only) will require additional state resources, including staffing and funding. Without additional state funding, DPI will continue to implement the Priority School reform efforts in Title I schools only.

**Table 2.3. Timeline for Implementation of Priority School Activities**

<table>
<thead>
<tr>
<th>Timeline</th>
<th>Activity</th>
<th>Person(s) Responsible</th>
<th>Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011-12</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spring</td>
<td>Develop application criteria for diagnostic review partner</td>
<td>DPI</td>
<td>TBD</td>
</tr>
<tr>
<td>Spring</td>
<td>Develop application criteria for external turnaround partners</td>
<td>DPI</td>
<td>TBD</td>
</tr>
<tr>
<td>Summer</td>
<td>Begin</td>
<td>Title I and School</td>
<td>TBD</td>
</tr>
<tr>
<td>Period</td>
<td>Task</td>
<td>Responsible Party</td>
<td></td>
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<td>--------------------------------------------------------</td>
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</tr>
<tr>
<td>2012-13</td>
<td>Release diagnostic review partner application</td>
<td>DPI TBD</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Release external turnaround partner application</td>
<td>DPI TBD</td>
<td></td>
</tr>
<tr>
<td>Fall</td>
<td>Continue development and finalization of agency and statewide RtI initiatives to support future Priority Schools</td>
<td>DPI TBD</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Continue communication of identification processes and reform plan requirements associated with Priority Schools</td>
<td>Title I and School Support Team TBD</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Run “Mock” reports with Priority School identifications using 2011-12 data to prepare schools at risk of identification</td>
<td>Office of Educational Accountability TBD</td>
<td></td>
</tr>
<tr>
<td>Winter</td>
<td>Select diagnostic review partner</td>
<td>DPI TBD</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Release state approved list of turnaround partners</td>
<td>DPI TBD</td>
<td></td>
</tr>
<tr>
<td>Spring</td>
<td>Final determination of Priority Schools</td>
<td>Office of Educational Accountability TBD</td>
<td></td>
</tr>
<tr>
<td>Timeframe</td>
<td>Activity</td>
<td>Responsible Party</td>
<td>Notes</td>
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<tr>
<td>--------------</td>
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<td>--------------------------------------------------------</td>
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<tr>
<td></td>
<td>using 2012-13 data</td>
<td></td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Focus School staff and representatives from their LEAs attend informational meetings and webinars conducted by the DPI regarding Focus School reform requirements</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Diagnostic review are conducted at Priority schools and MPS</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td>Summer</td>
<td>Training of Priority Schools and LEA representatives on Indistar®</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td>2013-14</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fall</td>
<td>Priority Schools’ reform plans due to DPI via Indistar®</td>
<td>Focus Schools and LEA Representatives</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Indistar® reform plans approved by DPI</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td>Winter</td>
<td>DPI begins monitoring implementation via site visits, Indistar® plans, data reviews, and fiscal reviews</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td>Spring</td>
<td>DPI continues monitoring implementation via site visits, Indistar® plans, data reviews, and fiscal reviews</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Indistar® opens for 2014-15 reform plans</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td>Summer</td>
<td>Indistar® reforms plans for 2014-15</td>
<td>Focus Schools and LEA Representatives</td>
<td>TBD</td>
</tr>
</tbody>
</table>
2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA’s choice of timeline.

<table>
<thead>
<tr>
<th>Timeline</th>
<th>Activity</th>
<th>Person(s) Responsible</th>
<th>Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011-12</td>
<td>Develop application criteria for diagnostic review partner</td>
<td>DPI</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Develop application criteria for external turnaround partners</td>
<td>DPI</td>
<td>TBD</td>
</tr>
<tr>
<td>Summer</td>
<td>Begin communication of identification processes and reform plan requirements associated with Priority Schools</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td>2012-13</td>
<td>Release diagnostic review partner application</td>
<td>DPI</td>
<td>TBD</td>
</tr>
<tr>
<td>Season</td>
<td>Task Description</td>
<td>Responsible Party</td>
<td>Timeframe</td>
</tr>
<tr>
<td>--------</td>
<td>------------------------------------------------------------------------------------------------------</td>
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</tr>
<tr>
<td>Fall</td>
<td>Release external turnaround partner application</td>
<td>DPI</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Continue development and finalization of agency and statewide RtI initiatives to support future Priority Schools</td>
<td>DPI</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Continue communication of identification processes and reform plan requirements associated with Priority Schools</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Run “Mock” reports with Priority School identifications using 2011-12 data to prepare schools at risk of identification</td>
<td>Office of Educational Accountability</td>
<td>TBD</td>
</tr>
<tr>
<td>Winter</td>
<td>Select diagnostic review partner</td>
<td>DPI</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Release state approved list of turnaround partners</td>
<td>DPI</td>
<td>TBD</td>
</tr>
<tr>
<td>Spring</td>
<td>Final determination of Priority Schools using 2012-13 data</td>
<td>Office of Educational Accountability</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Focus School staff and representatives from their LEAs attend informational meetings and webinars conducted by the DPI regarding Focus School reform requirements</td>
<td>Title I and School Support Team</td>
<td>TBD</td>
</tr>
<tr>
<td></td>
<td>Diagnostic review</td>
<td>Title I and School</td>
<td>TBD</td>
</tr>
<tr>
<td>Time Period</td>
<td>Activities</td>
<td>Responsible Parties</td>
<td></td>
</tr>
<tr>
<td>-------------</td>
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<td>---------------------</td>
<td></td>
</tr>
<tr>
<td>Summer</td>
<td>Training of Priority Schools and LEA representatives on Indistar®</td>
<td>Title I and School Support Team Center on Innovation and Instruction</td>
<td></td>
</tr>
<tr>
<td>2013-14</td>
<td>Priority Schools’ reform plans due to DPI via Indistar®</td>
<td>Focus Schools and LEA Representatives</td>
<td></td>
</tr>
<tr>
<td>Fall</td>
<td>Indistar® reform plans approved by DPI</td>
<td>Title I and School Support Team</td>
<td></td>
</tr>
<tr>
<td>Winter</td>
<td>DPI begins monitoring implementation via site visits, Indistar® plans, data reviews, and fiscal reviews</td>
<td>Title I and School Support Team</td>
<td></td>
</tr>
<tr>
<td>Spring</td>
<td>DPI continues monitoring implementation via site visits, Indistar® plans, data reviews, and fiscal reviews</td>
<td>Title I and School Support Team</td>
<td></td>
</tr>
<tr>
<td>Summer</td>
<td>Indistar® opens for 2014-15 reform plans</td>
<td>Title I and School Support Team</td>
<td></td>
</tr>
<tr>
<td>2014-16</td>
<td>Indistar® reforms plans for 2014-15 due</td>
<td>Focus Schools and LEA Representatives</td>
<td></td>
</tr>
<tr>
<td></td>
<td>DPI approves Indistar® reform plans</td>
<td>Title I and School Support Team</td>
<td></td>
</tr>
<tr>
<td>Annually</td>
<td>Continue implementation of reform plans aligned to annual schedule as detailed above</td>
<td>Focus Schools and LEA Representatives</td>
<td></td>
</tr>
</tbody>
</table>
2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

DPI will identify Priority schools every three years. If, after three years, a school no longer satisfies the criteria for identification, they will be removed from the list. Schools that are identified consecutively are subject to more intense interventions, discussed above.

2.E **Focus Schools**

2.E.i Describe the SEA’s methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as “focus schools.”

DPI appreciates the US Department of Education’s efforts to clarify means by which Focus Schools may be identified in the most recent FAQ Addendum, dated January 5, 2012. At this time, given DPI’s strategic planning goals of closing gaps across the state, Focus Schools will be identified based on large within school gaps in achievement and graduation rates. Specifically, schools with large subgroup gaps in reading attainment, mathematics attainment, or graduation rates, may be identified as a Focus School.

This method will likely identify schools (final lists will be produced at a later date, upon completion of index field testing) that are high performing by traditional measures. By focusing on attainment gaps and graduation gaps, DPI hopes to acknowledge that progress must be made in all educational settings, even those with large numbers of high-performing students, and that gaps can no longer be hidden in such situations.

To identify gaps, DPI will compare the proficiency rates of each demographic subgroup (five race/ethnic subgroups compared with the highest performing race/ethnic subgroup within the school; economically disadvantaged subgroup compared with the not economically disadvantaged subgroup; students with disabilities subgroup compared with the non disabled subgroup; English language learner subgroup compared with English proficient subgroup) for both reading and mathematics separately. Those schools with the largest within-school subgroup achievement gaps will be identified as Focus Schools. In addition, DPI will annually compare 4-year adjusted cohort and 6-year adjusted cohort subgroup graduation rates. Schools with the largest subgroup gaps in graduation rates will be identified as Focus Schools.

2.E.ii Provide the SEA’s list of focus schools in Table 2.

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA’s focus schools and their students and provide examples of and justifications for the interventions focus schools will
be required to implement to improve the performance of students who are the furthest behind.

**OVERVIEW**

As previously noted, Wisconsin committed to three strategic goals, including *closing achievement gaps*. This flexibility application provides Wisconsin the opportunity to modify its existing accountability system to align to this strategic goal with the identification of Focus Schools, or those schools which most contribute to the state’s achievement gap. Identified schools must implement systematic reforms which *individualize and customize instruction* for all students, including prioritized student populations (such as students with disabilities and English language learners), as defined within the five strategies to meet the state’s strategic goals. The state will require Focus Schools to implement this strategy via Wisconsin’s model for Response to Intervention (RtI). Unlike most RtI models, Wisconsin’s innovative model systematically organizes the way schools operate in order to reach the vision of academic and behavioral success for *all* students through a fluid and flexible, multi-level system of support that includes high quality core, extension, and intervention instruction; balanced assessment systems to examine gaps in opportunity and learning, and professional collaboration to determine how best to meet the needs of identified students. Additionally, Wisconsin’s vision for RtI is centered on culturally responsive and appropriate practices (see Figure 2.1), imperative to modifying instructional practices to meet the needs of all students and close achievement gaps.

**Figure 2.1. Wisconsin’s Vision for RtI**

Unlike the ubiquitous tiered system, Wisconsin’s system would more aptly be illustrated using a conical shape representing a fluid system with supports extending upwards (additional challenges) and downwards (interventions) from the core instruction to include all students within an individualized, differentiated educational plan that includes or is informed by high quality instruction, balanced assessments, collaboration, and culturally responsive practices. Figure 2.2 illustrates this vision in a different way, providing a Roadmap for Wisconsin educators to systematically implement Wisconsin’s Model for Academic and Behavioral Success (RtI).

**Figure 2.2.**
When implemented with fidelity, RtI will increase Wisconsin schools’ ability to make significant progress and achieve necessary outcomes within culturally responsive means for prioritized student populations in order to improve outcomes for all students and close achievement gaps.

**Statewide Commitment to RtI as a Means to Meeting Strategic Goals**

In order to meet this vision and support implementation fidelity, DPI, in collaboration with the 12 regional Collaborative Education Service Agencies (CESAs), developed a statewide RtI Center. The Wisconsin RtI Center provides high quality professional development and technical assistance (TA) statewide. (The Wisconsin RtI Center is described in greater detail in following sections.) This Center will provide the foundation of support for Wisconsin’s Focus Schools. Due to the state’s commitment, the systems and structures necessary for Focus Schools to implement reform are already in place or currently in development and, therefore, immediately available to districts and schools at little to no charge. This prior work positions Wisconsin to easily implement RtI consistently in the state’s Focus Schools and support change—specifically, decreasing achievement gaps.

**SCHOOL REFORM PLANS**

All LEAs with schools identified as Focus will be required to ensure that those schools do the following:

**Assess Core Instruction in Reading and Mathematics**

Focus Schools will participate in an online assessment of RtI implementation practices to further identify implementation components in need of support or training. This assessment will be conducted online using Indistar®, provided by the Center for Innovation and Instruction...
Indistar® is a web-based system used with school improvement teams to inform, coach, sustain, track, and report improvement activities. The tool’s pre-populated indicators draw upon the vast turnaround literature, including RtI (65 specific RtI indicators), as well as indicators supporting success for individual student populations, such as ELLs (19 indicators), SwDs (10 indicators), and various age levels (e.g., high school). In addition, Indistar® allows for customization, and Wisconsin intends to enhance the system with additional indicators aligned to the state’s vast understanding of effective RtI practices and interventions drawn from Wisconsin Title I schools. The development and continued growth of the Wisconsin RtI Center and DPI’s promotion of RtI as a model schoolwide plan in Title I schoolwide programs has provided the opportunity to learn about, share, and begin replicating effective RtI practices statewide. DPI will continue to work in conjunction with the Wisconsin RtI Center to embed these effective practices in Indistar®. More information on the Wisconsin RtI Center and its initiatives to grow RtI expertise in Wisconsin is detailed below.

Develop and Implement a School Reform Plan

Following completion of the needs assessment (conducted annually), LEAs must ensure each Focus School develops and submits a reform plan aligned to identified needs necessary to improve RtI implementation and academic outcomes for identified student populations via Indistar®. The Indistar® application will ensure Focus Schools progress through a continuous cycle of assessment, planning, implementation, and progress monitoring across the three year implementation timeline.

In order to receive approval from DPI, the reform plans must thoughtfully address the following components:

**Coordination of RtI initiatives.** The reform plan must address how LEAs will coordinate the Focus School’s RtI system including:

- Detailed description of how the school will utilize RtI as a strategy to meet the individualized needs of all students, as well as student subgroups, including SwDs and ELLs;
- Educating the school’s leadership on the Wisconsin RtI Framework;
- Ensuring readiness and development of a RtI school team;
- On-going analysis of the school’s RtI implementation on Indistar®; and
- Training and support around universal curriculum and instructional practices, universal screening, and processes or tools for progress monitoring.

**Positive behavioral interventions and support.** The reform plan must address implementation of a positive, school-wide, systematic approach to address behavior based on a proactive RtI model. LEAs will have access to consultation, training, and on-going TA with Wisconsin’s PBIS Network, a component of the Wisconsin RtI Center.

**Collaborative planning time.** If necessary, the plan must articulate how the LEA will modify the current school schedule to allow grade level and/or reading and mathematics teachers and support staff to meet frequently in order to review student data and modify instruction and
interventions.

**Professional development.** The reform plan must include a calendar of targeted professional development opportunities aligned to identified staff needs. The LEA must create opportunities for continuous learning through job-embedded professional development to increase all teachers’ capacity to implement the reform plan. If necessary, the LEA may need to revise the teacher and principal evaluation systems and hiring processes to align to the state’s Educator Effectiveness framework in order to ensure that staff in the Focus School(s) can effectively implement the reform efforts.

**Report RtI Implementation and Outcomes Data**
DPI will hold the LEAs accountable for adequate, on-going progress within Focus Schools through monitoring practices. On-going SEA and LEA monitoring of Focus School reform plans will take place through Indistar®. Indistar® allows DPI to collect and monitor student outcome data. In collaboration, the Wisconsin RtI Center and Wisconsin’s Title I and School Support Team will monitor the reform plans and data reports on a quarterly basis, allowing DPI to assess the implementation of interventions and progress of outcomes at individual schools. If the state recognizes significant delays or areas of concern, agency staff will conduct monitoring visits and if necessary assist the LEA and school in developing plans for rapid compliance.

**Flexibility in the Use of Title I Funds**
The LEA will have the option to set aside up to 20% of its Title I dollars to fund the school reform plan. This option will ensure resources can be allocated to these schools’ improvement efforts.

**SUPPORT FOR IMPLEMENTATION OF REFORM PLANS**
Given that success relies on implementation and each school will possess various levels of experience, skill, and expertise regarding RtI implementation, the state, in collaboration with the Wisconsin RtI Center, will provide extensive training, technical assistance and support to Focus Schools and their LEAs.

As previously noted, DPI established the Wisconsin RtI Center to support schools through the phases of RtI implementation to increase success, as well as sustainability. Wisconsin is one of a small number of states to establish, develop, and utilize a comprehensive, statewide RtI center. The Center exists to develop, coordinate, and provide high quality professional development and training opportunities, as well as to gather, analyze, and disseminate Wisconsin implementation data to enhance implementation statewide (see Figure 2.3).

**Figure 2.3**
As presented in Figure 2.4, the Wisconsin RtI Center developed a continuum of technical assistance and workshops aligned to the implementation process. Specifically, support begins in Year One (Purpose Building), as school staff receive training and guidance to become familiar with Wisconsin’s unique RtI model and its variations from the more common tiered model in order to ensure consistent language, understanding, and implementation (Foundational Overview), as well as workshops intended to support staff’s identification of their implementation needs within six key components of implementation, including high quality core instruction, collaboration, balanced assessment, high quality interventions and instruction, culturally responsive practices, and family engagement (Framework Mapping). During Years Two through Five (Implementation), schools and districts receive on-going assistance regarding any of the six key components as identified during annual needs assessments. As schools enter Full Implementation (Year Five and Beyond), the Center provides on-going training as needed, as well as “Success Stories,” a video series on implementation of RtI in Wisconsin schools, “Demonstration Schools,” which highlight current RtI implementation across the state, and “Recognized Schools,” which illustrate positive student outcomes after implementation of the Wisconsin RtI framework.

Figure 2.4
The RtI Center also employs regional technical assistance coordinators. Coordinator activities include:

- Basic consultation with the school leadership team on the school’s RtI framework or Wisconsin’s Vision of RtI;
- Basic consultation with the school leadership team on the technical assistance trainings of the Wisconsin RtI Center;
- Facilitation of the Wisconsin RtI School-wide Implementation Review to the schools’ leadership team;
- Facilitation in completing the Implementation Toolkit;
- Abbreviated Wisconsin RtI Foundational Overview or sections of the overview to all staff; and
- Follow-up to the RtI Mapping session.

The Center will align Coordinator activities to Focus School needs and assist LEAs and their Focus Schools with RtI implementation, as well as school and district improvement efforts.

Locally, Indistar® will provide Focus Schools and their LEAs practical documentation through built-in mechanisms for creating agendas, recording minutes, assigning responsibilities, setting timelines, allocating resources, coaching, and monitoring the fidelity of implementation of the school reform plan. Indistar® also allows schools to collect and monitor data aligned to the school’s reform plan in order to estimate the impact of academic interventions and the resulting student outcomes. Additionally, the development of the statewide longitudinal data
system will enable school and district staff to readily access data using multiple measures across a balanced system of assessments (as previously noted). With these systems in place, educators and state administrators will have the ability to collect and analyze important programmatic data over time. Schools will use these tools to promote dialogue amongst teams of educators addressing students’ academic needs in order to remove barriers to learning and promote achievement early.

The Title I and School Support Team will also increase contract requirements for the Title I Network (see Section 2.F) to ensure that representatives from each CESA attend specific trainings and workshops provided by the Wisconsin RtI Center (as identified as mandatory by the Center) to support Focus Schools within their CESA in a manner consistent with the Wisconsin vision for RtI (as opposed to reinforcing conflicting visions through the use of other vendors) and likely to improve student outcomes.

**MONITORING**

In addition to providing support, DPI will hold the LEAs accountable for adequate, on-going progress within Focus Schools through monitoring practices. On-going SEA and LEA monitoring of Focus Schools will take place primarily through the main online framework, Indistar®. Indistar® also allows DPI to collect and monitor data aligned to the school’s reform plan in order to estimate the impact of academic interventions and the resulting student outcomes. This resource ensures LEAs and schools monitor the progress of individual students in a consistent and timely manner. In collaboration, the Wisconsin RtI Center and Wisconsin’s Title I and School Support Team will monitor these online plans and data reports on a quarterly basis, allowing DPI to assess the implementation of interventions and progress of outcomes at individual schools. If the state recognizes significant delays or areas of concern, agency staff will submit a report to the Focus School and its LEA identifying areas for improvement and plans for rapid compliance.

**Increased Prescription and Directive Requirements**

If, after three years of reform and Focus School status, the school is again identified as a Focus School, DPI will increase the level of prescription and schools. LEAs will lose flexibility and autonomy until DPI receives sufficient evidence of on-going improvement. Specifically, the state will require these schools to participate in an onsite school improvement diagnostic review (SIDR) conducted by the Wisconsin RtI Center to thoroughly evaluate the level and quality of implementation as it aligns to the Wisconsin vision for RtI, instead of continuing with online self-assessments. Upon completion of the review, the state will provide prescriptive requirements for training, interventions, and supports which directly align to findings from the review and are consistent with needs identified in the data for specific student groups (e.g., DPI consultants with expertise in ELL educational programs provide workshops specific to best practices when serving ELL students if the school was identified due to low performance of their ELL students). Additionally, all practices identified in the reform plan will have to meet

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8 The WI RtI Center will utilize the three years of implementation to continue enhancing existing diagnostics and develop new assessments and data systems to effectively fulfill this requirement. Once these systems are in place, Focus Schools will transfer from Indistar®, to this system exclusively.
approval by the appropriate DPI expert (e.g., SwD, ELL, etc.).

This waiver application provides Wisconsin the opportunity to require implementation of systems and structures proven successful in serving all student populations (disaggregated, as well as aggregate). Specifically, DPI will require Focus Schools to implement with fidelity the state’s vision for RtI as a means to ensure all students (individual and subgroup populations) receive high quality, differentiated, and customized instruction to close the state’s achievement gaps. The requirements detailed in these sections will not only decrease gaps within identified Focus Schools, but across the state, as it is intended that this new requirement will increase awareness of the state’s vision for RtI, as well as the resources available to support implementation statewide.

**RATIONALE FOR FOCUS SCHOOL REQUIREMENTS**

Because Wisconsin envisions RtI as a means to appropriately serve all students, the grade level and student population do not present a challenge to implementation. RtI is not only appropriate for all students, it is meant for all students. Specifically, the systems to address Focus School’s achievement gaps (RtI) will be the same in each school, but the specific interventions, curricula, and strategies will differ based on unique need, and the RtI Center will work collaboratively with identified schools to support implementation within their various environments. While the research is still emerging, studies over the past ten years have indicated that RtI and school improvement are closely linked. The following sections provide a brief review of the national literature, as well as evidence collected locally by the Wisconsin RtI Center suggesting high quality RtI programs implemented with fidelity positively impact student outcomes.

**English Language Learners**

The National Center on Response to Intervention’s research shows that implementation of the RtI framework with ELLs, particularly those who are Spanish-speaking, improves English literacy. Brown and Sanford (2011) explain that few intervention programs have included ELLs in their norming samples. Therefore, educators must use what we currently know regarding effective instruction in literacy and instruction for ELLs for instruction at all levels of the multi-level prevention system.

Within Wisconsin, evidence suggests RtI has positively impacted instruction for ELLs and assisted in closing in-school achievement gaps. For example, one Wisconsin Title I school serving high proportions of students from low income households (32 percent) as well as English language learners (21 percent) saw the percentage of students scoring proficient or advanced on the state standardized tests increase from 80 percent to 87 percent (representing an eight percent increase) across the past five years. Similarly, another Title I school implementing RtI to serve a high poverty (25 percent) and LEP (10 percent) population saw an 11 percent increase (from 84 percent to 94 percent) in the proportion of students scoring proficient or advanced across the past five years.

Additionally, data from a Wisconsin district located in a different region of the state serving a
diverse student population (73 percent poverty, 53 percent minority with 24 percent black and 29 percent Hispanic, and 15 percent LEP) suggests RtI is an effective practice in closing achievement gaps. As illustrated in Figure 2.5, this district successfully reduced the achievement gap between its low income, high minority, and LEP students and the state average from 28 percent to five percent across eight years due, in part, to high quality RtI implementation.

**Figure 2.5.**

Similarly, an elementary school serving a high poverty (93 percent), high minority (71 percent) student population as well as a substantial (28 percent) LEP population not only reduced the proportion of students scoring minimal or basic on grade level benchmarks by 57 percent, but a substantial majority (78 percent) of students earned advanced scores after a year of high quality instruction implemented within a systematic vision of RtI (see Figure 2.6).

**Figure 2.6.**
Students with Disabilities
Six of the 16 studies analyzed by Hughes and Dexter reported data on the effects of their programs on special education referral and/or placement rates. Bollman and colleagues (2007) examined the effect of the St. Croix River Education District (SCRED) model on the rate of identification for special education services and reported that placement rates dropped from 4.5% to 2.5% over a 10-year period. They indicate that the statewide prevalence rate over the same time period dropped from 4% to 3.3%. Calendar (2007) reported that placements decreased by 3% for "districts with at least one RBM school," whereas the state rate decreased by 1%. Marston and his co-authors (2003) indicated that special education placement rates stayed constant over time for Minneapolis problem-solving model schools, as did the district as a whole. Peterson, Prasse, Shinn, and Swerdlik (2007) reported similar information: Referrals and placements stayed relatively stable over time after RtI implementation. O’Connor et al. (2005) examined the effect of the tiers of reading intervention model on placement rates. They found that during the 4 years of implementation, rates fell to 8% compared to an historical contrast group (same schools, same teachers) for which the rate was 15%. Finally, VanDerHeyden and colleagues (2007) reported that for the four schools included in their study, there was a decrease in referrals and an increase in placements. The authors interpreted this pattern as an indication of more appropriate referrals.

Similarly, one Wisconsin elementary school reduced the number of students identified as SLD as a proportion of the total number of students in the district by 83 percent (23 percent as compared to 4 percent) across the past nine years since the implementation of RtI (see Figure 2.7). Specifically, the proportion of SLD students increased temporarily after the implementation of a universal screening process. Upon the implementation of high quality interventions and processes to monitor the progress of students identified using the screening assessment, the proportion of students identified as SLD reduced dramatically. These findings illustrate the inability to properly identify struggling students without an adequate screening system (represented with the 15 to 18 percent growth in the proportion of students identified after implementation of the screener), as well as the over-identification of struggling students as SwD or SLD without implementation of a balanced assessment system aligned to appropriate resources and interventions as represented by the dramatic decrease (75 percent) in the proportion of identified students upon implementation of a balanced RtI system in 2005-06.

Figure 2.7.
Secondary Schools

M. Burns, Ph.D., at the University of Minnesota, conducted a literature synthesis for the National Association of Secondary School Principals (NASSP) regarding the use of RtI in secondary school settings. Burns explained that the research has consistently found RtI initiatives lead to gains in student achievement and schoolwide improvements, such as reduced referrals to and placements in special education and a higher rate of students scoring proficiently on state tests (Burns, Appleton, and Stehouwer, 2005). Windram, Scierka, and Silberglikt (2007) described two secondary programs and found a 66% proficiency rate on a group-administered accountability test among the 18 high school students who were considered at risk for failing the tests and who participated in the pilot RtI project. In addition, the average growth rate on a group-administered test for those students was more than three times the national average among students in grade 9 and more than five times their growth from the previous year. A similar program for mathematics in grade 8 led to growth rates that exceeded the national average by a factor of almost six (Windram, Scierka, and Silberglikt, 2007). Finally, the Heartland Area (Iowa) Education Agency 11 (2004) published extensive data regarding its well-known RtI approach and found high rates of proficiency among middle level and high school students, but perhaps more important, it reported a drop-out rate of less than 2%, which is well below the national average.

Data from one Wisconsin high school supports the literature, suggesting that successful implementation of RtI improved outcomes for students in ninth grade and reduced the proportion of students falling behind and becoming over-age or under-credited. Specifically, the high school reduced the proportion of students with at least one failing grade by 72 percent due in part to earlier screening in order to identify struggling students and align them to appropriate resources and interventions as necessary (see Figure 2.8). Recognizing that failure rates in ninth grade have been correlated to higher dropout rates, this figure demonstrates that this school has made a positive step towards one of the state’s strategic goals—increasing graduation rates—through the implementation of RtI.

**Figure 2.8.**
Academically Related Behaviors. One study (Kovaleski, Gickling, Morrow, and Swank, 1999) examined academic performance, specifically the academically related behaviors of time on task, task completion, and task comprehension. The authors wanted to see if students who were exposed to the Pennsylvania Instructional Support Teams (IST) model performed better on these variables than students at schools where the model was not in use. They found that students who received high implementation of the model did better on all measured variables than did students in the low implementation framework as well as those students who were not exposed to IST services.

The Wisconsin PBIS Network (previously noted) will provide necessary support to high schools struggling to establish a positive school culture, increase academic performance, improve safety, and decrease negative behaviors. The Wisconsin PBIS Network, in collaboration with the Wisconsin RtI Center, will provide support to Focus Schools regarding PBIS implementation and methods for sustainability.

Implementation Training. While RtI is an appropriate and effective strategy to address the achievement gap within all Focus Schools serving any grade level, DPI recognizes it is often more difficult to implement RtI with fidelity at higher grade levels where teachers may teach four or more classes of 30 students, potentially in different sections or courses, as compared to an elementary school teacher who works with the same 30 students all day, every day. Therefore, DPI and the Wisconsin RtI Center are developing workshops, trainings, and resources designed to increase the quality of implementation at the high school level, as well as increase the ease with which schools can achieve quality implementation. The RtI Center will draw upon findings from the National Centers for High Schools to identify evidence-based practices proven successful within high school implementation of RtI that the Center will modify to align to Wisconsin’s vision of implementation. For example, the Wisconsin RtI Center provided a daylong RtI training event, Implementing Essential Components of RtI in High Schools, providing a national perspective of implementation at the high school level informed by information from the National High School Center and the National Center on Response to
Intervention. Currently, more than half of the schools accessing training and resources from the Wisconsin RtI Center are middle schools and high schools and, as the figures presented in the previous sections indicate, RtI implementation has positively impacted Wisconsin schools of various levels, serving diverse populations.

While developing more extensive high school training resources, the Wisconsin RtI Center also facilitates networking opportunities online with a cohort of approximately 30 high school principals working in schools implementing RtI aligned to the Wisconsin vision. The administrators share best practices, as well as support and encouragement as they work to increase the quality and level of RtI implementation in their schools. These sessions will continue as a means to support administrators, even after the workshops and training resources are finalized.

The Wisconsin RtI Center is also collecting data from its participants, including six demonstration sites, to evaluate impact as schools increase their levels of implementation. Through this process, the Center will be able to provide schools with data regarding best practices, lessons learned, and strategies to address common challenges proven successful within schools serving similar student populations.

**Meeting State’s Strategic Goals**

While it is unclear if these data are representative of statewide implementation of RtI, or if the data can be entirely attributed to implementation of Wisconsin’s vision for RtI, the previous figures do suggest that high quality RtI programming implemented with fidelity can positively impact the state’s three strategic goals, including *closing the achievement gaps*. Therefore, prioritizing RtI as a means to address the strategic goals will serve as a reasonable and effective means to closing the achievement gaps in Focus Schools.

Implementation of the processes and practices described throughout Section 2.E in schools statewide (as opposed to Title I schools only) will require additional state resources, including staffing and funding. Without additional state funding, DPI will continue to implement the Focus School reform efforts in Title I schools only.

**TIMELINE FOR IMPLEMENTATION OF FOCUS SCHOOL ACTIVITIES**

Table 2.5 presents the Wisconsin’s proposed timeline for the implementation of activities designed to support academic improvement at the school level, as well as for identified and prioritized student subgroups.

| Table 2.5. Timeline for Implementation of Focus School Activities. |
ESEA FLEXIBILITY – REQUEST

U.S. DEPARTMENT OF EDUCATION

93


ESEA FLEXIBILITY – REQUEST

U.S. DEPARTMENT OF EDUCATION

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2.E.iv. Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

<table>
<thead>
<tr>
<th>Plans</th>
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<tbody>
<tr>
<td>WDFP begins to monitor and improve implementation via indicators</td>
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<tr>
<td>Focus Schools Reform Plans due to WDFP not indicators</td>
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<tr>
<td>Focus Schools Reform Plans are approved by WDFP</td>
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</tbody>
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<th>Requirements</th>
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<tr>
<td>Holistically examine reform plans to include the necessary precursors to achieving the specific goal of need</td>
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<tr>
<td>Provide schools targeted funding, technical assistance, and resources to needs identified during onsite reviews</td>
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<tr>
<td>Provide schools targeted professional development requirements aligned to needs and quality</td>
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<tr>
<td>Schools receive intensive on-site review of all implementation deliverables</td>
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<td>Six RL components are in place for each new cohort of the</td>
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</tbody>
</table>
Identification of Focus schools occurs every three years. Schools may be removed from the Focus schools list by no longer satisfying any of the identification criteria after three years.
TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

Provide the SEA’s list of reward, priority, and focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, priority, or focus school.

### TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOL

<table>
<thead>
<tr>
<th>LEA Name</th>
<th>School Name</th>
<th>School NCES ID #</th>
<th>REWARD SCHOOL</th>
<th>PRIORITY SCHOOL</th>
<th>FOCUS SCHOOL</th>
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</table>

**TOTAL # of Schools:**

**Total # of Title I schools in the State:** _____
**Total # of Title I-participating high schools in the State with graduation rates less than 60%:** _____

### Key

#### Reward School Criteria:
- A. Highest-performing school
- B. High-progress school

#### Priority School Criteria:
- C. Among the lowest five percent of Title I schools in the State based on the proficiency and lack of progress of the “all students” group
- D. Title I-participating or Title I-eligible high school with graduation rate less than 60% over a number of years
- E. Tier I or Tier II SIG school implementing a school intervention model

#### Focus School Criteria:
- F. Has the largest within-school gaps between the highest-achieving subgroup(s) and the lowest-achieving subgroup(s) or, at the high school level, has the largest within-school gaps in the graduation rate
- G. Has a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate
- H. A Title I-participating high school with graduation rate less than 60% over a number of years that is not identified as a priority school
2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

2.F Describe how the SEA’s differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA’s new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

OVERVIEW

In addition to recognizing and rewarding high performing or high progress Title I schools, as well as supporting immediate interventions and reforms in persistently low-achieving Title I schools (i.e., aggregate achievement or by subgroup), Wisconsin encourages continuous improvement in other Title I schools with supports designed deliberately to improve successful implementation of Title I programming in order to increase student achievement. The Department of Public Instruction (DPI) developed networks and collaborative partnerships in recent years with key stakeholders throughout the state to provide a statewide infrastructure of support while addressing staff capacity and resources at the state agency. These initiatives aim to provide consistent, yet differentiated resources to Title I districts and schools in order to continually improve student achievement and address the state’s strategic goals. Wisconsin will continue to utilize these initiatives in order to support innovative instruction and improved student achievement and school performance. The following sections describe these initiatives in greater detail.

Statewide Infrastructure

As a strategy to support the state’s progress towards the three strategic goals (as previously noted), DPI has worked in cooperation with key stakeholders and collaborative partners to develop a statewide infrastructure designed to provide information, guidance, resources, training, and support to districts and schools as necessary.

Title I Network

In collaboration with the 12 regional Collaborative Education Service Agencies (CESAs), the Title I Network provides increased access to technical assistance and professional development for Title I districts and schools. With financial support from DPI, each CESA provides free or reduced cost Title I services for all school districts in their CESA designed to increase student outcomes and close the achievement gap. The following sections describe the services currently provided by the Network to support Title I districts and schools, which will be continued in the future to support academic outcomes.

Title I Application. District Title I coordinators can consult with CESA staff regarding Title I law, programming, reporting requirements, and monitoring, as it applies to their program planning and grant application processes.

Title I Coordinator Leadership. District Title I coordinators can request information and resources through the Title I coordinator orientation, one-on-one technical assistance, and multiple regional meetings to support the management of Title I in their district and ensure
implementation of effective programming.

**Professional Development.** The Network provides multiple regional professional development opportunities based on specific Title I needs, as identified by districts in each CESA, including improving student achievement.

**RtI.** Beginning next year (2012-13), Title I Network contracts with DPI will require the CESAs to provide more support to schools struggling to improve student achievement or narrow achievement gaps, such as professional development, consultation with LEAs, and targeted resource alignment. Network representatives will have to serve as “Trainer-of-Trainers” and provide RtI training to districts in their CESA that is consistent with the training provided by the Wisconsin RtI Center in vision and language. Therefore, Network contracts will also state that CESA staff must attend all applicable RtI trainings and workshops provided by the Wisconsin RtI Center.

**Resources and Collaboration.** The Network also aligns district staff to pertinent information and resources regarding local and statewide initiatives and agencies supporting Title I programming to improve student outcomes.

**Wisconsin RtI Center**
As previously noted (see Section 2.E), the Wisconsin RtI Center and the Wisconsin PBIS Network provide high quality professional development and TA across the state in collaboration with DPI and the 12 regional CESAs. Technical assistance includes advice, assistance, and training pertaining to the implementation, operation, evaluation, and sustainability of a district or school’s RtI system. Although DPI identified the RtI Center as the locus for professional development and support for Title I Focus Schools, other Title I schools will also have on-going access to the Center and its resources.

**Standards, Instruction, and Assessment Center**
Currently in development, the SIA Center, based on the successful model of the Wisconsin RtI Center, will focus on implementation of the CCSS and other academic standards, as well as the instruction and assessment required for student success. The Center will work in collaboration with DPI and RtI Center to communicate best practices relevant to implementation of RtI in order to increase student outcomes and close the state’s achievement gap.

**Increase Student Outcomes in Reading and Math**
As a strategy to support the state’s progress towards the three strategic goals (as previously noted), DPI has developed internal, cross-agency workgroups and worked in cooperation with key stakeholders and collaborative partners to develop plans to *increase student outcomes in reading and mathematics* statewide.

**Common Core Standards**
In 2010, Wisconsin became the first state to adopt the Common Core State Standards (CCSS) in mathematics, language arts, and literacy across disciplines. Developed in collaboration with numerous stakeholders, the CCSS emphasize 21st Century Skills embedded within expectations for the understanding and application of rigorous core content knowledge. In collaboration with two multi-state consortia, Wisconsin is currently developing new common standards for
science and social studies (Refer to Principle 1.A for more detailed information regarding DPI’s transition plan for college- and career-ready standards.)

To ensure that districts and schools implement the CCSS with fidelity, DPI provides training, resources, and professional learning opportunities. DPI will also partner with the Title I Network, the Wisconsin Response to Intervention Center, and the Standards, Instruction, and Assessment Center to provide CCSS professional development to Title I districts and schools failing to make adequate progress as a means to improve instructional content and strategies, as well as support struggling learners (refer to Sections 1.A and 2.E for more details regarding these collaborations).

**Parent Involvement**
DPI has a long and distinguished history of recognizing the importance of family involvement in improving student achievement through family-community partnerships in Wisconsin’s public schools. Wisconsin has been recognized as a Partnership State Award Winner six times since 2000 by the National Network of Partnership Schools for its exemplary efforts to promote family involvement among PreK-12 schools. Highlights of DPI family involvement efforts designed to improve student outcomes follow:

- DPI annually sponsors about 20 VISTA volunteers in schools statewide who work to engage families in children’s learning. Since 2002, VISTA members have generated over $3.7 million in resources, volunteers, donations, and grants to Wisconsin schools, families, and communities.
- DPI family involvement staff offer comprehensive training in effective family involvement practices through an annual statewide parent leadership conference and regional workshops.
- State Superintendent of Public Instruction Tony Evers has appointed a Parent Advisory Council composed of 20 parent leaders statewide to provide a parent voice to DPI initiatives affecting children’s learning.
- The DPI Title I Community Learning and Partnerships website offers extensive family involvement publications, resources, strategies, and effective practices at [http://www.dpi.state.wi.us/fscp/index.html](http://www.dpi.state.wi.us/fscp/index.html).
- DPI funded creation of the Dual Language Learners website of the Wisconsin Collaborating Partners. This website gives programs and practitioners easy access to information and practical tips for working with young dual language learners, Birth-5 years, and their families: [http://www.dpi.state.wi.us/pld/slp.html](http://www.dpi.state.wi.us/pld/slp.html).
- The DPI-sponsored Wisconsin Summer Library Reading Program is designed to help families keep children reading and prevent the “summer slide” loss of learning: [http://www.dpi.state.wi.us/pld/slp.html](http://www.dpi.state.wi.us/pld/slp.html).
- The DPI Early Childhood webpage offers extensive Resources for Parents to help get children ready for Kindergarten: [http://www.dpi.state.wi.us/ec/begin-sch-yr.html](http://www.dpi.state.wi.us/ec/begin-sch-yr.html).
Innovative Instruction
As a key component of agency work, DPI has developed the previously noted internal, cross-agency workgroups, worked in cooperation with key stakeholders and collaborative partners, and created a system of recognition which incentivizes innovation.

Spotlight Schools
Spotlight Schools promote innovative instruction statewide in two ways. First, Spotlight Schools are required to host a minimum of three school teams per year to visit their school. During these visits, school teams have the opportunity to observe the Spotlight School’s practices, participate in discussions with the school’s principal and staff, and discuss possibilities for implementation at their own schools. Spotlight Schools also provide relevant materials and artifacts to support implementation for visiting schools. The second method for sharing spotlight practices is through statewide and regional sharing opportunities. Spotlight Schools have shared their practices in the following ways: presentations at statewide and local conferences, sharing information at CESA regional meetings, and creating videos of practices and posting them (along with relevant artifacts) on their websites.

Spotlight Practices Website
In the future, schools have access to a comprehensive database of effective practices implemented across the state, as well as opportunities to learn from other Wisconsin educators, design professional development, and organize school visits through electronic communication through the Spotlight Practices website (currently in development). Additionally, educators will have access to hyperlinks for specific spotlighted schools to view relevant videos and documents and gain increased knowledge of innovative practices and implementation strategies in order to improve student achievement in their own schools. DPI, in collaboration with the Title I Network, will encourage schools struggling with student achievement to visit Spotlight Schools excelling in the same practices the struggling schools have identified as in need of improvement (e.g., adolescent literacy, data driven decision-making, PBIS, etc.).

STATE CAPACITY
Implementation of the processes and practices described throughout Section 2.F in schools statewide (as opposed to Title I schools only) will require additional state resources, including staffing and funding. Without additional state funding, DPI will continue to implement these systems of support in Title I schools only.

2.G Build SEA, LEA, and School Capacity to Improve Student Learning

2.G Describe the SEA’s process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:
i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;
ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and
iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA’s differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

OVERVIEW

The state’s existing framework, modified to align with the experience and expertise developed across recent years, provides targeted interventions and supports that ensure long-term improvement and sustainability by building SEA, LEA, and school capacity to serve all schools. As described in detail below, this process includes a balanced system of monitoring, accountability, and support. DPI will actively monitor LEAs and schools, particularly those with low performance and/or large achievement gaps to ensure that planned reforms are implemented effectively and with fidelity. Wisconsin’s system also includes strict accountability measures for LEAs and schools that are not successful in improving student learning. This combination of consistent monitoring, firm accountability, and additional resources and support, will lead to improved student outcomes, particularly in low-performing schools and schools with the largest achievement gaps.

SEA MONITORING AND TECHNICAL ASSISTANCE

Informed by prior experiences assisting LEAs and schools implementing reform plans, DPI will draw upon its recently enhanced system of monitoring and support, while also incorporating new components which vary based on each school’s determination, to ensure districts and schools build the capacity necessary to improve student outcomes. DPI will implement comprehensive monitoring systems tailored to Priority Schools and Districts, Focus Schools, and all other schools.

Priority Schools

The SEA will utilize school improvement diagnostic reviews, the Indistar® online system, state approved vendors, fiscal monitoring, data reviews and site visits to monitor the implementation of reforms required of Priority Schools. Together, these strategies will paint a holistic picture for a school and district about the effectiveness of the school reform plan. DPI, in collaboration with turnaround partners and technical assistance providers, will assist the districts and schools in modifying their implementation practices based on findings from the various monitoring strategies.

Diagnostic reviews. As noted in Principle 2.D, DPI will require all Priority Schools to participate in a SIDR, conducted by an external partner under contract with the state, to examine district and school policies and practices which impact student achievement. Objective findings from these reviews will inform LEAs of existing weaknesses within their
school’s instructional programming. In consultation with SEA staff and technical assistance providers, LEAs will construct and submit a school reform plan which aligns to findings from the review. This process will promote on-going analysis of LEA policies and practices which support or hinder positive student outcomes and require the LEA to identify strategies to address areas of concern in order to build district and school capacity and increase student achievement.

**Indistar®.** DPI will require LEAs with Priority Schools to submit their school reform plans for approval using Indistar®, an online system aligned to the turnaround principles and designed to monitor the progress of the implementation of school reform plans. DPI Title I and School Support staff will review plans and communicate with Priority Schools and their LEAs regarding missing, incomplete, or inadequate plans for each indicator of success. In addition to providing a means for the state to monitor each LEA’s level of implementation of reforms, this process will facilitate the introduction of instructional program planning at the district and school level, resulting in modifications aligned to on-going assessments of need and the implementation of reforms, which the LEA can sustain at no cost after exiting Priority status.

**State-approved vendors.** State-approved vendors will support Priority schools and districts under contract with DPI. The vendors will act as a liaison between the school and the state, providing support to those schools and districts they serve while also reporting objective monitoring findings to the State Superintendent. If necessary, the State Superintendent will use this information to provide additional directives to the specific school or district.

**Fiscal oversight.** DPI will provide on-going fiscal oversight of expenditures submitted by Title I districts serving Priority Schools to ensure claims match activities included within approved budgets.

**Data reviews.** DPI will conduct monthly data reviews to ensure that schools and districts make progress towards their goals. The state will require LEAs to submit student achievement and school climate data for each of their Priority Schools. DPI staff will discuss progress towards goals, as evidenced by data, as well as concerns regarding objectives illustrating stagnant or minimal progress. The SEA will require LEA and school staff to identify and communicate strategies to modify existing plans and practices in order to address concerns and improve academic outcomes. This process will facilitate data reviews at the district level, resulting in modifications to instructional programming aligned to on-going assessments of need, which the LEA can sustain at no cost after exiting Priority status.

**School visits.** Wisconsin’s School Improvement Grant (SIG) monitoring system includes school visits to in order to ensure LEAs and schools receiving SIG funds have implemented their approved reform plans with fidelity, identified areas of concern within their implementation, and developed appropriate plans to resolve these issues accordingly. DPI staff will continue this process and conduct four school visits to each Priority School annually (with the exception of priority schools within a targeted priority district). Attendees will include the school’s principal, improvement vendor (if applicable), reform coordinator, as well as the
Focus Schools
Because Focus Schools are identified based on low performance of specific subgroups, the SEA will require the implementation of RtI, which will provide differentiated, individualized instruction to meet the specific academic needs of prioritized student populations within schools. The state will monitor the implementation of these practices to ensure that Focus Schools and their LEAs implement appropriate practices necessary to improve the academic outcomes of prioritized student subgroups. Through these practices, the Focus Schools and their LEAs will build their capacity to align students to differentiated resources which meet individual student needs identified through extensive monitoring processes which can continue after exiting Focus School status to ensure that prioritized student subgroups continually improve their academic performance.

Indistar®. The SEA will require LEAs with Focus Schools to submit their school reform plans for approval using Indistar®, an online system designed to monitor the progress of the implementation of school reform plans. DPI Title I and School Support staff will review plans and communicate with Focus Schools and their LEAs regarding missing, incomplete, or inadequate plans for each indicator of success. DPI will also provide technical assistance for Focus schools through Indistar’s® coaching feature. This allows SEA coaches to provide feedback and commentary on the school’s plan. In addition to providing a means for the state to monitor each LEA’s level of implementation of reforms, this process will facilitate the introduction of instructional program planning at the district and school level, resulting in modifications aligned to on-going assessments of need and the implementation of reforms, which the LEA can sustain at no cost after exiting Focus status.

All Title I Schools
In 2012-13, the SEA will introduce a new online ESEA application which will allow SEA staff to monitor and manage Title I grants efficiently and effectively to ensure that LEAs and their schools use federal funds appropriately to support continued academic improvement and school performance.

Monitoring Activities of School and Student Performance
Table 2.5 presents Wisconsin’s proposed monitoring activities designed to build school and district capacity to implement the reforms necessary to improve student outcomes and school performance in all Title I schools.

Table 2.5. Monitoring Activities of School and Student Performance

<table>
<thead>
<tr>
<th>SCHOOLS</th>
<th>STRATEGIES</th>
<th>MONITORING BY SEA</th>
</tr>
</thead>
<tbody>
<tr>
<td>Priority Schools</td>
<td>Diagnostic Review</td>
<td>Beginning of the year</td>
</tr>
<tr>
<td></td>
<td>Indistar® Monitoring Tool</td>
<td>Monthly with more frequent communication as necessary</td>
</tr>
</tbody>
</table>
**LEA AND SCHOOL ACCOUNTABILITY FOR IMPROVING PERFORMANCE**

DPI will maintain and enhance its existing accountability structures including its authority to intervene in Districts Identified for Improvement. DPI understands that a complete system of support includes a strong accountability component. The accountability system described in detail below will ensure that LEAs are responsible for school improvement, particularly for Priority Schools. Additionally, the system addresses capacity at the state, district, and school level. The system is designed to ensure that reforms are implemented in the most efficient and effective manner, while developing the local capacity to sustain reforms after the three years of implementation. For example, a persistently low-achieving school has demonstrated the lack of capacity to produce improved student outcomes and will, therefore, be required to partner with an expert. Similarly, if a large proportion of schools are identified due to systemic issues at the LEA level, the district has demonstrated it does not have the capacity to support reforms in its schools and the state will target reforms at the district level.

**Traditional Public Schools and Districts**

**Schools.** If a traditional public school is identified as a Priority School, it must: 1) participate in a state-contracted school improvement diagnostic review (SIDR) and partner with a state approved turnaround expert to develop a targeted school reform plan aligned to findings from the review, as well as targeted, prescriptive directives from DPI, or 2) close. If the school elects to implement a reform plan aligned to the turnaround principles, as prescribed by the state, but does not make adequate improvement and is identified as a Priority School again after the three year cohort, the State Superintendent will utilize his or her intervention authority to appoint a special master to direct the activities of the school outside the limitations and boundaries created by policies and practices of the school’s local education authority (LEA).
**Districts.** DPI has historically utilized districts as the entry point for reform in order to address local capacity and build sustainability. Recent experiences implementing school reforms and interventions within the state suggest that school administrators often face barriers to rapid reform as a result of district practices, as opposed to their own. DPI believes that changing structures at the district level will more likely result in long-term reform than changing structures within a school without consideration of the impact the district has on the school. This flexibility request provides DPI the opportunity to affect systemic reform, and differentiate based on identified needs.

The state will prioritize improvement efforts at the district level if the school’s diagnostic review demonstrates that systemic challenges at the LEA level contributed to identification as a Priority School. DPI will appoint a state-contracted expert with proven expertise in supporting reform at the LEA level to conduct a diagnostic review of central administration’s critical systems and structures, including human resources, curriculum and instruction, finance, and leadership. Based on district improvement diagnostic review (DIDR), the State Superintendent will direct reform at the LEA level and require schools to continue implementing successful school reforms, including DPI Corrective Action Requirements (CAR). The state-contracted LEA expert will act as a liaison between DPI and the district, supporting the implementation of the State Superintendent’s directives, while also providing objective monitoring results to DPI regarding implementation status and outcomes.

**Charter Schools**

When a charter school is initially identified as being among the persistently lowest performing schools in the state, the charter school authorizer will implement one of three options:

- The charter school (or its authorizer) will enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years. If annual performance targets are not met, the charter is revoked.
- DPI will require an on-site diagnostic review conducted by a state-approved school turnaround expert to identify the factors contributing to poor performance at the school. After participation in the state-conducted review, the charter school authorizer must implement one of two options with respect to the school consistent with the findings and recommendations of the diagnostic review:
  - Contract with a state-approved independent expert/vendor to implement reform plan aligned to turnaround principles and based on the recommendations of the diagnostic review.
  - Revoke the charter.
- In lieu of implementing either of these two options, the charter authorizer may instead elect to immediately revoke the charter.

If the persistently low-performing charter school has not demonstrated adequate improvement after three years of participating in a performance contract or implementing a reform plan, the authorizer must revoke the charter. No authorizer may renew a charter if
the school is persistently low performing. Relevant state law and new or, to the extent permissible, existing charter school contracts will need to reflect these requirements.

Private Schools in the Parental Choice Program
Unique to other states, Wisconsin is home to the largest and oldest voucher program in the United States. The Milwaukee Parental Choice Program (MPCP) provides low-income Milwaukee students the ability to attend private schools within the city using tax-payer funded vouchers towards tuition. The state instituted the program as a means to provide educational options to Milwaukee students. The current Legislature has expanded MPCP to include students within a higher income bracket, as well as offering beyond the city of Milwaukee.

These schools have not participated in the state’s accountability system. Beginning in 2010-11, the state required Choice schools to administer the WKCE assessment to all Choice funded students and to publicly report their results. Including Choice schools in the statewide accountability system is the next step in providing transparent information about student achievement across the state.

Due to constitutional limitations in private schools, the State Superintendent cannot direct specific programming or interventions within a private school. Therefore, when a choice school is initially identified as being among the persistently lowest performing schools in the state, it must implement one of the following three options:

- The choice school must enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years. If annual performance targets are not met, the school shall no longer participate in the Choice program; or
- DPI will conduct a mandatory on-site diagnostic review to identify the factors contributing to poor performance at the school, funded by the private school. After participation in the state-conducted review, the Choice school must implement one of two options with respect to the school consistent with the findings and recommendations of the diagnostic review:
  - Contract with a state-approved independent expert/vendor to implement a turnaround model based on the recommendations of the diagnostic review.
  - Discontinue participation in the choice program; or
- In lieu of implementing either of these options, the choice school may elect to immediately discontinue participation in the program.

SUPPORT
In order to optimize local capacity, there needs to be enough support, including technical assistance and additional resources, for LEAs and schools to improve student learning, especially in low performing schools and schools with the largest achievement gaps. The SEA will build the capacity of LEAs and their identified schools to successfully implement reform initiatives with a comprehensive system of support, which will include: state-approved turnaround vendors, a SEA Liaison, the Wisconsin RtI Center, the Title I Network, and other
networking opportunities (see Section 2.F). Additionally, the state will support districts’ and schools’ capacity to implement reforms with an intensive review of external technical assistance providers, as well as leverage funding to best support priority schools and districts and their efforts to improve student outcomes.

**Review and Approval of External Technical Assistance Providers**

DPI will approve a number of turnaround partners demonstrating evidence of experience and expertise in successful reform initiatives identified through an RFP process. During the RFP process, DPI staff, the CoP, and other external reviewers will evaluate applications based on rigorous criteria developed through a comprehensive review of best practices and key indicators of turnaround partner success. Specifically, the criteria will rely on research produced by groups such as Mass Insight Education and the Center on Innovation and Improvement. DPI will also research the experiences of other states that have approved external providers in order to develop rigorous and effective criteria. Examples of states that will be consulted include Virginia, Indiana, and Illinois.

As described above, the final criteria for review and approval will be developed based on current research, best practices, and experiences from other states. Criteria include:

- Successful and effective work with low performing schools (or districts, if applicable) or schools with comparable student populations;
- Instructional models that are comprehensive, yet aligned to the needs and contexts of individual schools and districts;
- A well-developed framework of leading success indicators; and
- A record of organizational and financial stability.

LEAs with Priority Schools, with the consultation of DPI, will select an approved vendor which best meets their individual needs; unless the LEA can provide evidence that it does not need the support of a vendor to successfully turnaround its low-performing schools. Vendors must implement comprehensive school reform efforts that integrate structural and programmatic interventions, including daily onsite support and leadership, while building the Priority School’s and the LEA’s ability to successfully implement and sustain reform efforts.

The state will hold state-approved vendors accountable for performance—their support and interventions must result in improved student outcomes. Specifically, a school is re-identified after the three year cohort and implementation of reforms, the state will remove the vendor serving that school from its approved provider list.

**Leverage of Funding**

DPI will provide support for implementation of meaningful interventions in Priority Schools through all available funding sources, including Title I, Part A, 1003(a), 1003(g) SIG (for eligible Priority Schools), 1116(b)(10), and other Federal funds as permitted. DPI understands that the turnaround interventions required in Priority Schools will require significant funding in order to fully implement and will ensure that Priority Schools have sufficient funding.
In particular, DPI has already appointed a Federal Funds Trustee for MPS. This position is responsible for ensuring that the state and district utilize the various federal funds available to the district appropriately, effectively, and efficiently.

Implementation of a large proportion of the processes and practices described throughout Section 2.G in schools statewide (as opposed to Title I schools only) will require additional state resources, including staffing and funding. Without additional state funding, DPI will continue to implement these efforts in Title I schools only.

**Principle 4: Reducing Duplication and Unnecessary Burden**

DPI will reduce burden on LEAs based on this waiver through a number of means:

- Districts Identified for Improvement will be required to submit a plan that addresses capacity at the district level which will focus on how the district functions overall (staffing, visioning, funding, etc.). Rather than working at the individual school level, a district-wide plan will ensure effective and efficient systems and structures are in place to impact student outcomes. These plans will be approved at the state level to hold the districts accountable for the reform plan.

- This waiver is intended to more closely align the new accountability system with requirements stated within CAR, including district-wide reforms such as a single comprehensive literacy plan.

- Requiring a consistent planning and monitoring tool (Indistar®) with low performing schools, will ensure the district is using a common plan and language with a universal vision, goals, and performance objectives.

- Requiring RtI and continuing to build capacity the Wisconsin RtI Center will greatly enhance student achievement. Districts are requesting more direction/guidance on specific interventions and best practices in implementing an effective RtI system. The waiver would promote this and build Wisconsin’s capacity around resources, professional development and implementation of RtI.

- The roll-out of the statewide Standards, Instruction and Assessment (SIA) Center will ensure consistency around instruction and assessment. Districts and schools will have much greater access to best practices that will inform instructional practice. Additional, the SIA Center will greatly enhance the collaboration with Wisconsin’s Institutes of Higher Education, which in turn will positively impact the education/training of new teachers.

- Providing alternatives to SES will greatly reduce the amount of staff time both at the SEA and LEA level in terms of approving providers, contracting with providers and tracking multiple provider programs. This flexibility would allow one program that would much more closely align with district/school improvement goals as well as individual student needs. This will also provide additional opportunities for parent involvement, which is a significant
component of the improvement process.

Wisconsin’s new accountability system will provide a single statewide system that will impact all schools. Currently, the system is primarily linked to Title I, as there is no funding/consequences at the state level for non-Title I schools. The new system will look at all schools, including charter schools and schools participating in the Parental Choice Program, and hold the same standard of accountability for all schools, statewide.
**PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP**

### 3.A DEVELOP AND ADOPT GUIDELINES FOR LOCAL TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

Select the option that pertains to the SEA and provide the corresponding description and evidence, as appropriate, for the option selected.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
<th>Option C</th>
</tr>
</thead>
</table>
| □ If the SEA has not already developed any guidelines consistent with Principle 3, provide:  
  i. the SEA’s plan to develop and adopt guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year;  
  ii. a description of the process the SEA will use to involve teachers and principals in the development of these guidelines; and  
  iii. an assurance that the SEA will submit to the Department a copy of the guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance 14). | □ If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3, provide:  
  i. a copy of any guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students;  
  ii. evidence of the adoption of the guidelines (Attachment 11); and  
  iii. the SEA’s plan to develop and adopt the remaining guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year;  
  iv. a description of the process used to involve teachers and principals in the development of the | □ If the SEA has developed and adopted all of the guidelines consistent with Principle 3, provide:  
  i. a copy of the guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students;  
  ii. evidence of the adoption of the guidelines (Attachment 11); and  
  iii. a description of the process the SEA used to involve teachers and principals in the development of these guidelines. |
THE WISCONSIN FRAMEWORK FOR EDUCATOR EFFECTIVENESS
The Wisconsin Framework for Educator Effectiveness is a performance-based evaluation system for teachers and principals that will serve as the state guideline for educator effectiveness. The primary purpose of the Wisconsin Framework for Educator Effectiveness is to support a system of continuous improvement of educator practice, from pre-service through service, that leads to improved student learning. The system will be designed to evaluate teachers and principals through a fair, valid, and reliable process using multiple measures across two main areas: educator practice and student outcomes. The framework (http://dpi.wi.gov/tepdl/edueff.html) described here will lead to the development of a state model for educator effectiveness, which will be piloted and implemented throughout the state by the 2014-15 school year.

Theory of Action
The Wisconsin Framework for Educator Effectiveness was developed using the same principles that guide each of the state level reforms proposed in this waiver request, specifically differentiation and personalization. The framework links educator evaluation with student achievement, and will ensure that all teachers and principals receive a comprehensive and rigorous evaluation. The new system provides individualized feedback, support, and professional development to every principal and teacher in the state. With this framework in place, Wisconsin’s educators will receive personalized support intended to raise the standard for educator excellence throughout the state.

The Wisconsin Framework for Educator Effectiveness was designed to raise the quality and effectiveness of Wisconsin’s educators, and improve student outcomes across Wisconsin. The new evaluation system will work in combination with other state level reforms, specifically increased academic standards and assessments, and a new accountability framework, that increases rigor, leading to more students ready for college and careers.

Key Design Features of the Framework
The following design features are predicated on the understanding that the success of a performance-based evaluation system hinges on the development of a high-quality system that...
is implemented with fidelity and fully aligned with professional development and support.

The framework necessitates both formative and summative processes. That is, educators must be engaged in evaluating their own practice and receive constructive formative feedback on an on-going basis, as well as receive feedback on their summative evaluations. Both formative feedback and summative evaluations should be aligned to the district’s human resource practices (including staffing, mentoring, professional development, and performance management) in order to provide a consistent focus. Professional development plans, in particular, should be personalized and aligned with evaluation feedback to ensure Wisconsin educators are supported throughout their careers.

**Guiding Principles**

The Design Team believes that the successful development and implementation of the new performance-based evaluation system is dependent upon the following guiding principles, which define the central focus of the entire evaluation system. The guiding principles of the educator evaluation system are:

- The ultimate goal of education is student learning. Effective educators are essential to achieving that goal for all students. It is imperative that students have highly effective teams of educators to support them throughout their public education. Effective practice leads to better educational achievement and requires continuous improvement and monitoring.

- A strong evaluation system for educators is designed to provide information that supports decisions intended to ensure continuous individual and system effectiveness. The system must be well-articulated, manageable, reliable, and sustainable. The goal of this system is to provide students with highly qualified and effective educators who focus on student learning. An educator evaluation system must deliver information that:
  - Guides effective educational practice that is aligned with student learning and development.
  - Documents evidence of effective educator practice.
  - Documents evidence of student learning.
  - Informs appropriate professional development.
  - Informs educator preparation programs.
  - Supports a full range of human resource decisions.
  - Is credible, valid, reliable, comparable, and uniform across districts.

The Wisconsin Framework for Educator Effectiveness Design Team Report and Recommendations is included in this request.

3.A.ii Provide evidence of the adoption of the guidelines

(Press Release to be attached)
DEVELOPMENT OF THE FRAMEWORK
The Wisconsin Framework for Educator Effectiveness was designed in collaboration with leaders of state professional education organizations, educator preparation programs, Governor Walker’s office, and the Wisconsin Department of Public Instruction. Design Team members represented the following:

American Federation of Teachers-Wisconsin (AFT-WI)
Association of Wisconsin School Administrators (AWSA)
Department of Public Instruction (DPI)
Office of the Governor
Professional Standards Council (PSC)
Wisconsin Association of Colleges of Teacher Education (WACTE)
Wisconsin Association of Independent Colleges and Universities (WAICU)
Wisconsin Association of School Boards (WASB)
Wisconsin Association of School District Administrators (WASDA)
Wisconsin Education Association Council (WEAC)

Representatives of these stakeholder groups formed a workgroup and a design team, both of which were informed by national experts, state research organizations, and regional technical assistance providers. The Design Team, the decision-making group, met monthly to reach consensus on the Educator Effectiveness framework for Wisconsin. The Workgroup also met monthly to generate recommendations, which informed Design Team deliberations and consensus building.

As a collaborative effort, both the Workgroup and Design Team reviewed and discussed current education practice, research, and framework design. Both groups relied on technical assistance throughout the framework development process. Researchers from the Wisconsin Center for Education Research (WCER) helped frame the Design Team decision points; identified current educator effectiveness research, policies, and models; developed background material; and provided in-depth feedback during meetings throughout the process. The National Comprehensive Center for Teacher Quality (TQ Center) also helped provide information on educator effectiveness research, policies, and models. Great Lakes West Regional Comprehensive Center (GLW) and Regional Educational Laboratory (REL) Midwest facilitated and documented framework meetings and decisions. In addition, members participated in multiple national conferences, including those hosted by the Council of Chief State School Officers (CCSSO) and the National Governors Association (NGA).

Decision feedback was supported through stakeholder communication. An Educator Effectiveness Symposium was held in June 2011 to inform stakeholders and elicit feedback on the emerging framework design. Additionally, stakeholders sought feedback from their various constituent groups throughout the process.
Continuous Improvement of Instruction
This request for flexibility is driven by the belief that increasing rigor across academic standards and assessments while implementing a new statewide accountability system will result in improved instruction and improved student outcomes throughout Wisconsin. The Wisconsin Framework for Educator Effectiveness is designed to provide individualized support and professional development plans to every teacher and principal in the state. Regularly timed formative evaluations will inform educators’ individualized professional development plans. As such, on-going improvement will be addressed through professional development.

MULTIPLE MEASURES

Educator Practice: Measures of educator practice will account for 50% of the overall summative rating for educators. Dimensions of effective educator practice for teachers will be based on the 2011 Interstate Teacher Assessment and Support Consortium (InTASC) Model Core Teaching Standards and, for principals, the 2008 Interstate School Leaders Licensure Consortium (ISLLC) Educational Leadership Policy Standards.

The InTASC and ISLLC standards were selected as they are widely recognized as rigorous and robust standards of professional practice. These research-based standards describe effective teacher and leadership practices that lead to improved student achievement. Both sets of standards have been endorsed by CCSSO and are envisioned as the foundation for a comprehensive framework that addresses each stage of an educator’s career. Numerous education organizations, unions, and institutes of higher education have endorsed the InTASC standards. In addition, the National Policy Board for Educational Administration (NPBEA) endorsed the 2008 ISLLC standards.

The following measures of educator practice will be used:

- For teachers, the domains and components of Charlotte Danielson’s *A Framework for Teaching* will be used to provide definition and specificity to the InTASC standards. Rubrics for observing teacher practice will be developed, adapted, or identified to address each component. Danielson’s work and other models based on InTASC will be used as a starting point in rubric development. The domains and components identified in the model will be required by school districts. Each domain represents a distinctive area of effective teaching practice. The components provide a detailed, but manageable, list of teaching skills that are consistent with the 2011 InTASC standards.

  Appropriate adaptations to the domains and components will be developed for certified professional staff that have out-of-classroom assignments as part or all of their duties, or for those who work with special populations.

- For principals, the 2008 ISLLC standards will be used. The ISLLC subordinate functions
under the standards will form the components. Rubrics for observing principal practice will be developed, adapted, or identified at the component level. Models based on ISLLC will be used as a starting point for rubric development.

- Multiple observations of educator practice are required during summative evaluations. Observations must be supplemented by other measures of practice. Multiple sources of evidence must be collected to document the evaluation of practice.

- Districts will have the flexibility to create their own rubrics of educator practice. Districts that choose to do so must apply to the State Superintendent through an equivalency review process. The rubrics (and related training, tools, etc.) for teacher practice must be based on the InTASC standards, and Danielson’s four domains of teaching responsibility, but may combine components into fewer categories.

**Student Achievement:** Measures of student achievement will comprise 50% of the overall evaluation system. Multiple measures of student outcomes will be used. State and district achievement data with both individual and school components will be included.

All teachers’ evaluations will be based in part on multiple measures of student outcomes. The measures used and their relative weights will vary based on availability of measures. For example, value-added data are available for a limited number of grades and subjects (currently, grades 3-7 reading and mathematics) (“covered grades and subjects”). Individual value-added data will be used as one of several measures of student outcomes for teachers of covered grades and subjects.

The following measures of student outcomes will be used for *teachers of covered grades and subjects*:

- Individual value-added data on statewide standardized assessments (currently possible for grades 3-7 reading and mathematics)
- District-adopted standardized assessment results where available. The selection of assessments will be informed by district and school goals, the Common Core State Standards, and 21st century skills and meet APA/AERA criteria for tests that are used for high-stakes decisions.
- Student learning objectives agreed upon by teachers and administrators that move students toward mastery of applicable content or skills. The student learning objectives must be rigorous and meet the following criteria: specific, measurable, attainable, relevant, and timely. The student learning objectives will be informed by district and school goals, the Common Core State Standards, and 21st century skills. The district will establish a process for the development and oversight of the student learning objective component. The state will provide guidelines and tools to support districts in this process.
- District choice of data based on improvement strategies and aligned to school and district goals within the state accountability system.
School-wide student achievement on state assessments in reading will account for 2.5% of the student outcome component of PreK-8 teacher’s evaluation. In lieu of school-wide reading, for 9-12 grade teachers, 2.5% of student outcomes will be graduation rate. If a successor state assessment system allows, a similar school-wide measure based on reading would be phased in at the high school level.

The following measures of student outcomes will be used for teachers of non-covered grades and subjects:

- District-adopted standardized assessment results where available as described above.
- Student learning objectives as described above.
- District choice of data based on improvement strategies and aligned to school and district goals within the state accountability system.

For principals, the following data when available will be used:

- School-wide value-added data from statewide standardized assessments taken by students in the school(s) to which the principal is assigned.
- District-adopted standardized assessment results where available. The selection of assessments will be informed by district and school goals, the Common Core State Standards, and 21st century skills and meet APA/AERA criteria for tests that are used for high-stakes decisions.
- School Performance Outcomes, agreed upon by principals and administrators, that move students toward mastery of applicable content or skills. The school performance objectives must be rigorous and meet the following criteria – specific, measurable, attainable, relevant, timely. The school performance objectives will be informed by district and school goals, the Common Core State Standards, and 21st Century skills. The district will establish a process for the development and oversight of the school performance objectives component. The state will provide guidelines and tools to support districts in this process.
- District choice of data based on improvement strategies.

School-wide student achievement on state assessments in reading would be considered for 5% of the student outcome component of PreK-8 principal’s evaluation. In lieu of school-wide reading, for 9-12 grade teachers, 5% of student outcomes will be graduation rate until a statewide reading assessment is available.

**The Evaluation Process**

New educators (first three years in a district) will be evaluated annually. Struggling educators (those whose summative performance rating is “Developing”) will be evaluated annually. Veteran, non-struggling educators will be evaluated once every three years, although these educators could be evaluated on a subset of performance dimensions each year, with the entire set covered over a three year period. These specifications refer to summative evaluations. Formative evaluation shall be on-going for all educators.
On-going formative evaluation processes will provide useful feedback to individual teachers in addition to school and district leadership. The formative evaluation process will identify needs within classrooms, and guide future professional development.

Educators will receive feedback on their performance in educator practice and student outcomes, both of which will be combined into an overall performance rating. Three categories of performance ratings will apply to all educators across the state:

- **Developing**: this rating describes professional practice and impact on student achievement that does not meet expectations and requires additional support and directed action.
- **Effective**: this rating describes solid, expected professional practice and impact on student achievement. Educators rated as effective will have areas of strength as well as areas for improvement that will be addressed through professional development.
- **Exemplary**: this rating describes outstanding professional practice and impact on student achievement. Educators rated as exemplary will continue to expand their expertise through professional development opportunities. In addition, these educators will be encouraged to utilize their expertise through leadership opportunities.

An educator will not be allowed to remain at the developing level and continue to practice indefinitely. If an educator is rated as developing over a time period the educator will undergo an intervention phase to improve on the areas rated as developing. If, at the end of the intervention phase, the educator is still developing, the district shall move to a removal phase. An appeals process shall be developed by the district.

The evaluation process will include multiple forms of evidence, and will serve both formative and summative evaluation needs. A manual describing formative and summative evaluation, and detailing evidence sources, the frequency of data collection, timelines, and procedures for collection and analysis of evidence will be developed. Formative evaluation shall be on-going. Summative evaluations shall follow the timelines specified in the manual.

### 3.B Ensure LEAs Implement Teacher and Principal Evaluation and Support Systems

3.B Provide the SEA’s process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, including mechanisms to review, revise, and improve, high-quality teacher and principal evaluation and support systems consistent with the SEA’s adopted guidelines.
The Wisconsin Educator Effectiveness Design Team and the Wisconsin Department of Public Instruction recently completed the development of the framework for Wisconsin’s new educator evaluation system. While the proposed framework is subject to change based on findings of the pilot evaluations, its publication initiated the process of implementing Wisconsin’s new educator evaluation system throughout the state. The state will be responsible for developing, piloting, implementing, evaluating, and maintaining the high quality evaluation system. The statewide Educator Effectiveness system will be fully developed, piloted, and implemented by 2014-15 to meet ESEA Flexibility requirements and will coincide with Wisconsin’s school and district accountability reform efforts discussed in Principles 1 and 2. DPI will be responsible for this work and ensuring alignment within the broader accountability system.

DPI has convened an Educator Effectiveness Coordinating Committee representing diverse stakeholders that will provide guidance and feedback throughout the piloting and initial implementation phases of the system, at least through the 2014-2015 school year. Districts and CESAs are also collaborating with DPI on the development, pilot, and training phases. The state is encouraging districts to begin implementing the new system as soon as possible and will allow any district wishing to implement the new system early to do so.

Development Phase (2011-2012)
During the development phase many key tasks will be accomplished to prepare for the pilot phase. These key tasks include the development of rubrics for educator practice, defining evaluation sources (observations, surveys, portfolios, etc.), building the value-added data system which links to district student information systems, developing criteria for student learning objectives, training of evaluators and those being evaluated, and writing guidance documents.

The department will convene an internal cross-agency coordination team. This phase of work will be aligned with the other state initiatives, including development of the state accountability system, early childhood literacy, and new assessment and data systems initiatives.

Pilot Phase (2012-2013)
School District Pilots: During the Piloting Phase (2012-2013) the state model will be piloted in diverse school districts that will include urban, suburban and rural school districts. A sufficient number of school districts will pilot the state model to provide valid and reliable evaluation data. The pilot will be conducted for one full school year. Large districts will pilot test in a sample of schools for principal evaluation, teacher evaluation, or a mix of teachers and principals. Smaller districts will pilot test in a substantial portion or perhaps all of the district’s schools. Specific licensure areas for teachers will be included (e.g. early childhood, English Language Learners, special education, music, art, physical education, agriculture, etc.). Evaluators and those being evaluated will be trained before participating in the pilot test. The training program will describe the evaluation process including the use of formative feedback, value-added student outcomes, and performance rating categories.
**Pilot Evaluation:** During the pilot year, an external evaluator will evaluate the pilot program that will include formative and summative feedback and will address, at a minimum:

- Implementation process: are evaluations carried out as intended, following appropriate procedures in completing the evaluations on time?
- Understanding: do district leaders, teachers and principals understand what is to be evaluated, how evaluations are to occur, and how the results should be used?
- Acceptance: do district leaders, teachers, and principals accept the evaluation process and results, are the measures perceived as fair?
- Reliability: are evaluations being carried out in a consistent manner; is there evidence of inter-rater reliability?
- Impact: how is the evaluation process impacting practice?
- Frequency distribution of scores on component measures (i.e., SLOs, practice, other student outcome scores).

No high stakes decisions will be made using pilot evaluation results (e.g., non-renewal, termination). This would not preclude districts from referring educators to an intervention process outside of the pilot evaluation approach if warranted.

**Evaluation of the Training Program:** Educators will have opportunities to provide on-going feedback on the pilot process (e.g., through the department’s Educator Effectiveness website, department staff, external evaluator, trainers, etc.). This feedback will inform the state model and modifications will be made to the system.


**Roll-out (2013-2014):** Districts will be supported through on-going evaluator/educator training, resource tools and communication. Resources will include rubrics, scoring protocols, technical assistance with analyzing student growth measures, protocols for combining multiple measures, department supported training from evaluators, and professional development tailored to state system materials. The state model will address the following:

- On-going training for evaluators for teachers and principals.
- Evaluation results that are valid and reliable.
- Evaluation rubrics and tools that are fair, rigorous and transparent.
- Sufficient timing and frequency of evaluations to ensure sufficient data is collected.
- Collaborative professional development time for educators to respond to student outcome data.
- Student data that is correlated between student outcomes and educator effectiveness ratings.

**Statewide Implementation (2014-2015):** All districts will be required to begin implementation of the state model in 2014-2015. School districts may apply to the State Superintendent to develop their own rubrics (and related training, tools, etc.) provided that they meet the Wisconsin Model Educator Effectiveness System standards (as defined in development...
District principals and teachers will be trained in the Wisconsin Model Educator Effectiveness System before implementing the system.

Continuous Improvement (On-going): The state model will continue to be evaluated for fidelity of implementation and impact on practice and student outcomes. Data collection and monitoring will be focused on increased educator effectiveness and the improvement of student outcomes. The effectiveness ratings of teachers and principals will be consistent with overall student and school performance.

Systems should provide individualized and useful feedback to educators. Educators should report that the evaluation process is providing information that assists them in improving their practice and positively affects student outcomes. Educators should work together collaboratively to improve teaching and learning through an on-going process of planning, instructing, assessing, and improvement.

The state model will be adapted for the evaluation of other professional educators, including pupil services, paraprofessionals, and other district administrators. The teacher and principal evaluation system will inform the development and expansion of the state model.
SAMPLE FORMAT FOR PLAN

Below is one example of a format an SEA may use to provide a plan to meet a particular principle in the ESEA Flexibility.

<table>
<thead>
<tr>
<th>Key Milestone or Activity</th>
<th>Detailed Timeline</th>
<th>Party or Parties Responsible</th>
<th>Evidence (Attachment)</th>
<th>Resources (e.g., staff time, additional funding)</th>
<th>Significant Obstacles</th>
</tr>
</thead>
<tbody>
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NOTE: ATTACHMENTS AND APPENDICES WILL BE INCLUDED WITH THE FEBRUARY 21, 2011 SUBMISSION, BUT HAVE NOT BEEN INCLUDED WITH THIS POSTING.
WAIVER SURVEY

About the federal flexibility
The U.S. Department of Education has offered states the opportunity to apply for flexibility on certain provisions of the federal Elementary and Secondary Education Act (ESEA, currently known as NCLB, the No Child Left Behind Act). States’ proposals must demonstrate how they will use this flexibility to implement the following principles:

- College- and career-ready expectations for all students
- State-developed differentiated recognition, accountability, and support
- Supporting effective instruction and leadership
- Reducing duplication and unnecessary burden

About the survey
The Department of Public Instruction (DPI) is conducting this survey to gather public feedback and guidance on Wisconsin’s flexibility request. This survey will be open from January 23—February 3, 2012. DPI is seeking feedback on our draft proposal in terms of overall direction, but specifically we want to ensure there is enough detail and clarity in each of the four principles. Please be as specific as possible in your feedback. We will take your input under advisement as we refine the proposal to be submitted for federal review by February 21, 2012. All responses will be kept confidential and reported in the aggregate (e.g. 78% of respondents agreed...).

If you have questions about this survey, please email ESEAwavier@dpi.wi.gov.

1. What best describes your role?
   a) Teacher (General Education)
   b) Teacher (Special Education)
   c) Teacher (ELL)
   d) Principal
   e) Title I Director/ESEA Coordinator
   f) Title III Director/ELL Coordinator
   g) Other district-based federal program director
   h) Other school- or district-based personnel
   i) Superintendent
   j) DPI staff
   k) Institution of Higher Education (IHE) staff
   l) Parent
   m) Student
   n) Community members (business, technology, nonprofit leader)
   o) Staff of professional or membership organization
   p) Staff of research organization
   q) Staff of philanthropic organization
   r) Other education stakeholder
2. How familiar are you with the current requirements of the Elementary and Secondary Education Act (ESEA) / No Child Left Behind (NCLB)?
   - Very familiar
   - Familiar
   - Somewhat familiar
   - Not at all familiar

3. Should Wisconsin request a waiver of any ESEA/NCLB requirements?
   - Yes
   - No
   - I’m not sure / don’t know

The following questions are in regard to the narrative of Principle 1:

4. The narrative clearly explains how Wisconsin will implement College and Career Readiness standards and assessments for all students.
   - Strongly agree
   - Agree
   - Disagree
   - Strongly disagree
   - I’m not sure / don’t know

5. The narrative clearly describes a focused plan toward improving college and career readiness for all students.
   a. Strongly agree
   b. Agree
   c. Disagree
   d. Strongly disagree
   e. I’m not sure / don’t know

6. The actions described clearly show how the college and career readiness standards and assessments will help improve outcomes for English Language Learners (ELLs).
   - Strongly agree
   - Agree
   - Disagree
   - Strongly disagree
   - I’m not sure / don’t know

7. What strategies/supports/resources could be provided to better address the needs of ELLs in the area of college/career standards and assessments?
   [OPEN RESPONSE]
8. The actions described clearly show how the college and career readiness standards and assessments will help improve outcomes for Students with Disabilities (SWD).
   - Strongly agree
   - Agree
   - Disagree
   - Strongly disagree
   - I’m not sure / don’t know

9. What strategies/supports/resources could be provided to better address the needs of SWDs in the area of college/career standards and assessments?
   [OPEN RESPONSE]

10. How will transitioning to college and career readiness standards and assessments impact the preparation of Wisconsin’s high school graduates for postsecondary education, workforce training, or immediate employment?
    - It will improve the preparation of all graduates
    - It will improve the preparation of some but not all graduates
    - It will have no impact on the preparation of graduates
    - It will weaken the preparation of graduates
    - I’m not sure / don’t know

11. Principle 4 of the ESEA flexibility pertains to reducing duplication and burden on districts, in order to provide an environment in which schools and districts have the flexibility to focus on what’s best for students.

    Please identify specific Wisconsin Statutes, Administrative Rules, or DPI requirements that could be modified or eliminated to reduce duplication and unnecessary burden in the area of college and career ready standards and assessments. Ideas on how to reduce burdensome requirements and a rationale for the modification of state law and/or rule are welcome.
    [OPEN RESPONSE]

The following questions are in regard to the narrative of Principle 2:

12. The narrative clearly explains how Wisconsin will develop a statewide system of support based on differentiated accountability.
    a. Strongly agree
    b. Agree
    c. Disagree
    d. Strongly disagree
    e. I’m not sure / don’t know

13. The four priority areas (achievement, growth, closing gaps, and on-track/postsecondary readiness) will result in the proper identification of schools along a performance continuum.
14. The multiple measures included in the accountability index are meaningful indicators of college and career readiness.
   a. Strongly agree
   b. Agree
   c. Disagree
   d. Strongly disagree
   e. I’m not sure / don’t know

15. Reporting an annual accountability score, based on the index described in Principle 2, will provide valuable information about school performance.
   a. Strongly agree
   b. Agree
   c. Disagree
   d. Strongly disagree
   e. I’m not sure / don’t know

16. The accountability determinations [Significantly Exceeding Expectation, Exceeding Expectations, Meeting Expectations, Not Meeting Expectations, Significantly Below Expectations, Persistently Failing to Meet Expectations] are clear and appropriate ratings for a differentiated accountability system.
   a. Strongly agree
   b. Agree
   c. Disagree
   d. Strongly disagree
   e. I’m not sure / don’t know

17. Do you have suggestions for different labels?
   [OPEN RESPONSE]

18. The supports and interventions described clearly show how a statewide system of support based on differentiated accountability will help improve outcomes for English Language Learners (ELLs).
   a. Strongly agree
   b. Agree
   c. Disagree
   d. Strongly disagree
   e. I’m not sure / don’t know
19. What strategies/resources could better address the needs of ELLs in the area of supports and interventions?
   [OPEN RESPONSE]

20. The supports and interventions described clearly show how a statewide system of support based on differentiated accountability will help improve outcomes for Students with Disabilities (SWD).
   a. Strongly agree
   b. Agree
   c. Disagree
   d. Strongly disagree
   e. I’m not sure / don’t know

21. What strategies/resources could better address the needs of SWD in the area of supports and interventions?
   [OPEN RESPONSE]

In seeking a waiver of ESEA/NCLB requirements, Wisconsin must propose alternative approaches that are designed to increase the quality of instruction and improve academic achievement for all students, particularly in low performing schools and in schools with large achievement gaps.
22. What are some powerful incentives that can have the greatest impact on a school’s performance? Please share 2 or 3 incentives. [OPEN RESPONSE]

23. What supports have the greatest impact in improving student learning in a short period of time? Please share 2 or 3 of the most critical/high leverage supports. [OPEN RESPONSE]

24. On a scale of 1 to 10 please rank the following interventions as to which you believe have the greatest impact on a school that is not performing well, with 1 being the most effective intervention.

- ___Replacing administration at the school and/or district level
- ___Providing administrators more autonomy and decision-making authority
- ___Replacing least effective teachers
- ___Mandated professional development for teachers and administrators in those content areas that match the needs of the students
- ___Redesigning the school schedule (day, week or year) to include additional learning time for students
- ___Redesigning the school schedule (day, week or year) to include additional time for teacher collaboration
- ___Using data to inform instruction and continuous improvement
- ___Establishing a school environment that is safe and conducive to students’ social, emotional and health needs
- ___Implement a system that ensures all students receive support while those at greatest risk receive the most intensive and customized interventions
- ___Provide ongoing opportunities for family and community involvement

Other suggestions

25. Currently NCLB requires schools identified for improvement to provide Supplemental Education Services (SES). Do you agree or disagree with the proposed modifications to SES as outlined in Principle 2?

a. Strongly agree
b. Agree
c. Disagree
d. Strongly disagree
e. I’m not sure/don’t know

26. Principle 4 of the ESEA flexibility pertains to reducing duplication and burden on districts, in order to provide an environment in which schools and districts have the flexibility to focus on what’s best for students.

Please identify specific Wisconsin Statutes, Administrative Rules, or DPI requirements that could be modified or eliminated to reduce duplication and unnecessary burden in the statewide system of support. Ideas on how to reduce burdensome requirements and a rationale for the modification of state law and/or rule are welcome.

[OPEN RESPONSE]
27. Wisconsin is advancing a number of reform initiatives aimed at college and career readiness for all students by increasing rigor and personalizing/differentiating learning. What are some ways we can increase rigor and personalize learning? Please share 2 or 3 suggestions.

[OPEN RESPONSE]

The following questions are in regard to the narrative of Principle 3:

28. The narrative clearly explains how Wisconsin will implement the Educator Effectiveness (EE) system for teachers and principals.
   - Strongly agree
   - Agree
   - Disagree
   - Strongly disagree
   - I’m not sure / don’t know

29. The narrative clearly describes a focused plan toward improving educator practice.
   a. Strongly agree
   b. Agree
   c. Disagree
   d. Strongly disagree
   e. I’m not sure/don’t know
30. The actions described clearly show how the EE system will help improve outcomes for English Language Learners (ELLs).
   o Strongly agree
   o Agree
   o Disagree
   o Strongly disagree
   o I’m not sure / don’t know

31. What strategies/supports/resources could be included in the EE system to better address the needs of ELLs?
   [OPEN RESPONSE]

32. The actions described clearly show how the EE system will help improve outcomes for Students with Disabilities (SWD).
   o Strongly agree
   o Agree
   o Disagree
   o Strongly disagree
   o I’m not sure / don’t know

2. What strategies/supports/resources could be included in the EE system to better address the needs of SWDs?
   [OPEN RESPONSE]

33. Principle 4 of the ESEA flexibility pertains to reducing duplication and burden on districts, in order to provide an environment in which schools and districts have the flexibility to focus on what’s best for students.

   Please identify specific Wisconsin Statutes, Administrative Rules, or DPI requirements that could be modified or eliminated to reduce duplication and unnecessary burden in the educator effectiveness system. Ideas on how to reduce burdensome requirements and a rationale for the modification of state law and/or rule are welcome.

   [OPEN RESPONSE]

34. What other comments or suggestions do you have?
   [OPEN RESPONSE]

Thank you for taking the time to share your input!
**1. NCLB Waiver Drafted - DPI Seeking Comments**

The Department of Public Instruction has posted its draft waiver request for flexibility related to several provisions of the federal Elementary and Secondary Education Act (also known as No Child Left Behind, NCLB). The agency invites public comment through a survey, until February 6. After this two-week comment period, the agency will revise the waiver request and submit it to the U.S. Department of Education (USDE) by February 21.

“Wisconsin’s waiver request brings together a number of initiatives that have been in the works for some time. We are seeking public input on our draft waiver plan now so we can refine our reform efforts and ensure Wisconsin’s public education system is responsive to our citizens,” said State Superintendent Tony Evers.

The waiver request addresses, as required by the USDE, how Wisconsin would use flexibility from NCLB to address four principles:

- Transitioning to College and Career-Ready Standards and Assessments for All Students
- Differentiated Recognition, Accountability, and Support
- Support for Effective Instruction and Leadership
- Reduce Duplication and Unnecessary Burden

A DPI news release summarizes the proposals in each area.

The draft request, news release, public notice, and survey are available from the DPI newsroom.
Senate
INFORMATIONAL HEARING
Committee on Education

The committee will hold an informational hearing on the following items at the time specified below:

Thursday, February 2, 2012
10:00 AM
412 East

This will be a joint hearing with the Assembly Education Committee.

Wisconsin ESEA Waiver Proposal

1/19/2012: The meeting time was changed from 1/25/2012 9:30 AM to 2/2/2012 10:00 AM. The top notes were changed. The bottom notes were removed.
1/25/2012: The top notes were changed.

_________________________
Senator Luther Olsen
Chair
Assembly
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1/25/2012: The top notes were changed.

Representative Steve Kestell
Chair
ESEA Waiver Request
Stakeholder Engagement

Media Outreach
Press Release 1/23/12
Tony’s editorial 1/25/12
ConnectEd 1/25/12

DPI homepage 1/23/12 http://dpi.wi.gov/
DPI’s ESEA webpage http://www.dpi.wi.gov/esea/

Informed draft waiver posted for comment (emailed directly)
(cover letter, summary, draft waiver request, and survey):
ESEA listserv (sent 1/23/12), which includes:
  • ESEA Coordinators
  • District Administrators
  • CESA Administrators
  • 2R Charter Schools and Authorizers
  • Miscellaneous school individuals requesting to receive ESEA info

Education-Related Organizations:
  • WI-AFT
  • AWSA
  • WASB
  • WASDA
  • WEAC
  • WASCD
  • WCASS
  • WASBO

Institutes of Higher Education:
  • UW-Madison School of Education
  • WTCS
  • WAICU
  • UWSA
  • WI Council of Religious and Independent Schools

School and District Accountability Design Team (sent 1/24/12)
Title III / Bilingual-Bicultural (sent 1/24/12 via Tolu Sanabria)
State Superintendent’s Parent Advisory Committee

Directors of Special Education and Special Ed Council (Stephanie Petska’s Special Ed listserv; she is also meeting with WCASS Executive Board week of 1/30/12)

Regional Service Network Directors for Special Ed (CESAs)

Title I COP (I think Mary Kleusch sent) - ?

DPI Cabinet

Meetings

Senator Luther Olsen
Representative Steve Kestell
3 other legislators’s staff – Jennifer K will know which ones
Gov staff
School Administrators Alliance
Milwaukee Public Schools
Disability Rights Wisconsin
Board for People with Developmental Disabilities
QEC
Wisconsin Education Association Council
WI-AFT
Wisconsin Association of School Boards
Collaborative Council, which includes:

Wisconsin RTI Center (odd; should we include?)

Webinars

Title I Committee of Practitioners
CESA Title I Network

Conference Calls

CESA 12 Professional Advisory Council (all district administrators)

Evidence of other support/consultation

WEAC press release 1/23/12
Wisconsin adopts Common Core State Standards

MADISON — State Superintendent Tony Evers formally adopted the newly released Common Core State Standards for English language arts and mathematics today for Wisconsin.

“Wisconsin is ready to make the Common Core State Standards its academic standards for curriculum, instruction, and assessment,” Evers said. “These standards are aligned with college and career expectations, will ensure academic consistency throughout the state and across other states that adopt them, and have been benchmarked against international standards from high-performing countries.”

Evers exercised his authority under Article X of the Wisconsin Constitution to adopt the standards. Adoption by the state superintendent is referenced in the state’s Race to the Top application which was sent to the U.S. Department of Education on Tuesday.

The standards for English language arts and mathematics, which became public today (June 2), define the knowledge and skills students should have during their elementary and secondary school education so they are prepared to compete and succeed in the global economy. Wisconsin is a partner state in the Common Core State Standards Initiative and has had on-going involvement in shaping the standards as they were developed, reviewing them, and providing feedback to the project writers.

The process to implement the Common Core State Standards so they improve student achievement requires understanding the content of the standards, developing curriculum that reflects the standards, and then providing resources for teachers to develop lesson plans to teach those standards. The Department of Public Instruction will partner with school districts, universities, and education organizations to provide curriculum models and on-line resources to transition to the Common Core State Standards. Additionally, Wisconsin will work with the SMARTER/Balanced Assessment Consortium to develop high-quality, common assessments that are connected to classroom instruction.

“These English language arts and mathematics standards will serve as a solid foundation to ensure every child is a graduate ready for the workforce or postsecondary studies,” Evers said. “Higher student achievement is
driven by rigorous standards, high-quality curriculum, and assessments that provide meaningful feedback to improve instruction.”

Wisconsin was an early state in recognizing the need for standards that prepared students for workforce and college expectations. In spring of 2007, business leaders shared their expectations for students who would be graduating in five to 10 years. The state then worked with Achieve’s American Diploma Project and with the Partnership for 21st Century Skills to revise its standards for English language arts and mathematics. Once the Common Core State Standards Initiative was announced, Wisconsin expanded its focus to work with participating states and territories, the National Governors Association Center for Best Practices, and the Council of Chief State School Officers to develop the Common Core State Standards.

###

1 June 2010

Carol Whang  
c/o WestEd  
730 Harrison Street  
San Francisco CA. 94107

Dear Ms. Whang:

Enclosed please find a signed original of the State of Wisconsin’s Memorandum of Understanding for the SMARTER Balanced Assessment Consortium Race to the Top Fund Assessment Program: Comprehensive Assessment Systems Grant Application (CFDA Number: 85.395B).

Also enclosed are original Letters of Intent for Institutes of Higher Education from the University of Wisconsin System and the Wisconsin Technical College System which together served 56,000 Direct Matriculation Students in 2008-2009. In addition we have included a letter of support from the Wisconsin Association of Independent Colleges and Universities which represents 20 independent colleges and universities in Wisconsin.

Please contact me with any questions.

Yours,

Lynette Russell, Ph.D.  
Director  
Office of Educational Accountability  
(608) 267-1072
June 1, 2010

To: Tony Evers, State Superintendent of Public Instruction
   SMARTER Balanced Assessment Consortium

From: Kevin P. Reilly, President

Subject: Race to the Top Comprehensive Assessment Systems Grant Application

I am pleased to inform you that the University of Wisconsin System will participate in the SMARTER Balanced Assessment Consortium. Attached is the signed Letter of Intent for Institutes of Higher Education. The University of Wisconsin System looks forward to working with K-12 and higher education partners from the participating states in developing assessments that measure student achievement against standards designed to ensure that all students gain the knowledge and skills needed to succeed in college and the workplace. This is certainly a goal that will benefit institutes of higher education and secondary education, but even more importantly, our students.

Our overall goal is to prepare high school students for college level coursework, and reduce the need for remediation. It is our hope that the summative assessments will encourage curriculum development that will better prepare students to be successful in college and the workplace. It is important to note that while the University of Wisconsin System is committed to the development of a new high school summative assessment tool, it is critical that this assessment tool be used along with placement tests and other measures to place students in courses where they can be successful. The University of Wisconsin System looks forward to being at the table in the development of assessments that allow us to achieve these goals.

I want to compliment both the Wisconsin Department of Public Instruction and the SMARTER Balanced Assessment Consortium for your leadership in this Grant Application. The University of Wisconsin System looks forward to being an active partner in this important endeavor.
Letter of Intent for Institutes of Higher Education

SMATER Balanced Assessment Consortium

Race to the Top Fund Assessment Program: Comprehensive Assessment Systems Grant Application
CFDA Number: 84.395B

The purpose of this Letter of Intent is to

(a) Detail the responsibilities of the IHE or IHE system,
(b) Identify the total number of direct matriculation students in the partner IHE or IHE system in the 2008–2009 school year, and
(c) Commit the State's higher education executive officer (if the State has one) and the president or head of each participating IHE or IHE system through signature blocks.

(a) Detail the responsibilities of the IHE or IHE system

Each IHE or IHE system commits to the following agreements:

1. Participation with the Consortium in the design and development of the Consortium's final high school summative assessments in mathematics and English language arts in order to ensure that the assessments measure college readiness; and

2. Implementation of policies, once the final high school summative assessments are implemented that exempt from remedial courses and place into credit-bearing college courses any student who meets the Consortium-adopted achievement standard (as defined in the NIA) for each assessment and any other placement requirement established by the IHE or IHE system.
(b) **Total Number of Direct Matriculation Students (as defined in the NIA) in the Partner IHE or IHE system in the 2008–2009 School Year**

Note: NIA defines direct matriculation student as a student who entered college as a freshman within two years of graduating from high school.

<table>
<thead>
<tr>
<th>State</th>
<th>Name of Participating IHEs</th>
<th>Number of Direct Matriculation Students in IHE in 2008-2009</th>
<th>Total Direct Matriculation Students in State in 2008-2009</th>
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<tbody>
<tr>
<td>Wisconsin</td>
<td>University of Wisconsin System</td>
<td>24,000</td>
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(c) Partner IHE or IHE System Signature Blocks

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<tr>
<th>IHE or IHE system SIGNATURE BLOCK for Race to the Top Fund Assessment Program Comprehensive Assessment Systems Grant Application.</th>
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</table>

| State Name: |
| Wisconsin |
| State's higher education executive officer, if State has one (Printed Name): |
| Kevin P. Reilly |
| Signature State's higher education executive officer, if State has one: |
| [Signature] |
| President or head of each participating IHE or IHE system, (Printed Name): Kevin P. Reilly |
| Signature of president or head of each participating IHE or IHE system: |
| [Signature] |

| Telephone: |
| (608) 262-2321 |
| Date: |
| 6/1/10 |
| Telephone: |
| (608) 262-2321 |
| Date: |
| 6/1/10 |
June 3, 2010

Tony Evers  
State Superintendent  
Department of Public Instruction  
PO Box 7841  
Madison, WI 53707-7841

Dear Superintendent Evers:

The Wisconsin Technical College System welcomes the opportunity to collaborate with other educational partners across the state and the nation as part of the SMARTER Balanced Assessment Consortium. Attached is the signed Letter of Intent representing WTCS support.

A common goal at both the secondary and postsecondary level in Wisconsin is to prepare students for the 21st century. Ensuring that students are able to enter college without remediation will maximize student success not only in their pursuit of a postsecondary credential but also in the workplace. In a time of tight resources and a rapidly changing global economy, Wisconsin needs a workforce that is highly-skilled and adaptable and strong educational partnerships are critical to putting our economy back on track.

To that end, the WTCS looks forward to participating in the design and development of high school summative assessments in mathematics and English language arts which support college and career-ready preparedness across the K-12 and postsecondary institutions. We are hopeful that this tool, when used in concert with placement tests and other assessment strategies, will complement and further the work of the 16 technical colleges as they seek to meet the needs of the citizens of Wisconsin.

Thank you again for this opportunity to work and learn with other states as we develop assessments that support student attainment of the knowledge and skills necessary for Wisconsin students to compete in the global economy.

Sincerely,

Dan Clancy  
President

Attachment
SMATER Balanced Assessment Consortium IHE Letter of Intent

Letter of Intent for Institutes of Higher Education

SMATER Balanced Assessment Consortium

Race to the Top Fund Assessment Program: Comprehensive Assessment Systems Grant Application

CFDA Number: 84.395B

The purpose of this Letter of Intent is to

(a) Detail the responsibilities of the IHE or IHE system,
(b) Identify the total number of direct matriculation students in the partner IHE or IHE system in the 2008–2009 school year, and
(c) Commit the State’s higher education executive officer (if the State has one) and the president or head of each participating IHE or IHE system through signature blocks.

(a) Detail the responsibilities of the IHE or IHE system

Each IHE or IHE system commits to the following agreements:

1. Participation with the Consortium in the design and development of the Consortium’s final high school summative assessments in mathematics and English language arts in order to ensure that the assessments measure college readiness; and

2. Implementation of policies, once the final high school summative assessments are implemented that exempt from remedial courses and place into credit-bearing college courses any student who meets the Consortium-adopted achievement standard (as defined in the NIA) for each assessment and any other placement requirement established by the IHE or IHE system.
(b) Total Number of Direct Matriculation Students (as defined in the NIA) in the Partner IHE or IHE system in the 2008–2009 School Year

Note: NIA defines direct matriculation student as a student who entered college as a freshman within two years of graduating from high school

<table>
<thead>
<tr>
<th>State</th>
<th>Name of Participating IHEs</th>
<th>Number of Direct Matriculation Students in IHE in 2008-2009</th>
<th>Total Direct Matriculation Students in State in 2008-2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wisconsin</td>
<td>Wisconsin Technical College System</td>
<td>32,000</td>
<td></td>
</tr>
</tbody>
</table>
SMARTER Balanced Assessment Consortium IHE Letter of Intent

(c) Partner IHE or IHE System Signature Blocks

IHE or IHE system SIGNATURE BLOCK for Race to the Top Fund Assessment Program Comprehensive Assessment Systems Grant Application.

Each IHE or IHE system commits to the following agreements:

(a) Participation with the Consortium in the design and development of the Consortium’s final high school summative assessments in mathematics and English language arts in order to ensure that the assessments measure college readiness; and

(b) Implementation of policies, once the final high school summative assessments are implemented, that exempt from remedial courses and place into credit-bearing college courses any student who meets the Consortium-adopted achievement standard (as defined in the NIA) for each assessment and any other placement requirement established by the IHE or IHE system.

State Name: Wisconsin

State’s higher education executive officer, if State has one (Printed Name):
    Daniel Clancy

Signature State’s higher education executive officer, if State has one:
    [Signature]

President or head of each participating IHE or IHE system, (Printed Name):
    Daniel Clancy

Signature of president or head of each participating IHE or IHE system:
    [Signature]

<table>
<thead>
<tr>
<th>State Name: Wisconsin</th>
<th>Telephone:</th>
</tr>
</thead>
<tbody>
<tr>
<td>State’s higher education executive officer, if State has one (Printed Name):</td>
<td>Telephone:</td>
</tr>
<tr>
<td>Daniel Clancy</td>
<td>608-266-7983</td>
</tr>
<tr>
<td>Signature State’s higher education executive officer, if State has one:</td>
<td>Date:</td>
</tr>
<tr>
<td>[Signature]</td>
<td>6/3/10</td>
</tr>
<tr>
<td>President or head of each participating IHE or IHE system, (Printed Name):</td>
<td>Telephone:</td>
</tr>
<tr>
<td>Daniel Clancy</td>
<td>608-266-7983</td>
</tr>
<tr>
<td>Signature of president or head of each participating IHE or IHE system:</td>
<td>Date:</td>
</tr>
<tr>
<td>[Signature]</td>
<td>6/3/10</td>
</tr>
</tbody>
</table>
May 27, 2010

Dr. Tony Evers, State Superintendent
Department of Public Instruction
125 S. Webster Street
P O Box 7841
Madison, WI 53707-7841

Dear Dr. Evers,

The Wisconsin Association of Independent Colleges and Universities (WAICU) has always been committed to the highest possible educational standards and assessment systems in support of elementary and secondary student achievement and college readiness. WAICU will be "at the table" as an active voluntary participant in future collaborative efforts with our partners at the Department of Public Instruction, the University of Wisconsin System, and the Wisconsin Technical College System.

We strongly support the development of new assessment systems and the continuous improvement of existing systems that measure student knowledge and skills against college- and career-ready standards in mathematics and English language arts. Faculty from WAICU-member colleges and universities and staff from the WAICU office have served on myriad task forces, boards, and committees and devoted countless hours to establishing meaningful comprehensive educational standards. For example, WAICU was a full partner in developing the "PI-34" regulations for teacher education. To cite another example, math professors from WAICU-member institutions currently serve on a tri-sector task force (representing the University of Wisconsin, the Wisconsin Technical College System, and WAICU) convened by the Department of Public Instruction that seeks to establish a common standard for the knowledge and skills required to be ready for credit-bearing math courses at the postsecondary level.

WAICU commits to work closely with the Wisconsin Department of Public Instruction, our higher education counterparts in the state, and the SMARTER Balanced Assessment Consortium in the design and development of high school summative assessments in mathematics and English Language arts for the purpose of measuring college readiness.

As the president of WAICU, I co-chair the Wisconsin PK-16 Leadership Council with the State Superintendent of Public Instruction, the president of the University of Wisconsin System, and the president of the Wisconsin Technical College System. The watchword of the Council has been "seamlessness," and a major emphasis has been improving transitions between secondary and postsecondary education. WAICU's history of collaboration and collegiality speaks to our willingness to work together on new opportunities and challenges.

Please call on me if I can help in any way.

Sincerely,

Rolf Wegenke, Ph.D.
President
122 W. Washington Avenue, Suite 700
Madison, WI 53703-2723
www.waicu.org

ROLF WEGENKE, Ph.D.
President
SMARTER Balanced Assessment Consortium MOU

Memorandum of Understanding

SMARTER Balanced Assessment Consortium

Race to the Top Fund Assessment Program: Comprehensive Assessment Systems Grant Application

CFDA Number: 84.395B

This Memorandum of Understanding ("MOU") is entered as of June 1, 2010, by and between the SMARTER Balanced Assessment Consortium (the "Consortium") and the State of Wisconsin, which has elected to participate in the Consortium as (check one)

_____ An Advisory State (description in section e),

OR

___X___ A Governing State (description in section e),

pursuant to the Notice Inviting Applications for the Race to the Top Fund Assessment Program for the Comprehensive Assessment Systems Grant Application (Category A), henceforth referred to as the "Program," as published in the Federal Register on April 9, 2010 (75 FR 18171-18185).

The purpose of this MOU is to

(a) Describe the Consortium vision and principles,
(b) Detail the responsibilities of States in the Consortium,
(c) Detail the responsibilities of the Consortium,
(d) Describe the management of Consortium funds,
(e) Describe the governance structure and activities of States in the Consortium,
(f) Describe State entrance, exit, and status change,
(g) Describe a plan for identifying existing State barriers, and
(h) Bind each State in the Consortium to every statement and assurance made in the application through the following signature blocks:
   (I)(A) Advisory State Assurance
   OR
   (I)(B) Governing State Assurance
   AND
   (ii) State Procurement Officer

May 14, 2010
(a) **Consortium Vision and Principles**

The Consortium's priorities for a new generation assessment system are rooted in a concern for the valid, reliable, and fair assessment of the deep disciplinary understanding and higher-order thinking skills that are increasingly demanded by a knowledge-based economy. These priorities are also rooted in a belief that assessment must support ongoing improvements in instruction and learning, and must be useful for all members of the educational enterprise: students, parents, teachers, school administrators, members of the public, and policymakers.

The Consortium intends to build a flexible system of assessment based upon the Common Core Standards in English language arts and mathematics with the intent that all students across this Consortium of States will know their progress toward college and career readiness.

The Consortium recognizes the need for a system of formative, interim, and summative assessments—organized around the Common Core Standards—that support high-quality learning, the demands of accountability, and that balance concerns for innovative assessment with the need for a fiscally sustainable system that is feasible to implement. The efforts of the Consortium will be organized to accomplish these goals.

The comprehensive assessment system developed by the Consortium will include the following key elements and principles:

1. A Comprehensive Assessment System that will be grounded in a thoughtfully integrated learning system of standards, curriculum, assessment, instruction and teacher development that will inform decision-making by including formative strategies, interim assessments, and summative assessments.

2. The assessment system will measure the full range of the Common Core Standards including those that measure higher-order skills and will inform progress toward and acquisition of readiness for higher education and multiple work domains. The system will emphasize deep knowledge of core concepts within and across the disciplines, problem solving, analysis, synthesis, and critical thinking.

3. Teachers will be involved in the design, development, and scoring of assessment items and tasks. Teachers will participate in the alignment of the Common Core Standards and the identification of the standards in the local curriculum.

4. Technology will be used to enable adaptive technologies to better measure student abilities across the full spectrum of student performance and evaluate growth in learning; to support online simulation tasks that test higher-order abilities; to score the results; and to deliver the responses to trained scorers/teachers to access from an
electronic platform. Technology applications will be designed to maximize interoperability across user platforms, and will utilize open-source development to the greatest extent possible.

5. A sophisticated design will yield scores to support evaluations of student growth, as well as school, teacher, and principal effectiveness in an efficient manner.

6. On-demand and curriculum-embedded assessments will be incorporated over time to allow teachers to see where students are on multiple dimensions of learning and to strategically support their progress.

7. All components of the system will incorporate principles of Universal Design that seek to remove construct-irrelevant aspects of tasks that could increase barriers for non-native English speakers and students with other specific learning needs.

8. Optional components will allow States flexibility to meet their individual needs.

(b) Responsibilities of States in the Consortium

Each State agrees to the following element of the Consortium’s Assessment System:

- Adopt the Common Core Standards, which are college- and career-ready standards, and to which the Consortium’s assessment system will be aligned, no later than December 31, 2011.

Each State that is a member of the Consortium in 2014–2015 also agrees to the following:

- Adopt common achievement standards no later than the 2014–2015 school year,
- Fully implement statewide the Consortium summative assessment in grades 3-8 and high school for both mathematics and English language arts no later than the 2014–2015 school year,
- Adhere to the governance as outlined in this document,
- Agree to support the decisions of the Consortium,
- Agree to follow agreed-upon timelines,
- Be willing to participate in the decision-making process and, if a Governing State, final decision, and
- Identify and implement a plan to address barriers in State law, statute, regulation, or policy to implementing the proposed assessment system and to addressing any such barriers prior to full implementation of the summative assessment components of the system.
(c) Responsibilities of the Consortium

The Consortium will provide the following by the 2014-15 school year:

1. A comprehensively designed assessment system that includes a strategic use of a variety of item types and performance assessments of modest scope to assess the full range of the Common Core Standards with an emphasis on problem solving, analysis, synthesis, and critical thinking.

2. An assessment system that incorporates a required summative assessment with optional formative/benchmark components which provides accurate assessment of all students (as defined in the Federal notice) including students with disabilities, English learners, and low- and high-performing students.

3. Except as described above, a summative assessment that will be administered as a computer adaptive assessment and include a minimum of 1–2 performance assessments of modest scope.

4. Psychometrically sound scaling and equating procedures based on a combination of objectively scored items, constructed-response items, and a modest number of performance tasks of limited scope (e.g., no more than a few days to complete).

5. Reliable, valid, and fair scores for students and groups that can be used to evaluate student achievement and year-to-year growth; determine school/district/state effectiveness for Title I ESEA; and better understand the effectiveness and professional development needs of teachers and principals.

6. Achievement standards and achievement level descriptors that are internationally benchmarked.

7. Access for the State or its authorized delegate to a secure item and task bank that includes psychometric attributes required to score the assessment in a comparable manner with other State members, and access to other applications determined to be essential to the implementation of the system.

8. Online administration with limited support for paper-and-pencil administration through the end of the 2016–17 school year. States using the paper-and-pencil option will be responsible for any unique costs associated with the development and administration of the paper-and-pencil assessments.
9. Formative assessment tools and supports that are developed to support curricular goals, which include learning progressions, and that link evidence of student competencies to the summative system.

10. Professional development focused on curriculum and lesson development as well as scoring and examination of student work.

11. A representative governance structure that ensures a strong voice for State administrators, policymakers, school practitioners, and technical advisors to ensure an optimum balance of assessment quality, efficiency, costs, and time. The governance body will be responsible for implementing plans that are consistent with this MOU, but may make changes as necessary through a formal adoption process.

12. Through at least the 2013–14 school year, a Project Management Partner (PMP) that will manage the logistics and planning on behalf of the Consortium and that will monitor for the U.S. Department of Education the progress of deliverables of the proposal. The proposed PMP will be identified no later than August 4, 2010.

13. By September 1, 2014, a financial plan will be approved by the Governing States that will ensure the Consortium is efficient, effective, and sustainable. The plan will include as revenue at a minimum, State contributions, federal grants, and private donations and fees to non-State members as allowable by the U.S. Department of Education.

14. A consolidated data reporting system that enhances parent, student, teacher, principal, district, and State understanding of student progress toward college- and career-readiness.

15. Throughout the 2013–14 school year, access to an online test administration application, student constructed-response scoring application and secure test administration browsers that can be used by the Total State Membership to administer the assessment. The Consortium will procure resources necessary to develop and field test the system. However, States will be responsible for any hardware and vendor services necessary to implement the operational assessment. Based on a review of options and the finance plan, the Consortium may elect to jointly procure these services on behalf of the Total State Membership.
(d) Management of Consortium Funds

All financial activities will be governed by the laws and rules of the State of Washington, acting in the role of Lead Procurement State/Lead State, and in accordance with 34 CFR 80.36. Additionally, Washington is prepared to follow the guidelines for grant management associated with the American Recovery and Reinvestment Act (ARRA), and will be legally responsible for the use of grant funds and for ensuring that the project is carried out by the Consortium in accordance with Federal requirements. Washington has already established an ARRA Quarterly reporting system (also referred to as 1512 Reporting).

Per Washington statute, the basis of how funding management actually transpires is dictated by the method of grant dollar allocation, whether upfront distribution or pay-out linked to actual reimbursables. Washington functions under the latter format, generating claims against grant funds based on qualifying reimbursables submitted on behalf of staff or clients, physical purchases, or contracted services. Washington's role as Lead Procurement State/Lead State for the Consortium is not viewed any differently, as monetary exchanges will be executed against appropriate and qualifying reimbursables aligned to expenditure arrangements (i.e., contracts) made with vendors or contractors operating under "personal service contracts," whether individuals, private companies, government agencies, or educational institutions.

Washington, like most States, is audited regularly by the federal government for the accountability of federal grant funds, and has for the past five years been without an audit finding. Even with the additional potential for review and scrutiny associated with ARRA funding, Washington has its fiscal monitoring and control systems in place to manage the Consortium needs.

- As part of a comprehensive system of fiscal management, Washington's accounting practices are stipulated in the State Administrative and Accounting Manual (SAAM) managed by the State's Office of Financial Management. The SAAM provides details and administrative procedures required of all Washington State agencies for the procurement of goods and services. As such, the State's educational agency is required to follow the SAAM; actions taken to manage the fiscal activities of the Consortium will, likewise, adhere to policies and procedures outlined in the SAAM.
- For information on the associated contracting rules that Washington will adhere to while serving as fiscal agent on behalf of the Consortium, refer to the Revised Code of Washington (RCW) 39.29 "Personal Service Contracts." Regulations and policies authorized by this RCW are established by the State's Office of Financial Management, and can be found in the SAAM.
(e) Governance Structure and Activities of States in the Consortium

As shown in the SMARTER Balanced Assessment Consortium governance structure, the Total State Membership of the Consortium includes Governing and Advisory States, with Washington serving in the role of Lead Procurement State/Lead State on behalf of the Consortium.

A Governing State is a State that:
- Has fully committed to this Consortium only and met the qualifications specified in this document,
- Is a member of only one Consortium applying for a grant in the Program,
- Has an active role in policy decision-making for the Consortium,
- Provides a representative to serve on the Steering Committee,
- Provides a representative(s) to serve on one or more Work Groups,
- Approves the Steering Committee Members and the Executive Committee Members,
- Participates in the final decision-making of the following:
  - Changes in Governance and other official documents,
  - Specific Design elements, and
  - Other issues that may arise.

An Advisory State is a State that:
- Has not fully committed to any Consortium but supports the work of this Consortium,
- Participates in all Consortium activities but does not have a vote unless the Steering Committee deems it beneficial to gather input on decisions or chooses to have the Total Membership vote on an issue,
- May contribute to policy, logistical, and implementation discussions that are necessary to fully operationalize the SMARTER Balanced Assessment System, and
- Is encouraged to participate in the Work Groups.

Organizational Structure
Steering Committee
The Steering Committee is comprised of one representative from each Governing State in the Consortium. Committee members may be a chief or his/her designee. Steering Committee Members must meet the following criteria:
- Be from a Governing State,
- Have prior experience in either the design or implementation of curriculum and/or assessment systems at the policy or implementation level, and
- Must have willingness to serve as the liaison between the Total State Membership and Working Groups.

Steering Committee Responsibilities
- Determine the broad picture of what the assessment system will look like,
SMARTER Balanced Assessment Consortium MOU

- Receive regular reports from the Project Management Partner, the Policy Coordinator, and the Content Advisor,
- Determine the issues to be presented to the Governing and/or Advisory States,
- Oversee the expenditure of funds in collaboration with the Lead Procurement State/Lead State,
- Operationalize the plan to transition from the proposal governance to implementation governance, and
- Evaluate and recommend successful contract proposals for approval by the Lead Procurement State/Lead State.

Executive Committee

- The Executive Committee is made up of the Co-Chairs of the Executive Committee, a representative from the Lead Procurement State/Lead State, a representative from higher education and one representative each from four Governing States. The four Governing State representatives will be selected by the Steering Committee. The Higher Education representative will be selected by the Higher Education Advisory Group, as defined in the Consortium Governance document.
- For the first year, the Steering Committee will vote on four representatives, one each from four Governing States. The two representatives with the most votes will serve for three years and the two representatives with the second highest votes will serve for two years. This process will allow for the rotation of two new representatives each year. If an individual is unable to complete the full term of office, then the above process will occur to choose an individual to serve for the remainder of the term of office.

Executive Committee Responsibilities

- Oversee development of SMARTER Balanced Comprehensive Assessment System,
- Provide oversight of the Project Management Partner,
- Provide oversight of the Policy Coordinator,
- Provide oversight of the Lead Procurement State/Lead State,
- Work with project staff to develop agendas,
- Resolve issues,
- Determine what issues/decisions are presented to the Steering Committee, Advisory and/or Governing States for decisions/votes,
- Oversee the expenditure of funds, in collaboration with the Lead Procurement State/Lead State, and
- Receive and act on special and regular reports from the Project Management Partner, the Policy Coordinator, the Content Advisor, and the Lead Procurement State/Lead State.

May 14, 2010
Executive Committee Co-Chairs

- Two Co-chairs will be selected from the Steering Committee States. The two Co-chairs must be from different states. Co-chairs will work closely with the Project Management Partner. Steering Committee members wishing to serve as Executive Committee Co-chairs will submit in writing to the Project Management Partner their willingness to serve. They will need to provide a document signed by their State Chief indicating State support for this role. The Project Management Partner will then prepare a ballot of interested individuals. Each Steering Committee member will vote on the two individuals they wish to serve as Co-chair. The individual with the most votes will serve as the new Co-chair.
- Each Co-chair will serve for two years on a rotating basis. For the first year, the Steering committee will vote on two individuals and the one individual with the most votes will serve a three-year term and the individual with the second highest number of votes will serve a two-year term.
- If an individual is unable to complete the full term of office, then the above process will occur to choose an individual to serve for the remainder of the term of office.

Executive Committee Co-Chair Responsibilities

- Set the Steering Committee agendas,
- Set the Executive Committee agenda,
- Lead the Executive Committee meetings,
- Lead the Steering Committee meetings,
- Oversee the work of the Executive Committee,
- Oversee the work of the Steering Committee,
- Coordinate with the Project Management Partner,
- Coordinate with Content Advisor,
- Coordinate with Policy coordinator,
- Coordinate with the Technical Advisory Committee (TAC), and
- Coordinate with Executive Committee to provide oversight to the Consortium.

Decision-making

Consensus will be the goal of all decisions. Major decisions that do not reach consensus will go to a simple majority vote. The Steering Committee will determine what issues will be referred to the Total State Membership. Each member of each group (Advisory/Governing States, Steering Committee, Executive Committee) will have one vote when votes are conducted within each group. If there is only a one to three vote difference, the issue will be re-examined to seek greater consensus. The Steering Committee will be responsible for preparing additional information as to the pros and cons of the issue to assist voting States in developing consensus and reaching a final decision. The Steering Committee may delegate this responsibility to the Executive Committee. The Executive Committee will decide which decisions or issues are votes to
be taken to the Steering Committee. The Steering Committee makes the decision to
take issues to the full Membership for a vote.

The Steering Committee and the Governance/Finance work group will collaborate with
each Work Group to determine the hierarchy of the decision-making by each group in
the organizational structure.

Work Groups
The Work Groups are comprised of chiefs, assessment directors, assessment staff,
curriculum specialists, professional development specialists, technical advisors and other
specialists as needed from States. Participation on a workgroup will require varying
amounts of time depending on the task. Individuals interested in participating on a Work
Group should submit their request in writing to the Project Management Partner indicating
their preferred subgroup. All Governing States are asked to commit to one or more Work
Groups based on skills, expertise, and interest within the State to maximize contributions
and distribute expertise and responsibilities efficiently and effectively. The Consortium has
established the following Work Groups:

- Governance/Finance,
- Assessment Design,
- Research and Evaluation,
- Report,
- Technology Approach,
- Professional Capacity and Outreach, and
- Collaboration with Higher Education.

The Consortium will also support the work of the Work Groups through a Technical Advisory
Committee (TAC). The Policy Coordinator in collaboration with the Steering Committee will
create various groups as needed to advise the Steering Committee and the Total State
Membership. Initial groups will include

- Institutions of Higher Education,
- Technical Advisory Committee,
- Policy Advisory Committee, and
- Service Providers.

An organizational chart showing the groups described above is provided on the next page.
SMARTER Balanced Assessment Consortium Organizational Structure

Total State Membership

<table>
<thead>
<tr>
<th>Lead Procurement State</th>
<th>Governing States</th>
<th>Advisory States</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Executive Committee Co-Chairs</td>
</tr>
<tr>
<td></td>
<td>Steering Committee</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Executive Committee</td>
<td></td>
</tr>
</tbody>
</table>

Policy Coordinator

Institutions of Higher Education

Policy Advisory Committee

Technical Advisory Committee

Project Management Partner

Content Advisor

Working Groups

Technical Advisors

Governance/Finance

Collaboration with Higher Education

Research and Evaluation

Technology Approach

Professional Capacity and Outreach

Assessment Design

Report

May 14, 2010
SMARTER Balanced Assessment Consortium MOU

(f) State Entrance, Exit, and Status Change

This MOU shall become effective as of the date first written above upon signature by both the Consortium and the Lead Procurement State/Lead State (Washington) and remain in force until the conclusion of the Program, unless terminated earlier in writing by the Consortium as set forth below.

Entrance into Consortium
Entrance into the Smarter Balanced Assessment Consortium is assured when:

- The level of membership is declared and signatures are secured on the MOU from the State’s Commissioner, State Superintendent, or Chief; Governor; and President/Chair of the State Board of Education (if the State has one);
- The signed MOU is submitted to the Consortium Grant Project Manager (until June 23) and then the Project Management Partner after August 4, 2010;
- The Advisory and Governing States agree to and adhere to the requirements of the governance;
- The State’s Chief Procurement Officer has reviewed its applicable procurement rules and provided assurance that it may participate in and make procurements through the Consortium;
- The State is committed to implement a plan to identify any existing barriers in State law, statute, regulation, or policy to implementing the proposed assessment system and to addressing any such barriers prior to full implementation of the summative assessment components of the system; and
- The State agrees to support all decisions made prior to the State joining the Consortium.

After receipt of the grant award, any request for entrance into the Consortium must be approved by the Executive Committee. Upon approval, the Project Management Partner will then submit a change of membership to the USED for approval. A State may begin participating in the decision-making process after receipt of the MOU.

Exit from Consortium
Any State may leave the Consortium without cause, but must comply with the following exit process:

- A State requesting an exit from the Consortium must submit in writing their request and reasons for the exit request,
- The written explanation must include the statutory or policy reasons for the exit,
- The written request must be submitted to the Project Management Partner with the same signatures as required for the MOU,
- The Executive Committee will act upon the request within a week of the request, and
- Upon approval of the request, the Project Management Partner will then submit a change of membership to the USED for approval.
Changing Roles in the Consortium
A State desiring to change from an Advisory State to a Governing State or from a Governing State to an Advisory State may do so under the following conditions:
- A State requesting a role change in the Consortium must submit in writing their request and reasons for the request,
- The written request must be submitted to the Project Management Partner with the same signatures as required for the MOU, and
- The Executive Committee will act upon the request within a week of the request and submit to the USED for approval.

(g) Plan for Identifying Existing State Barriers

Each State agrees to identify existing barriers in State laws, statutes, regulations, or policies by noting the barrier and the plan to remove the barrier. Each State agrees to use the table below as a planning tool for identifying existing barriers. States may choose to include any known barriers in the table below at the time of signing this MOU.

<table>
<thead>
<tr>
<th>Barrier</th>
<th>Issue/Risk of Issue (If known)</th>
<th>Statute, Regulation, or Policy</th>
<th>Governing Body with Authority to Remove Barrier</th>
<th>Approximate Date to Initiate Action</th>
<th>Target Date for Removal of Barrier</th>
<th>Comments</th>
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[remainder of page intentionally left blank]
(h) Bind each State in the Consortium to every statement and assurance made in the application through the following signature blocks

<table>
<thead>
<tr>
<th>(h)(i)(A) ADVISORY STATE SIGNATURE BLOCK for Race to the Top Fund Assessment Program Comprehensive Assessment Systems Grant Application Assurances.</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Required from all &quot;Advisory States&quot; in the Consortium.)</td>
</tr>
<tr>
<td>As an Advisory State in the SMARTER Balanced Assessment Consortium, I have read and understand the roles and responsibilities of Advisory States, and agree to be bound by the statements and assurances made in the application.</td>
</tr>
</tbody>
</table>

<table>
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<tr>
<th>State Name:</th>
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<thead>
<tr>
<th>Governor or Authorized Representative of the Governor (Printed Name):</th>
<th>Telephone:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature of Governor or Authorized Representative of the Governor:</td>
<td>Date:</td>
</tr>
<tr>
<td>Chief State School Officer (Printed Name):</td>
<td>Telephone:</td>
</tr>
<tr>
<td>Signature of the Chief State School Officer:</td>
<td>Date:</td>
</tr>
<tr>
<td>President of the State Board of Education, if applicable (Printed Name):</td>
<td>Telephone:</td>
</tr>
<tr>
<td>Signature of the President of the State Board of Education, if applicable:</td>
<td>Date:</td>
</tr>
</tbody>
</table>
(h)(i)(B) GOVERNING STATE SIGNATURE BLOCK for Race to the Top Fund Assessment Program Comprehensive Assessment Systems Grant Application Assurances

(Required from all "Governing States" in the Consortium.)

As a Governing State in the SMARTER Balanced Assessment Consortium, I have read and understand the roles and responsibilities of Governing States, and agree to be bound by the statements and assurances made in the application.

I further certify that as a Governing State I am fully committed to the application and will support its implementation.

<table>
<thead>
<tr>
<th>State Name: Wisconsin</th>
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<table>
<thead>
<tr>
<th>Governor or Authorized Representative of the Governor (Printed Name):</th>
<th>Telephone:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jim Doyle</td>
<td>608-266-1212</td>
</tr>
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<table>
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<tr>
<th>Signature of Governor or Authorized Representative of the Governor:</th>
<th>Date:</th>
</tr>
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<tr>
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<tr>
<th>Chief State School Officer (Printed Name):</th>
<th>Telephone:</th>
</tr>
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<tbody>
<tr>
<td>Tony Farris</td>
<td>608-266-8687</td>
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<th>Signature of the Chief State School Officer:</th>
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<th>President of the State Board of Education, if applicable (Printed Name):</th>
<th>Telephone:</th>
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<table>
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<tr>
<th>Signature of the President of the State Board of Education, if applicable:</th>
<th>Date:</th>
</tr>
</thead>
<tbody>
<tr>
<td>N.A.</td>
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(h)(ii) STATE PROCUREMENT OFFICER SIGNATURE BLOCK for Race to the Top Fund Assessment Program Comprehensive Assessment Systems Grant Application Assurances.

(Required from all States in the Consortium.)

I certify that I have reviewed the applicable procurement rules for my State and have determined that it may participate in and make procurements through the SMARTER Balanced Assessment Consortium.

State Name: Wisconsin

State’s chief procurement official (or designee), (Printed Name): Helen McCain

Signature of State’s chief procurement official (or designee): Helen McCain

Telephone: (608) 267-9634

Date: 5/27/10
## Wisconsin Student Assessment System (WSAS) Percent Proficient or Advanced 2010-11

<table>
<thead>
<tr>
<th>Group</th>
<th>Percent Proficient Reading</th>
<th>Percent Proficient Mathematics</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Students</td>
<td>83.0%</td>
<td>77.2%</td>
</tr>
<tr>
<td>Female</td>
<td>85.8%</td>
<td>77.0%</td>
</tr>
<tr>
<td>Male</td>
<td>80.4%</td>
<td>77.4%</td>
</tr>
<tr>
<td>American Indian or Alaska Native</td>
<td>75.8%</td>
<td>65.9%</td>
</tr>
<tr>
<td>Asian or Pacific Islander</td>
<td>79.2%</td>
<td>78.4%</td>
</tr>
<tr>
<td>Black Not Hispanic</td>
<td>59.9%</td>
<td>46.2%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>69.7%</td>
<td>62.6%</td>
</tr>
<tr>
<td>White Not Hispanic</td>
<td>88.3%</td>
<td>83.7%</td>
</tr>
<tr>
<td>Students with Disabilities</td>
<td>48.6%</td>
<td>44.5%</td>
</tr>
<tr>
<td>Students w/o Disabilities</td>
<td>88.6%</td>
<td>82.6%</td>
</tr>
<tr>
<td>Economically Disadvantaged</td>
<td>71.7%</td>
<td>63.2%</td>
</tr>
<tr>
<td>Not Economically Disadvantaged or No Data</td>
<td>90.7%</td>
<td>86.8%</td>
</tr>
<tr>
<td>Limited English Proficient</td>
<td>57.5%</td>
<td>55.6%</td>
</tr>
<tr>
<td>English Proficient</td>
<td>84.6%</td>
<td>78.6%</td>
</tr>
<tr>
<td>Migrant</td>
<td>62.6%</td>
<td>52.2%</td>
</tr>
<tr>
<td>Non-migrant</td>
<td>83.0%</td>
<td>77.2%</td>
</tr>
</tbody>
</table>
TABLE 2: Priority Schools

In recognition of the need to establish cut scores for the accountability index, as well as to implement new proficiency cut scores for the Wisconsin Knowledge and Concepts Examination, DPI has not submitted lists of Focus or Reward schools at this time. It is not appropriate to produce these high-stakes lists and rely upon components of a complex index system that are not yet finalized. DPI will field test the accountability index proposed in this request for ESEA Flexibility in June 2012, following consultation with DPI’s Technical Advisory Committee and a standards setting process. At that time, DPI will be prepared to produce preliminary, redacted lists of Focus and Reward schools.

DPI has included a preliminary list of Priority schools because the calculation to create this list is based on straight proficiency, applying methodology that mirrors current, SIG methodology. As mentioned Principle 2, the list of Priority schools may include non-Title I schools in addition to the bottom 5% of Title I schools. However, until State funding is made available, only Title I funds are currently available to provide the interventions referenced in Principle 2. As such, those interventions will only be available to Title I schools at this time.

Please note the draft nature of this list for four reasons:

1. All school types (public Title I, public non-Title I, non-district charter, and private Parental Choice Program (PCP) schools) are included in this list, but at this time DPI does not have three years of assessment data for all PCP schools. The Student Achievement sub-scale area of the accountability index—used to identify priority schools—weights schools with up to three years of data. Current Parental Choice Program schools will have three years of data upon full implementation of the accountability index, at the end of the 2012-13 school year. This is also true for any public or non-district charter schools for which DPI does not have three years of data at this time.
2. All schools listed have data for at least the 2010-11 school year. However, some schools on the list may have closed or converted to a different school type since that time.
3. Parental Choice Program schools do not currently collect data that allow DPI to distinguish between Full Academic Year (FAY) and non-FAY students, while accountability calculations for all other schools include FAY students only.
4. Finally, the change to NAEP-based cut scores will be field tested following the 2011-12 school year and fully implemented at the end of the 2012-13 school year, at which point average proficiency rates for all schools are expected to change significantly.

DPI is committed to transparency throughout this change to a new accountability system, and will produce field test lists of Focus, Priority, and Reward schools in June 2012, and final lists at the end of the 2012-13 school year.
About the Data

This file contains a preliminary list of all schools in Wisconsin that have an average proficiency rate below that of the 5th percentile of Title 1 Schools. The preliminary list was created using test data from 2008-09 through 2010-11 and represents schools that would be on the Priority School list based on those results. Some schools may have converted or closed since 2010-11. The process for generating this list was as follows:

1) Derive the weighted Reading and Mathematics proficiency rates for all schools for which DPI has test data. The weighted Mathematics and Reading proficiency indexes are a weighted average of the last three years of test data for each school, weighted by the number of students tested each year, and giving more weight to the more current years. The weighted Mathematics and Reading proficiency rates are then averaged to produce the average proficiency rate.

2) Rank-order the Title 1 schools by their average proficiency rate.

3) There were 1,193 Title 1 schools in Wisconsin in 2010-11, 5% of this number being 60 schools. Find the average proficiency rate of the 60th-lowest Title 1 school. This school had a proficiency rate of 49.1%.

4) Find all schools, regardless of Title 1 status, that had an average proficiency rate of 49.1% or lower in the 2010-11 school year. This list also includes Choice schools, which are designated within the field "SCHOOL_TYPE_DESC".

Cautions

Alternative Education schools have been removed from all calculations.

Choice schools do not have data that allow for distinguishing between FAY and Non-FAY students, while all public and charter schools are evaluated only on FAY students that took the WSAS. In addition, as of this date, Choice schools only have one year of test data available. As a result, the average proficiency rates presented here for Choice schools represent only the current year's data. Further, the methodology used to calculate average proficiency rates to generate this list represents current methodology proposed in the Student Achievement Sub-scale area of the Accountability Index being submitted in DPI's request for federal flexibility from ESEA. The methodology is therefore subject to review. Finally, the cut scores that determine proficiency on the WSAS will be changing in the upcoming year, at which point the average proficiency rates of all schools will change dramatically for all subsequent years.

For a list of schools participating in Parental Choice Programs, contact the Department of Public Instruction. You may also access the program’s webpage at: dpi.wi.gov/sms/choice.html.
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<tr>
<th>District Name</th>
<th>School Name</th>
<th>School Type</th>
<th>School Type Details</th>
<th>School Description</th>
<th>Title 1 Indicator</th>
<th>Number Enrolled**</th>
<th>Reading Proficiency</th>
<th>Mathematics Proficiency</th>
<th>Reading + Math Proficiency</th>
<th>Years of Data Avail</th>
<th>School NCES ID</th>
<th>District NCES ID</th>
<th>Priority School Criteria</th>
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<td>0.0%</td>
<td>9.1%</td>
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<td>NA</td>
<td>NA</td>
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<tr>
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<td>25</td>
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<td>10.7%</td>
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<td>5509600</td>
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<tr>
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<td>Wings Academy Public school Elem/Sec Combined</td>
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<td>Milwaukee</td>
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<td>30.4%</td>
<td>3</td>
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<td>School Description</td>
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<td>Years of Data Avail</td>
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<td>Victory Chri</td>
<td>Choice School</td>
<td>Choice School</td>
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### Wisconsin Priority Schools
Based on 2008-09 through 2010-11 WSAS Data

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<th>School Name</th>
<th>School Type</th>
<th>School Description</th>
<th>Title I Indicator</th>
<th>Number Enrolled**</th>
<th>Reading Proficiency</th>
<th>Mathematics Proficiency</th>
<th>Reading + Math Proficiency</th>
<th>Years of Data Avail</th>
<th>School NCES ID</th>
<th>District NCES ID</th>
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</table>

**Priority School Criteria:**

C. Among the lowest five percent of Title I schools in the State based on the proficiency and lack of progress of the “all students” group

D-1. Title I-participating high school with graduation rate less than 60% over a number of years - DOES NOT APPLY

D-2. Title I-eligible high school with graduation rate less than 60% over a number of years - DOES NOT APPLY

E. Tier I or Tier II SIG school implementing a school intervention model

NA - Choice School

Note: MPCP = Milwaukee Parental Choice Program

*BEAM converted from a non-district charter to a Milwaukee Public School in 2011-12. It is on this preliminary list because the school has three years of data ending in 2010-11.

**The Number of Students enrolled for public schools and non-district charters represents students enrolled for the full academic year (FAY) only. The Number of Students enrolled in MPCP schools represents all tested students, regardless of FAY status.
The Wisconsin Framework for Educator Effectiveness

Working Draft

January 2012
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I.  Letter from the State Superintendent (in progress)
II. Executive Summary

The Wisconsin Educator Effectiveness Design Team (hereafter the Design Team) recommends key design features of and an implementation timeline for a performance-based evaluation system for teachers and principals. The Wisconsin Framework for Educator Effectiveness (hereafter the Framework), released in November 2011, will shape the development of a state educator effectiveness system. The primary purpose of the Framework is to support a system of continuous improvement of educator practice—from pre-service through inservice—that leads to improved student learning. The resulting system will evaluate teachers and principals through a fair, valid, and reliable process using multiple measures across two main areas: educator practice and student outcomes. The system will be piloted and implemented throughout the state by the 2014-15 school year. An equivalency review process for districts that choose to develop their own rubrics of educator practice will be developed.

The Design Team acknowledges the significant change that the resulting educator effectiveness system will represent, and believes the system will positively impact both educator practice and student learning throughout Wisconsin. Further, this system will fulfill federal requirements around educator evaluation and professional development.

Development of The Framework

This framework was designed in collaboration with leaders of state professional education organizations, educator preparation programs, Governor Walker’s office and the Wisconsin Department of Public Instruction. Design Team members represented the following:

- American Federation of Teachers-Wisconsin (AFT-WI)
- Association of Wisconsin School Administrators (AWSA)
- Department of Public Instruction (DPI)
- Office of the Governor
- Professional Standards Council (PSC)
- University of Wisconsin-Madison School of Education
- Wisconsin Association of Colleges of Teacher Education (WACTE)
- Wisconsin Association of Independent Colleges and Universities (WAICU)
- Wisconsin Association of School Boards (WASB)
- Wisconsin Association of School District Administrators (WASDA)
- Wisconsin Education Association Council (WEAC)
Representatives of these stakeholder groups formed a workgroup and a design team, both of which were informed by national experts, state research organizations, and regional technical assistance providers. The Design Team—the decision-making group—met monthly to reach consensus on the Framework. The Workgroup also met monthly to generate recommendations, which informed Design Team deliberations and consensus building.

Both groups relied on technical assistance throughout the framework development process. Researchers from the Wisconsin Center for Education Research (WCER) helped frame the Design Team decision points; identified current educator effectiveness research, policies, and models; developed background material; and provided in-depth feedback during meetings throughout the process. The National Comprehensive Center for Teacher Quality (TQ Center) also helped provide information on educator effectiveness research, policies, and models. Great Lakes West Regional Comprehensive Center (GLW) and Regional Educational Laboratories (REL) Midwest facilitate and documented framework meetings and decisions. In addition, members participated in multiple national conferences, including meetings hosted by the Council of Chief State School Officers (CCSSO) and the National Governors Association (NGA).

Decision feedback was supported through stakeholder communication. An Educator Effectiveness Symposium was held in June 2011 to inform stakeholders and elicit feedback on the emerging framework design.

Five key decision areas guided the Design Team’s work, as did the CCSSO document “Transforming Teaching and Leading: A Vision for a High-Quality Educator Development System.” The five key decision areas are:

1. What are the purposes of the system?
2. How will educator practice be evaluated?
3. How will student achievement & other outcomes be incorporated?
4. How will the evaluation process be administered?
5. How will the model be implemented statewide?

The decision areas guided the Design Team's work and shaped monthly meetings.

**Guiding Principles**

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The ultimate goal of education is student learning. Effective educators are essential to achieving that goal for all students. The Design Team believes it is imperative that students have highly effective teams of educators to support them throughout their public education. The Design Team further believes that effective practice leading to better educational achievement requires continuous improvement and monitoring.

A strong evaluation system for educators is designed to provide information that supports decisions intended to ensure continuous individual and system effectiveness. The system must be well-articulated, manageable, reliable and sustainable. The goal of this system is to provide students with highly qualified and effective educators who focus on student learning.

An educator evaluation system must deliver information that:

i. Guides effective educational practice that is aligned with student learning and development.
ii. Documents evidence of effective educator practice.
iii. Documents evidence of student learning.
iv. Informs appropriate professional development.
v. Informs educator preparation programs.
vi. Supports a full range of human resource decisions.
vii. Is credible, valid, reliable, comparable, and uniform across districts.

Defining Effectiveness

The Design Team defines educator effectiveness as follows;

- **Effective Teacher**: An effective teacher consistently uses educational practices that foster the intellectual, social and emotional growth of children, resulting in measurable growth that can be documented in meaningful ways.

- **Effective Principal**: An effective principal shapes school strategy and educational practices that foster the intellectual, social and emotional growth of children, resulting in measurable growth that can be documented in meaningful ways.

Key Design Features of the Framework

The following design features are predicated on the understanding that the success of a performance-based evaluation system hinges on whether the system is high-quality, fully aligned with professional development, and implemented with fidelity.
The following fundamental features necessitate both formative and summative processes. That is, educators must be engaged in evaluating their own practice and receive low-stakes formative feedback on an ongoing basis, as well as receive feedback on their summative evaluations. Both formative feedback and summative evaluations should be aligned to the district’s human resource practices (including staffing, mentoring, professional development, and performance management) in order to provide a consistent focus. Professional development plans, in particular, should be personalized and aligned with evaluation feedback to ensure Wisconsin educators are supported throughout their careers.

1. Multiple Measures of Educator Practice

Measures of educator practice will account for 50% of the overall summative rating for educators. Dimensions of effective educator practice—for teachers—will be based on the 2011 Interstate Teacher Assessment and Support Consortium (InTASC) Model Core Teaching Standards and—for principals—the 2008 Interstate School Leaders Licensure Consortium (ISLLC) Educational Leadership Policy Standards. The InTASC and ISLLC standards can be found in Appendix E and F.

The InTASC and ISLLC standards were selected as they are widely recognized as rigorous and robust standards of professional practice. These research-based standards describe effective teacher and leader practices that lead to improved student achievement. The standards are envisioned as the foundation for a comprehensive framework that addresses each stage of an educator’s career. Both sets of standards were developed through multi-state collaborative efforts and have been endorsed by numerous education organizations, associations, and institutes of higher education.

The following measures of educator practice will be used:

- For teachers, the domains and components of Charlotte Danielson’s *A Framework for Teaching* (Danielson, 2007) will be used to provide definition and specificity to the InTASC standards. Rubrics for observing teacher practice will be developed, adapted, or identified to address each component. Danielson’s work and other models based on InTASC will be used as a starting point in rubric development. The domains and components identified in the model will be required by school districts. Each domain represents a distinctive area of effective teaching practice. The components provide a detailed, but manageable, list of teaching skills that are consistent with the 2011 InTASC standards. The Danielson domains and components can be found in Appendix G.
Appropriate adaptations to the domains and components will be developed for certified professional staff that have out-of-classroom assignments as part or all of their duties or work with special populations.

- For principals, the 2008 ISLLC standards will be used. The ISLLC subordinate functions under the standards will form the components. Rubrics for observing principal practice will be developed, adapted, or identified at the component level. Models based on ISLLC will be used as a starting point in the rubric development.

- Multiple observations of educator practice are required during summative evaluations. Observations must be supplemented by other measures of practice. Multiple sources of evidence must be collected to document the evaluation of practice.

- Districts will have the flexibility to create their own rubrics of educator practice. Districts that choose to do so must apply to the State Superintendent through an equivalency review process. For teachers, rubrics must be aligned with the 2011 InTASC standards and be comparable to the Danielson domains and components. For principals, rubrics must be aligned with the 2008 ISLLC standards and be comparable to the ISLLC subordinate functions.

2. Multiple Measures of Student Outcomes

Measures of student outcomes will account for 50% of the overall summative rating for educators. Multiple measures of student outcomes will be used. State and district achievement data with both individual and school components will be included.

- For teachers, the following data when available will be used:
  - Individual value-added data on statewide standardized assessments (currently grades 3-7 reading and math);\(^2\)
  - District-adopted standardized assessment results.
  - Student Learning Objectives (SLOs) agreed upon by teachers and administrators. SLOs are a collaborative method of setting measurable goals and measuring growth in student performance towards those goals during the course of instruction. SLOs can be based on teacher-developed or other classroom assessments.

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\(^2\) Design Team specified the value-added model for student growth will be developed by the Value-Added Research Center at University of Wisconsin-Madison, and that the model shall control for demographic variables (race/ethnicity, gender, socio-economic status, disability status, and ELL status).
• District choice of data based on improvement strategies, and aligned to school and district goals based on areas of need highlighted by the state accountability system.
• For elementary and middle school levels, school-wide reading scores will be used. For high schools, graduation rate will be used.

- For teachers, when the first three measures of student data (state assessment, district assessments and SLOs) are available, equal weight will be given to these three measures and together they will make up 90% of the data used for student outcomes. When only two of these measures are available, equal weight will be given to each measure and together they will make up 90% of the data used for student outcomes. When only SLOs are available, they will account for 90% of the data used in student outcomes. District improvement strategies and school-wide data will each comprise 5% under student outcomes in all cases. Student outcome weights can be found in Appendix H.

- For principals, the following data when available will be used:
  - School-wide value-added data from state-wide standardized assessments taken by students in the school(s) to which the principal is assigned.
  - District-adopted standardized assessment results.
  - School Performance Outcomes (SPOs) agreed upon by principals and district leaders. SPOs are a collaborative participatory method of setting measurable goals and measuring growth in whole school performance toward those goals during the course of a year.
  - District choice of data based on improvement strategies and aligned to school and district goals based on areas of need highlighted by the state accountability system.
  - For elementary and middle school levels, school-wide reading scores will be used. For high schools, graduation rate will be used.

- For principals, when the first three measures of student data (state assessment, district assessments, and SPOs) are available, equal weight will be given to these

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3 State assessment value-added student growth will be divided across school years (and teachers, as appropriate and needed) in a manner that accurately reflects the current mid-year (November) testing window. Currently, the 10th grade state assessment cannot be used to calculate value-added student growth. If the successor state assessment system allows, a school-wide reading measure at high school will be used.
4 Design Team specified the value-added model will be developed by the Value-Added Research Center at University of Wisconsin-Madison, and that the model shall control for demographic variables (race/ethnicity, gender, socio-economic status, disability status, and ELL status).
5 If the successor state assessment system allows, a similar school-wide reading measure at high school will be used.
three measures and together they will make up 90% of the data used for student outcomes. When only two of these measures are available, equal weight will be given to each measure and together they will make up 90% of the data used for student outcomes. When only SPOs are available, they will account for 90% of the data used in student outcomes. District improvement strategies and school-wide data will comprise 5% respectively under student outcomes in all cases.

Figure 1: System Weights

3. Summative Performance Ratings
Educators will receive feedback on their performance in educator practice and student outcomes, both of which will be combined into an overall performance rating. Educators will receive one of three ratings:

- **Developing**: this rating describes professional practice and impact on student achievement that does not meet expectations and requires additional support and directed action.
- **Effective**: this rating describes solid, expected professional practice and impact on student achievement. Educators rated as effective will have areas of strength as well as areas for improvement that will be addressed through professional development.
- **Exemplary**: this rating describes outstanding professional practice and impact on student achievement. Educators rated as exemplary will continue to expand their expertise through professional development opportunities. In addition, these educators will be encouraged to utilize their expertise through leadership opportunities.

An educator will not be allowed to remain at the developing level and continue to practice indefinitely. If an educator is rated as developing for longer than would be reasonable for their level of experience in their position the educator will undergo an **intervention phase** to improve on the areas rated as developing. If, at the end of the intervention phase, the educator is still rated as developing, the district shall move to a **removal phase**. An appeals process shall be developed by the district.

### 4. Matrix Model for Combining Measures
Dimensions of educator practice and student learning outcomes will be weighed equally. In order to determine summative performance ratings, educator practice and student outcomes will be combined using a matrix model. The matrix model has been applied by several states and districts as a way to represent how measures of practice and measures of outcomes can be combined to inform evaluation decisions. There are two axes: one represents a combination of practice measures, and one represents a combination of student outcome measures. Before the different measures are aggregated into a single score for each axis, they may be weighted for their relative importance to educator effectiveness determinations. When the scores are combined, they will yield one rating for each axis with 5 being the highest rating and 1 being the lowest. The final rating would then be determined by locating the cell that represents the cross section of the practice and outcome ratings. The pink highlighted cells in the upper-left corner represent a
“Developing” rating, the empty grey cells represent an “Effective” rating, and the pink highlighted cells in the lower-right corner represent an “Exemplary” rating. Should the results indicate that scores for practice and outcomes are substantially different (e.g., very high for student outcomes but very low for practice) a review would be triggered to investigate the discrepancy.

Figure 2: Educator Effectiveness System Matrix

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</tr>
<tr>
<td>5</td>
<td>*</td>
</tr>
</tbody>
</table>

* Asterisks indicate a mismatch between educator’s practice performance and student outcomes and requires a focused review to determine why the mismatch is occurring and what, if anything, needs to be corrected.

5. Differentiated Evaluation Schedules
New educators (first three years in a district) will be evaluated annually. Struggling educators (those whose summative performance rating is “Developing”) will be evaluated annually. Veteran, non-struggling educators will be evaluated once every three years, although these educators could be evaluated on a subset of performance dimensions each year, with the entire set covered over a three year period. These specifications refer to summative evaluations. Formative evaluation shall be ongoing for all educators.

6. Skilled Evaluators
Teachers’ immediate supervisor will evaluate teaching practice. Principals’ immediate supervisors will evaluate principal practice.

The Design Team recognizes the benefits of multiple observers and therefore encourages the use of a second observer, such as a peer, administrator or evaluator from an institute of higher education. They also recognize that this is not always practical and therefore
recommend that pre-service internships be explored in the development phase. Pre-service interns could potentially cover classroom time to allow master educators, cooperating teachers, or outside observers to serve as peer evaluators. Similarly, pre-service principal internships should be considered.

All evaluators will be required to complete a comprehensive certification training program that is consistent across the state.

7. Formative and Summative Use of Evaluation Data
The evaluation process will include multiple forms of evidence, and will serve both formative and summative evaluation needs. A manual detailing evidence sources, the frequency of data collection, timelines and procedures for collection and analysis of evidence will be developed. Formative evaluation shall be ongoing. Summative evaluations shall follow the timelines specified in the manual.

Data issues (e.g. longitudinal tracking, teacher-student linkages, data warehousing) will be handled by a uniform statewide system. The Design Team recommends that the laws and regulations of the State of Wisconsin must ensure that personally identifiable information in relation to the evaluation system is not subject to public disclosure. As such, individual evaluation ratings (and subcomponents used to determine ratings) are not subject to open records requests.

Non-personally identifiable data will be used to ensure institutional and system accountability and improvement. For example:
- Traditional and alternative preparation programs for teachers and principals
- Induction, mentoring, and professional development programs
- The validity, reliability, fairness, and fidelity of implementation of the educator evaluation system
- Other appropriate research and accountability purposes subject to DPI approval, state and federal regulations, or individual institutional review boards (IRBs).

The privacy of evaluation ratings will be aligned with school and district accountability system suppression rules.

8. Equivalency Review Process
Districts will have the flexibility to create their own rubrics of educator practice. Districts must apply to the State Superintendent to develop their own rubrics (and related training, tools, etc.) provided they meet the Wisconsin Model Educator Effectiveness System
standards (to be defined in the development phase). The equivalency review process will require the following:

a. The measurement of educator practice will be reported on comparable scales.
b. The method for combining the ratings from the two components (educator practice and student outcomes) will be the same across all systems.
c. The timeline for development and initial implementation will be the same for all.
d. Every teacher and principal will receive a rating of Developing, Effective, or Exemplary.

The equivalency review process will require districts to engage staff in the development of rubrics and other training tools. For teachers, rubrics must be aligned with the 2011 InTASC Standards and be comparable to the Danielson domains and components. For principals, rubrics must be aligned with the 2008 ISLLC Standards and be comparable to the ISLLC subordinate functions.

Moving The Framework Forward

The Design Team recognizes the urgency of moving this work forward. In particular—as spelled out in the ESEA flexibility guidance (NCLB waivers)—the state is required to have a fully implemented educator effectiveness system by 2014-15.

In many areas, the bulk of the work lies ahead, and the Framework for Educator Effectiveness is only a start. The Framework highlights the issues most critical in developing and implementing a new statewide Educator Effectiveness system. Even beyond the development and piloting years, the state model must be continuously improved based on educators’ feedback and experience.

Role of the State

The state will be responsible for developing, piloting, implementing, evaluating and maintaining the high quality evaluation system. The statewide Educator Effectiveness model will be fully developed, piloted and implemented by 2014-15 to meet ESEA Flexibility requirements (NCLB waivers)\(^6\), and will coincide with Wisconsin's school and district accountability reform effort. DPI will be responsible for this work and ensuring alignment within the broader accountability system. DPI will work to identify and leverage

\(^6\) ESEA Flexibility, (http://www.ed.gov/esea/flexibility)
resources wherever possible, but all work outlined in the Framework and required by a high-quality statewide system is contingent on funding.

**Stakeholder Involvement**

DPI will convene a coordinating committee representing diverse stakeholders that will provide guidance and feedback throughout the development, pilot, and initial implementation phases of the model, at least through the 2014-2015 school year.

Districts are also encouraged to collaborate with DPI on the development, pilot and training phases. The state will encourage districts to begin implementing the new system as soon as possible and will allow any district wishing to implement the new system early to do so.

**Timeline**

Figure 3 depicts the timeline for developing, piloting, and implementing the full system.

**Figure 3: Educator Effectiveness Timeline**

![Educator Effectiveness Timeline](image)

*All work contingent on funding and resources*

As detailed in the timeline, work to move from the framework to a state system must begin immediately. However, resources to implement these recommendations have yet to be
identified, budgeted, or legislated. The following points on resource allocation require action:

1. The Design Team recommends that a thorough review of current statutes, rules, and policies that govern the preparation, induction, and licensure of Wisconsin educators should be completed as quickly as possible. The review should be completed to ensure that Wisconsin statutes, rules, and policies are supportive of the Framework for Educator Effectiveness. It is critical that every state process affecting educators—from preparation through professional development—is aligned with the definition of effectiveness and intended to increase educator effectiveness.

2. The state must allocate sufficient staff, time, and resources to develop, pilot, implement, evaluate, and maintain a high quality educator effectiveness system.

III. Introduction

The relationship between teacher effectiveness and student outcomes has been well documented (Rockoff, 2004; Rivkin, 2005). Research has shown that effective teachers and principals can help all students achieve at high levels of success (Goe, 2007). Teachers need specific feedback, support and professional development opportunities to help all students learn. Thus, one of the highest priorities for school leaders is providing guidance, support and instructional leadership to teachers so they can be successful in improving student outcomes.

Principals, as instructional leaders, influence educational practices and develop school strategies (Leithwood et al., 1994; Hallinger and Heck, 1996) that in turn increase the ability of teachers to implement standards-based differentiated instruction. School leaders also need specific feedback, support and professional development opportunities from district leaders to increase their ability to guide and support teachers (Fink & Resnick, 2001; Browne-Ferrigno &Muth, 2004; Mitgang, 2007). Effective principals create the conditions for effective teaching.

Currently, the evaluation models used in many of our schools do not provide the kind of feedback and support educators need to improve educator practice and student learning outcomes. Evaluations are unevenly conducted with little connection to the individual educator’s professional development and how much students are learning (Kimball,
Milanowski, & McKinney, 2009). Educators need specific feedback to assist them in their professional growth and development.

The Wisconsin Framework for Educator Effectiveness calls for a teacher and principal evaluation system based on multiple measures of educator practice and student outcomes which is fair, valid and reliable. The framework is focused on educator-evaluator collaboration and feedback to inform professional growth, and to set specific goals to measure progress. The evaluation system will help bring all teachers and principals to high standards of performance as well as document existing strengths and areas for improvement.

**Development of the Framework**

In December 2010, State Superintendent Tony Evers announced the formation of an Educator Effectiveness Design Team to develop recommendations for a meaningful educator evaluation system which respects collaboration and provides tools, opportunities, and support for instructional and leadership practice. The goal was to develop a fair and valid system to improve educator practice that ultimately leads to improved student learning.

Wisconsin is working with more than 28 states as part of the State Consortium on Educator Effectiveness, led by the Council of Chief State School Officers (CCSSO). The efforts of this State Consortium is to link the Common Core State Standards for students with standards-driven changes to policies for teaching and leading, including evaluation, training, and staff development. This national-level work informed the state Design Team and Workgroup.

The specific charge of the Design Team was to develop criteria for evaluation that were clearly articulated and used multiple indicators, including student academic growth data. The group looked at model state performance assessments for the initial, professional, and master licenses; career ladder evaluations; and the rigorous performance assessments used for National Board certification. Through the framework, the Design Team intended to

1. Define key guiding principles of a high-quality educator effectiveness program.
3. Create a regulatory framework for implementation that includes how student achievement data will be used.
4. Provide recommendations for methods to support improvement and incentives for performance.

The Design Team included leaders from the American Federation of Teachers (AFT), Association of Wisconsin School Administrators (AWSA), Office of the Governor,
Professional Standards Council (PSC), Wisconsin Association of Colleges of Teacher Education (WACTE), Wisconsin Association of Independent Colleges and Universities (WAICU), Wisconsin Association of School Boards (WASB), Wisconsin Association of School District Administrators (WASDA), Wisconsin Department of Public Instruction (DPI), and Wisconsin Education Association Council (WEAC). See Appendix A for a complete list of Design Team members.

The Workgroup was comprised of designees of the Design Team and included members from the Association of Wisconsin School Administrators (AWSA), School of Education Dean’s Office, Wisconsin Association of School Boards (WASB), Wisconsin Association of School District Administrators (WASDA), Wisconsin Department of Public Instruction (DPI), and Wisconsin Education Association Council (WEAC). See Appendix B for a complete list of Workgroup members.

The Design Team decisions were informed by several methods. The Workgroup, designees of the Design Team, gathered and reviewed effective educator practice research, presented findings, and made recommendations to the Design Team. In addition, Design Team and Workgroup members participated in multiple national conferences, including several hosted by the CCSSO and the National Governors Association (NGA). The Design Team relayed meeting information to their respective groups and held an Educator Effectiveness Symposium in June 2011 to inform stakeholders and elicit feedback on framework design.

Technical assistance was provided to the Design Team and Workgroup throughout the framework development process. Researchers from the Wisconsin Center for Education Research (WCER) helped frame the Design Team decision points, developed background material based on research, and provided technical assistance throughout the process. Researchers from the National Comprehensive Center for Teacher Quality (TQ Center) provided feedback and identified current educator effectiveness research, policies, and models. Great Lakes West Regional Comprehensive Center (GLW) and Research Educational Laboratories (REL) Midwest facilitated and documented framework meetings and decisions, and also provided technical assistance throughout the process.

The Workgroup and Design Team met monthly to discuss current education practice, research, and framework design. The Design Team reviewed, discussed, and debated information presented by the Workgroup and feedback from Wisconsin stakeholders. When needed, the Design Team provided feedback to the Workgroup and requested further clarification on decision areas. The cooperative efforts of the Workgroup and the Design Team and thoughtful consideration of the components created a framework built on collaboration.

**Guiding Principles**
The ultimate goal of education is student learning. Effective educators are essential to achieving that goal for all students. The Design Team believes it is imperative that students have highly effective teams of educators to support them throughout their public education. The Design Team further believe that effective practice leading to better educational achievement requires continuous improvement and monitoring.

A strong evaluation system for educators will provide information that supports decisions intended to ensure continuous individual and system effectiveness. This system must be well-articulated, manageable, reliable, and sustainable. The goal of this system is to provide students with highly qualified and effective educators who focus on student learning. The guiding principles of the educator evaluation system are as follows:

An educator evaluation system must deliver information that:

i. Guides effective educational practice that is aligned with student learning and development.
ii. Documents evidence of effective educator practice.
iii. Documents evidence of student learning.
iv. Informs appropriate professional development.
v. Informs educator preparation programs.
vi. Supports a full range of human resource decisions.
vii. Is credible, valid, reliable, comparable, and uniform across districts.

These guiding principles will serve as the foundation of the Wisconsin Educator Effectiveness System. How each principle relates to an effective educator has been detailed below.

i. Guides effective educational practice that is aligned with student learning and development.
The goal of the Wisconsin Framework for Educator Effectiveness is to provide students with highly qualified and effective educators who focus on student learning. The system will support best instructional practice and data driven decision making with the ultimate goal of improved student learning and engagement. As defined by the Design Team, the definition of an effective principal and teacher is a follows:

An effective principal shapes school strategy and educational practices that foster the intellectual, social and emotional growth of children, resulting in measurable growth that can be documented in meaningful ways.

An effective teacher consistently uses educational practices that foster the intellectual, social and emotional growth of children, resulting in measurable growth that can be documented in meaningful ways.
The Design Team recognizes that a comprehensive evaluation system should apply to other professional educators not just to teachers and principals. While some aspects of the framework could apply to all educators, the Design Team envisions that considerations for these educators will be specifically detailed in the development process.

**ii. Documents evidence of effective educator practice.** Data will be collected and reviewed in order to understand the extent to which an educator’s practice aligns with the practices that are known to promote student learning. Educator practice will be documented using multiple forms of evidence, including observation, review of documents, surveys/data, discussions with educators, and interviews with stakeholders. The use of multiple measures will provide a comprehensive picture of what factors are contributing to or hindering quality practice and lead to a fairer and more accurate evaluation system.

**iii. Documents evidence of student learning.** Improving student learning is the ultimate goal of the system. The use of multiple measures will contribute to building a more accurate and fair representation of the effectiveness of individual educators and offer insight into areas of improvement. A value-added model will be used to measure teacher and principal effects on student learning. Statewide standardized assessment and district-adopted standardized assessment results, along with student learning outcomes (SLOs) for teachers and school performance outcomes (SPOs) for principals will be included. In addition, district choice of data based on improvement strategies and aligned to school and district goals within the state accountability system will comprise a small portion of student outcome results.

**iv. Informs appropriate professional development.** The framework will be a formative tool to help educators improve practice and increase student learning outcomes. It will guide professional development goals in order to build upon educators’ areas of strength and improve areas of weakness. The framework will inform Professional Development Plans (PDP) of Wisconsin educators.

**v. Informs educator preparation programs.** The Framework is based on the 2011 Interstate Teacher Assessment and Support Consortium (InTASC) Model Core Teaching Standards for teachers and the 2008 Interstate School Leaders Licensure Consortium (ISLLC) Educational Leadership Policy Standards for principals. These standards are aligned with the Wisconsin Educator Standards defined in administrative code PI 34, which govern educator preparation program approval and educator licensure. The teacher and principal evaluation system will provide aggregate data on educators as they enter the field and progress through their careers. This information will inform educator preparation program improvement and, along with other data currently collected, will help ensure that initial educators are prepared to be effective educators.
vi. Supports a full range of human resource decisions. The framework will provide rich information about educator effectiveness that will allow schools and districts to make informed human resource decisions. Such decisions include the recruitment, hiring, induction, professional development, retention, compensation, and promotion of teachers and principals. However, we need to be cautious about moving forward with personnel decisions before the model is fully developed and evaluated.

vii. Is credible, valid, reliable, comparable, and uniform across districts. Wisconsin districts vary in context and capacity, ranging from small rural districts to large urban centers. The Framework provides a systematic and comparable evaluation method that allows designations made under the system to be meaningful regardless of locale. The Design Team recognizes that the desire for statewide consistency must be balanced with local flexibility, in order to ensure that the system is not overly burdensome and does not constrain local innovation.

Effectiveness Across the Career Continuum

The Framework provides a seamless transition from pre-service educator preparation to inservice educator evaluation. Pre-service candidates are evaluated for proficiency in the Wisconsin Teacher or Administrator Standards, which are aligned with the InTASC and ISLLC standards. Educator preparation programs evaluate candidates using a required assessment portfolio and other performance-based assessments. Candidates are endorsed by educator preparation programs and licensed under PI 34 administrative rules. Licensed teachers and principals hired into Wisconsin school districts will be evaluated during inservice under the state educator effectiveness system, which is also based on the InTASC and ISLLC standards. Data collected from the educator effectiveness system will inform pre-service preparation programs. Pre-service teachers and administrators are coupled in a community of practice, linked by their need for continuous learning and improvement.

Figure X: Transition from Pre-service Preparation to In-Service Evaluation
IV. Design Features

Wisconsin educators deserve a high-quality evaluation system that ensures every educator receives accurate and useful feedback on their performance. The Framework focuses on the evaluation, support and development of Wisconsin teachers and principals. The process of educator evaluation will provide continuous feedback based on high-quality standards. In this process every educator's strengths will be emphasized, and areas of weaknesses will be improved through a focus on professional development and growth. A culture of professional learning and collaboration is at the core of the Framework. The evaluation system will empower educators to be informed and active in their own practice.

The Framework provides for self-reflection, continuous feedback, and professional growth and development. The framework links a teacher's evaluation to teacher self-reflection and specific professional development plans which focus on areas of strength or areas identified for improvement. School and district leaders will use trend information to plan targeted professional development for improved student outcomes.

Multiple Measures of Educator Practice

Measures of educator practice will account for 50% of the overall summative rating for educators. Dimensions of effective educator practice—for teachers—will be based on the
2011 Interstate Teacher Assessment and Support Consortium (InTASC) Model Core Teaching Standards and—for principals—the 2008 Interstate School Leaders Licensure Consortium (ISLLC) Educational Leadership Policy Standards. The InTASC and ISLLC standards can be found in Appendix E and F.

The InTASC and ISLLC standards were selected as they are widely recognized as rigorous and robust standards of professional practice. These research-based standards describe effective teacher and leader practices that lead to improved student achievement. The standards are envisioned as the foundation for a comprehensive framework that addresses each stage of an educator's career. Both sets of standards were developed through multi-state collaborative efforts and have been endorsed by numerous education organizations, associations, and institutes of higher education.

Following is a detailed discussion of the standards, rubrics, and sources of evidence to be used for measuring teacher and principal practice.

**Teachers**
The 2011 InTASC Model Core Teaching Standards will be used to evaluate effective teacher practices. InTASC has 10 standards that fall into four themes of effective teacher practice:

- the learner and learning,
- content,
- instructional practice, and
- professional responsibility.

InTASC provides a set of model core teaching standards that outline what teachers should know and be able to do to ensure every student reaches the goal of being ready to enter college or the workforce in today's world. These standards outline the common principles and foundations of teaching practice that cut across all subject areas and grade levels and that are necessary to improve student achievement. More importantly, these Model Core Teaching Standards articulate what effective teaching and learning looks like in a transformed public education system – one that empowers every learner to take ownership of their learning, that emphasizes the learning of content and application of knowledge and skill to real world problems, that values the differences each learner brings to the learning experience, and that leverages rapidly changing learning environments by recognizing the possibilities they bring to maximize learning and engage learners.

The core teaching standards reflect new understandings of learners and learning and focuses on the imperative that every student can and must achieve to high standards. These standards describe what effective teaching that leads to improved student achievement looks like. They are based on the best understanding of current research on
teaching practice with the acknowledgement that how students learn and strategies for engaging learners are evolving more quickly than ever. These standards promote a new paradigm for delivering education and call for a new infrastructure of support for professionals in that system. The 2011 InTASC standards can be found in Appendix E.

The domains and components of Charlotte Danielson’s *A Framework for Teaching* (Danielson, 2007) will be used to provide definition and specificity to the InTASC standards. The *Framework for Teaching* is a research-based set of components of instruction, aligned to the INTASC standards. In this framework, the complex activity of teaching is divided into 22 components (and 76 smaller elements) clustered into four domains of teaching practice: planning and preparation (Domain 1), classroom environment (Domain 2), instruction (Domain 3), and professional responsibilities (Domain 4). Each component defines a distinct aspect of a domain; two to five elements describe a specific feature of a component. Levels of teaching performance (rubrics) describe each component and provide a roadmap for improvement of teaching.

Danielson’s *Framework* may be used for many purposes, but its full value is realized as the foundation for professional conversations among practitioners as they seek to enhance their skill in the complex task of teaching. The *Framework* may be used as the foundation of a school or district’s mentoring, coaching, professional development, and teacher evaluation processes, thus linking all those activities together and helping teachers become more thoughtful practitioners.

Rubrics for observing teacher practice will be developed, adapted, or identified to address each component. Danielson’s work and other models based on InTASC will be used as a starting point in rubric development. The domains and components identified in the model will be required by school districts. Each domain represents a distinctive area of effective teaching practice. The components provide a detailed, but manageable, list of teaching skills that are consistent with the 2011 InTASC standards. Appropriate adaptations to the domains and components will be developed for certified professional staff that have out-of-classroom assignments as part or all of their duties or work with special populations. The Danielson domains and components can be found in Appendix G.

In the development of the rubrics, Phase 2 workgroups will identify and recommend specific sources of evidence to be used to assess teacher practice on the Danielson components. Each component should be evaluated on multiple sources of evidence. These may include:

- Observations of teacher practice
- Review of documents
Surveys/data
Discussions with the teacher

At a minimum, for each component, discussion with the teacher should be considered in addition to at least two other categories of evidence. Evidence sources may differ at different school levels, subject areas, and contexts.

**Principals**

The 2008 ISLLC Standards will be used to evaluate effective principal practice. The ISLLC standards serve as broad set of national guidelines and establish common goals regarding school leadership. These standards provide high level guidance and insight about the characteristics, professional duties, and responsibilities of school and district leaders. Based on research, the standards reflect the wealth of new information learned about educational leadership over the past decade. Using the policy standards as a foundation, states created a common language and brought consistency to education leadership policy (Council of Chief State School Officers, 2008). The ISLLC standards can be found in Appendix F.

The 2008 ISLLC Standards will form the domains of the principal evaluation system. The ISLLC subordinate functions under the standards will form the components. Rubrics will be developed, adapted, or identified at the component level. Models based on ISLLC will be used as a starting point.

In the development of rubrics, Phase 2 workgroups will identify and recommend specific sources of evidence to be used to assess principal practice on the components. Each component should be evaluated on multiple sources of evidence. These could include:

- Observation of principal practice
- Review of documents
- Interviews with stakeholders
- Surveys/data
- Discussions with the principal

At a minimum, for each component, discussion with the principal will be considered in addition to at least two other categories of evidence. Evidence sources may differ at different school levels and contexts.

**Multiple Measures of Student Outcomes**

Measures of student outcomes will account for 50% of the overall summative rating for educators. Multiple measures of student outcomes will be used. State and district achievement data with both individual and school components will be included. Other
student outcome measures include student learning objectives (for teachers) and school performance objectives (for principals).

With respect to state assessments (WKCE and its successor), student outcome measures will include both individual and school components. For teachers of grades and subjects for which value-added data are available (currently, grade 3 – 7 reading and math), individual value-added scores will be used. For teachers in non-tested grades and subjects, a combination of district assessments (if available) and student learning objectives will be used. In addition, for teachers in both tested and non-tested grades and subjects at the elementary and middle levels, school-wide student achievement on state assessments in reading will be used for a portion of the student outcome component of the teacher’s evaluation. At the high school level, graduation rate will be used for a portion of the student outcome component of the teacher’s evaluation. If the successor state assessment system allows, a school-wide measure based on reading would be phased in at the high school level. For principals, school-wide value-added will be used as a measure of performance in the same grades and subjects as for teachers.

Specific measures for teachers and principals are outlined in the following sections.

**SIDEBAR:**

*Analytic process for measuring effects:* Teacher effects on student learning outcomes in the statewide standardized tested grades and subjects will be measured using a value-added model developed by the Value-Added Research Center (VARC) at the University of Wisconsin-Madison. The value-added model will control for demographic factors (race/ethnicity, gender, socio-economic status, disability status, and ELL status).

Value-added models are a statistical tool for measuring the contributions of schools, classrooms, teachers, and teacher teams to growth in student achievement. A refined value-added model can sort out which influences upon learning are beyond the ability of educators direct control, such as prior achievement and student background characteristics, while holding them accountable for what they can and should control, which is the continued growth in achievement for all students. As such, value-added can be a useful tool as one component of a “multiple measures” approach to identifying the effects of schools (under a school value-added model) or teachers (under a teacher value-added model) upon growth in achievement compared to other schools and teachers whom educate similar student populations.

While student achievement can be measured in different ways, including attainment indicators (which measure achievement at a particular point in time) and more advanced
growth metrics, value-added indicators have several features that make them useful measures of educational productivity.

Value-added models apply statistical controls for all available factors which might influence student growth, including prior achievement and student background characteristics, in order to establish a "level playing field."

In order to provide the most precision and accuracy, value-added results will include growth estimates with standard errors, which are used to gauge precision. Without standard errors, educators are left without knowledge of how precisely their contributions to student growth have been measured. Another important issue when considering the small size of many Wisconsin schools and classrooms is that growth estimates can be pulled in one direction or another by just a few students. It is important to account as accurately as possible for whether a school’s growth estimate is based on many data points or only a few. Value-added models can account for this by including "shrinkage" estimators, which adjust each school's estimate according to its precision.

**Teachers**

All teachers’ evaluations will be based in part on multiple measures of student outcomes. The measures used and their relative weights will vary based on availability of measures. For example, value-added data are available for a limited number of grades and subjects (currently, grades 3-7 reading and math) ("covered grades and subjects"). Individual value-added data will be used as one of several measures of student outcomes for teachers of covered grades and subjects.

The following measures of student outcomes will be used for teachers of covered grades and subjects:

1. Individual value-added data on state-wide standardized assessments (currently possible for grades 3-7 reading and math)

2. District-adopted standardized assessment results where available. The selection of assessments will be informed by district and school goals, the state standards, and 21st century skills and meet APA/AERA criteria for tests that are used for high-stakes decisions.

3. Student learning objectives – agreed upon by teachers and administrators – that move students toward mastery of applicable content or skills. The student learning objectives must be rigorous and meet the following criteria: specific, measurable, attainable, relevant, timely. The student learning objectives will be informed by
district and school goals, the state standards and 21st century skills. The district will establish a process for the development and oversight of the student learning objective component. The state will provide guidelines and tools to support districts in this process.

4. District choice of data based on improvement strategies and aligned to school and district goals within the state accountability system.

School-wide student achievement on state assessments in reading will account for 2.5% of the student outcome component of PreK-8 teacher’s evaluation. In lieu of school-wide reading, for 9-12 grade teachers, 2.5% of student outcomes will be graduation rate. If a successor state assessment system allows, a similar school-wide measure based on reading would be phased in at the high school level.

The following measures of student outcomes will be used for teachers of non-covered grades and subjects:

1. District-adopted standardized assessment results where available as described above.

2. Student learning objectives as described above.

3. District choice of data based on improvement strategies and aligned to school and district goals within the state accountability system.

School-wide student achievement on state assessments in reading will account for be considered for 2.5% of the student outcome component of PreK-8 teacher’s evaluation. In lieu of school-wide reading, for 9-12 grade teachers, 2.5% of student outcomes will be graduation rate. If a successor state assessment system allows, a similar school-wide measure based on reading would be phased in at the high school level.

**Weighting of practice and student outcomes**: Student outcomes and educator practice will be weighted equally to create an educator effectiveness performance rating based on the Educator Effectiveness System Matrix (see Matrix Model of Combining Measures). Components that contribute to the student outcomes portion of the score (50% of the overall teacher effectiveness performance rating) will vary based on what outcome measures are available for each grade and subject taught. Below is a breakdown of how each student outcome measure is weighted to create a final teachers’ student outcome score/value (50% of evaluation).

**Group 1-Teachers with State Assessments, District Assessments, and SLOs**
Pre-K-8: 15% state summative assessment, 15% district assessment, 15% SLOs, 2.5% district choice, and 2.5% school-wide reading (currently the statewide assessment enables a growth calculation in grades 3-8)
9-12 (currently no statewide assessment that enables a growth calculation): 22.5% district assessment, 22.5% SLOs, 2.5% district choice, and 2.5% graduation rate

**Group 2 – Teachers with District Assessments and SLOs**
PreK – 8: 22.5% district assessment, 22.5% SLOs, 2.5% district choice, and 2.5% school-wide reading
9 – 12: 22.5% district assessment, 22.5% SLOs, 2.5% district choice, and 2.5% graduation rate

**Group 3 – Teachers with State Assessments and SLOs**
PreK – 8: 22.5% state summative assessment, 22.5% SLOs, 2.5% district choice, and 2.5% school-wide reading
9 – 12: 22.5% state summative assessment, 22.5% SLOs, 2.5% district choice, and 2.5% graduation rate

**Group 4 – Teachers with SLOs (neither state nor district-wide assessments available):**
PreK – 8: 45% SLOs, 2.5% school-wide reading and 2.5% district choice
9 – 12: 45% SLOs, 2.5% graduation rate, and 2.5% district choice
Principals

The following measures of student achievement will be used:

1. School-wide value-added data from state-wide standardized assessments taken by students in the school(s) to which the principal is assigned.

2. District-adopted standardized assessment results where available. The selection of assessments will be informed by district and school goals, the state standards and 21st century skills and meet APA/AERA criteria for tests that are used for high-stakes decisions.

3. School Performance Outcomes – agreed upon by principals and administrators – that move students toward mastery of applicable content or skills. The school performance objectives must be rigorous and meet the following criteria – specific, measurable, attainable, relevant, timely. The school performance objectives will be informed by district and school goals, the Common Core State Standards, and 21st Century skills. The district will establish a process for the development and oversight of the school performance objectives component. The state will provide guidelines and tools to support districts in this process.

4. District choice of data based on improvement strategies.

School-wide student achievement on state assessments in reading would be considered for 5% of the student outcome component of PreK-8 principal’s evaluation. In lieu of school-wide reading, for 9-12 grade teachers, 5% of student outcomes will be graduation rate until a state-wide reading assessment is available.

Weighting of outcomes and practice measure: Student outcomes and principal practice will be weighted equally to create a principal effectiveness performance rating based on the Educator Effectiveness System Matrix (see Matrix Model of Combining Measures). Components that contribute to the student outcomes portion of the score (50% of the overall teacher effectiveness performance rating) will vary based on what outcome measures are available at the school level. School performance outcomes (SPOs) will be comparable to teacher student learning objectives and will be determined by principals and supervisors.

Below is a breakdown of how each student outcome measure is weighted to create a final principal student outcome score/value (50% of evaluation).

Group 1: PreK – 8 schools with State and District Assessment
15% state summative assessment (reading and math), 15% district assessment, 15% school performance outcomes, 2.5% district choice, and 10% school-wide reading

**Group 2: PreK – 8 schools with State Assessment**
22.5% state assessment (11.25% reading and 11.25% math), 22.5% school performance outcomes, 2.5% district choice, and 2.5% school-wide reading

**Group 3: 9 – 12 school**
45% school performance outcomes, 2.5% district choice, and 2.5% graduation rate
For 9 – 12 schools, if the successor state assessment system includes the requested EXPLORE, PLAN, ACT package, it will be phased in for high school principal evaluation as a state summative assessment.

**Differentiated Performance Ratings**

Educators will receive feedback on their performance in educator practice and student outcomes, both of which will be combined into an overall performance rating. Educators will receive one of three ratings:

- **Developing**: this rating describes professional practice and impact on student achievement that does not meet expectations and requires additional support and directed action.
- **Effective**: this rating describes solid, expected professional practice and impact on student achievement. Educators rated as effective will have areas of strength as well as areas for improvement that will be addressed through professional development.
- **Exemplary**: this rating describes outstanding professional practice and impact on student achievement. Educators rated as exemplary will continue to expand their expertise through professional development opportunities. In addition, these educators will be encouraged to utilize their expertise through leadership opportunities.

An educator will not be allowed to remain at the developing level and continue to practice indefinitely. If an educator is rated as developing for longer than would be reasonable for their level of experience in their position the educator will undergo an *intervention phase* to improve on the areas rated as developing. If, at the end of the intervention phase, the educator is still rated as developing, the district shall move to a *removal phase*. An appeals process shall be developed by the district.

**Matrix Model for Combining Measures**
Dimensions of educator practice and student learning outcomes will be weighed equally. In order to determine summative performance ratings, educator practice and student outcomes will be combined using a matrix model. The matrix model has been applied by several states and districts as a way to represent how measures of practice and measures of outcomes can be combined to inform evaluation decisions. There are two axes: one represents a combination of practice measures, and one represents a combination of student outcome measures. Before the different measures are aggregated into a single score for each axis, they may be weighted for their relative importance to educator effectiveness determinations. When the scores are combined, they will yield one rating for each axis with 5 being the highest rating and 1 being the lowest. The final rating would then be determined by locating the cell that represents the cross section of the practice and outcome ratings. The pink highlighted cells in the upper-left corner represent a “Developing” rating, the empty grey cells represent an “Effective” rating, and the pink highlighted cells in the lower-right corner represent an “Exemplary” rating. Should the results indicate that scores for practice and outcomes are substantially different (e.g., very high for student outcomes but very low for practice) a review would be triggered to investigate the discrepancy.

Figure X: Educator Effectiveness System Matrix

**Educator Effectiveness System Matrix**

<table>
<thead>
<tr>
<th>Models of Practice</th>
<th>Student Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
</tr>
<tr>
<td>1</td>
<td>*</td>
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<tr>
<td>2</td>
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<tr>
<td>4</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
</tr>
</tbody>
</table>

*Asterisks indicate a mismatch between educator’s practice performance and student outcomes and requires a focused review to determine why the mismatch is occurring and what, if anything, needs to be corrected.*

Differentiated Evaluation Process
The process will be differentiated between new educators, struggling educators, and those who are performing effectively. New educators (first three years in a district) will be evaluated annually. Struggling educators (those whose summative performance rating is “Developing”) will be evaluated annually. Veteran, non-struggling educators will be evaluated once every three years, although these educators could be evaluated on a subset of performance dimensions each year, with the entire set covered over a three year period. These specifications refer to summative evaluations. Formative evaluation shall be ongoing for all educators.

In the case of teachers, teacher leadership positions may be considered for teachers who consistently perform in the exemplary category.

The process will include collection of multiple forms of evidence. A process manual detailing the sources of evidence for each performance dimension, the frequency of data collection, time lines for collection and analysis, and procedures for evaluating the evidence will be developed by Phase 2 workgroups.

**Skilled Evaluators**

The immediate supervisor will evaluate the educator. Evaluators will be required to participate in a comprehensive certification training program that is consistent across the state. A Request for Proposal (RFP) will be developed by DPI to procure comprehensive, high quality certification training uniformly throughout the state (including recertification training as needed).

The Design Team recognizes that a second observer, such as a peer, administrator or evaluator from an institute of higher education would be beneficial. They also recognize that this is not always practical and therefore recommend that pre-service internships be explored in the development phase. In the case of teachers, pre-service interns could potentially cover classroom time to allow master educators and cooperating teachers to serve as peer evaluators. Similarly, pre-service principal internships should be considered.

**Formative and Summative Use of Evaluation Data**

Educators will have opportunities to receive formative feedback on performance elements that will be included in the summative evaluation. Formative elements may include self-reflection, feedback from coaches and mentors, and professional learning community focus on evaluation standards. Evaluators will be trained by the state-wide training program to provide formative and summative feedback. Professional growth plans may be developed by teachers and their evaluators that include specific goals, benchmarks and timelines.
The process will include collection of multiple forms of evidence. A process manual
detailing the sources of evidence for each performance dimension, the frequency of data
collection, time lines for collection and analysis, and procedures for evaluating the evidence
will be developed as part of the state model.

SIDEBAR: Data issues (e.g. longitudinal tracking, teacher-student linkages, data
warehousing) will be handled by a uniform statewide system. The Design Team
recommends that the laws and regulations of the State of Wisconsin must ensure that
personally identifiable information in relation to the evaluation system is not subject to
public disclosure. As such, individual evaluation ratings (and subcomponents used to
determine ratings) are not subject to open records requests.

Non-personally identifiable data will be used to ensure institutional and system accountability
and improvement. For example:

- Traditional and alternative preparation programs for teachers and principals
- Induction, mentoring, and professional development programs
- The validity, reliability, fairness, and fidelity of implementation of the educator
evaluation system
- Other appropriate research and accountability purposes subject to DPI approval,
  state and federal regulations, or individual institutional review boards (IRBs).

The privacy of evaluation ratings will be aligned with school and district accountability
system suppression rules.

**Equivalency Review Process**

Districts will have the flexibility to create their own rubrics of educator practice. Districts
must apply to the State Superintendent to develop their own rubrics (and related training,
tools, etc.) provided they meet the Wisconsin Model Educator Effectiveness System
standards (to be defined in the development phase). The equivalency review process will
require the following:

a. The measurement of educator practice will be reported on comparable
scales.
b. The method for combining the ratings from the two components (educator
practice and student outcomes) will be the same across all systems.
c. The timeline for development and initial implementation will be the same for
all systems.
d. Every teacher and principal will receive a rating of Developing, Effective, or
Exemplary.
The equivalency review process will require districts to engage staff in the development of rubrics and other training tools. For teachers, rubrics must be aligned with the 2011 InTASC Standards and be comparable to the Danielson domains and components. For principals, rubrics must be aligned with the 2008 ISLLC Standards and be comparable to the ISLLC subordinate functions.
V. Next Steps

The state will be responsible for developing, piloting, implementing, evaluating and maintaining the high quality evaluation system. The statewide Educator Effectiveness model will be fully developed, piloted and implemented by 2014-15 to meet ESEA Flexibility requirements (NCLB waivers)\(^7\), and will coincide with Wisconsin's school and district accountability reform effort. DPI will be responsible for this work and ensuring alignment within the broader accountability system. DPI will work to identify and leverage resources wherever possible, but all work outlined in the Framework and required by a high-quality statewide system is contingent on funding.

**Timeline**

The Wisconsin Framework for Educator Effectiveness is the first step towards the development of a state model. Development tasks in phase 2 are contingent upon the allocation of resources to support this work. The following draft timeline will guide stakeholder workgroups as they continue to develop the Educator Effectiveness System.

Figure 5: Educator Effectiveness Timeline

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\(^7\) ESEA Flexibility, (http://www.ed.gov/esea/flexibility)
During 2011-2012, key tasks will be completed by DPI, with the assistance of representative workgroups of educators, in order to further define the state model. [See appendix for list of key tasks.] This work may be accomplished with representatives from professional organizations (WEAC, AFT-WI, AWSA, WASDA, WASB, etc.), technical assistance providers, research organizations and/or vendors. Districts may volunteer to develop and pilot components of the system (e.g. rubrics, student learning objectives, training modules, data collection tools, etc.) in conjunction with DPI. The state superintendent will convene a state coordinating committee representing diverse stakeholders that will provide guidance and feedback throughout the development, pilot, and initial implementation phases, at least through the 2014-2015 school year. The state coordinating committee will keep stakeholders informed during the developmental years.

In 2012-2013, districts may volunteer to pilot the state model. Training of evaluators and those who will be evaluated (teachers and principals) will occur before pilots begin. Pilots will be closely monitored and evaluated by evaluators.

In 2013-2014, the state model will be revised based upon evaluation results and recommendations. Training modules will be informed by evaluator and educator feedback and revised accordingly. The Wisconsin Model Educator Effectiveness System will be implemented statewide in 2014-2015. The DPI student information system and value-added student outcome data will be available in 2014-2015 to allow for full implementation.
The Workgroup and Design Team recognize that transitioning to a new framework will require time and energy from teachers and their evaluators. During the development phase, a representative group of stakeholders will explore how to transition to this new system efficiently and smoothly, including:

- Differentiation of evaluations
- Observation workload being split among multiple evaluators
- Training evaluators for accuracy and efficiency
- Use of videos to replace live observations which can be rated by an expert panel
- Provisions for on-line coaching and mentoring
- Develop, adapt or purchase evaluation management tools to collect and store evidence, review evidence and track the completion of evaluations
- Develop, adapt or purchase a state instructional technology system to take advantage of economies of scale and to feed the state longitudinal data systems.
- Encouraging districts to work together to share a common evaluation approach, tools, technology and training costs.

**Development Phase (2011-2012)**

During the development phase many key tasks will be accomplished to prepare for the pilot phase (see Appendix D). These key tasks include the development of rubrics for educator practice, defining evaluation sources (observations, surveys, portfolios, etc.), building the value-added data system which links to district student information systems, developing criteria for student learning objectives, training of evaluators and those being evaluated, and writing guidance documents.

The department will convene an internal cross-agency coordination team. This phase of work will be aligned with the Accountability Design Team, which is responsible for designing a new state accountability system. The department coordinating team will assist in the development and monitoring of the educator effectiveness state model.

*Educator Practice*: Key tasks include the development of rubrics for teacher and principal practice. For teachers, rubrics will be developed, adapted or identified at the domain and component level of the Danielson Framework. Danielson's work and adaptations of Danielson will be used as a starting point. For principals, the ISLLC 2008 standards will form the domains of the rubrics. For each component or standard, multiple levels of performance will be indicated. The rubrics will be clear, and describe observable characteristics and behaviors. The rubrics will be adapted for educators of special populations including gifted students, students with disabilities, English language learners,
migrant and homeless populations, etc. A representative group of various education stakeholder groups will be convened by the department to finalize the development/adaptation/identification of the rubrics. Representatives from educator preparation programs will assist in linking pre-service assessments to the in-service effective educator evaluation system to provide a smooth transition into the teacher/administrator profession.

Evidence sources for educator practice will be defined. Sources of evidence may include observation data, student/parent surveys, review of documents such as portfolios, lesson plans, and professional development activities and other evidence of professional responsibility. Data collection tools will be developed for use by evaluators and for educators being evaluated. Local district capacity to manage educator practice data will be supported.

**Student Outcomes**

A considerable amount of development work will be needed in order to provide fair, valid and reliable student outcome data that are linked to individual educators. A key foundation of this will involve a data system which contains accurate and up-to-date student-teacher linkage data for attributing the value-added growth of students to the appropriate teacher(s). This same type of capacity (to collect and link student outcome data to teachers) will also be necessary for any district-level or school-level assessments, such as MAP. Summary scores which combine the various sub-components of both educator practice measures and student outcome data must also be collected and entered into a central repository of information (presumably at either the district or state level) in order to determine educator rating categories. The process for these decisions and creation of necessary databases will occur during the developmental period by a collaborative workgroup composed of education researchers, statisticians, information technology experts, and practitioners.

Criteria for developing, scoring, and reporting data from student learning objectives (SLOs) must also be adopted, revised or developed by a collaborative representative workgroup. SLOs, based on the Common Core Standards and 21st Century Skills, must meet high quality standards in order to move student learning forward, incorporating key issues such as setting appropriate and rigorous goals, identifying metrics with which to measure progress, and training for the scoring/rating of student work in a comparable and reliable manner. Guidelines and tools to guide the SLO development process will be necessary to make this happen.

**Evaluation process:** Formative and summative evaluation processes must be established. Timing and frequency of evaluation will be determined and differentiated based on
educator career stages (new, veteran, struggling etc.). Data collection and formative feedback requirements will be determined.

*Training Plan:* Training for evaluators and those who will be evaluated (teachers and principals) will need to include understanding of both educator practice and student outcome data collection and feedback. Value-added measurements will be explained and understood through the training program. Formative and summative evaluation processes will be clearly described and integrated into training modules. The integrity and fidelity of the effective educator system is dependent on a high quality training program. Thus the training program must be well-developed and piloted to assure that evaluators and educators will consistently apply the teacher and principal evaluation system.

*Developmental Pilots:* During the Development Phase (Year 1) districts may volunteer to pilot components of the state model as they are developed (e.g., SLOs for teachers and SPOs principals; practice measures; other outcome measures). Districts that have already implemented components will receive feedback. The results of these developmental pilot tests will inform the work of key task workgroups.

*State Policy & Process Manuals:* After evaluation processes have been developed, piloted and evaluated, a state manual will be written describing the state model in detail. This manual will assist local school districts and service providers (CESAS, professional organizations, etc.) in the implementation of the effective educator system.

*Communication Plan:* The department will inform stakeholders of the Wisconsin Framework for Educator Effectiveness. The department will conduct webinars to inform stakeholder groups of the key components of this framework. The WDPI Educator Effectiveness webpage will be maintained and updated at [http://dpi.wi.gov/tepdl/edueff.html](http://dpi.wi.gov/tepdl/edueff.html).

**Pilot Phase (2012-2013)**

*School District Pilots:* During the Piloting Phase (2012-2013) the state model will be piloted in diverse school districts which will include urban, suburban and rural school districts. A sufficient number of school districts will pilot the state model to provide valid and reliable evaluation data. The pilot will be conducted for one full school year. Large districts will pilot test in a sample of schools for principal evaluation, teacher evaluation, or a mix of teachers and principals. Smaller districts will pilot test in a substantial portion or perhaps all of the district’s schools. Specific licensure areas for teachers will be included (e.g. early childhood, English Language Learners, special education, music, art, physical education, agriculture, etc.). Evaluators and those being evaluated will be trained before participating in the pilot test. The training program will describe the evaluation process including the
use of formative feedback, value-added student outcomes, and performance rating categories.

Pilot Evaluation: During the pilot year, an external evaluator will evaluate the pilot program which will include formative and summative feedback and will address, at a minimum:

1. Implementation process: are evaluations carried out as intended, following appropriate procedures in completing the evaluations on time?
2. Understanding: do district leaders, teachers and principals understand what is to be evaluated, how evaluations are to occur, and how the results should be used?
3. Acceptance: do district leaders, teachers and principals accept the evaluation process and results? This should include measures of perceived fairness.
4. Reliability: are evaluations being carried out in a consistent manner; is there evidence of inter-rater reliability?
5. Impact: how is the evaluation process impacting practice?
6. Frequency distribution of scores on component measures (i.e., SLOs, practice, other student outcome scores).

No high stakes decisions will be made using pilot evaluation results (e.g., non-renewal, termination). This would not preclude districts from referring educators to an intervention process outside of the pilot evaluation approach if warranted.

Evaluation of the Training Program: Educators will have opportunities to provide on-going feedback on the pilot process (e.g., through the department Educator Effectiveness website, department staff, external evaluator, trainers, etc.). This feedback will inform the state model and modifications will be made to the system.


Roll out (2013-2014): Districts will be supported through ongoing evaluator/educator training, resource tools and communication. Resources will include rubrics, scoring protocols, technical assistance with analyzing student growth measures, protocols for combining multiple measures, department -supported training from evaluators, and professional development tailored to state system materials. The state model will address the following:

- On-going training for evaluators for teachers and principals.
- Evaluation results that are valid and reliable.
- Evaluation rubrics and tools that are fair, rigorous and transparent.
- Sufficient timing and frequency of evaluations to ensure sufficient data is collected.
- Collaborative professional development time for educators to respond to student outcome data.
• Student data that is correlated between student outcomes and educator effectiveness ratings.

State-wide Implementation (2014-2015): All districts will be required to begin implementation of the state model in 2014-2015. School districts may apply to the State Superintendent to develop their own rubrics (and related training, tools, etc.) provided that they meet the Wisconsin Model Educator Effectiveness System standards (as defined in development phase). District principals and teachers will be trained in the Wisconsin Model Educator Effectiveness System before implementing the system.

Continuous Improvement (Ongoing): The state model will continue to be evaluated for fidelity of implementation and impact on practice and student outcomes. Data collection and monitoring will be focused on increased educator effectiveness and the improvement of student outcomes. The effectiveness ratings of teachers and principals will be consistent with overall student and school performance.

Systems should provide individualized and useful feedback to educators. Educators should report that the evaluation process is providing information which assists them in improving their practice and positively affects student outcomes. Educators should work together collaboratively to improve teaching and learning through an on-going process of planning, instructing, assessing, and improvement.

The state model will be adapted for the evaluation of other professional educators, including pupil services, paraprofessionals, and other district administrators. The teacher and principal evaluation system will inform the development and expansion of the state model.

Conclusion

The members of the Design Team are clear: a state educator effectiveness system marks a major shift for Wisconsin, and will require tremendous commitment on the part of the legislature, teacher preparation programs, the state education agency, local districts and educators throughout the state to implement this system. The work ahead, while significant, is both necessary and attainable. The Design Team believes that it has established a solid foundation and looks now to the state legislature, DPI, local districts, and stakeholders to advance this important initiative. Working collaboratively, we have the opportunity to implement a system that lives up to Wisconsin’s proud educational legacy.
VI. References


Additional Resources:


Council of Chief State School Officers (CCSSO): http://ccsso.org/

Department of Public Instruction (DPI): http://dpi.wi.gov/home.html

DPI – Educator Effectiveness: http://dpi.state.wi.us/tepdl/edueff.html


Danielson website: http://charlottedanielson.com/
VII. Appendices

Appendix A: Design Team Members
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Appendix F: 2008 ISLLC Educational Leadership Policy Standards
Appendix G: Charlotte Danielson's *A Framework for Teaching* Domains and Components
Appendix H: Student Outcome Weights
Appendix I: Glossary
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Appendix D: Key Tasks for the Development Phase (Year 1)
Appendix E: 2011 InTASC Model Core Teaching Standards

| Standard 1 | Learner Development: The teacher understands how learners grow and develop, recognizing that patterns of learning and development vary individually within and across the cognitive, linguistic, social, emotional, and physical areas, and designs and implements developmentally appropriate and challenging learning experiences. |
| Standard 2 | Learning Differences: The teacher uses understanding of individual differences and diverse cultures and communities to ensure inclusive learning environments that enable each learner to meet high standards. |
| Standard 3 | Learning Environments: The teacher works with others to create environments that support individual and collaborative learning, and that encourage positive social interaction, active engagement in learning, and self motivation. |
| Standard 4 | Content Knowledge: The teacher understands the central concepts, tools of inquiry, and structures of the discipline(s) he or she teaches and creates learning experiences that make the discipline accessible and meaningful for learners to assure mastery of the content. |
| Standard 5 | Application of Content: The teacher understands how to connect concepts and use differing perspectives to engage learners in critical thinking, creativity, and collaborative problem solving related to authentic local and global issues. |
| Standard 6 | Assessment: The teacher understands and uses multiple methods of assessment to engage learners in their own growth, to monitor learner progress, and to guide the teacher's and learner's decision making. |
| Standard 7 | Planning for Instruction: The teacher plans instruction that supports every student in meeting rigorous learning goals by drawing upon knowledge of content areas, curriculum, cross-disciplinary skills, and pedagogy, as well as knowledge of learners and the community context. |
| Standard 8 | Instructional Strategies: The teacher understands and uses a variety of instructional strategies to encourage learners to develop deep understanding of content areas and their connections, and to build skills to apply knowledge in meaningful ways. |
| Standard 9 | Professional Learning and Ethical Practice: The teacher engages in ongoing professional learning and uses evidence to continually evaluate his/her practice, particularly the effects of his/her choices and actions on others (learners, families, other professionals, and the community), and adapts practice to meet the needs of each learner. |
| Standard 10 | Leadership and Collaboration: The teacher seeks appropriate leadership roles and opportunities to take responsibility for student learning, to collaborate with learners, families, colleagues, other school professionals, and community members to ensure learner growth, and to advance the profession. |
**Appendix F: 2008 ISLLC Educational Leadership Policy Standards**

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<th>Standard</th>
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| **Standard 1** | An education leader promotes the success of every student by facilitating the development, articulation, implementation, and stewardship of a vision of learning that is shared and supported by all stakeholders.  
Functions:  
A. Collaboratively develop and implement a shared vision and mission  
B. Collect and use data to identify goals, assess organizational effectiveness, and promote organizational learning  
C. Create and implement plans to achieve goals  
D. Promote continuous and sustainable improvement  
E. Monitor and evaluate progress and revise plans |
| **Standard 2** | An education leader promotes the success of every student by advocating, nurturing, and sustaining a school culture and instructional program conducive to student learning and staff professional growth.  
Functions:  
A. Nurture and sustain a culture of collaboration, trust, learning, and high expectations  
B. Create a comprehensive, rigorous, and coherent curricular program  
C. Create a personalized and motivating learning environment for students  
D. Supervise instruction  
E. Develop assessment and accountability systems to monitor student progress  
F. Develop the instructional and leadership capacity of staff  
G. Maximize time spent on quality instruction  
H. Promote the use of the most effective and appropriate technologies to support teaching and learning  
I. Monitor and evaluate the impact of the instructional program |
| **Standard 3** | An education leader promotes the success of every student by ensuring management of the organization, operation, and resources for a safe, efficient, and effective learning environment.  
Functions:  
A. Monitor and evaluate the management and operational systems  
B. Obtain, allocate, align, and efficiently utilize human, fiscal, and technological resources  
C. Promote and protect the welfare and safety of students and staff  
D. Develop the capacity for distributed leadership  
E. Ensure teacher and organizational time is focused to support quality instruction and student learning |
| **Standard 4** | An education leader promotes the success of every student by collaborating with faculty and community members, responding to diverse community interests and needs, and mobilizing community resources.  
Functions:  
A. Collect and analyze data and information pertinent to the educational environment  
B. Promote understanding, appreciation, and use of the community’s diverse cultural, social, and intellectual resources  
C. Build and sustain positive relationships with families and caregivers  
D. Build and sustain productive relationships with community partners |
| Standard 5 | An education leader promotes the success of every student by acting with integrity, fairness, and in an ethical manner. Functions:  
A. Ensure a system of accountability for every student’s academic and social success  
B. Model principles of self-awareness, reflective practice, transparency, and ethical behavior  
C. Safeguard the values of democracy, equity, and diversity  
D. Consider and evaluate the potential moral and legal consequences of decision-making  
E. Promote social justice and ensure that individual student needs inform all aspects of schooling |
| Standard 6 | An education leader promotes the success of every student by ensuring management of the organization, operation, and resources for a safe, efficient, and effective learning environment. Functions:  
A. Monitor and evaluate the management and operational systems |
Appendix G: Charlotte Danielson’s Framework for Teaching Domains and Components

Domain 1: Planning and Preparation
- Demonstrating Knowledge of Content and Pedagogy
- Demonstrating Knowledge of Students
- Setting Instructional Outcomes
- Demonstrating Knowledge of Resources
- Designing Coherent Instruction
- Designing Student Assessments

Domain 2: The Classroom Environment
- Creating an Environment of Respect and Rapport
- Establishing a Culture for Learning
- Managing Classroom Procedures
- Managing Student Behavior
- Organizing Physical Space

Domain 3: Instruction
- Communicating with Students
- Using Questioning and Discussion Techniques
- Engaging Students in Learning
- Using Assessment in Instruction
- Demonstrating Flexibility and Responsiveness

Domain 4: Professional Responsibilities
- Reflecting on Teaching
- Maintaining Accurate Records
- Communicating with Families
- Participating in a Professional Community
- Growing and Developing Professionally
- Showing Professionalism
Appendix H: Student Outcome Weights

Student Outcome Detail (50% of evaluation)

- Models of Practice (50.0%)
- State Assessment (15.0%)
- District Assessment (15.0%)
- Student Learning Objectives (15.0%)
- District Choice (2.5%)
- School-wide Reading (Elementary-Middle) (2.5%)
- Graduation (High School) (2.5%)
Student Outcome Weights—PK- 8

State assessment, district assessment, SLOs, and other measures

- State assessment
- District assessment
- SLOs
- School-wide reading
- District choice

0 10 20 30 40 50

0 10 20 30 40 50

SLOs and other measures

- SLO
- School-wide reading
- District choice

Student Outcome Weights—9-12

State assessment, district assessment, SLOs, and other measures

- District assessment
- SLO
- Graduation rate
- District choice

0 10 20 30 40 50

0 10 20 30 40 50

SLOs

- SLO
- Graduation rate
- District choice
Appendix I: Glossary

1. **Classroom Observations**- Used to measure observable classroom processes including specific teacher practices, aspects of instruction, and interactions between teachers and students. Classroom observations can measure broad, overarching aspects of teaching or subject-specific or context specific aspects of practice.

2. **Effective Principal**- An effective principal shapes schools strategy and educational practices that foster the **intellectual, social and emotional** growth of children, resulting in measureable growth that can be documented in meaningful ways.

3. **Effective Teacher**- An effective teacher consistently used educational practices that foster the **intellectual, social and emotional** growth of children, resulting in measureable growth that can be documented in meaningful ways.

4. **Formative Evaluation**- Formative evaluation is a process used to gather feedback on educator practice and student outcomes in order to adjust on-going teaching and leading, and to improve student outcomes. Formative evaluations occur within the teaching and learning process and, as a result, are often dynamic, in-the-moment, small-scale evaluations. This can be considered an evaluation of the process.

5. **Multiple Measures of Student Learning**- The various types of assessments of student learning, including for example, value-added or growth measures, curriculum-based tests, pre/post tests, capstone projects, oral presentations, performances, or artistic or other projects.

6. **Multiple Measures of Teacher Performance**- The various types of assessments of teachers’ performance, including for example, classroom observations, student test score data, self-assessments, or student or parent surveys.

7. **Nontested Grades and Subjects**- Refers to the grades and subjects that are not required to be tested under the Elementary and Secondary Education Act.

8. **School Performance Outcomes**: A participatory method of setting measurable goals, or objectives, based on the specific school student data, such as the baseline performance of the students, and the measurable gain in student performance during the course of the year. SPOs can be based on standardized assessments, but they also may be based on school-developed assessments if they are “rigorous and comparable across districts.” The general method of SPOs draws on both effective pedagogical practices and approaches to goal setting and evaluation and task motivation found in multiple professions.

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8 Provided by the Teacher Quality Center
9. **Standards for Professional Practice** - A set of ideals for what behaviors, skills, knowledge and dispositions teacher should exhibit.

10. **Student Growth** - The change in student achievement for an individual student between two or more points in time. A state also may include other measures that are rigorous and comparable across classrooms.

11. **Student Learning Objectives (SLOs)** - A participatory method of setting measurable goals, or objectives, based on the specific assignment or class, such as the students taught, the subject matter taught, the baseline performance of the students, and the measurable gain in student performance during the course of instruction. SLOs can be based on the Elementary and Secondary Education Act or other standardized assessments, but they also may be based on teacher-developed or other classroom assessments if they are “rigorous and comparable across classrooms.” The general method of SLOs draws on both effective pedagogical practices and approaches to goal setting and evaluation and task motivation found in multiple professions. In some instances, SLOs are shared by a team of job-alike teachers.

12. **Student Surveys** - Questionnaires that typically ask students to rate teachers on an extent-scale regarding various aspects of teachers’ practice as well as how much students say they learned or the extent to which they were engaged.

13. **Summative Evaluation** - A summative evaluation is designed to assess the cumulative results of educator practice and student outcomes in order to determine the effectiveness of an educator at a given (end) point in time. Summative evaluations can occur annually or at predetermined intervals, but are cumulative in nature, and therefore evaluate performance after a period of time. This can be considered an evaluation of the outcomes.

14. **Teacher Self-Assessments** - Surveys, instructional logs, or interviews in which teachers report on their work in the classroom; the extent to which they are meeting standards; and in some cases, the impact of their practice. Self-assessments may consist of checklists, rating scales, and rubrics and may require teachers to indicate the frequency of particular practices.

15. **Reliability** - The ability of an instrument to measure teacher performance consistently across different rates and different contexts.

16. **Validity** - The ability of an instrument to measure the attribute that it intends to measure.

17. **Value-Added Models (VAMs)** - Complex statistical models that attempt to determine how specific teachers and schools affect student achievement growth over time. This model generally uses at least two years of students’ test scores and may take into account other student-and school-level variables, such as family
background, poverty, and other contextual factors. VAMs attempt to determine the extent to which changes in student performance can be attributed to a specific school and/or teacher compared with that of the average school or teacher.
Evaluation system to balance educator practice and student outcomes

Framework for Educator Effectiveness is first step in model evaluation system

MADISON — Teachers and principals will be evaluated on their professional practice and student achievement in an educator evaluation system outlined in a preliminary report issued today by the Wisconsin Educator Effectiveness Design Team. State Superintendent Tony Evers appointed the group last December.

As described in the Wisconsin Framework for Educator Effectiveness, student outcomes and educator practice will be weighted equally to create an educator effectiveness performance rating. Outcomes for students will come from multiple measures. Those include value-added data from state assessments, district assessment data, student learning objectives, school-wide reading at the elementary level and graduation at the high school level, and district choice data based on improvement strategies.

Educator practice, which also will account for 50 percent of the evaluation rating, will be based on standards such as instructional strategies, classroom organization, content knowledge, school culture, and collaboration with faculty and the community. The standards come from the nationally recognized 2011 Interstate Teacher Assessment and Support Consortium (InTASC) Model Core Teaching Standards and the 2008 Interstate School Leaders Licensure Consortium (ISLLC) Educational Leadership Policy Standards.

“Centered on student learning, fair, valid, and reliable — these are core principles for our educator effectiveness framework,” said State Superintendent Tony Evers. “Our performance-based evaluation system will support teachers and principals in their job of educating students and help our educators improve throughout their careers.”

In the framework, an effective educator is defined as consistently using educational practices that foster the intellectual, social, and emotional growth of children. That growth, documented in meaningful ways, will be part of the evaluations conducted by a teacher’s or a principal’s immediate supervisor. The evaluation system will include multiple forms of evidence and will serve both formative and summative evaluation needs. Evaluations will include observations, a review of documents, surveys, data, and discussions with the educator. Evaluations will result in a
performance rating at one of three levels: developing, effective, and exemplary. For all ratings, the evaluation will identify areas of strength and areas for improvement to be addressed through professional development.

New educators, who are in the first three years in a district, and educators, whose performance rating is at the developing level, will be evaluated annually. Veteran, non-struggling educators will have a summative evaluation every three years, though these educators could be evaluated on a subset of performance dimensions each year, with the entire set covered over a three-year period. Formative evaluation will be ongoing for all educators. When fully developed and implemented, the system will support a full range of human resource decisions.

Mary Bell, president of the Wisconsin Education Association Council, and Bryan Kennedy, president of the American Federation of Teachers-Wisconsin, commended the efforts of other members who worked with them on the design team. “Through consensus building, Wisconsin will be using an educator evaluation system that will improve teaching and student learning,” Bell said. “We have taken solid steps in the development of an evaluation system that constructively uses student outcome data and professional practice,” Kennedy added.

As work continues on developing the model evaluation system, the 2012-13 and 2013-14 school years will involve piloting the model, evaluator and educator training, evaluating and revising the model as well as identifying a statewide implementation strategy. Full implementation of the model in the 2014-15 school year depends on funding to identify or develop rubrics for educator practice, training for educators and evaluators, continuing efforts on the state’s data system to link student achievement data with an individual educator, establishing reliable calculations for value-added student outcomes, and increasing the capacity of local districts to collect and use student outcome data.

“The Wisconsin Educator Effectiveness Framework provides a good foundation for a statewide model evaluation system,” said John Ashley, executive director of the Wisconsin Association of School Boards. “Additionally, the framework recognizes that many districts have evaluation systems in place and allows districts flexibility to create or continue using their own rubrics of educator practice.”

Julie Underwood, dean of the University of Wisconsin-Madison School of Education, praised the framework for its comprehensiveness. “The educator effectiveness design team’s work gives us the opportunity to align our system from pre-service education, to professional development, and evaluation,” she said.

Miles Turner, executive director of the Wisconsin Association of School District Administrators, and Jim Lynch, executive director of the Association of Wisconsin School Administrators, also were active on the design team. “This is exciting work. We are developing resources that will move Wisconsin ahead with a performance-based evaluation system that respects the collaborative nature of successful schools,” Turner said. “We have a
tremendous opportunity to take the work of the design team and develop a well thought-out model evaluation system. It will take our continued best efforts, at the state and local level, to seize this opportunity,” Lynch added.

The work group and design team, made up of leaders from a broad range of education stakeholders, developed the Wisconsin Educator Effectiveness Framework. Representatives came from: the American Federation of Teachers (AFT), Association of Wisconsin School Administrators (AWSA), Office of the Governor, Professional Standards Council, University of Wisconsin-Madison School of Education, Wisconsin Association of Colleges of Teacher Education (WACTE), Wisconsin Association of Independent Colleges and Universities (WAICU), Wisconsin Association of School Boards (WASB), Wisconsin Association of School District Administrators (WASDA), and Wisconsin Education Association Council (WEAC). Critical to the process was technical assistance provided by researchers from the Wisconsin Center for Education Research (WCER), Great Lakes West Regional Comprehensive Center (GLW), and Regional Educational Laboratory (REL) Midwest. National work by the State Consortium on Educator Effectiveness, led by the Council of Chief State School Officers, guided the state design team and work group efforts. The design team developed a timeline for moving the framework into a statewide model will ensure the process is not rushed.

As a next step, the state superintendent will convene a state coordinating committee, representing diverse stakeholders who will provide guidance and feedback to the Department of Public Instruction throughout the development, pilot, and initial implementation phases. That committee will work through 2014-15 when the evaluation system will be implemented statewide.

“I am happy to accept the recommendations in the Wisconsin Framework for Educator Effectiveness,” Evers said. “We need to move ahead to ensure the effectiveness of educators in our schools and classrooms. The timeline in the framework gives us the opportunity to do this right so we improve academic achievement for all students.”

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WEAC and AFT Recommendations

to State Superintendent Tony Evers

November 21, 2011

The Wisconsin Education Association Council (WEAC) and the American Federation of Teachers, Wisconsin, (AFT) submit the following recommendations to the Governor’s School Accountability Task Force. The recommendations are informed by a series of eight public events held around the state entitled Speak Out for Public Schools: The ABC’s of School Accountability. The Speak Out events were promoted and open to the public. Local media were invited and attended each of the events. They occurred in Eau Claire, Weston (DC Everest), Superior, Reedsburg, Oshkosh, South Milwaukee, Kenosha and Green Bay. The events started on September 20th and concluded on November 8th.

More than 500 Wisconsin parents, community members, teachers, support professionals and school officials attended the events. The events were organized around four discussion areas: school programs and services, student achievement, teaching effectiveness and parent/community involvement in schools. The discussions were conducted in small groups of six to ten participants. Small group discussions were led by local volunteers. The format was designed to allow individuals ample opportunity to voice their opinions and to suggest ideas not specifically addressed by the discussion questions. Individual responses to questions were collected and tabulated.

Additional conversation and input was generated through an online Facebook page at www.facebook.com/SpeakOutWisconsin. Review of Facebook discussions served as an additional basis for the recommendations.

The recommendations offered by WEAC and AFT are:

- **Recommendation #1**: Wisconsin should create a holistic system of school accountability.
- **Recommendation #2**: Wisconsin should develop specific criteria for assessing non-tested subject areas.
- **Recommendation #3**: Wisconsin should assess key indicators of school quality, including class size, the quality and availability of staff professional development programs, the availability of vital student support services and school climate.
- **Recommendation #4**: Wisconsin should link educator evaluation systems to professional development programs that promote teaching effectiveness.
- **Recommendation #5**: Wisconsin should provide parents with access to meaningful information regarding the strengths and weaknesses of their schools.
Recommendation #1: Wisconsin should create a holistic system of school accountability.

Issues surrounding school and teacher accountability are being discussed with increasing frequency nationally, with many states contemplating and even enacting new systems and measures. When asked about accountability, Wisconsinites who attended the statewide series of listening sessions identified breadth of curriculum and student support services as some the most important qualities they value in their schools. And, regarding school improvement and teacher effectiveness, participants identified class size, school environment (climate) and professional development as key areas that mattered most.

Many of these measures fall on the input side of the school equation, and stand in contrast to the standard set of outputs (test scores, disaggregated test scores and graduation rates) that have come to dominate school accountability. Outputs are important markers, but they do not tell us what we need to do to improve school performance. Efforts to improve school quality must identify variables internal to the process of education itself that are directly related to student learning. These inputs include teacher quality, professional development, the availability of subject-specific and developmental specialists, class size, tutoring and other academic support services for students, and effective school leadership, to name but a few.

The question before us today is how to build an accountability system that balances the measure of vital inputs (programs and services for children) with standard output measures. How, in other words, can we build an accountability system that actually measures the programs and services that the public values most?

Parents and community members attending the listening sessions identified art, music, foreign language, and career and technical education specifically as classes that they are most concerned about losing—or that they want more of in districts where such programs were deemed insufficient.

Because student outcomes in these subjects are difficult to measure through the present regime of standardized testing, the state accountability system must incorporate school-based measures of student performance if they are to respect the integrity of these disciplines.

Wisconsin can create a holistic assessment system that better informs strategies to improve achievement and better reflects what parents and community members value most by:

- Balancing inputs (programs and services for children) with standardized outcome measures, and
- By incorporating school-based performance measures in non-tested subjects into the overall set of metrics used to assess education.

In order to incorporate non-tested subjects into the accountability system, Wisconsin must first identify the basic qualities it aspires to, specifically for art, music, foreign language and career and technical education. Then it can determine the extent to which school districts are meeting standards related to (1) opportunity to learn, and (2) quality. Do all students statewide have equal access to such programs?
At what grade levels should the different subjects be introduced? And how do we measure the quality of these programs in objective fashion?

Recommendation #2: Wisconsin should develop specific criteria for assessing non-tested subject areas.

Wisconsin has academic standards established in a number of areas, and they should be enhanced to include robust offerings in art, music, physical education, foreign language, and career and/technical education. Speak Out participants were most concerned about preserving these curricular offerings, and Wisconsin should develop a unique set of rubrics for each of these non-tested subjects.

WEAC and AFT recognize that assessing non-tested subjects such as art and music poses many challenges. Further inquiry and discussion are needed to develop an assessment model that will work for Wisconsin. Nevertheless, we believe that, at minimum, non-tested subjects can be assessed using the four sets of criteria outlined below.

(A) Measure the quantity and duration of such programming (opportunities to learn)—what are the minimum number of hours and days of instruction and number of course offerings that should be made available to students, what percentage of students should be able to participate at different grade levels, and are school districts meeting these requirements?

(B) Use teacher qualifications as a measure of program quality—quality measures should include the qualifications of staff teaching the different programs beyond basic licensure requirements. How do you measure a highly qualified foreign language teacher? How about a teacher of art? Are more robust experiences needed than traditional schooling that would allow teachers to be more effective in class? Are there specific certificate programs that better enrich teachers and help them be more effective? One possible measure of teacher qualification is National Board Certification, given its rigor and availability in almost all subject areas. Other criteria should also be explored.

(C) Establish school-based performance measures—the state also needs to establish simple and clear parameters outlining criteria for performance assessment that schools can use to measure student achievement in these programs. Performance is the ability of a student to exhibit actions that show understanding of a subject. In science, for example, a student’s knowledge of the experimental method is better measured by having them perform an actual experiment and assessing the process than by asking a series of questions on a standardized exam. Similar performance expectations should be developed for art, music, foreign language and career and/technical education.

In music, for example only, 10th grade students might be expected to play basic scales on their instrument, and successfully master compositions for band or orchestra performance. Different skills and expectations would be set for different grade levels.
In art, students might be expected to understand primary colors and color composition by the end of middle school. Art students in high school might be expected to establish rudimentary skills of creating dimension (depth) in sketches and paintings. In short, performance measures are those where students can demonstrate a level of mastery over a given topic, which is especially important for subjects that are not easily measured by standardized tests.

Other program performance measures might also be developed. For example, we know that music and art teachers value the role of families and the community and look for regular opportunities to build partnerships that extend beyond school (community music festivals, performances at nursing homes, community art fairs, etc.). Standards might be developed that measure the frequency and adequacy of such outreach programs.

School districts would be required to construct their assessments based on guidelines provided by the state, but implemented locally.

(D) Set participation goals and determine if these subjects improve graduation rates—the state should set goals that a minimum percentage of at-risk students participate in art, music, foreign language and career and/technical education in pilot districts and establish an ongoing study to determine any correlation with rates of graduation.

By assessing the extent to which students are offered these subjects by grade level, by establishing quality measures for teachers that are discipline specific, and by creating standards that allow school districts to score student performance, Wisconsin can create a rigorous and objective set of accountability measures in non-tested subjects, while ensuring their survival in an environment of ever-narrowing curricular offerings.

Recommendation #3: Wisconsin should assess key indicators of school quality, including class size, the quality and availability of staff professional development programs, the availability of vital student support services and school climate.

When asked about school improvement strategies, participants rated highly the importance of class size, professional development for staff, and a positive school climate, which includes relations between staff and administrators as well as those within the overall school. These topics account for more than a third of the responses to the question “How do we improve schools where the students are struggling?” Importantly, class size, professional development, and a positive school climate also ranked highly as strategies participants identified to support effective teaching.

Participants also identified student support services, which include academic support (tutoring and mentoring) in addition to guidance and psychological counseling, as highly valued programs.

Accordingly, the state’s accountability system should measure class size. It should also gauge the level and nature of support services for children. In addition, school climate should be assessed with annual state-developed surveys to ensure comparability between schools and districts.
Professional development poses a larger challenge. The frequency of professional development could be counted, but the quality of those programs—the extent to which they are targeted to specific needs of individual teachers—is more difficult to assess.

One strategy is for the state to establish a best practices guideline that it then asks school districts to adopt. Accountability would be a measure of the extent to which districts adhere to the guideline. A small number of expert teams could be created to work with low-performing schools to implement these practices. Other school districts could be randomly audited every few years to measure their progress.

Ultimately, the extent to which these input measures help student achievement will be checked by output measures, such as standardized tests in reading and math, which undoubtedly will remain as one component of any accountability system. The relationship between these input variables, school-based performance measures, and outcomes can then be better analyzed.

Recommendation #4: Wisconsin should link educator evaluation systems to professional development programs that promote teaching effectiveness.

If the purpose of accountability is to improve student achievement, then the role of teaching is integral. Expectations for teachers continue to increase and today’s teacher is required to have more knowledge than her/his predecessors about subject matter and the skills necessary to teach effectively. This requires knowledge of child development, learning styles and different methods of teaching to meet the needs of all students in our increasingly diverse state. Our teacher evaluation system needs to be aligned with what we know are the characteristics of effective teaching.

Speak Out participants cited, and WEAC and AFT agree, that teachers must know the subjects they teach, must understand child development as it pertains to learning, and must be able to adapt their lesson plans to children with different learning styles.

It is hoped that Wisconsin’s new teacher evaluation system being developed through the State Superintendent’s Educator Effectiveness Design Team will be an important step in appraising a teacher’s understanding of and ability to practice different teaching methods. Ideally, professional development programs (suggested above) would be aligned with these new teacher evaluations and offer development opportunities in areas identified through the evaluation process.

Participants, it should be noted, overwhelmingly reject the use of standardized test scores as a primary means to help improve teaching, although they do support using growth measures of student progress through the school year. They reject basing pay on standardized test scores and reject tying evaluation primarily to standardized test scores.

Instead, participants favor as the best strategies to help effective teaching: teacher mentoring, professional development, reasonable class sizes, and maintaining a positive school climate.
Participants, in other words, believe that strategies that promote the growth of teaching are the best means we have to improve overall academic quality and achievement.

Accordingly, as part of the state accountability system, Wisconsin should report by district: the percentage of new teachers with trained mentors, the percentage of teachers working toward master status, the percentage of teachers with master status, and rates of teacher retention not related to an individual’s inability to gain professional licensure (in which case they are forced to leave the profession).

Recommendation #5: Wisconsin should provide parents with access to meaningful information regarding the strengths and weaknesses of their schools.

Information collected at the state level from each of the assessments outlined in recommendations 1 through 4 should be available to parents, teachers, school officials and others through a transparent and easily understood system. Additional information, such as the hours and numbers of course offerings by district, teacher and staff expertise, and school performance standards for non-tested subjects, would be posted and made available to the public while maintaining current confidentiality protections afforded to students and staff. This information should become part of a new standard for school performance reports.

Conclusion

A holistic accountability system would (1) incorporate input variables (programs and services for children) linked to achievement, (2) incorporate school-based performance measures for non-tested subjects, and (3) put in place measures that promote teacher growth. A holistic system is more likely to promote student growth than an outputs-only accountability system because it measures what affects classroom teaching and the level of support services and programs for children. It would also have the advantage of reflecting what parents and the community value most in their schools.

-end-
Appendix 2 – Crafting a New Accountability System for Wisconsin

Crafting a New Accountability System for Wisconsin

Purpose & Background

The purpose of the School and District Accountability Design Team is to design a fair and accurate accountability system that measures the growth and attainment of all students, including those in traditional public schools, charter schools, and private school choice programs, to ensure that every Wisconsin child has the opportunity to graduate ready to succeed in college or a career.

Redesigning Wisconsin’s school and district accountability system is driven by our shared desire to raise achievement and learning among all Wisconsin students to world-class levels. Using rigorous benchmarks, our goal is to ensure all students have the opportunity to graduate from high school ready for college and career success.

Wisconsin has new world-class standards with the adoption of the Common Core State Standards in English Language Arts and Mathematics, and we are developing new state assessments and data systems that are comprehensive, robust, and timely. Wisconsin must now develop an accountability system that not only reflects these reforms, but draws upon them for maximum impact.

Agreeing that NCLB was a broken accountability system, State Superintendent Evers and Governor Walker established the School and District Accountability Design Team in August 2011 with an aggressive timeline: establish the key principles and design features of Wisconsin’s next generation accountability system by December 2011.¹ The Design Team’s work, as represented in this report, lays the foundation for a robust, comprehensive state accountability system.

Vision

Wisconsin’s accountability system will be comprehensive, robust, and timely. It will

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¹ The emerging decisions of this framework will inform the federal waiver request that Superintendent Evers will submit in February 2012 to the US Department of Education. The waiver request will not, however, limit the scope of this design team’s work.
provide meaningful information that can be used to guide educational practices that ensure all students have the opportunity to graduate from high school ready for college and a career.

Having discussed one, three, five, and ten year plans, the Design Team considered a vision for accountability in both the short-term and the long-term, and a path to establish the long-term vision.

**Design Team Members**

State Superintendent Evers and Governor Walker co-chaired the Design Team, along with Senator Olsen and Representative Kestell, who chair the Legislature’s education committees. The team consists of:

- business leaders
- community groups
- education leaders
- elected officials
- parent organizations
- philanthropic representatives

Design team members are included in cover letter accompanying this report and/or can be found in Appendix 2F at the end of this document.

**Guiding Principles**

The following principles set forth by the Design Team informed their decisions and will continue to guide the design of a new accountability system.

A quality accountability system will:

1. Support high-quality instruction in all publicly funded schools and districts;
2. Include all publicly funded students in accountability calculations;
3. Measure progress using both growth and attainment calculations;
4. Make every effort to align this work with other state educational reform initiatives;
5. Align performance objectives to career and college readiness;
6. Focus on and include multiple measures of student outcomes that can be used to guide and inform practice and for accountability purposes;
7. Use disaggregated student data for determinations and reporting to facilitate the
Appendix 2 – Crafting a New Accountability System for Wisconsin

narrowing of persistent achievement gaps;

8. Make valid and reliable school and district accountability determinations annually;

9. Produce reports that are transparent, timely, useful and understandable by students, parents, teachers, administrators, and the general public;

10. Provide differentiated systems of support to the lowest performing schools and districts including professional development targeted to their deficits;

11. Recognize the highest performing schools and districts, and disseminate their best practices to schools serving similar populations to help scale-up high performance statewide;

12. Have reasonable and realistic implementation goals that ensure the state, districts, and schools have the capacity to fully implement the accountability system and act on the results; and

13. Remain open to feedback and findings about potential system improvements through implementation to ensure maximum effectiveness of the system.
Defining College and Career Readiness

The Design Team developed the following definition of college and career readiness that sets the standard for preparing our students and is the ultimate benchmark by which we measure our progress:

Students who are college and/or career ready have, upon graduation, the knowledge, habits, and skills needed to succeed in postsecondary education and/or training that maximize their options and opportunities to successfully participate in productive and sustainable employment.

In Wisconsin, we expect our schools to prepare all students to be ready for college and careers. This can include pursuing a degree at two- or four-year institutions, technical/vocational programs, community college, apprenticeship, significant on-the-job training, or the military. Entry into career or college should be without remediation. All students in Wisconsin should graduate from high school possessing and demonstrating the knowledge (academic and technical content), skills (e.g., critical thinking, application of knowledge), and habits (e.g., perseverance, time management) that only come from a rigorous, rich, and well-rounded curriculum and effective schools.
Priority Areas

The accountability system should reflect the guiding principles established by the Design Team and prioritize areas of focus. Identifying priority areas is an efficient way to operationalize the guiding principles and the definition of career and college readiness. As such, performance in four priority areas—based on research of the strongest indicators of student college and career readiness—will shape reporting, determinations, and supports:

1. Student Growth
2. Student Attainment
3. On-Track Indicators / Post-Secondary Readiness
4. Closing the Achievement Gap

The Design Team examined each of the four priority areas and how performance could be measured. The group selected the following measures as key metrics they value in an accountability system. It was decided that a subset of measures will be used for a school’s accountability determination that will drive support, rewards, and interventions, while more measures will be available on public reports to increase transparency and public accountability and foster deepened data use.

Elements with asterisks are not currently available but can be captured in the future, and therefore are included in the system design.

Recommendation
Report school and district performance annually on the four priority areas.
Student Growth

Student growth is a critical component of evaluating the performance of a school or district in preparing students to be college and career ready. All schools and districts start with students of different abilities, different strengths, and different educational backgrounds. Growth is essential to understanding the learning trajectories of students in the school or district, and measuring how successful a school or district is at catching up students who start further behind their peers.

To measure growth, multiple points in time of student test data are necessary, as well as information about the students and the test. Currently, it is possible to obtain growth estimates for students on the Wisconsin Knowledge & Concepts Exam (WKCE). Highly precise growth estimates will be possible with the new SMARTER Balanced Assessment Consortium (SBAC) assessment, available in 2014-15.

At the high school level, there is only one tested grade and so growth estimates are not available. This is true for the current and future—WKCE and SMARTER—high school assessments required for federal accountability. To track student growth in high school, either the development of end-of-course assessments or the purchase of an assessment suite such as the EXPLORE-PLAN-ACT + Work Keys is necessary.

Recommendation
Both student growth percentiles and value-added growth models should be examined for inclusion in the accountability system.
Appendix 2 – Crafting a New Accountability System for Wisconsin

**Student Attainment**

The Design Team determined it is not enough to know how students are growing. The other side of the student learning coin is attainment. Student attainment measures student performance relative to some fixed standard such as the Common Core State Standards. Student attainment of an objective standard of knowledge and skill allows us to know what proportion of a district or school’s students are ultimately reaching the career and college readiness goal. Traditionally, this has been measured by proficiency rates on state standardized assessments like the WKCE. Assessments can measure where students are relative to these content standards and uncover where students in a school or district are strong and where they need more instruction and skill-building.

The Common Core State Standards (CCSS) reflect the most clear and consistent representation of what students are expected to learn K-12. Assessments aligned to the CCSS reflect where students are relative to these standards in any given grade. Districts and schools should be held accountable for having a high percentage of students who reach or exceed the proficiency threshold for their grade level and subject.

<table>
<thead>
<tr>
<th>Subject</th>
<th>Measures</th>
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| **Reading/ELA (Grades 3-8)**          | • State test score (percent proficient and advanced)  
|                    | • Participation in state test (WKCE and WAA-SwD)   |
| **Math (Grades 3-8)**                  | • State test score (percent proficient and advanced)  
|                    | • Participation in state test (WKCE and WAA-SwD)   |
| **Science**                         | • State test score if new assessments are developed |
| **Social Studies**                   | • State test score if new assessments are developed |
| **Reading and Math in HS**            | • State test score available: WKCE in 10th grade; SBAC* in 11th grade  
|                    | • Participation in state test  
|                    | • PLAN* in Grade 9, ACT* in Grade 11 or 12       |

*indicates data is not immediately available but could be in 3-5-10 year plan

**Recommendation**

The accountability system should use multiple measures and reflect the skills and knowledge students need to be successful in a variety of post-secondary opportunities.
On-Track Indicators (Elementary and Middle School)

On track indicators are crucial to providing districts and schools feedback about students who are not in position to be college and career ready, and may need additional support and instruction to reach that standard. The crucial difference between the current accountability system and one that includes on-track indicators is that on-track indicators allow a district or school to intervene in a student’s learning before it is too late by providing a timely and accurate assessment of the student’s likely success.

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>3rd Grade Reading</td>
<td>State test score (percent proficient or advanced)</td>
</tr>
<tr>
<td>Attendance</td>
<td>Annual student-level data</td>
</tr>
<tr>
<td>Truancy</td>
<td>Annual student-level data*</td>
</tr>
<tr>
<td>Middle School Dropout Rates</td>
<td>Data currently collected but occurs in very small numbers statewide</td>
</tr>
</tbody>
</table>

*indicates data is not immediately available but could be in 3-5-10 year plan

Research shows that by combining a few simple data points, much can be learned about likely future outcomes for students.² The above indicators represent some of the best practice/current research on how best to inform districts and schools on struggling students.

² The National High School Center has done a number of high profile reports on evaluating student transitions. [http://www.betterhighschools.org/pubs/ews_guide.asp](http://www.betterhighschools.org/pubs/ews_guide.asp). Also, major urban school districts such as Milwaukee and Chicago use so called ‘Early Warning Systems’ that look at future outcomes of students using current data.
Appendix 2 – Crafting a New Accountability System for Wisconsin

**Post-Secondary Readiness** (High School)

Post-secondary readiness is at the heart of this system design. The measures in this priority area are designed to capture student progress on the variety of post-secondary outcomes students will encounter upon exiting K-12 education. These include assessments in preparation for entry into higher education, military service, or a trade/industry certification program. It also includes measures of postsecondary success for previous students to give districts and schools an indication of how the education they provided shaped the outcomes of their students later in life.

### Student Engagement
- Attendance rate
- Truancy rate*
- Dropout rate

### High School Transitions
- Credits earned by end of 9th grade*
- Course failures by end of 9th grade*

### Postsecondary Preparation
- Participation in advanced courses*
- Rate of college credit earned in HS (AP, IB, Dual Credit)*
- Rate of industry certifications*
- Participation rates in AP, ACT, and SAT* exams
- Score on postsecondary readiness exams (AP, ACT, SAT*)
- Military readiness assessment*
- Workforce readiness assessment*
- Graduation rates (cohort and extended)

### Postsecondary Success
- Entrance rates
- Credit accumulation*
- Remediation rates*
- Completion rates
- Workforce entry*

*indicates data is not immediately available but could be in 3-5-10 year plan

Due to the diversity of postsecondary choices, a variety of measures and metrics are necessary to evaluate student access across these arenas, and to evaluate district and school success in preparing students for any and all choices they may make for themselves after exiting K-12 education.

**Recommendation**
Include indicators of post-secondary success that balance multiple pathways and honor both career and college options.
Appendix 2 – Crafting a New Accountability System for Wisconsin

**Closing the Achievement Gap**

The Design Team determined that closing the achievement gap is crucial to ensure that all students have access to equal opportunities upon exiting K-12 education. This is particularly true in Wisconsin where we have significant achievement gaps among racial groups, students with disabilities, and low income students. To make certain we have a priority focus on closing the achievement gap, districts and schools must be held accountable for their efforts to improve equality in education across a number of student subgroups.

### Achievement Gap - Attainment

- Difference between NCLB subgroups in reading and mathematics assessments
- Differences between lowest performing students and other students*

### Achievement Gap - Growth

- Difference between NCLB subgroups in growth to proficiency on reading and mathematics assessments.
- Growth to proficiency of the lowest 25% of performers*

### Achievement Gap - Postsecondary Readiness

- Subgroup differences in graduation rate
- Subgroup differences in postsecondary enrollment*

*indicates data is not immediately available but could be in 3-5-10 year plan

**System Design Beyond the Priority Areas**

As a system, the priority areas and measures selected should benchmark performance against the Common Core State Standards and 21st century skills that are the foundation of college and career readiness. As the accountability system evolves, it should reflect the Design Team values and emphases, as outlined in the guiding principles, and our definition of college and career readiness. That is, as new measures that cover content areas beyond reading and mathematics—such as art, music, physical education, and world languages—and that address 21st century skills become available, they should be incorporated into the system. This is to avoid unintended consequences such as narrowed curriculums, and to enrich the system to better reflect the richness of schools.
Appendix 2 – Crafting a New Accountability System for Wisconsin

**Early Warning Indicators**

The Design Team determined that there is an opportunity to include Early Warning Indicators into the accountability system. Early Warning Indicators can operate at the school, district, and state level. They mark key transition points along a student’s K-12 path, and call attention to potential problems before a student is “lost.”

A variety of the measures and metrics should be considered for use in a statewide early warning system made available to districts and schools. These student level indicators would allow districts to have the necessary information to intervene early in the education of students who are not on track to be career and college ready. As an example, using prior data the state could build a profile of what previous college and career students looked like on a number of measures at different points in time, to demonstrate empirically valid pathways to college and career readiness. Additionally, the state could create an index of these indicators that spans all grades, and report individual student college and/or career readiness estimated from this indicator.

Early warning systems have been used in Chicago Public Schools and other states/districts to help schools employ timely strategies in order to improve student outcomes and meet performance targets. Such a system is also essential to guiding support to the lowest performing schools to help them channel resources and services to individual students, instead of thinking about the student body as a whole, or as cohorts of students in grades.

Using Wisconsin's longitudinal data system and next generation data systems to collect this data is feasible, but new costs associated with reporting Early Warning Indicators would arise. Such a system can be provided as a service to districts and schools by the state in a cost-effective and efficient manner that would greatly improve the usability of data for educators and school leaders to drive educational practices and meet the needs of each student in Wisconsin.

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3 For research supporting early warning systems and the use of high-leverage indicators, please see *Developing Early Warning Systems to Identify Potential High School Dropouts* (http://www.betterhighschools.org/pubs/ews_guide.asp), and *Predictors of In-School and Post-School Success* (http://www.nsttac.org/sites/default/files/assets/pdf/InSchoolPostSchoolPredictorsSuperTable.pdf).
Design Features of Determinations and Reporting

The Design Team wanted to ensure everyone across the education system is making progress and improving no matter where they are—student, teacher, school, district, and state. The focus is not only about everyone moving up, but also moving students who are furthest behind ahead faster in order to close achievement gaps. For this reason, the accountability system should:

- Report performance on the four priority areas. Final accountability determinations will be based on the aggregate score of the four priority areas.

- Place aggregate scores on an index (0-100) that results in both an accountability score and a corresponding rating that determines what level of support, intervention, or reward the school receives.4 Rating categories recommended by the Quad Chairs are as follows:
  
  - Significantly Exceeding Expectations
  - Exceeding Expectations
  - Meeting Expectations
  - Not Meeting Expectations
  - Significantly Below Expectations
  - Persistently Failing to Meet Expectations

- Be designed in consultation with the state's Technical Advisory Committee (TAC) to ensure a valid standard setting process is conducted, and that valid and reliable determinations are made.

- Factor growth and attainment differently depending on a school's performance. Specifically, it was decided to weight growth more heavily for schools with low attainment (i.e. those with low proficiency rates), and structure the system so

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4 There was substantial disagreement over whether a category rating or a letter grade should accompany a school’s accountability score. Those in favor of ratings felt they convey more meaningful information, including actionable information, than a letter grade would; those opposed to ratings felt they obfuscate school performance and unnecessarily complicate designations. Those opposed to grading schools felt grades would be pejorative, reductionist, and a misrepresentation, masking the breadth of what is valued in our schools. Those in favor of grading schools felt letter grades would be transparent and easily understood by parents and the public, and would serve as a galvanizing force to involve the community in improving a school’s standing. Ultimately, as there was no consensus, a vote was taken. More of the Design Team members voted to have a descriptor than a letter grade accompany the accountability score. The quad chairs followed-up on this issue and recommended six category ratings. See Appendix E for further details.
that schools with high attainment are not penalized for small growth rates. This prevents the system from penalizing schools that have high proficiency rates with little room to grow; and emphasizes the need for higher rates of progress in low performing schools that need to “catch up.”

- Report performance of the “all students” category, all student subgroups, and the lowest 25%.

- Use both student growth and proficiency on the English Language Arts (ELA) and mathematics assessments in making annual determinations. These two content areas will be weighed equally within both the growth and proficiency calculations.

- Incorporate science and social studies into the proficiency measures, once assessments in these content areas are available.

- Place schools on a continuum of levels in which support, interventions, and rewards are directly linked and adjusted according to the accountability determinations. Continuous improvement is expected of every school and district.

- Acknowledge the population served by the school and district, but hold all schools accountable for making progress regardless of their student population. While schools that serve high-needs students are not to be exempt from making progress, their population should be taken into consideration when viewing results.

- Produce a report card for every school and district, which includes not only accountability determinations, but also demographic information, course offerings, etc. Include a disclaimer and/or tutorial that will be developed to ensure data interpretations are made appropriately.

- Report multiple years of accountability determinations so that trend data is readily available. Report longitudinal data as much as possible over annual snapshot data.

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5 This psychometric process will be done under the guidance of the state’s Technical Advisory Committee (TAC). Adjustments will be made within category. Clear explanations of weighting and scoring will be provided to enhance transparency.
Appendix 2 – Crafting a New Accountability System for Wisconsin

- Publish report cards online, allowing users to drill into different aspects of school performance for more data. Provide a dashboard detailing performance on each of the four priority areas, as well as comprehensive data covering a variety of student and school factors.

Throughout the process, Design Team members weighed in on the potential design of new report cards. Appendix A includes elementary and high school draft report cards.

**Supports, Interventions and Rewards**

Supporting all schools along the performance continuum is a clear goal of the Design Team. Recognition of high performing schools, conducting diagnostic reviews and directing interventions aligned to the diagnostic review will all be components of the statewide system of support.

A strong accountability system will not, by itself, result in continuous improvement. A parallel system of assistance and intervention is necessary to advance district reform and school improvement. While the district is the entry point for the state’s support work, these decisions on supports, interventions and rewards address the state’s responsibilities:

- State will identify high and low performing schools, and sort them into accountability categories along a continuum based on performance
- State will intervene in persistently low performing schools
- State will conduct diagnostic reviews in persistently low performing schools and require a school improvement plan be developed aligned with the diagnostic review
- State will monitor implementation of improvement plans in low performing schools
- State will use all evidenced-based interventions available
- State will make available a tool for other schools and districts to conduct diagnostic reviews on their own as a form of self-assessment and continuous improvement
- State will observe a sample of high performing schools with model programs and best practices to disseminate and replicate
- State will publicly recognize high performing schools

While it is a design feature that the accountability system will identify the high performing schools as well as the low performing schools, the focus of our statewide system of support will be on the latter.
Diagnostic Review

The first step in addressing low achievement in schools will be a diagnostic review. The state can make the diagnostic review an online tool so that it is freely and readily available to any district or school wishing to conduct a self-assessment. However, for those schools identified as low performing, the district will be required to conduct a diagnostic review. The state or its designee will conduct an in-depth diagnostic review with the lowest performing schools. The diagnostic review must factor in the student population of the school. For example, examining access to instruction for students with disabilities in relation to this group’s performance is critical when conducting reviews. Likewise, examining the student population in light of any special programmatic focus of the school (e.g. dropout prevention schools) in relation to student performance is also critical.

Persistently Low Performing

Persistently low performing public schools will have increased state involvement beginning with a mandatory onsite diagnostic review to identify the problem(s) at the school and district level. Interventions aligned to the findings of that review will be required, as will intensive progress monitoring. As directed state intervention is warranted, these schools and districts will be required to submit an improvement plan addressing the findings of the diagnostic review, and work with the state to monitor progress on the plan.

Specific interventions will vary depending on school type (public, choice, charter), the needs of the school and their specific performance indicators. Examples include extended learning time, targeted reading and math supports, professional development and implementation assistance. In the case of charter schools—namely those chartered with specific pedagogical choices—intervention and support should be mindful of these choices which set the charter school apart.

If, after three years, the school is again identified as persistently low performing, the State Superintendent will intervene. In the case of choice schools, the state will remove the school from the choice program. In the case of charter schools, the authorizer must revoke the charter.

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6 As the Design Team did not reach conclusions on who intervenes, when or how in choice and charter schools, the Quad Chairs followed-up on this issue and recommended these actions. See Appendix F for further details.
Low Performing

Low performing schools will be required to conduct a diagnostic review in collaboration with the district. These schools should form a school leadership team and develop a school improvement plan that specifically addresses the results of the diagnostic review. As found in reviews of best practices, parents should be engaged in the development of the improvement plan. Online (not onsite) monitoring of improvement efforts could be conducted. The state can assist the district by disseminating a bank of supports and interventions that schools/districts could model. These interventions will be evidenced-based best practices, and whenever applicable, drawn from Wisconsin schools with proven track records in the performance area of concern.

High Performing

The top performing schools will be publicly recognized. The state will look to a sample of high performing schools to identify best practices. The state will share best practices statewide, particularly with low and persistently low performing schools that have deficits in specific performance areas. All high performing schools should be recognized regardless of whether they are public, charter or a school in the choice program. While the state will not provide monetary rewards to high performing schools, resources must be budgeted to effectively share best practices statewide.

District Accountability

District accountability will be modeled on the same principles outlined above for school accountability. District performance of all students at the elementary, middle and high school levels will be reported for the same four priority areas. In addition, in order to maintain a focus on turning around the lowest performing schools, districts with any persistently low achieving schools will be identified for improvement.

Improvement efforts at the district-level must not add unnecessary compliance burdens. That is, district improvement efforts should ensure that monitoring of interventions does not become the goal over the interventions themselves.

Recommendation

Just as the state should align resources to help the neediest schools, districts should align resources to help the neediest students.
Appendix 2 – Crafting a New Accountability System for Wisconsin

Moving Forward

Sustainability
This new accountability system reflects the values we share about our schools, and elementary and secondary education in Wisconsin. In order to provide our schools the opportunity to be successful, we have to remain committed to carrying out this vision for education now and into the future. To support and sustain the efforts of the Design Team will require a strong communication plan, engaged stakeholders, and funding to carry out the system recommendations.

Stakeholder Engagement and Strategic Communication
This plan cannot be carried out in isolation; stakeholders must work together moving forward. The state education agency, Wisconsin Department of Public Instruction (DPI), will have primary responsibilities for plan development and implementation. DPI will continue to reach out to stakeholders as work proceeds on implementing the Design Team’s recommendations. DPI will use existing structures and create additional structures as necessary for coordinated communication and stakeholder engagement, including using digital outreach for efficient dissemination of information. DPI will engage stakeholders in the review period for ESEA Flexibility (waiver), in addition to seeking broad public review.

The role of strategic and coordinated communication—both to share information proactively and provide transparency in the process—in developing the next generation accountability system will be critical. Consistent messaging, easy-to-understand “talking points” or over-arching themes will help the public understand the technical and difficult aspects of next generation accountability. Seeking public input and involvement in rollout, development and implementation via piloting/field-testing, surveys, webinars and sharing of “quick wins” will also be important in the critical formative years of this new endeavor. Proactively involving the media will also be a key strategy.

Other Next Steps:
• Develop and improve Diagnostic Review, Supports, Interventions and Rewards structures to implement state accountability system
• Coordinate 1-3 year implementation plan with districts, regional partners, and state professional associations
• Work with Technical Advisory Committee (TAC) to validate the technical aspects of determinations and other psychometric components of the system.
• Integrate new accountability elements into statewide data systems
• Begin integration of aligned initiatives within DPI (Title I, Common Core,

Recommendation
It isn’t the creation of the system that’s important; it is the meaningful use of the system that’s important.
Appendix 2 – Crafting a New Accountability System for Wisconsin

Educator Effectiveness, Response to Intervention (RtI) and Positive Behavioral Interventions and Supports (PBIS), digital learning plan, etc.

- Build comprehensive system for continual professional development on new accountability system to meet the needs of all stakeholders (i.e., urban, rural, small districts; parents/guardians and business/community) and to accelerate learning on critical new components of system
- Design sustainability plan at DPI including organizational, structural, human and material resources

Funding

Many of the most innovative and vital components of the above recommendations are beyond the scope of work going on in Wisconsin today. Implementation of this vision will require rethinking and reorganizing how current accountability work is carried out. It will also require additional resources to expand supports and rewards beyond the limited scope of Federal Title I funding.

The Design Team has approached this process with a shared understanding that these values will be reflected in the allocation of resources for accountability purposes moving forward. Some of the enhancements to the next-generation accountability system are low-cost and high-yield, such as providing on-track indicators and growth modeling. Other, just as important and impactful components, will require a higher level of supportive funding to bring to life, such as on-site diagnostic reviews, targeted, state-directed interventions and new, more comprehensive assessments. In both cases, advancing comprehensive and coherent accountability funding in 2013’s budget and subsequent years is a priority for the Design Team.
Appendix 2 – Crafting a New Accountability System for Wisconsin

**Timeline**

<table>
<thead>
<tr>
<th>Stage 1 Design Phase</th>
<th>Stage 2 Implementation Phase</th>
<th>Stage 3 Operational Phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design Team final report draft</td>
<td>Design Team final report issued</td>
<td>DPI TAC consultation</td>
</tr>
<tr>
<td>Design Team final report issued</td>
<td>DPI TAC consultation</td>
<td>ESEA waiver shared with Design Team and posted for public comment</td>
</tr>
<tr>
<td>DPI TAC consultation</td>
<td>ESEA waiver hearing on ESEA waiver</td>
<td>~January 21, 2012</td>
</tr>
<tr>
<td>Any necessary implementation legislation drafted Spring 2012</td>
<td>DPI submits ESEA waiver to USED</td>
<td>~January 21, 2012</td>
</tr>
<tr>
<td>Next Generation Accountability System field test</td>
<td>Peer review and initial decisions on ESEA waiver</td>
<td>February 21, 2012</td>
</tr>
<tr>
<td>State Superintendent’s 2012-15 budget request</td>
<td>Biennial Budget Debate and Passage</td>
<td></td>
</tr>
<tr>
<td>Governor’s Biennial Budget 2013-15 budget request</td>
<td>February – July 2013</td>
<td></td>
</tr>
<tr>
<td>Next Generation Accountability System determinations applied to 2012-15</td>
<td>New Generation Interventions and Rewards applied</td>
<td></td>
</tr>
<tr>
<td>New state assessments field tested</td>
<td>New state assessments implemented</td>
<td>Spring 2014</td>
</tr>
<tr>
<td>New state assessments implemented</td>
<td></td>
<td>Spring 2015</td>
</tr>
</tbody>
</table>

**Our Commitment**

Collectively we are committed to implementing, evaluating, and sustaining this state accountability system, which prioritizes what we value in education. We believe the system will increase college and career readiness of all Wisconsin students. We recommend the system be fully funded in the next state budget. We will stay engaged as stakeholders committed to successfully implementing this new accountability system for the state of Wisconsin.

The Department of Public Instruction (DPI) will continue to work with stakeholders on the development of an accountability system that fulfills the vision established above and adheres to the guiding principles. DPI will also engage the department’s Technical Advisory Committee in the first half of 2012 to consult on the technical and psychometric issues inherent to transitioning from NCLB to a new accountability system.

We will remain open to enhancements and refinements that improve the validity, reliability and overall effectiveness of Wisconsin’s school and district accountability system.
Pine Creek School | K-8 Charter School
School Report Card | Summary | 2012-13 School Year

School Rating

Meeting Some Expectations

Significantly Exceeding 91-100
Exceeding 76-90
Meeting 61-75
Meeting Some 51-60
Expectations or >60 with ≥1 red flag
Meeting Few 41-50
Expectations
Persistently Failing to Meet Expectations 0-40

Student Accountability Index

Student Achievement 91 / 100
Reading Achievement 46 / 50
Mathematics Achievement 45 / 50

Student Growth 89 / 100
Reading Growth 42 / 50
Mathematics Growth 47 / 50

Closing Achievement Gaps 70 / 100
Achievement Gaps 32 / 50
Growth Gaps 38 / 50

On-Track Indicators 79 / 100
3rd Grade Reading Achievement 24 / 30
8th Grade Math Achievement 22 / 30
Attendance 33 / 40

OVERALL SCHOOL SCORE 82 / 100
School score is the average of the four subscale area scores.

School Accountability Expectations

Index Improvement Goal
This Year’s Goal 75
School Score 82

Test Participation
Minimum Rate 95.0%
Lowest Subgroup 97.4%

Dropout Rate
Maximum Rate 6.0%
School Rate 0.4%

Absenteeism
Maximum Rate 13.0%
School Rate 13.3%

School Rating Determination

Overall School Score 82
Number of Red Flags 1
Meeting Some Expectations

Enrollment 453
Demographics
Race/Ethnicity
American Indian 1%
Asian 7%
Black (not Hispanic) 25%
Hispanic 31%
White (not Hispanic) 36%

Student Groups
Students with Disabilities 27%
Economically Disadvantaged 55%
English Language Learners 31%

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Public schools, charter schools, and private schools participating in a Parental Choice Program operate under different structures. These different types of schools should not be directly compared.
School Rating

Exceeding Expectations

- Significantly Exceeding: 91-100
- Exceeding: 76-90
- Meeting: 61-75
- Meeting Some: 51-60
- Expectations: or >60 with ≥1 red flag
- Persistently Failing to Meet Expectations: 0-40

School Accountability Index

<table>
<thead>
<tr>
<th>Student Achievement</th>
<th>92 / 100</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reading Achievement</td>
<td>47 / 50</td>
</tr>
<tr>
<td>Mathematics Achievement</td>
<td>45 / 50</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Closing Achievement Gaps</th>
<th>72 / 100</th>
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</thead>
<tbody>
<tr>
<td>Achievement Gaps</td>
<td>31 / 50</td>
</tr>
<tr>
<td>Graduation Gaps</td>
<td>41 / 50</td>
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</table>

<table>
<thead>
<tr>
<th>Postsecondary Readiness</th>
<th>94 / 100</th>
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</thead>
<tbody>
<tr>
<td>Graduation</td>
<td>58 / 60</td>
</tr>
<tr>
<td>ACT Performance/Participation</td>
<td>18 / 20</td>
</tr>
<tr>
<td>Attendance</td>
<td>18 / 20</td>
</tr>
</tbody>
</table>

OVERALL SCHOOL SCORE: 86 / 100

School score is the average of the three subscale area scores.

School Accountability Indicators

<table>
<thead>
<tr>
<th>Index Improvement Goal</th>
<th>This Year's Goal</th>
<th>School Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>77</td>
<td>86</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Test Participation</th>
<th>Minimum Rate</th>
<th>Lowest Subgroup</th>
</tr>
</thead>
<tbody>
<tr>
<td>95.0%</td>
<td>96.3%</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Dropout Rate</th>
<th>Maximum Rate</th>
<th>School Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.0%</td>
<td>2.2%</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Absenteeism</th>
<th>Maximum Rate</th>
<th>School Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>13.0%</td>
<td>8.3%</td>
<td></td>
</tr>
</tbody>
</table>

School Rating Determination

- Overall School Score: 86
- Number of Red Flags: 0
- Exceeding Expectations

Enrollment

- 605

Demographics

- Race/Ethnicity
  - American Indian: 2%
  - Asian: 8%
  - Black (not Hispanic): 19%
  - Hispanic: 28%
  - White (not Hispanic): 43%
- Student Groups
  - Students with Disabilities: 29%
  - Economically Disadvantaged: 48%
  - English Language Learners: 28%

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Public schools, charter schools, and private schools participating in a Parental Choice Program operate under different structures. These different types of schools should not be directly compared.


APPENDIX B: Statewide System of Support Matrix

<table>
<thead>
<tr>
<th>Determination Designation</th>
<th>Description</th>
<th>Support and Interventions</th>
<th>Applicability of Intervention by School Type</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Title I Traditional Public</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>✔️</td>
</tr>
</tbody>
</table>
| ISD                        | Highest Performing Schools | Add descriptor here for highest performers | CURRENT: (Total Schools of Recognition)  
  • Schools of Recognition Award and Grants  
  • Spotlight Schools Program, inter district meetings  
  • Title I Schoolwide Programs (includes Spotlight schools)  
  • Characteristics of Successful/District Diagnoses/Screening Processes  
  • District’s needs prioritized in District Diagnoses/Screening Processes | ✔️ | ✔️ | ✔️ | ✔️ |
|                           |             |                           | NEXT-GENERATION ACCOUNTABILITY SYSTEM:  
  • Continues the options above, as funding allows  
  • Accountability funded schools have opportunity to be designated recognized schools  
  • Potentially creates additional categories of schools such as the number and type of schools increase, e.g., high growth  
  • Create opportunities for these schools to partner with identified low performing schools to replicate practices and help drive improvement | ✔️ | ✔️ | ✔️ | ✔️ |
|                           |             |                           | Schools are designated and receive awards, etc. | Table 1 shows schools are designated and receive awards, etc. | ✔️ | ✔️ |
| ISD                        | lowest performing schools | Add descriptor here for schools “on track” or meeting expectations | CURRENT: (Meeting AYP)  
  • Characteristics of Successful/Diagnoses/Screening Processes  
  • CEAs for “Not in Compliance” or “In Compliance”  
  • Technical Assistance  
  • Statewide Professional Development and Technical Assistance  
  • Online Resources (Schools, 7AEP, professional) | ✔️ | ✔️ | ✔️ | ✔️ |
|                           |             |                           | Schools are designated, funding is available to support diagnostic services or monetary rewards for non-Title I schools | Schools are designated, funding is available for Title I eligible charter schools only | ✔️ | ✔️ |
|                           |             |                           | Funding is needed to support diagnostic services or monetary rewards for non-Title I charter schools | Schools are designated, funding is needed to support diagnostic services or monetary rewards for Title I eligible charter schools only | ✔️ | ✔️ |
|                           |             |                           | Legal issues may provide tiered-directed diagnostic services, or additional monetary awards to provide schools | ✔️ | ✔️ | ✔️ | ✔️ | ✔️ | ✔️ | ✔️ | ✔️ |

WORKING DRAFT
### APPENDIX C: Measures for Reporting and Data Availability

<table>
<thead>
<tr>
<th>Measures-Metrics</th>
<th>Reporting</th>
<th>Year 1</th>
<th>Year 3</th>
<th>Year 5</th>
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<tr>
<td><strong>Student Attainment</strong></td>
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<tr>
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<tr>
<td>Science (4th, 8th, 10th grade)</td>
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<tr>
<td><strong>Student Growth (Grades 3-8)</strong></td>
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<td>Math</td>
<td>State test-growth score</td>
<td>WKCE</td>
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<td>SBAC</td>
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<tr>
<td><strong>Student Growth (High School)</strong></td>
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<td>Purchase ACT Assessments?</td>
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<td><strong>End-of-course assessments</strong></td>
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<td>New Test?</td>
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<td>SBAC</td>
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<td>New Test</td>
</tr>
<tr>
<td>Achievement Gap-Postsecondary entrance</td>
<td>Graduation rates, Dropout rates, postsecondary entrance rates</td>
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</tr>
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<td><strong>On-Track Indicators (3-8)</strong></td>
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<tr>
<td>On Grade Level</td>
<td>District benchmark tests</td>
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<tr>
<td>3rd Grade Reading</td>
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<tr>
<td>Student Attendance</td>
<td>Attendance rate (school, class, etc.)</td>
<td>Yes-annual</td>
<td>Yes-annual</td>
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<tr>
<td>Truancy rate</td>
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<tr>
<td>Dropout rates</td>
<td>Yes</td>
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<td><strong>Postsecondary Readiness (9-12)</strong></td>
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<td>Attendance rate (school, class, etc.)</td>
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<td>Yes-annual</td>
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<td>Truancy rate</td>
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<td>Dropout rates</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td>Postsecondary preparation</td>
<td>Participation rates in advanced courses</td>
<td>CWCS</td>
<td>CWCS</td>
<td>SIS</td>
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<tr>
<td>Rates of college credit earned in HS: AP, IB, Dual credit</td>
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<td>CWCS</td>
<td>SIS</td>
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<td>Rates of industry/trade certification in HS</td>
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<tr>
<td>Participation rates of postsecondary exams: ACT, SAT</td>
<td>ACT Only</td>
<td>ACT Only</td>
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<tr>
<td>Average scores on postsecondary exams</td>
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<td>ACT Only</td>
<td>ACT Only</td>
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<tr>
<td>Military readiness assessment</td>
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<tr>
<td>Workforce readiness assessment</td>
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<td>Graduation rates</td>
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<tr>
<td>Extended graduation rates</td>
<td>Yes</td>
<td>Yes</td>
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<td>Postsecondary success</td>
<td>Postsecondary entrance rates</td>
<td>NSC</td>
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<td>College credit accumulation</td>
<td>NSC</td>
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<td>SIS</td>
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<td>Postsecondary remediation rates</td>
<td>NSC</td>
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<td>SIS</td>
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<td>Postsecondary completion</td>
<td>NSC</td>
<td>NSC</td>
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<tr>
<td>Workforce entry</td>
<td>SIS?</td>
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</table>

**School Environment**
<table>
<thead>
<tr>
<th><strong>Behavioral incidents</strong></th>
<th><strong>Discipline data by type</strong></th>
<th><strong>Yes-snapshot</strong></th>
<th><strong>Yes-snapshot</strong></th>
<th><strong>Yes-snapshot</strong></th>
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</thead>
<tbody>
<tr>
<td><strong>Safety</strong></td>
<td>Rate of violent suspensions</td>
<td>Yes</td>
<td>Yes</td>
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<td><strong>Course selection</strong></td>
<td>Course availability</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td></td>
<td>Course participation</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td><strong>Extra and Co-Curricular</strong></td>
<td>Availability and participation rates</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td><strong>Access to PE, Music, Art, etc.</strong></td>
<td>Availability and participation rates</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td><strong>Career exploration</strong></td>
<td>Descriptive: testing, planning, etc</td>
<td>Statewide Surveys</td>
<td>Yes</td>
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<tr>
<td><strong>Vocational opportunities: Program, course, internship, etc.</strong></td>
<td>Availability and participation rates</td>
<td>Yes</td>
<td>Yes</td>
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<tr>
<td><strong>Intervention services</strong></td>
<td>Availability and participation rates</td>
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<tr>
<td><strong>Engagement/Involvement</strong></td>
<td>Teacher, parent, student surveys</td>
<td>Statewide Surveys</td>
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<td><strong>Interactions</strong></td>
<td>Teacher, parent, student surveys</td>
<td>Statewide Surveys</td>
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<td><strong>Educator Effectiveness</strong></td>
<td>Results from EE system</td>
<td>EE System</td>
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<tr>
<td><strong>Leader Effectiveness</strong></td>
<td>Results from EE system</td>
<td>EE System</td>
<td>EE System</td>
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<table>
<thead>
<tr>
<th><strong>School Context</strong></th>
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<tbody>
<tr>
<td><strong>School Type</strong></td>
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<td><strong>School Demographics</strong></td>
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<tr>
<td><strong>Student Demographics</strong></td>
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<td><strong>Feeder patterns</strong></td>
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## APPENDIX D: Measures for Determinations and Data Availability

<table>
<thead>
<tr>
<th>Measures-Metrics</th>
<th>Determinations</th>
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<tbody>
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<td>Year 1</td>
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<tr>
<td>Achievement-Participation</td>
<td>State test-participation rate</td>
</tr>
<tr>
<td>Reading/ELA</td>
<td>State test-attainment score</td>
</tr>
<tr>
<td>Math</td>
<td>State test-attainment score</td>
</tr>
<tr>
<td>Science (4th, 8th, 10th grade)</td>
<td>State test-attainment score</td>
</tr>
<tr>
<td>Social Studies (4th, 8th, 10th grade)</td>
<td>State test-attainment score</td>
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<tr>
<td><strong>Student Growth (Grades 3-8)</strong></td>
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<tr>
<td>Reading/ELA</td>
<td>State test-growth score</td>
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<tr>
<td>Math</td>
<td>State test-growth score</td>
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<tr>
<td><strong>Student Growth (High School)</strong></td>
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<tr>
<td>Explore-PLAN-ACT</td>
<td>ACT test-growth score</td>
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<td><strong>End-of-course assessments</strong></td>
<td>Assessment-growth score</td>
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<td><strong>Gap</strong></td>
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<tr>
<td>Achievement Gap-Reading</td>
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<td>Achievement Gap-Science</td>
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<td>Achievement Gap-Postsecondary entrance</td>
<td>Graduation rates, Dropout rates, postsecondary entrance rates</td>
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<td><strong>On-Track Indicators (3-8)</strong></td>
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<td>3rd Grade Reading</td>
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<td>Attendance rate (school, class, etc.)</td>
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<tr>
<td>Dropout rates</td>
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<td><strong>Postsecondary Readiness (9-12)</strong></td>
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<td>Postsecondary completion</td>
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</table>
| Workforce entry | SIS?
APPENDIX E: Measures for Determinations and Data Availability

Note: The following are recommendations from the Quad Chairs. These recommendations were made after the final Design Team meeting, but as next steps, they grew from the Design Team discussions.

School and District Accountability Design Team
Quad Chair Decision Items

I. Persistently Lowest Performing Schools – Traditional Public Schools

Design Team Consensus: Based on a review of the meeting notes and the homework, the Design Team agreed that those schools which are initially identified as being among the persistently lowest performing in the state should be required to implement state-directed action.

A. Implementation of initial school-level identification

To carry out the Design Team recommendations, the state will conduct a mandatory on-site diagnostic review to identify the problem(s) at the school and district level. After participation in the state-conducted diagnostic review, the school must determine whether to implement one of two options:

(1) Contract with a state-approved independent expert and/or vendor to implement a turnaround model based on the recommendations of the diagnostic review. The school will have three years to implement the state-driven actions and demonstrate improved performance. These recommended actions could include, but are not limited to:

   a. Mandatory new scientific-research based curriculum in the school and/or the district, along with required screening, assessments, interventions, and necessary professional development;

   b. Replacement of the school staff and/or school leadership;

   c. Opening as a charter school, including through a contract with a charter management organization that has a proven track record of success in turning around low performing schools. The organization must be selected after a rigorous review process approved by DPI, and the State Superintendent must approve the selection of the charter operator.

(2) Close

B. Implementation of subsequent school-level identification

If a traditional public school is identified again after three years of targeted, state-directed intervention and has not demonstrated adequate improvement, the State Superintendent
will utilize his or her intervention authority under Ch. 118.42 to appoint a special master to direct the activities of the school. These activities could include, but are not limited to, directing that the school board reopen the school under a contract with a charter management organization that has a proven track record of success in turning around low performing schools, is selected after a rigorous review process approved by the state, and is approved by the State Superintendent; or closure of the school.

C. Implementation of district-level identification

For persistently low performing districts, a DPI contracted expert will complete a diagnostic review at the LEA level to evaluate critical systems and structures within the district’s central office that include human resources, curriculum and instruction, finance, leadership. Based on diagnostic review, the State Superintendent will direct reform at the LEA level in addition to reforms at the school level. The district would work closely with the turnaround expert in implementing the required reforms. Schools would continue to implement improvements based on DPI Corrective Action Requirements.

II. Persistently Lowest Performing Schools – Charter Schools

Design Team Consensus: For development of the state’s next generation accountability system, the Design Team generally agreed that a charter school should be subject to having their charter contract removed if it is among the persistently lowest performing schools in the state. Further, some members of the Design Team raised concerns that it was not appropriate for the state to direct a charter school to implement a particular curriculum.

A. Implementation of Initial School-Level Identification

After the school has been in operation for at least three years, and the school is initially identified as being among the persistently lowest performing schools in the state, the charter school authorizer will implement one of three options:

Option 1: The charter school (or its authorizer) must enter into a performance agreement with the Department of Public Instruction in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years. If annual performance targets are not met, the charter is revoked. To meet these rigorous performance benchmarks, the charter school authorizer may contract with a charter management organization that has a demonstrated record of success to implement any necessary reforms, or the charter school board may seek a different authorizer to implement the reforms.

Option 2: The Department of Public Instruction will conduct a mandatory on-site diagnostic review to identify the problem(s) at the school and authorizer level. After participation in the state-conducted review, the charter school authorizer must implement one of two options with respect to the school consistent with the findings and recommendations of the diagnostic review:
Appendix 2 – Crafting a New Accountability System for Wisconsin

a. Contract with a state-approved independent expert/vendor to implement a turnaround model based on the recommendations of the diagnostic review. These recommendations could include, but are not limited to, mandatory new scientific-research based curriculum in the school and/or the district, along with required screening, assessments, interventions and necessary professional development; replacement of the school staff and/or school leadership; or closing and restarting the school under a contract with a charter management organization that has a demonstrated record of school improvement to manage the school’s improvement activities.

b. Revoke the charter

Option 3: In lieu of implementing either of these two options, the charter authorizer may instead elect to immediately revoke the charter.

B. Implementation of Subsequent School-Level Identification and Authorizer Requirements

If the persistently low-performing charter school has not demonstrated adequate improvement after three years of either a turnaround model or a performance contract, the authorizer must revoke the charter. No authorizer may renew a charter if the school is persistently low performing. Relevant state law and new or, to the extent permissible, existing charter school contracts must be updated to reflect these requirements.

III. Persistently Lowest Performing Schools – Choice Schools

Design Team Consensus: The Design Team agreed as a guiding principle that all schools – traditional public, choice, and charter – should be part of the new accountability system. They also agreed, in principle, that choice schools should participate in the diagnostic reviews process and that, if a choice school is persistently lowest performing, the school should be removed from the program.

A. Implementation of Initial School-Level Identification

After the choice school has been in operation for at least three years, and the school is initially identified as being among the persistently lowest performing schools in the state, the choice school will implement one of the following three options:

Option 1: The choice school must enter into a performance agreement with the Department of Public Instruction in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years. If annual performance targets are not met, the school shall no longer participate in the choice program.

Option 2: The Department of Public Instruction will conduct a mandatory on-site diagnostic
review to identify the problem(s) at the school and authorizer level. The cost of the diagnostic review will be funded by the choice school. After participation in the state-conducted review, choice school must implement one of two options with respect to the school consistent with the findings and recommendations of the diagnostic review:

a. Contract with a state-approved independent expert/vendor to implement a turnaround model based on the recommendations of the diagnostic review. These recommendations could include, but are not limited to, mandatory new scientific-research based curriculum in the school and/or the district, along with required screening, assessments, interventions and necessary professional development; replacement of the school staff and/or school leadership; or closing and restarting the school under a contract with a charter management organization that has a demonstrated record of school improvement to manage the school’s improvement activities.

b. Discontinue participation in the choice program.

Option 3: In lieu of implementing either of these options, the choice school may elect to immediately discontinue participation in the program.

B. Implementation of subsequent-school level identification

If the persistently low-performing choice school has not demonstrated adequate improvement after three years of either a turnaround model or a performance contract, the state must discontinue the school’s participation in the choice program.

IV. School Performance Categories

Design Team Consensus: The design team agreed that the focus of the new system should be on placing schools in a continuum of levels, with continuous improvement expected for all students. A school’s report card would be based on four priority areas (attainment; growth; CCR or “on track” measures; and closing achievement gaps), and final accountability determinations will be based on the aggregate score of the four priority areas. The Design Team agreed to place aggregate scores on an index (0-100) that results in both an accountability score and a corresponding rating that determines what level of support, intervention, or reward the school receives.

A. Implementation of School Performance Categories

Consistent with our Design Team discussions and relevant research on rating categories, DPI will adopt six school performance categories that will allow differentiation of schools along a continuum. The standards for each of these levels will be based on the accountability index proposed by the Design Team, and will be developed through the standards setting process run by DPI’s Technical Advisory Committee. The performance categories will be as follows:
Appendix 2 – Crafting a New Accountability System for Wisconsin

<table>
<thead>
<tr>
<th>Accountability Rating*</th>
<th>Includes a subset for Federal waiver purposes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Significantly Exceeding Expectations</td>
<td>Reward Schools, Spotlight Schools</td>
</tr>
<tr>
<td>Exceeding Expectations</td>
<td></td>
</tr>
<tr>
<td>Meeting Expectations</td>
<td></td>
</tr>
<tr>
<td>Not Meeting Expectations</td>
<td>Focus Schools</td>
</tr>
<tr>
<td>Significantly Below Expectations</td>
<td>Focus Schools</td>
</tr>
<tr>
<td>Persistently Failing to Meet Expectations</td>
<td>Priority Schools</td>
</tr>
</tbody>
</table>

*School cannot be in top three categories if the school missed its annual measurable objective. School cannot be in the top category if low in any of the four Priority Areas.

**The Title I levels required by the ESEA waiver (reward, focus, priority) are included as a subset of these proposed categories, but will also include other schools.

V. ADDITIONAL ITEMS

- DPI will continue to use full academic year for all schools’ accountability determinations.
- DPI will provide a link to each school’s website on the accountability report card.
- DPI’s accountability index and the associated standard setting process will expect growth along the spectrum of performance to the extent possible within the parameters of the assessment.
- DPI will require (or state law will be changed to require) schools to display their report cards prominently on their website’s homepage.
- DPI will have a process for continuous review and improvement of the accountability system, including any necessary revisions to the standards applied to accountability ratings. There will be no “automatic trigger” to change standards in state law.
- DPI will produce the report card on an annual basis as soon as possible in alignment with applicable assessment and data collection timelines. Further discussion will be had about options available to students given the timing of the report card and whether any open enrollment changes are needed.
### School and District Accountability Design Team Members

<table>
<thead>
<tr>
<th>Name</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Chairs</strong></td>
<td></td>
</tr>
<tr>
<td>Governor Scott Walker</td>
<td>Governor</td>
</tr>
<tr>
<td>State Superintendent Tony Evers</td>
<td>Department of Public Instruction</td>
</tr>
<tr>
<td>Senator Luther Olsen</td>
<td>Senate Education Committee, Chair</td>
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# School and District Accountability Design Team Members

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Foreword


The adoption of the Common Core State Standards capped a one year effort led by the Council of Chief State School Officers (CCSSO) and the National Governors Association Center for Best Practices (NGA) to define K-12 academic standards that are aligned with college and work expectations, inclusive of rigorous content and application, and are internationally benchmarked. Staff from state departments of education reviewed and provided feedback on early drafts leading to a public comment period for citizens and educators. As of June 2011, 42 states have adopted the Common Core State Standards in this voluntary effort to bring academic consistency across the states.

Adoption of the standards, however, is the easy task. Implementing them through engaging instruction coupled with rigorous learning activities and assessment is the hard work. I applaud the efforts that are underway at the DPI, local school districts, Cooperative Educational Service Agencies (CESAs), professional organizations, and colleges and universities to bring the Common Core State Standards to teachers across Wisconsin.

The first step to implementation requires that teachers know and understand the Common Core State Standards. This document provides guidance on the relationship between the Common Core State Standards and our vision of Every Child a Graduate, supporting all students through Response to Intervention, and the responsibility that all teachers have for developing reading, writing, thinking, speaking, and listening skills.

One of the most distinguishing features of the Common Core State Standards is the emphasis directed to literacy in all of the disciplines. For students to be career and college ready, they must be proficient in reading and writing complex informational and technical text. This means that instruction in every classroom focuses on both the content and the reading and writing skills that students need to demonstrate learning in the discipline.

To support and ensure implementation, we will partner with school districts, universities, professional organizations, CESAs, and CCSSO to develop curriculum resources and highlight effective practices. Wisconsin educators are the best, both in their content knowledge and commitment to high-quality instruction. Combining helpful resources with effective practices used by quality educators leads to success for Wisconsin students.

Tony Evers, PhD
State Superintendent
Acknowledgements

A special thanks to the Council of Chief State School Officers and the National Governors Association for having the vision to undertake the massive state-led project, the Common Core State Standards.

Thanks to Great Lakes West Comprehensive Center and Director Linda Miller for the generous support of Wisconsin’s standards projects, and to Rachel Trimble and Beth Ratway for their guidance during the last year.

Thanks also to the CESA Statewide Network and Commissioner Jesse Harness for partnering to keep the CCSS message consistent statewide, and to the CESA School Improvement Specialists Network for their role in producing and providing high quality professional development statewide.

Also thanks to the many staff members across divisions and teams at DPI who have collaboratively contributed their time and talent to this project.

Finally, a special thanks to Wisconsin educators and citizens who provided public comment and feedback to drafts of the Common Core State Standards, served on statewide standards leadership groups, and supported implementation of standards.

Purpose of the Document

To assist Wisconsin education stakeholders in understanding and implementing the Common Core State Standards (CCSS), Wisconsin Department of Public Instruction (DPI) has developed guidance to be used along with the CCSS. These materials are intended to provide further direction and should not be viewed as administrative rule. This publication provides a vision for student success, guiding principles for teaching and learning, and locates the standards within a multi-level system of support where high quality instruction, balanced assessment, and collaboration function together for student learning. Information on the design and content of the CCSS is included, as is a guide to assist with facilitating local conversations about these internationally-benchmarked standards and how they impact instruction.
Aligning for Student Success

To build and sustain schools that support every student in achieving success, educators must work together with families, community members, and business partners to connect the most promising practices in the most meaningful contexts. Major statewide initiatives focus on high school graduation, Response to Intervention (RtI), and the Common Core State Standards for English Language Arts, Disciplinary Literacy, and Mathematics. While these are often viewed as separate efforts or initiatives, each of them is connected to a larger vision of every child graduating college and career ready. The graphic below illustrates how these initiatives function together for a common purpose. Here, the vision and set of guiding principles form the foundation for building a supportive process for teaching and learning rigorous and relevant content. The following sections articulate this integrated approach to increasing student success in Wisconsin schools and communities.

A Vision: Every Child a Graduate

In Wisconsin, we are committed to ensuring every child is a graduate who has successfully completed a rigorous, meaningful, 21st century education that will prepare him or her for careers, college and citizenship. Though our public education system continues to earn nation-leading graduation rates, a fact we can be proud of, one in ten students drop out of school, achievement gaps are too large, and overall achievement could be even higher. This vision for every child a graduate guides our beliefs and approaches to education in Wisconsin.

Guided By Principles

All educational initiatives are guided and impacted by important and often unstated attitudes or principles for teaching and learning. The Guiding Principles for Teaching and Learning emerge from research and provide the touchstone for practices that truly affect the vision of every child a graduate prepared for college and career. When made transparent, these principles inform what happens in the classroom, the implementation and evaluation of programs, and most important, remind us of our own beliefs and expectations for students.
Ensuring a Process for Student Success

To ensure that every child in Wisconsin graduates prepared for college and career, schools need to provide high quality instruction, balanced assessment and collaboration reflective of culturally responsive practices. The Wisconsin Response to Intervention (RtI) framework helps to organize the components of a system designed to support student learning. Below, the three essential elements of high quality instruction, balanced assessment and collaboration interact within a multi-level system of support to ensure each student receives what he or she needs to access higher levels of academic and behavioral success.

At the school or district level, programs, initiatives and practices related to high quality instruction, balanced assessment and collaboration can be more powerful when organized or braided to function systemically to support all students. The focus must be on a comprehensive approach to student learning.

Connecting to Content: The Common Core State Standards

Within this vision for increased student success, rigorous, internationally-benchmarked academic standards provide the content for high quality curriculum and instruction, and for a balanced assessment system aligned to those standards. With the adoption of the CCSS, Wisconsin has the tools to build world-class curriculum, instruction and assessments for greater student learning. The CCSS articulate what we teach so that educators can focus on how instruction can best meet the needs of each student. When implemented within a multi-level system of support, the CCSS can help to ensure that every child will graduate prepared for college, work and a meaningful life.

“Educators must work together with families, community members, and business partners to connect the most promising practices in the most meaningful contexts.”
Guiding Principles for Teaching and Learning

These guiding principles are the underpinnings of effective teaching and learning for every Wisconsin teacher and every Wisconsin student. They are larger than any one initiative, process or set of standards. Rather, they are the lens we look through as we identify teaching and learning standards, design assessments and determine what good instruction looks like. These principles recognize that every student has the right to learn and are built upon three essential elements: high quality instruction, balanced assessment, and collaboration. They are meant to align with academic excellence, rigorous instruction, and college and career readiness for every Wisconsin student. For additional research, resources and probing questions to support professional learning on the six principles, please see the Wisconsin Research and Resources section of this document.

Every student has the right to learn.
It is our collective responsibility as an education community to make certain each child receives a high-quality, challenging education designed to maximize potential, an education that reflects and stretches his or her abilities and interests. This belief in the right of every child to learn forms the basis of equitable teaching and learning. The five principles that follow cannot exist without this commitment guiding our work.

Instruction must be rigorous and relevant.
To understand the world in which we live, there are certain things we all must learn. Each school subject is made up of a core of essential knowledge that is deep, rich, and vital. Every student, regardless of age or ability, must be taught this essential knowledge. What students learn is fundamentally connected to how they learn, and successful instruction blends the content of a discipline with processes of an engaging learning environment that changes to meet the dynamic needs of all students.

Purposeful assessment drives instruction and affects learning.
Assessment is an integral part of teaching and learning. Purposeful assessment practices help teachers and students understand where they have been, where they are, and where they might go next. No one assessment can provide sufficient information to plan teaching and learning. Using different types of assessments as part of instruction results in useful information about student understanding and progress. Educators should use this information to guide their own practice and in partnership with students and their families to reflect on learning and set future goals.

Learning is a collaborative responsibility.
Teaching and learning are both collaborative processes. Collaboration benefits teaching and learning when it occurs on several levels: when students, teachers, family members, and the community collectively prioritize education and engage in activities that support local schools, educators, and students; when educators collaborate with their colleagues to support innovative classroom practices and set high expectations for themselves and their students; and when students are given opportunities to work together toward academic goals in ways that enhance learning.

Students bring strengths and experiences to learning.
Every student learns. Although no two students come to school with the same culture, learning strengths, background knowledge, or experiences, and no two students learn in exactly the same way, every student’s unique personal history enriches classrooms, schools, and the community. This diversity is our greatest education asset.

Responsive environments engage learners.
Meaningful learning happens in environments where creativity, awareness, inquiry, and critical thinking are part of instruction. Responsive learning environments adapt to the individual needs of each student and encourage learning by promoting collaboration rather than isolation of learners. Learning environments, whether classrooms, schools, or other systems, should be structured to promote engaged teaching and learning.
Reaching Every Student; Reaching Every Discipline

Reaching Every Student
The CCSS set high, clear and consistent expectations for all students. In order to ensure that all students can meet and exceed those expectations, Wisconsin educators provide flexible and fluid support based on student need. Each student brings a complex system of strengths and experiences to learning. One student may have gifts and talents in mathematics and need additional support to reach grade-level standards in reading. A student may be learning English as a second language while remaining identified for gifted services in science. The following statements provide guidance for how to ensure that the CCSS provide the foundation for learning for every student in Wisconsin, regardless of their unique learning needs.

Application of Common Core State Standards for English Language Learners
The National Governors Association Center for Best Practices and the Council of Chief State School Officers strongly believe that all students should be held to the same high expectations outlined in the Common Core State Standards. This includes students who are English language learners (ELLs). However, these students may require additional time, appropriate instructional support, and aligned assessments as they acquire both English language proficiency and content area knowledge.

ELLs are a heterogeneous group with differences in ethnic background, first language, socioeconomic status, quality of prior schooling, and levels of English language proficiency. Effectively educating these students requires pre-assessing each student instructionally, adjusting instruction accordingly, and closely monitoring student progress. For example, ELLs who are literate in a first language that shares cognates with English can apply first-language vocabulary knowledge when reading in English; likewise ELLs with high levels of schooling can often bring to bear conceptual knowledge developed in their first language when reading in English. However, ELLs with limited or interrupted schooling will need to acquire background knowledge prerequisite to educational tasks at hand. Additionally, the development of native-like proficiency in English takes many years and may not be achieved by all ELLs especially if they start schooling in the US in the later grades. Teachers should recognize that it is possible to achieve the standards for reading and literature, writing and research, language development and speaking and listening without manifesting native-like control of conventions and vocabulary.

English Language Arts
The Common Core State Standards for English Language Arts (ELA) articulate rigorous grade-level expectations in the areas of reading, writing, speaking, listening to prepare all students to be college and career ready, including English language learners. Second-language learners also will benefit from instruction about how to negotiate situations outside of those settings so they are able to participate on equal footing with native speakers in all aspects of social, economic, and civic endeavors.

ELLs bring with them many resources that enhance their education and can serve as resources for schools and society. Many ELLs have first language and literacy knowledge and skills that boost their acquisition of language and literacy in a second language; additionally, they bring an array of talents and cultural practices and perspectives that enrich our schools and society. Teachers must build on this enormous reservoir of talent and provide those students who need it with additional time and appropriate instructional support. This includes language proficiency standards that teachers can use in conjunction with the ELA standards to assist ELLs in becoming proficient and literate in English. To help ELLs meet high academic standards in language arts it is essential that they have access to:

- Teachers and personnel at the school and district levels who are well prepared and qualified to support ELLs while taking advantage of the many strengths and skills they bring to the classroom;
- Literacy-rich school environments where students are immersed in a variety of language experiences;
- Instruction that develops foundational skills in English and enables ELLs to participate fully in grade-level coursework;
• Coursework that prepares ELLs for postsecondary education or the workplace, yet is made comprehensible for students learning content in a second language (through specific pedagogical techniques and additional resources);

• Opportunities for classroom discourse and interaction that are well-designed to enable ELLs to develop communicative strengths in language arts;

• Ongoing assessment and feedback to guide learning; and

• Speakers of English who know the language well enough to provide ELLs with models and support.

Application to Students with Disabilities

The Common Core State Standards articulate rigorous grade-level expectations in the areas of mathematics and English language arts. These standards identify the knowledge and skills students need in order to be successful in college and careers.

Students with disabilities, students eligible under the Individuals with Disabilities Education Act (IDEA), must be challenged to excel within the general curriculum and be prepared for success in their post-school lives, including college and/or careers. These common standards provide an historic opportunity to improve access to rigorous academic content standards for students with disabilities. The continued development of understanding about research-based instructional practices and a focus on their effective implementation will help improve access to mathematics and English language arts (ELA) standards for all students, including those with disabilities. Students with disabilities are a heterogeneous group with one common characteristic: the presence of disabling conditions that significantly hinder their abilities to benefit from general education (IDEA 34 CFR §300.39, 2004). Therefore, how these high standards are taught and assessed is of the utmost importance in reaching this diverse group of students.

In order for students with disabilities to meet high academic standards and to fully demonstrate their conceptual and procedural knowledge and skills in mathematics, reading, writing, speaking and listening (English language arts), their instruction must incorporate supports and accommodations, including:

• Supports and related services designed to meet the unique needs of these students and to enable their access to the general education curriculum (IDEA 34 CFR §300.34, 2004).

• An Individualized Education Program (IEP) which includes annual goals aligned with and chosen to facilitate their attainment of grade-level academic standards.

• Teachers and specialized instructional support personnel who are prepared and qualified to deliver high-quality, evidence-based, individualized instruction and support services.

Promoting a culture of high expectations for all students is a fundamental goal of the Common Core State Standards. In order to participate with success in the general curriculum, students with disabilities, as appropriate, may be provided additional supports and services, such as:

• Instructional supports for learning, based on the principles of Universal Design for Learning (UDL), which foster student engagement by presenting information in multiple ways and allowing for diverse avenues of action and expression.

• Instructional accommodations (Thompson, Morse, Sharpe & Hall, 2005), changes in materials or procedures, which do not change the standards but allow students to learn within the framework of the Common Core.

• Assistive technology devices and services to ensure access to the general education curriculum and the Common Core State Standards.

Some students with the most significant cognitive disabilities will require substantial supports and accommodations to have meaningful access to certain standards in both instruction and assessment, based on their communication and academic needs. These supports and accommodations should ensure that students receive access to multiple means of learning and opportunities to demonstrate knowledge, but retain the rigor and high expectations of the Common Core State Standards.
Implications for the Common Core State Standards for Students with Gifts and Talents

The CCSS provide a roadmap for what students need to learn by benchmarking expectations across grade levels. They include rigorous content and application of knowledge through higher-order skills. As such, they can serve as a foundation for a robust core curriculum, however, students with gifts and talents may need additional challenges or curricular options. In order to recognize what adaptations need to be made or what interventions need to be employed, we must understand who these students are.

According to the National Association for Gifted Children (2011), “Giftedness, intelligence, and talent are fluid concepts and may look different in different contexts and cultures” (para. 1). This means that there are students that demonstrate high performance or have the potential to do so in academics, creativity, leadership, and/or the visual and performing arts. Despite this diversity there are common characteristics that are important to note.

Students with gifts and talents:
• Learn at a fast pace.
• Are stimulated by depth and complexity of content.
• Make connections.

These traits have implications for how the Common Core State Standards are used. They reveal that as curriculum is designed and instruction is planned there must be:

• Differentiation based on student readiness, interest, and learning style:
  – Pre-assessing in order to know where a student stands in relation to the content that will be taught (readiness), then teach those standards that the student has not mastered and enrich, compact, and/or accelerate when standards have been mastered. This might mean using standards that are beyond the grade level of the student.
  – Knowledge of our students so we are familiar with their strengths, background knowledge, experiences, interests, and learning styles.

  – Flexible grouping to provide opportunities for students to interact with peers that have similar abilities, similar interests, and similar learning styles (homogenous grouping), as well as different abilities, different interests, and different learning styles (heterogeneous grouping).

• Differentiation of content, process, and product.
  – Use of a variety of materials (differentiating content) to provide challenge. Students may be studying the same concept using different text and resources.
  – Variety of tasks (differentiating process). For example in a science lesson about the relationship between temperature and rate of melting, some students may use computer-enhanced thermometers to record and graph temperature so they can concentrate on detecting patterns while other students may graph temperature at one-minute intervals, then examine the graph for patterns.
  – Variety of ways to demonstrate their learning (differentiating product). These choices can provide opportunities for students with varying abilities, interests, and learning styles to show what they have discovered.

• Adjustment to the level, depth, and pace of curriculum.
  – Compact the curriculum to intensify the pace.
  – Vary questioning and use creative and critical thinking strategies to provide depth.
  – Use standards beyond the grade level of the students. Since the CCSS provide a K-12 learning progression, this is easily done.
  – Accelerate subject areas or whole grades when appropriate.

• Match the intensity of the intervention with the student’s needs. This means that we must be prepared to adapt the core curriculum and plan for a continuum of services to meet the needs of all students, including those with gifts and talents.
References

Individuals with Disabilities Education Act (IDEA), 34 CFR §300.34 (a). (2004).


Reaching Every Discipline
Wisconsin’s Approach to Disciplinary Literacy

Background
In Wisconsin, we hold the vision that every child must graduate ready for post-secondary education and the workforce. To achieve this vision, students must develop the skills to think, read, communicate, and perform in many academic contexts. If students must develop these specific skills, every educator must then consider how students learn to read, write, think, speak and listen in their discipline.

The kinds of reading, writing, thinking, speaking and listening required in a marketing course are quite different when compared with the same processes applied in an agriculture, art or history course. For example, a student may have successfully learned the vocabulary and content needed to score an A on a freshman biology test, but finds he still struggles to understand relevant articles from *Popular Science Magazine*, or use his science vocabulary to post respected responses on an environmental blog he reads at home. This student knows biology content, but lacks the disciplinary literacy to think, read, write, and speak with others in this field. Without this ability, his content knowledge is limited only to the classroom, and cannot extend to the real world around him.

In Wisconsin, disciplinary literacy is defined as the confluence of content knowledge, experiences, and skills merged with the ability to read, write, listen, speak, think critically and perform in a way that is meaningful within the context of a given field.

Teaching for disciplinary literacy ensures that students develop the skills to use the deep content knowledge they learn in school in ways that are relevant to each of them, and to the world around them.

In 2009, *The State Superintendent’s Adolescent Literacy Plan* offered recommendations for how to begin professional conversations about disciplinary literacy in Wisconsin. The plan recommended Wisconsin write standards for literacy that were specific to each discipline, and emphasized the need to accompany these literacy standards with discipline-specific professional learning.

Wisconsin’s Approach to Disciplinary Literacy
In 2010, the Council of Chief State School Officers (CCSSO) responded to this need for standards by publishing Common Core State Standards for Literacy in History/Social Studies, Science and Technical Subjects in grades 6-12. These standards were adopted by State Superintendent Tony Evers in June 2010. Wisconsin applauds this bold move to begin a national conversation on disciplinary literacy, and recognizes the need to broaden this effort to include all disciplines, and every educator in every grade level.

The ability to read, write, think, speak, and listen, in different ways and for different purposes begins early and becomes increasingly important as students pursue specialized fields of study in high school and beyond. These abilities are as important in mathematics, engineering and art courses as they are in science, social studies and English.

To further solidify Wisconsin’s expanded approach to disciplinary literacy, a statewide leadership team comprised of K-16 educators from diverse subject areas was convened. A set of foundations, was established and directs Wisconsin’s approach to disciplinary literacy.

This document begins the conversation about literacy in all subjects. It will come to life when presented to teachers and they are able to showcase their subjects’ connection to literacy in all subjects which will bring the literacy standards to life for their community of learners.
Wisconsin Foundations for Disciplinary Literacy

To guide understanding and professional learning, a set of foundational statements, developed in concert with Wisconsin's Guiding Principles for Teaching and Learning, directs Wisconsin's approach to disciplinary literacy.

- Academic learning begins in early childhood and develops across all disciplines.
- Content knowledge is strengthened when educators integrate discipline-specific literacy into teaching and learning.
- The literacy skills of reading, writing, listening, speaking and critical thinking improve when content-rich learning experiences motivate and engage students.
- Students demonstrate their content knowledge through reading, writing, listening, and speaking as part of a content literate community.

Wisconsin's Common Core Standards for Literacy in All Subjects

With the Wisconsin Foundations for Disciplinary Literacy, Wisconsin expands the Common Core State Standards for Literacy in History/Social Studies, Science and Technical Subjects, to include every educator in every discipline and at every level. The Common Core Standards for English Language Arts include the Literacy Standards in History/Social Studies, Science and Technical Subjects as well as other relevant standards materials, resources, and research that support discipline-specific conversations across all content areas and grade levels.

The Common Core State Standards for Literacy in all Subjects is included as part of every set of Wisconsin standards as each discipline is reviewed in accordance with the process for Wisconsin standards revision http://www.dpi.wi.gov/standards. This document includes relevant resources and research that may be helpful in advancing school and district conversations, and can also be downloaded at www.dpi.wi.gov/standards or purchased as a stand-alone document through www.dpi.wi.gov/publications.
Appendix 4 – Center for Standards, Instruction, and Assessment

Every Child a Graduate: Wisconsin’s Journey to Excellence

“The Work of School Districts”
Phase-by-Phase Roll Out
Common Core State Standards (CCSS) for Teaching and Learning

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<th>Phase 1</th>
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<td>- Understand the underpinnings and impetus for the CCSS</td>
<td>- Develop local curriculum based on CCSS</td>
<td>- Plan and develop units of study and lesson plans based on CCSS</td>
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<td>- Begin the local district systems shift toward the CCSS</td>
<td>- Align and select instructional resources based on CCSS</td>
<td>- Facilitate collaborative lesson study on integration of CCSS</td>
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<td>- Investigate and interpret the knowledge, skills and understandings in grade level CCSS</td>
<td>- Research and align high quality instructional strategies to CCSS</td>
<td>- Select and use high quality instructional strategies to teach CCSS in universal classrooms</td>
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<tr>
<td>- Plan for curriculum alignment work</td>
<td>- Review and align local formative and benchmark assessments to CCSS</td>
<td>- Use high quality teaching methods to promote CCSS learning in interventions</td>
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Foundations and Investigations

Curriculum and Resources

Planning, Assessment, Instruction and Reporting

CESAs: Make Possible the Schools Wisconsin Wants
Appendix 4a Serving Wisconsin Educators

The Wisconsin Standards, Instruction, and Assessment Center: Serving Wisconsin Educators

Purpose
The Standards, Instruction, and Assessment Center will centralize content experts focused on development of high-quality, standardized resources and training plans related to the Common Core State Standards (CCSS) that will be easily accessed at low to no cost across the state. This Center will serve as a separate-but-connected entity centered at the Department of Public Instruction in partnership with CESA and institutions of higher education, one that is empowered to address needs related to high quality instructional practices by quickly developing excellent online resources, training plans, and virtual modules. Further, the Center will serve as a hub of content experts to serve the whole state on a regional basis.

Priorities:
- Standardization of highly accessible materials and fidelity of implementation
- Low to no cost resources
- Increased access to content expertise across the state
- Centralized leadership connected to DPI
- Agility, speed, and responsiveness to needs across the state and DPI direction
- Partnerships with IHEs

Stakeholders: Who is the Center for?
With the goal of improving outcomes of all students, the SIA Center will create resources for classroom educators and other educational stakeholders with a focus on improving instructional practices.

Resources for classroom educators will focus on how they can improve their practices; resources for principals will focus on how they can best support their classroom educators’ improvement; resources for other school and district staff will similarly focus on bringing the Common Core State Standards to life for each and every student. To do this, all resources will incorporate Universal Design for Learning (UDL) principles, and will take advantage of technology to the fullest extent possible to ensure greater accessibility.

CESA Role
In order to facilitate more district contact time for CESA staff, the SIA Center will provide high-quality, standardized resources for use in every CESA. CESA staff will be able to focus their expertise to add value through one-on-one and group training and planning sessions with their districts. The training and other sessions will benefit from use of standardized resource that are diligently devised to reach specific audiences: general education and special education teachers; English as a second language and bilingual education teachers; and other educational leaders. By creating resources that incorporate UDL principles, the SIA Center will contribute to personalization of learning, and in doing so, open up the important content of the CCSS to all students.
Outcomes
Ultimately, the Center aims to produce resources that result in improved instructional practices that embed
- A deep understanding of the CCSS
- Consistent, appropriate attention to data to inform decisions
- Assessment practices that improve learning and inform instruction
These high-quality instructional practices will in turn result in better outcomes for students, specifically higher rates of college and career readiness (measures TBD).

Initial Scope of Work
2012-13
The first year of the SIA Center will focus on two things:
1. Establishing a governance structure and relationships with stakeholders across the state
2. Building in-depth K-12 CCSS content knowledge in disciplinary literacy, English language arts, and mathematics
   a. In general education
   b. For special education
   c. For English language learners
These foci require
- Development of resources that provide representative samples of high quality instruction that includes purposeful, embedded assessment, based in CCSS
- Instrument to gauge classroom-level CCSS implementation
- An online bank of resources
  o Make high-quality materials available across the state
  o Serve as a forum for educators

Initial Outputs
Initial professional development to be focused on the following
1. Elementary reading
2. Middle and high school mathematics
3. Disciplinary literacy (at all levels)

Tasks (Spring-Fall 2012):
- SIA Center proposal approved
- Identification of partner agency/institution/system/network
- Funding structure finalized
- Positions posted
- Hire staff

Long-term Scope of Work (three-to-five-year plan)
In year two, the SIA Center will focus on assessment literacy, and specifically the relationship of formative practices as a key part of instruction. This links the CCSS with instructional practices and assessment. Year three of the SIA Center will focus not only on assessment, but including other types of data to inform and adjust instructional practices.
The Wisconsin Standards, Instruction and Assessment Center: Using an established and proven model to create a high quality, connected, equitable professional learning center

Wisconsin Response to Intervention Center
Established 2009

Current professional learning includes:
- Response to Intervention
- Foundational Overview
- Universal Instructional Practices Review (Reading and Mathematics)
- Data Analysis: Screening and Progress Monitoring
- Assessment Literacy
- Evidence Based Practices
- Family Involvement
- Coaches Professional Learning Series

Capacity:
20.0 FTE (statewide experts, and regional technical assistance coordinators for academics and behavior)

Wisconsin Standards, Instruction, and Assessment Center

Drawing on Wisconsin Response to Intervention infrastructure makes proposed Center cost-effective for Wisconsin, and easily replicable for other states

Replicable Practices and Processes:
- Co-led by Wisconsin Department of Public Instruction and Cooperative Educational Services Agencies
- Online tool for district-level evaluation
- Professional learning communities model
- Statewide technical assistance coordinators and data and evaluation practices
- Consistent protocol, processes, practices, and expectations

Wisconsin Standards, Instruction, and Assessment Center will draw on:
- Wisconsin Department of Public Instruction guidance documents
- Learning Forward Standards for Professional Learning
- Wisconsin Guiding Principles for Teaching and Learning
- Statewide Common Core State Standards professional development for English language arts and mathematics
- 2011-12 plan to develop 2.0 Curriculum resources
- Wisconsin approach to disciplinary literacy

Learning Forward Partnership will bring:
- Statewide approach to professional learning
- Addition of 50 statewide CCSS trainers
- Increased capacity to build connected learning for standards, instruction, assessment, and educator effectiveness
Credits Required by Districts for Graduation Summary 2011

The following are descriptive statistics describing the credits required for graduation in the 382 applicable Wisconsin districts in 2011.

Compared to the average:
- The average number of credits required for graduation is 24.7.
- 213, or 55.8%, districts have a total credit requirement below the average of 24.7.
- 169, or 44.2%, districts have a total credit requirement above the average of 24.7.

Compared to the proposed requirement of 21.5:
- 2, or 0.5%, districts have a total credit requirement below 21.5.
- 9, or 2.4%, districts have a total credit requirement at 21.5.
- 371, or 97.1%, districts have a total credit requirement above 21.5.
Total Credits Required for Graduation
- About 65% of districts require between 20.1 and 25 credits to graduate.
- About 35% of districts require between 25.1 and 30 credits to graduate.

Total Credits Required for Graduation – Grouped by Fives

<table>
<thead>
<tr>
<th>Credits Required</th>
<th>Districts</th>
<th>Percent</th>
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<tbody>
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<tr>
<td>20.1 thru 25</td>
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Total Credits Required for Graduation - Detail

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English

- About 98% of districts require four credits of English to graduate.
- A small percentage of districts require more, between 4.3 and 5 credits.

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Foreign Language

- About 98% of districts do not require foreign language credits to graduate.
- A small percentage of districts require between 0.5 and 4 credits of foreign language.

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<td>.3</td>
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**Computer Science**

- About 70% of districts do not require computer science credits to graduate.
- About 23% of districts require half of a credit to graduate.
- A small percentage of districts require more, up to 2 credits.

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<tr>
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**Mathematics**

- All districts require at least two mathematics credits to graduate.
- About 61% of districts require two mathematics credits to graduate.
- About 35% of districts require three mathematics credits to graduate.

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<tr>
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<td>.3</td>
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<tr>
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Science

- All districts require at least two science credits to graduate.
- About 68% of districts require two science credits to graduate.
- About 28% of districts require three science credits to graduate.

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</tbody>
</table>

Social Studies

- All districts require at least three social studies credits to graduate.
- About 72% of districts require three social studies credits to graduate.
- About 17% of districts require 3.5 social studies credits to graduate.
- About 11% of districts require four social studies credits to graduate.

<table>
<thead>
<tr>
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<tr>
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</tbody>
</table>
Fine Arts

- About 84% of districts do not require fine arts credits to graduate.
- About 7% of districts require half of a credit to graduate.
- About 8% of districts require one credit to graduate.
- A small percentage of districts require more, up to four credits.

<table>
<thead>
<tr>
<th>Credits Required</th>
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<td>.3</td>
</tr>
<tr>
<td>Total</td>
<td>382</td>
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</tr>
</tbody>
</table>

Physical Education

- About 90% of districts require 1.5 physical education credits to graduate.
- About 8% of districts require two physical education credits to graduate.

<table>
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<tr>
<th>Credits Required</th>
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<td>382</td>
<td>100.0</td>
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</tbody>
</table>
Health

- About 2% of districts do not require health credits to graduate.
- About 95% of districts require half of a credit to graduate.
- A small percentage of districts require more, up to 1.25 credits.

<table>
<thead>
<tr>
<th>Credits Required</th>
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<th>Percent</th>
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<td>2.4</td>
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<td>.3</td>
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<tr>
<td>Total</td>
<td>382</td>
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</tbody>
</table>

Vocational Technical

- About 76% of districts do not require vocational technical credits to graduate.
- About 13% of districts require half of a credit to graduate.
- About 7% of districts require one credit to graduate.
- A small percentage of districts require more, up to 9.5 credits.

<table>
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</table>
Electives

- About 0.5% of districts do not require elective credits to graduate.
- About 50% of districts require between 5.1 and 10 credits to graduate.
- About 49% of districts require between 10.1 and 15 credits to graduate.
- A small percentage of districts require more, up to 17 credits.

### Electives Credits Required – Grouped by Fives

<table>
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<th>Percent</th>
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<tr>
<td>.1 thru 5</td>
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<td>15.1 thru 20</td>
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### Electives Credits Required - Detail

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<td>11.50</td>
<td>20</td>
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<td>12.00</td>
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<tr>
<td>12.25</td>
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</tr>
<tr>
<td>12.50</td>
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<td>2.6</td>
</tr>
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<td>13.00</td>
<td>14</td>
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<tr>
<td>13.50</td>
<td>7</td>
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<td>1</td>
<td>.3</td>
</tr>
<tr>
<td>14.00</td>
<td>3</td>
<td>.8</td>
</tr>
<tr>
<td>14.50</td>
<td>4</td>
<td>1.0</td>
</tr>
<tr>
<td>15.00</td>
<td>6</td>
<td>1.6</td>
</tr>
<tr>
<td>16.50</td>
<td>1</td>
<td>.3</td>
</tr>
<tr>
<td>17.00</td>
<td>1</td>
<td>.3</td>
</tr>
<tr>
<td>Total</td>
<td>382</td>
<td>100.0</td>
</tr>
</tbody>
</table>
Reference to the *Guide to Implementing Programs of Study in Wisconsin* is informational. To access the Guide, please visit this link:

http://www.wicareerpathways.org/Resources/POSGUIDE.pdf
Wisconsin public schools continue to earn nation-leading graduation rates, college entrance exam scores, and a growing number of students taking rigorous college-level courses. On this foundation, we must move forward faster against increased international competition to boost family-supporting job growth across Wisconsin.

We cannot afford to rest on our laurels. Graduation and achievement gaps are too large; too many students drop out of school (one in ten); and we have a broken school finance system that erodes our ability to ensure all children graduate prepared for future success and technological innovation. Public education builds our workforce and middle class prosperity.

Our education system works for most kids, but not all kids. Some learn differently or need support, while others need new challenges. Our mission is to prepare them all to succeed in further education and careers.

To meet the needs of today’s students, we must customize the student experience, adopting technologies and instruction in ways that meaningfully engage the digital generation.

To advance education for all students, I remain focused around four simple, but powerful areas:

**Standards and Instruction:** What and how should kids learn?

**Assessments and Data Systems:** How do we know if they learned it?

**Accountability for Systems and Individuals:** How do we support improvement?

**School Finance:** How should we pay for schools?

In these and other areas, we have worked with parents, students, educators, and leaders across the state to transform our education system so that every child is a graduate ready for college and careers. To ensure a lasting impact, we need to act swiftly to implement cutting-edge strategies to drive improvements in student achievement.
Every Child a Graduate Overview

Standards and Instruction

- Implement *internationally benchmarked academic standards* to ensure students are globally competitive;
- Require low-performing districts to adopt *comprehensive literacy and mathematics plans* as well as uniform curriculum among schools;
- Create systems that promote *early interventions* in reading and mathematics, such as Response to Intervention and early screening; and
- Adopt new flexibilities for students to *earn competency-based and college credits* during high school and expand more innovative charter schools.

Assessments and Data Systems

- Design an online, adaptive *next generation assessment* system that is based on the Common Core State Standards;
- Implement interim assessments that *gauge student progress throughout the year*, providing real-time data to teachers and parents; and
- Improve accountability through a *statewide student information system* that supports districts, streamlines operations, and expands research.

Accountability for Systems and Individuals

- Develop a *growth-based accountability system* that includes all publicly funded schools, relies on multiple measures of student and school performance, and focuses on college and career readiness;
- Replicate best practices from *high-performing schools* and provide technical assistance and support to *improve the lowest-performing schools*;
- Develop a *fair and robust educator evaluation system* that incorporates student achievement data; and
- Require Milwaukee Public Schools, under corrective action, to adopt a *uniform curriculum in reading and mathematics*, implement *data-driven student intervention* systems, and ensure all *teachers are highly qualified*.

School Finance Reform

- Guarantee a *minimum amount of state aid* for every student;
- Incorporate a *poverty-factor* into the formula, accounting for families’ ability to pay — not just the community’s property value;
- Establish *sustainability* in state funding, while strengthening rural, declining enrollment, and negatively aided districts; and
- Redirect the school levy tax credit directly into school aids, *increasing transparency* and state support for classroom learning.
Appendix 8 Impact and Cut Point Analysis

Impact and Cut-Point Analyses

Appendix 8 includes:

- **Part 1**: N-size Change Analysis
- **Part 2**: Explanation of Proficiency Rate Weighting
- **Part 3**: Impact Analysis of the High-Need Supergroup – Inclusion of Schools in Calculation
- **Part 4**: Effect of the High-Need Supergroup and Subgroup Representation in the Graduation Gap Sub-Score
- **Part 5**: Defining the Absenteeism Threshold for Red Flags
- **Part 6**: Defining the Dropout Rate Threshold for Red Flags

**Part 1: N-size Change Analysis**

*Changing Minimum N-Size*

In recognition of the importance of including as many students as possible in accountability calculations, particularly those in high-need groups, the Department of Public Instruction (DPI) will make two significant changes to its accountability system. The first change is a reduction in the minimum n-size required for inclusion in accountability calculations, from 40 to 20. An impact analysis of this change is provided below. (Note that for public reporting, a cell size of 10 is used.) The second change, introduced in Part 3, is inclusion of a High-Need Supergroup as a method to include students with disabilities, English language learners, and economically disadvantaged students in accountability calculations when all three subgroups lack the minimum n-size of 20.

The Figure below shows the number and percent of schools and students included in accountability calculations and proposed cell sizes.
### Number and Percent of Schools and Students Included in AYP Calculations, Current Cell Size versus Proposed Cell Size, 2010-11 School Year

<table>
<thead>
<tr>
<th></th>
<th>Number of Schools</th>
<th>% of Schools Included in Accountability</th>
<th>Number of Students</th>
<th>% of Students Included</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Current Cell Sizes</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>All Students</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Cell Sizes*</td>
<td>1,912</td>
<td>90.7%</td>
<td>373,369</td>
<td>99.9%</td>
</tr>
<tr>
<td>Cell Size 20</td>
<td>1,877</td>
<td>89.1%</td>
<td>372,853</td>
<td>99.8%</td>
</tr>
<tr>
<td>American Indian</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Cell Sizes</td>
<td>21</td>
<td>1.0%</td>
<td>1,622</td>
<td>28.4%</td>
</tr>
<tr>
<td>Cell Size 20</td>
<td>46</td>
<td>2.2%</td>
<td>2,338</td>
<td>41.0%</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Cell Sizes</td>
<td>73</td>
<td>3.5%</td>
<td>4,566</td>
<td>31.9%</td>
</tr>
<tr>
<td>Cell Size 20</td>
<td>212</td>
<td>10.1%</td>
<td>8,323</td>
<td>58.1%</td>
</tr>
<tr>
<td>Black</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Cell Sizes</td>
<td>194</td>
<td>9.2%</td>
<td>22,023</td>
<td>69.1%</td>
</tr>
<tr>
<td>Cell Size 20</td>
<td>330</td>
<td>15.7%</td>
<td>25,767</td>
<td>80.9%</td>
</tr>
<tr>
<td>Hispanic</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Cell Sizes</td>
<td>199</td>
<td>9.4%</td>
<td>19,103</td>
<td>59.0%</td>
</tr>
<tr>
<td>Cell Size 20</td>
<td>402</td>
<td>19.1%</td>
<td>24,585</td>
<td>75.9%</td>
</tr>
<tr>
<td>White</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Cell Sizes</td>
<td>1,611</td>
<td>76.5%</td>
<td>283,585</td>
<td>98.0%</td>
</tr>
<tr>
<td>Cell Size 20</td>
<td>1,754</td>
<td>83.2%</td>
<td>287,984</td>
<td>99.5%</td>
</tr>
<tr>
<td>LEP</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Cell Sizes</td>
<td>139</td>
<td>6.6%</td>
<td>10,927</td>
<td>51.5%</td>
</tr>
<tr>
<td>Cell Size 20</td>
<td>274</td>
<td>13.0%</td>
<td>14,792</td>
<td>69.7%</td>
</tr>
<tr>
<td>SwD</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Cell Sizes</td>
<td>313</td>
<td>14.9%</td>
<td>19,313</td>
<td>41.9%</td>
</tr>
<tr>
<td>Cell Size 20</td>
<td>912</td>
<td>43.3%</td>
<td>35,590</td>
<td>77.1%</td>
</tr>
<tr>
<td>Economic Disadvantaged</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Current Cell Sizes</td>
<td>1,184</td>
<td>56.2%</td>
<td>123,838</td>
<td>88.7%</td>
</tr>
<tr>
<td>Cell Size 20</td>
<td>1,596</td>
<td>75.7%</td>
<td>135,744</td>
<td>97.2%</td>
</tr>
</tbody>
</table>

*The current cell size for the "All Students" group is 10, while the current cell size for all other subgroups is 40. As a result, the proposed cell size of 20 causes a **decrease** in the number of schools and students identified for the "All Students" group, and an **increase** in all other subgroups.*
Part 2: Explanation of Proficiency Rate Weighting

Consider a hypothetical school with the following information:

<table>
<thead>
<tr>
<th></th>
<th>Number Tested Math</th>
<th>Number Tested Reading</th>
<th>% Proficient in Mathematics</th>
<th>% Proficient in Reading</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current Year</td>
<td>75</td>
<td>75</td>
<td>83%</td>
<td>90%</td>
</tr>
<tr>
<td>Prior Year</td>
<td>82</td>
<td>82</td>
<td>75%</td>
<td>79%</td>
</tr>
<tr>
<td>Two Years Prior</td>
<td>90</td>
<td>90</td>
<td>86%</td>
<td>85%</td>
</tr>
</tbody>
</table>

To calculate the weighted proficiency rate for this school in the current year’s accountability calculations, DPI takes the following steps for both Mathematics and Reading separately:

Step 1) Calculate the total number of students tested in all 3 years:

Total Tested = 75 + 82 + 90
Total Tested = 247

Step 2) Calculate the average tested per year:

Average Tested = Total Tested / Number of Years of Data
Average Tested = 247 / 3
Average Tested = 82.33

Step 3) Derive the weight to be given each year of data based on the number of students tested in each year:

Year Weight = Year Tested / Average Tested

   Current Year Weight = 75 / 82.33 = 0.911
   Prior Year Weight = 82 / 82.33 = 0.996
   Two Years Prior Weight = 90 / 82.33 = 1.093
Step 4) Apply the weights derived in Step 3 to the Mathematics and Reading proficiency rates by multiplying the percent proficient in each year by the derived weights:

<table>
<thead>
<tr>
<th></th>
<th>Number Tested</th>
<th>% Proficient in Mathematics</th>
<th>% Proficient in Reading</th>
<th>Weights based on Number Tested</th>
<th>Adjusted % Proficient in Mathematics</th>
<th>Adjusted % Proficient in Reading</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current Year</td>
<td>75</td>
<td>0.83</td>
<td>0.90</td>
<td>0.911</td>
<td>0.756</td>
<td>0.820</td>
</tr>
<tr>
<td>Prior Year</td>
<td>82</td>
<td>0.75</td>
<td>0.79</td>
<td>0.996</td>
<td>0.747</td>
<td>0.787</td>
</tr>
<tr>
<td>Two Years Prior</td>
<td>90</td>
<td>0.86</td>
<td>0.85</td>
<td>1.093</td>
<td>0.940</td>
<td>0.929</td>
</tr>
</tbody>
</table>

Step 5) Multiply the current year adjusted percent proficient in mathematics and reading by 1.5, the prior year by 1.25, and two years prior by 1.0:

<table>
<thead>
<tr>
<th></th>
<th>Number Tested</th>
<th>Adjusted % Proficient in Mathematics</th>
<th>Adjusted % Proficient in Reading</th>
<th>Weights based on Year</th>
<th>Re-Adjusted % Proficient in Mathematics</th>
<th>Re-Adjusted % Proficient in Reading</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current Year</td>
<td>75</td>
<td>0.756</td>
<td>0.820</td>
<td>1.5</td>
<td>1.134</td>
<td>1.230</td>
</tr>
<tr>
<td>Prior Year</td>
<td>82</td>
<td>0.747</td>
<td>0.787</td>
<td>1.25</td>
<td>0.934</td>
<td>0.984</td>
</tr>
<tr>
<td>Two Years Prior</td>
<td>90</td>
<td>0.940</td>
<td>0.929</td>
<td>1.0</td>
<td>0.940</td>
<td>0.929</td>
</tr>
</tbody>
</table>

Step 6) Sum the re-adjusted percent proficient in mathematics and reading:

<table>
<thead>
<tr>
<th></th>
<th>Number Tested</th>
<th>Adjusted % Proficient in Mathematics</th>
<th>Adjusted % Proficient in Reading</th>
<th>Weights based on Year</th>
<th>Re-Adjusted % Proficient in Mathematics</th>
<th>Re-Adjusted % Proficient in Reading</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current Year</td>
<td>75</td>
<td>0.756</td>
<td>0.820</td>
<td>1.5</td>
<td>1.134</td>
<td>1.230</td>
</tr>
<tr>
<td>Prior Year</td>
<td>82</td>
<td>0.747</td>
<td>0.787</td>
<td>1.25</td>
<td>0.934</td>
<td>0.984</td>
</tr>
<tr>
<td>Two Years Prior</td>
<td>90</td>
<td>0.940</td>
<td>0.929</td>
<td>1.0</td>
<td>0.940</td>
<td>0.929</td>
</tr>
<tr>
<td>Sum:</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3.008</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3.143</td>
</tr>
</tbody>
</table>

Step 7) Divide the sums by 3.75. The divisor is 3.75 because this school has three years of data. The divisor would be 2.5 if the school had only two years of data, and 1.0 if the school had only one year of data. The vast majority of Wisconsin’s schools have three years of data.
<table>
<thead>
<tr>
<th></th>
<th>Number Tested</th>
<th>Adjusted % Proficient in Mathematics</th>
<th>Adjusted % Proficient in Reading</th>
<th>Weights based on Year</th>
<th>Re-Adjusted % Proficient in Mathematics</th>
<th>Re-Adjusted % Proficient in Reading</th>
</tr>
</thead>
<tbody>
<tr>
<td>Current Year</td>
<td>75</td>
<td>0.756</td>
<td>0.820</td>
<td>1.5</td>
<td>1.134</td>
<td>1.230</td>
</tr>
<tr>
<td>Prior Year</td>
<td>82</td>
<td>0.747</td>
<td>0.787</td>
<td>1.25</td>
<td>0.934</td>
<td>0.984</td>
</tr>
<tr>
<td>Two Years Prior</td>
<td>90</td>
<td>0.940</td>
<td>0.929</td>
<td>1.0</td>
<td>0.940</td>
<td>0.929</td>
</tr>
<tr>
<td><strong>Sum:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>3.008</strong></td>
<td><strong>3.143</strong></td>
</tr>
<tr>
<td><strong>Divisor:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>3.75</strong></td>
<td><strong>3.75</strong></td>
</tr>
<tr>
<td><strong>Final Weighted Proficiency Rate</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td><strong>0.802</strong></td>
<td><strong>0.838</strong></td>
</tr>
</tbody>
</table>
Part 3: Impact Analysis of High-Need Supergroup – Inclusion of Schools in Calculation

High-Need Subgroup Analysis

Wisconsin is comprised of many small school districts. Over 90% of Wisconsin’s districts enroll fewer than 5,000 students. In many of these districts, subgroup populations are below even the proposed new minimum group size of 20 required for inclusion in accountability calculations. In order to ensure more schools have an opportunity to receive performance calculations, DPI will create a “high-need” subgroup to factor into the accountability index. The high-need subgroup combines students with disabilities, English language learners, and economically disadvantaged subgroups. In instances where a school’s individual subgroup populations in those three areas are all below minimum cell size requirements, the combined subgroup will be used as recognition of the need to closely monitor the performance of these traditionally high need student populations. Two impact analyses of using the high-need subgroup are included in this Appendix.

Effects of High Need Subgroup on the Number of Schools Included in Index Gap Calculations

<table>
<thead>
<tr>
<th>Gap Measure</th>
<th># Schools Included Without Supergroup</th>
<th># Schools Included With Supergroup</th>
<th>Net Change in # Schools Included in Index Calculations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Achievement Gap</td>
<td>1,567</td>
<td>1,640</td>
<td>+73</td>
</tr>
<tr>
<td>Graduation Gap</td>
<td>241</td>
<td>275</td>
<td>+34</td>
</tr>
<tr>
<td>Growth Gap</td>
<td>951</td>
<td>1,074</td>
<td>+123</td>
</tr>
</tbody>
</table>
Part 4: Effect of the Use of a High-Need Supergroup and Subgroup Representation in the Graduation Gap Sub-Score

Background

In aligning State Superintendent Evers’ goal of making every child a graduate with DPI’s strategic initiative of closing achievement gaps within the state, Wisconsin’s Graduation Gap Sub-Score was created in order to recognize schools that graduate all students at equal rates. For example, if a school has large gaps in its graduation rates of English Language Learners (ELLs) versus those of its English-proficient students (Non-ELLs), the Graduation Gap Sub-Score will detect that gap and identify the school with a high gap rate.

Since at least 20 students are needed for a minimum cell size, it is functionally necessary for both groups being compared (i.e., ELLs vs. Non-ELLs, students with disabilities vs. students without disabilities, etc.) to have at least 20 students in the subgroup. Many schools do not have any comparison groups that meet cell sizes, and as a result, do not receive a Graduation Gap sub-score. Using standard methodology, the Graduation Gap sub-score would be calculated for only about half of Wisconsin’s high schools.

Because this gap measure was designed to shine a light on how schools are improving the achievement and graduation rates of their at-risk groups, DPI will take an approach that achieves as much subgroup representation in the gap measure as is possible, while maintaining statistically sound, fair, and data-driven practices.

In order to assign a Graduation Gap sub-score calculation to more schools, Wisconsin will employ a High-Need Supergroup. The High-Need Supergroup consists of any student who is either an English Language Learner, economically disadvantaged, or a student with disabilities. The use of this High-Need Supergroup allows Wisconsin to give a Graduation Gap Sub-Score to 34 additional schools.

Figure 1: Effects of Use of High-Need Supergroup on the Number of Schools Included in Graduation Gap Sub-Score Calculations

<table>
<thead>
<tr>
<th>Graduation Gap</th>
<th>Total # Schools Graduating Students</th>
<th># Schools Included in Graduation Gap Sub-Score Calculations Without High-Need Supergroup Usage</th>
<th># Schools Included in Graduation Gap Sub-Score Calculations With High-Need Supergroup Usage</th>
<th>Net Change in # Schools Included in Sub-Score Calculations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>580</td>
<td>241 (41.6%)</td>
<td>275 (47.4%)</td>
<td>+34 (+5.8%)</td>
</tr>
</tbody>
</table>
**Additional Racial Representation through Use of the High-Need Supergroup:**

To evaluate subgroup representation in the Graduation Gap sub-score, DPI evaluated the percent of all subgroups being represented in **all schools with a Graduation Gap sub-score**, with and without usage of the High-Need Supergroup. Although Wisconsin’s approach to calculating the Graduation Gap sub-score was already picking up the vast majority of each high-need subgroup, implementing High-Need Supergroups allows the state to identify a Graduation Gap sub-score for 34 additional schools (Figure 1), and improve the overall representation of all subgroups in the calculation of the Graduation Gap sub-score. See Figure 2.

**Figure 2: Percent of At-Risk populations Represented in each Sample Type, Sample without High-Need Supergroup Implemented versus Sample with High-Need Supergroup Implemented**

<table>
<thead>
<tr>
<th>Student Representation</th>
<th>Subgroup Representation WITHOUT High-Need Supergroup</th>
<th>Subgroup Representation WITH High-Need Supergroup</th>
<th>Change in Representation</th>
</tr>
</thead>
<tbody>
<tr>
<td>All Students</td>
<td>77.9%</td>
<td>83.6%</td>
<td>+5.6%</td>
</tr>
<tr>
<td>Asian</td>
<td>91.5%</td>
<td>94.2%</td>
<td>+2.7%</td>
</tr>
<tr>
<td>American Indian</td>
<td>72.1%</td>
<td>74.5%</td>
<td>+2.4%</td>
</tr>
<tr>
<td>Black</td>
<td>83.8%</td>
<td>85.0%</td>
<td>+1.2%</td>
</tr>
<tr>
<td>Hispanic</td>
<td>85.7%</td>
<td>88.6%</td>
<td>+2.9%</td>
</tr>
<tr>
<td>White</td>
<td>76.2%</td>
<td>82.7%</td>
<td>+6.5%</td>
</tr>
<tr>
<td>Students with Disabilities</td>
<td>79.5%</td>
<td>84.3%</td>
<td>+4.7%</td>
</tr>
<tr>
<td>English Language Learners</td>
<td>91.2%</td>
<td>93.7%</td>
<td>+2.5%</td>
</tr>
<tr>
<td>Economically Disadvantaged</td>
<td>82.8%</td>
<td>85.5%</td>
<td>+2.7%</td>
</tr>
<tr>
<td>Total Number of Students</td>
<td>54,485</td>
<td>58,421</td>
<td>+3,936</td>
</tr>
</tbody>
</table>

*Note: The denominator in the above percentages is the number of students in each subgroup present in ALL schools that graduate students. The numerator is the number of students of each respective subgroup present in the sample with a Graduation Gap sub-score.

**Effect of High-Need Supergroup Implementation on Graduation Gap Sub-Scores:**

Before implementing High-Need Supergroups in the calculation of the Graduation Gap sub-score, it was necessary to investigate whether the 34 schools that were additionally identified through the utilization of the High-Need Supergroup method were receiving Graduation Gap Sub-Scores that were systematically different from schools not identified by this method.

Figure 5 below shows a scatter plot of the distribution of Graduation Gap scores as a function of school size. Schools that were identified *without* use of a High-Need Supergroup are signified by the orange points, while the additional schools that were identified through the use of a High-
Need Supergroup are signified by the teal points. Based on the data in the graph, there is no systematic difference between schools that are identified through use of the High-Need Supergroup and those that are not.

**Summary:**

The results show that there is no meaningful difference between the Graduation Gap sub-score of schools that are identified through use of a High-Need Supergroup and those that are not, nor is there a meaningful correlation of school size and the school's Graduation Gap sub-score. These results support the use of High-Need Supergroups as a valid method of increasing the number of schools identified with a Graduation Gap sub-score, as well as increasing the representation of all subgroups in the sample of schools being given a Graduation Gap sub-score.

**Figure 5:** Graduation Gap sub-score as a function of School Size (Number of Students Enrolled), Disaggregated by High-Need Supergroup Use
**Part 5: Defining the Absenteeism Threshold for Red Flags**

This portion of the Appendix demonstrates the methodology for calculating the Absenteeism Red Flag.

**Process for defining the absenteeism threshold for receiving a red flag:**

1) Calculate each school’s absenteeism rate. The absenteeism rate is defined as the percent of a school’s students that are habitually absent. For an explanation of how a student is deemed to be habitually absent, see the section below entitled “Process for Defining Habitual Absenteeism in Students.”

2) Arrange schools in order of their absenteeism rate from highest to lowest.

3) Calculate the cumulative student population in each school, starting with the school with the highest absenteeism rate and proceeding down the list. To find the cumulative student population, each school’s student population is added to a running total beginning with the first school (the school with the highest absenteeism rate) and proceeding down the list. For each school, the running total is then divided by the total number of students in all schools, thereby deriving the cumulative student population.

4) Plot each school’s absenteeism rate and cumulative population as a function of the number of schools. In Figure 6 below, the X-axis represents the number of schools being included in the calculations. The Y-axis represents the absenteeism rate and also the cumulative student population density.

![Figure 6: Absenteeism Rate Threshold](image-url)
5) The absenteeism rate threshold is defined as the point at which the two lines cross in Figure 6. This is a logical point at which to define the threshold, as any school to the left of this point (and thus with an absenteeism rate higher than 13%) is one of the schools contributing most to Wisconsin’s overall absenteeism rate. Any school with an absenteeism rate greater than or equal to the threshold is given a red flag.

Process for Defining Habitual Absenteeism in Students:

The Absenteeism Flag is a new, dynamic, high-leverage indicator that will be used in Wisconsin’s new accountability system. In order to establish the parameters of this new indicator in a systematic, data-driven way, DPI took the following steps to ensure that this new indicator is directly tied to improving student outcomes:

1) Calculate each student’s attendance rate for the prior year.
2) Calculate percentiles for student attendance rates.
3) Separate students into “bins” based on their percentile attendance rate:
   a. The first bin holds students in the bottom 5th percentile of attendance;
   b. The second bin holds students in the 6th to 10th percentile of attendance;
   c. Etc.
   d. The 20th bin holds students in the 95th to 99th percentile of attendance.
4) Calculate the average proficiency rate of students in each bin for the current year.
5) Plot the bins against their average proficiency rates (Figure 7).
Figure 7 shows a strong correlation between attendance and proficiency, particularly in the bottom percentile bin. There is a very large drop-off in Mathematics proficiency when a student is in the bottom 5% of attendance (these students are in Bin 1 on Figure 7). Correlations are similar for reading performance (results not shown).

Based on information provided in Figure 7, the Absenteeism Threshold is set to equal the attendance threshold of Bin One (Figure 8).

<table>
<thead>
<tr>
<th>Bin</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Attendance Percentile</td>
<td>1-5</td>
<td>6-10</td>
<td>11-15</td>
<td>16-20</td>
<td>21-25</td>
<td>26-30</td>
<td>31-35</td>
<td>36-40</td>
<td>41-45</td>
<td>46-50</td>
</tr>
<tr>
<td>Attendance Threshold</td>
<td>&lt;86.4%</td>
<td>86.4%</td>
<td>90.2%</td>
<td>92.0%</td>
<td>93.2%</td>
<td>94.1%</td>
<td>94.7%</td>
<td>95.4%</td>
<td>95.8%</td>
<td>96.3%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Bin</th>
<th>11</th>
<th>12</th>
<th>13</th>
<th>14</th>
<th>15</th>
<th>16</th>
<th>17</th>
<th>18</th>
<th>19</th>
<th>20</th>
</tr>
</thead>
<tbody>
<tr>
<td>Attendance Percentile</td>
<td>51-55</td>
<td>56-60</td>
<td>61-65</td>
<td>66-70</td>
<td>71-75</td>
<td>76-80</td>
<td>81-85</td>
<td>86-90</td>
<td>91-95</td>
<td>96-99</td>
</tr>
<tr>
<td>Attendance Threshold</td>
<td>96.7%</td>
<td>97.2%</td>
<td>97.5%</td>
<td>97.8%</td>
<td>98.3%</td>
<td>98.4%</td>
<td>98.9%</td>
<td>99.2%</td>
<td>99.4%</td>
<td>100%</td>
</tr>
</tbody>
</table>
Any student with an attendance rate of less than 86.4% will be flagged as habitually absent.

**Figure 9: Absenteeism Red Flag Impact Data**

<table>
<thead>
<tr>
<th>Number of Schools with Eligible Grades in 2011</th>
<th>Number of Schools Potentially Flagged in 2011</th>
<th>Percent of Schools Potentially Flagged in 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>2,167</td>
<td>234</td>
<td>10.8%</td>
</tr>
</tbody>
</table>
Part 6: Defining the Dropout Rate Threshold for Red Flags

Process for defining the dropout rate threshold for receiving a red flag:
1) Calculate each school’s dropout rate.
2) Arrange schools in order of their dropout rate from highest to lowest.
3) Calculate the cumulative student population in each school, starting with the school with the highest dropout rate and proceeding down the list. To find the cumulative student population, each school’s student population is added to a running total beginning with the first school (the school with the highest dropout rate) and proceeding down the list. For each school, the running total is then divided by the total number of students in all schools with students in eligible grades (7-12), thereby deriving the cumulative student population.
4) Plot each school’s dropout rate and cumulative population as a function of the number of schools. In Figure 10 below, the X axis represents the number of schools being included in the calculations. The Y-axis represents the dropout rate and also the cumulative student population density.
5) The dropout rate threshold is defined as the point at which the two lines cross.
6) Any school with a dropout rate greater than or equal to the threshold is flagged.

**Figure 10:** Dropout Rate vs. Cumulative Student Population Density

![Graph showing dropout rate vs. cumulative student population density.](image)

**Figure 11:** Dropout Rate Red Flag Impact Data

<table>
<thead>
<tr>
<th>Number of Schools with Eligible Grades in 2011</th>
<th>Number of Schools PotentiallyFlagged in 2011</th>
<th>Percent of Schools PotentiallyFlagged in 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,181</td>
<td>100</td>
<td>8.5%</td>
</tr>
</tbody>
</table>
Appendix 9 Draft Report Cards

Draft School Report Cards

This appendix includes two draft mock-ups of what a school report card would look like under Wisconsin’s new school accountability system. Data on these mock-ups are illustrative and do not represent actual Wisconsin schools. Details on these mock-ups such as score components, numerical values, weighting, labels, score ranges, titles, and web addresses are illustrative and do not represent final determinations or active systems.
Pine Creek School | K-8 Charter School
School Report Card | Summary | 2012-13 School Year

School Rating

82
Meeting Some Expectations

Significantly Exceeding 91-100
Expectations and no red flags
Exceeding 76-90
Expectations and no red flags
Meeting 61-75
Expectations and no red flags
Meeting Some 51-60
Expectations or >60 with ≥1 red flag
Meeting Few 41-50
Expectations or >60 with ≥2 red flags
Persistently Failing to Meet Expectations 0-40

Student Achievement
91 / 100
Reading Achievement 46 / 50
Mathematics Achievement 45 / 50

Student Growth
89 / 100
Reading Growth 42 / 50
Mathematics Growth 47 / 50

Closing Achievement Gaps
70 / 100
Achievement Gaps 32 / 50
Growth Gaps 38 / 50

On-Track Indicators
79 / 100
3rd Grade Reading Achievement 24 / 30
8th Grade Math Achievement 22 / 30
Attendance 33 / 40

OVERALL SCHOOL SCORE
82 / 100
School score is the average of the four subscale area scores.

Recent Performance
School Scores Last 5 Years

<table>
<thead>
<tr>
<th>Year</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>08-09</td>
<td>74</td>
</tr>
<tr>
<td>09-10</td>
<td>74</td>
</tr>
<tr>
<td>10-11</td>
<td>79</td>
</tr>
<tr>
<td>11-12</td>
<td>83</td>
</tr>
<tr>
<td>12-13</td>
<td>82</td>
</tr>
</tbody>
</table>

School Accountability Expectations

Index Improvement Goal
This Year’s Goal 75
School Score 82

Test Participation
Minimum Rate 95.0%
Lowest Subgroup 97.4%

Dropout Rate
Maximum Rate 6.0%
School Rate 0.4%

Absenteeism
Maximum Rate 13.0%
School Rate 13.3%

Enrollment
453

Demographics
Race/Ethnicity
American Indian 1%
Asian 7%
Black (not Hispanic) 25%
Hispanic 31%
White (not Hispanic) 36%

Student Groups
Students with Disabilities 27%
Economically Disadvantaged 55%
English Language Learners 31%

School Rating Determination

Overall School Score 82
Number of Red Flags 1
Meeting Some Expectations

DRAFT – 2/20/12

dpi.wi.gov/reportcard
Public schools, charter schools, and private schools participating in a Parental Choice Program operate under different structures. These different types of schools should not be directly compared.
### School Rating

<table>
<thead>
<tr>
<th>Expectations</th>
<th>Score</th>
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</thead>
<tbody>
<tr>
<td>Exceeding</td>
<td>86</td>
</tr>
<tr>
<td>Meeting Some</td>
<td>51-60</td>
</tr>
<tr>
<td>Meeting Few</td>
<td>41-50</td>
</tr>
<tr>
<td>Persistently Failing to Meet Expectations</td>
<td>0-40</td>
</tr>
</tbody>
</table>

#### School Accountability Index

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student Achievement</td>
<td>92 / 100</td>
</tr>
<tr>
<td>Reading Achievement</td>
<td>47 / 50</td>
</tr>
<tr>
<td>Mathematics Achievement</td>
<td>45 / 50</td>
</tr>
<tr>
<td>Closing Achievement Gaps</td>
<td>72 / 100</td>
</tr>
<tr>
<td>Achievement Gaps</td>
<td>31 / 50</td>
</tr>
<tr>
<td>Graduation Gaps</td>
<td>41 / 50</td>
</tr>
<tr>
<td>Postsecondary Readiness</td>
<td>94 / 100</td>
</tr>
<tr>
<td>Graduation</td>
<td>58 / 60</td>
</tr>
<tr>
<td>ACT Performance/Participation</td>
<td>18 / 20</td>
</tr>
<tr>
<td>Attendance</td>
<td>18 / 20</td>
</tr>
<tr>
<td>OVERALL SCHOOL SCORE</td>
<td>86 / 100</td>
</tr>
</tbody>
</table>

School score is the average of the three subscale area scores.

### Recent Performance

<table>
<thead>
<tr>
<th>Year</th>
<th>School Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>08-09</td>
<td>80</td>
</tr>
<tr>
<td>09-10</td>
<td>79</td>
</tr>
<tr>
<td>10-11</td>
<td>83</td>
</tr>
<tr>
<td>11-12</td>
<td>84</td>
</tr>
<tr>
<td>12-13</td>
<td>86</td>
</tr>
</tbody>
</table>

### School Accountability Indicators

#### Test Participation

- Minimum Rate: 95.0%
- Lowest Subgroup: 96.3%

#### Dropout Rate

- Maximum Rate: 6.0%
- School Rate: 2.2%

#### Absenteeism

- Maximum Rate: 13.0%
- School Rate: 8.3%

### School Rating Determination

- Overal School Score: 86
- Number of Red Flags: 0

Exceeding Expectations

### Demographics

#### Race/Ethnicity
- American Indian: 2%
- Asian: 8%
- Black (not Hispanic): 19%
- Hispanic: 28%
- White (not Hispanic): 43%

#### Student Groups
- Students with Disabilities: 29%
- Economically Disadvantaged: 48%
- English Language Learners: 28%
The U.S. Education Department’s decision to grant waivers from the strictures of the No Child Left Behind Act gives states an unprecedented opportunity to decide how they will assess their own schools. States can now create a more flexible set of metrics to determine how a school is performing. These measures should go beyond test scores and graduation rates to include indicators that provide early warning of academic problems and that point to solutions, so that more students can graduate ready for college and career.

Chief among the early warning signals is chronic absence—when a student misses 10 percent or nearly a month of school over the course of an academic year. Research now documents the extraordinary scale of student absenteeism, the toll these absences take on achievement and the connection to high school dropout rates. In some communities, chronic absence affects as many as a third of all students. Chronic absence is a particularly powerful indicator of academic risk from kindergarten to second grade, when students are not yet taking standardized tests.

Attendance data is already collected by most school districts, but not often analyzed effectively. Most schools count how many students show up daily (average daily attendance) but do not monitor how many miss so many days that they are at academic risk. Thus schools and districts miss the opportunity to intervene early before students fall so far behind that they require expensive remediation or simply drop out.

Across the country, schools and their community partners have found that paying attention to chronic absence is a highly effective strategy for turning around low-performing schools because it is an easily understood, easily measured sign of progress that can provide a unifying goal for the whole community. When schools and community partners work together to reduce absences, they often see results within a semester or school year, first in attendance and later in academic performance. After all, improvements in classroom teaching and curriculum are not likely to yield results unless students are actually in class.

**Using Attendance in Waiver Applications**

States should embed individual student measures—assessing how many students in each school are chronically absent (missing 10 percent or more of school) and how many are achieving satisfactory attendance (missing 5 percent or fewer days)—in the accountability systems they develop for waiver applications. States can:

**Recommendation 1.** Make improving individual student attendance an Annual Measurable Objective in the Accountability section of the waiver application.

**Recommendation 2:** Include chronic and satisfactory attendance in the performance indices being proposed for any new or revised statewide school accountability systems.

**Recommendation 3:** Make chronic absence a factor in determining which campuses are deemed Focus and Priority schools as defined in the waiver process and assessing how much progress they make.

**Recommendation 4:** Make good or improved attendance a factor in determining bonuses for Reward schools.
The Attendance Imperative

The connection between attendance and individual student achievement is intuitive: If you don’t show up, you don’t learn. In Baltimore City Public Schools, administrators found an average 25-percentage point gap in standardized test scores between students who attended regularly and those who missed 20 or more days in the previous year, which is Maryland’s definition of chronic absence. That achievement gap was bigger than the one separating students by socioeconomic status or English language skills. Baltimore’s efforts to address chronic absence have been credited with helping the city turn around its flagging graduation rates. A recent study in Georgia estimated that 10,000 more students would have passed the state’s reading test and 30,000 more students would have passed the math test if they had just attended five more days of school in the prior year.

Research also shows a strong connection between attendance and high school graduation. By sixth grade, chronic absence becomes one of three early warning signs that a student will drop out of high school. By ninth grade, attendance is a better indicator of dropout than eighth grade test scores. Overall, a student with 10 or fewer absences—roughly the equivalent of satisfactory attendance in most districts—is two and a half times more likely to graduate than is a chronically absent peer.

What many policymakers do not realize, however, is that chronic absenteeism affects students long before middle or high school. Nationally, research suggests one in 10 kindergarten and 1st grade students misses nearly a month of school. Children living in poverty who are chronically absent in kindergarten have the lowest levels of academic performance by the time they reached fifth grade. A study in Northern California found only 17 percent of students chronically absent in both kindergarten and 1st grade were reading proficiently by the end of 3rd grade, compared to 64 percent of those who showed up regularly. Students who do not learn to reading proficiently by the end of third grade are likely to fall further behind once they reach fourth grade and are expected to “read to learn.”

What’s more, chronic absenteeism can affect the entire classroom, when teachers have to slow down instruction to accommodate students who missed the lessons in the first place. A study of New York City fourth graders found that even students with good attendance had lower standardized test scores when they went to schools where absentee rates were too high.
Tracking the Right Data

Tracking chronic absence and satisfactory attendance rarely requires any additional data collection, just a different way of looking at what’s collected. Schools typically keep absence records for individual students, and most districts store this information electronically, often turning it over to states for use in longitudinal student databases. Many states currently track some measures of attendance to determine Adequate Yearly Progress under No Child Left Behind. With rare exceptions, though most rely on average daily attendance figures or on truancy rates, which reflect only unexcused absences. Both of these measures can hide genuine problems with students accumulating enough absences for any reason—excused or unexcused—to put them at risk academically.

For instance, 95 percent average daily attendance for an entire school is typically considered good. But when researchers looked at elementary school attendance in three urban school districts, they found that a 95 percent average often masked a bigger problem with chronic absence. Think about it like this: If you had 100 students in your school and 95 percent showed up every day, you’d still have five absences a day. That’s 900 absences over the course of the 180-day school year, and that could mean as many as 45 kids missing 20 days of school. It’s rarely that extreme, but the three-district analysis found that at elementary schools with that 95 percent average, the proportion of chronically absent students ranged from 7 percent to a troublesome 23 percent.

It is also critical for states to focus on chronic absence because unexcused absences or truancy figures do not tell the entire story. As this chart of attendance data from Baltimore, Md., reveals, truancy often fails to detect all the students who are at risk academically due to poor attendance. Excessive absences reflect more than simply willfully skipping school. School attendance drops when families lack the financial resources to meet their basic needs for shelter, food, clothing, and transportation. Health problems such as asthma and poor dental care can keep kids from attending regularly. Safety concerns, including neighborhood violence and schoolyard bullying, also keep students home. If classroom instruction is ineffective and not engaging, student may reflect their discontent by failing to show up.

In the early grades, truancy rates are generally low and have
little relationships to chronic absence, because very young children seldom stay home without the knowledge of an adult who calls in an excuse. Among older students, truancy often underestimates the scale of the attendance problem because it does not capture days missed to suspensions, which are considered school-authorized rather than unexcused. Overly punitive approaches to school discipline can unnecessarily cause students to miss so much school that they fall behind.

**Improving student performance by reducing chronic absence**

The good news is research and the experience of a growing number of local initiatives show that chronic absence can be significantly reduced when schools, families, and community agencies work together to ensure children attend school regularly. The most effective efforts:

- Use data on chronic absence to identify patterns, set a target for reduction and monitor progress over time
- Take comprehensive approaches involving students, families, and community agencies
- Create engaged, personalized learning environments which entice students to attend school every day.
- Examine factors contributing to chronic absence, especially from parent perspectives
- Pay attention to attendance early, ideally starting in pre-K
- Combine strategies to improve attendance among all children, with special interventions targeting those who are chronically absent
- Offer positive supports to promote school attendance before resorting to punitive responses or legal action.

Ultimately, states need to assess rates of chronic absence to know why schools are not performing and what is needed to turn achievement around: Are students struggling academically because what’s happening in the classroom is not meeting their needs, or because they’re not in class often enough to benefit from what school has to offer?

---

**Definitions of Key Attendance Measures:**

**Average Daily Attendance:**
The percentage of enrolled students who attend school each day.

**Satisfactory Attendance:**
Missing 5% or less of school in an academic year including all absences: excused, unexcused, suspensions.

**Chronic Absence:**
Missing 10% or more of school in an academic year including all absences. We recommend a percentage rather than a set number of days because it promotes earlier intervention throughout the year and better comparison across districts.

**Truancy:**
Typically refers only to unexcused absences and is defined by each state.

---

“If you get 90 percent on a test, you’re doing pretty good. If your attendance is 90 percent in 180-day year you are missing 18 days of school, nearly a month. What are our best teachers supposed to do in that situation?”

**Arne Duncan**
*U.S. Secretary of Education*
How to Use Chronic Absence in a Waiver Application

The waiver process grew out frustration over NCLB’s rigid rules and a sense that the strictures were inhibiting true reform. The 10-year-old federal act judges a school as failing if one subpopulation is not making adequate progress. It prescribes a set of interventions that offer little flexibility, and it provides for student and school supports that haven’t consistently proved effective. The waiver application or “ESEA Flexibility Request” allows states to develop their own “system of differentiated recognition, accountability and support.” As such, it affords several opportunities for including chronic absence and satisfactory attendance in the index for judging schools. These opportunities include:

Recommendation 1. Make improving individual student attendance—specifically chronic absence and satisfactory attendance—Annual Measurable Objectives in the Accountability section of the application. The Education Department asks states to develop Annual Measure Objectives or performance targets for the new accountability systems. The department proposes three approaches to framing the goals: reduce by half the percentage of all students and students in each subgroup who are not proficient within six years; set a goal to achieve 100 percent proficiency by 2020; or to create another “similarly ambitious” method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups.

The third option affords an opportunity for schools to move beyond simply tracking average daily attendance to monitoring chronic absence and satisfactory attendance levels for all schools. Even though ESEA typically only focuses on collecting data starting in grade 3, we recommend requiring reporting of these attendance measures starting in kindergarten. Data for this proven early warning sign is already available then, and high levels of chronic absence in the early grades is correlated with lower academic performance in 3rd grades. We suggest states require all schools to report on the levels of chronic absence and satisfactory attendance for the entire student body, as well as by grade and student sub-population. To ensure comparability, states should establish or maintain statewide guidelines for defining when a student should be marked absent for the day.

Including these measures helps to promote college and career readiness. Simply put, students are not ready for career or college if they do not have the persistence to attend school regularly. Chronic absenteeism underscores a student’s lack of persistence and time management skills, two academic behaviors that David Conley’s “College Knowledge” identifies as key to college readiness.\textsuperscript{x}

Recommendation 2: Include chronic and satisfactory attendance in the performance indices being proposed for any new or revised statewide school accountability systems. Analysis of the first 11 applications suggest that states are using the waiver process as an opportunity to replace Adequate Yearly Progress with a more multi-faceted measures to which all schools could be held accountable.\textsuperscript{xii} Levels of chronic absence and satisfactory attendance should be available for each school and compared to the statistics for the other elementary, middle or high schools in their district. It should also be publicly reported and comparable across school districts.

Recommendation 3. Make attendance a factor in determining which campuses are Focus and Priority schools. The waiver process requires states to identify the lowest performing 5 percent of schools as Priority schools and another 10 percent with the largest achievement gaps as Focus schools. In addition to test scores and graduation rates, states can include high chronic absence rates in the formulas for determining which schools need extra attention. Likewise reduced chronic absenteeism and improved satisfactory attendance should be considered metrics for assessing improvement in these schools.

Recommendation 4: Make good or improved attendance a factor in determining bonuses to Reward schools. Title I schools where students are performing well academically or where they are making steady progress would be considered Reward schools and eligible for bonuses. Use improved attendance for individual students as an additional factor in considering when schools are eligible for bonuses. It could also be used as incentive for other Title I schools.
Attendance Works would like to express special thanks to the W.K. Kellogg Foundation and the Annie E. Casey foundation for their ongoing support of our work including the development of our research and policy briefs. Please note the findings and conclusions presented in this report are those of the authors alone, and do not necessarily reflect the opinions of the Foundation.

v Baltimore Education Research Consortium 2011.
Wisconsin’s Accountability Index System

Continued Development and Finalization

Acronyms:
DPI = Department of Public Instruction
DWR = Data Warehouse and Reporting
OEA = Office of Educational Accountability
TAC = Technical Advisory Committee
WKCE = Wisconsin Knowledge and Concepts Exam

Timeline:

<table>
<thead>
<tr>
<th>Key Tasks/Milestones</th>
<th>Outcome(s)</th>
<th>Resource(s) Involved</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waiver Application Submitted</td>
<td>Wisconsin considered for ESEA Flexibility</td>
<td>DPI Staff</td>
</tr>
<tr>
<td>Ongoing internal review of Accountability Index</td>
<td>Identification of final decision points Index is improved</td>
<td>OEA Staff</td>
</tr>
<tr>
<td>TAC meeting(s) scheduled</td>
<td>DPI staff are prepared for meeting; additional index planning timelines can be set</td>
<td>OEA Staff</td>
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<tr>
<td>TAC consultation areas finalized</td>
<td></td>
<td>OEA, Title I, Special Education Staff</td>
</tr>
<tr>
<td>TAC agenda set</td>
<td></td>
<td>OEA Staff</td>
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<tr>
<td>Data planning – consultation with data warehouse staff</td>
<td>OEA and DWR staff understand data needs for index</td>
<td>OEA, DWR Staff</td>
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<tr>
<td>Respond to any waiver application follow-up requests from US Department of Education</td>
<td>Plan established for data loads necessary to accountability index</td>
<td></td>
</tr>
<tr>
<td>Cabinet, State Superintendent Update</td>
<td>Request for ESEA Flexibility</td>
<td>DPI Staff</td>
</tr>
<tr>
<td></td>
<td>Internal leadership is engaged and has opportunities to provide input</td>
<td>DPI Leadership</td>
</tr>
<tr>
<td>Key Tasks/Milestones</td>
<td>Outcome(s)</td>
<td>Resource(s) Involved</td>
</tr>
<tr>
<td>----------------------</td>
<td>------------</td>
<td>----------------------</td>
</tr>
<tr>
<td><strong>March 2012</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Index Mapping Draft Complete</td>
<td>Progress toward completion of accountability index statistical processes</td>
<td>OEA Staff</td>
</tr>
<tr>
<td>Index Mapping Internal Review</td>
<td></td>
<td>OEA Staff</td>
</tr>
<tr>
<td>WKCE cut-score change proposal review</td>
<td></td>
<td>CTB-McGraw Hill Psychometricians; OEA Staff</td>
</tr>
<tr>
<td>Initial cut-score change communications drafted for school administrators</td>
<td>Transparency</td>
<td>OEA, Communications Staff</td>
</tr>
<tr>
<td>Transparency</td>
<td>Steps toward a smooth transition</td>
<td>OEA, Communications Staff</td>
</tr>
<tr>
<td>TAC Meeting</td>
<td>Review and Consultation on key indicators (listed below) completed</td>
<td>TAC members, DPI Staff</td>
</tr>
<tr>
<td>Plan for Standards Setting Finalized</td>
<td>Timeline set</td>
<td>DPI Staff</td>
</tr>
<tr>
<td>Plan for Standards Setting Finalized</td>
<td>Stakeholders contacted</td>
<td>DPI Staff</td>
</tr>
<tr>
<td>Plan for Standards Setting Finalized</td>
<td>Agenda established</td>
<td>DPI Staff</td>
</tr>
<tr>
<td>Accountability Report Draft Design finalized</td>
<td>In consultation with stakeholders, updated draft of full accountability report (summary and detail pages) created</td>
<td>OEA Staff</td>
</tr>
<tr>
<td>Accountability Report Draft Design finalized</td>
<td>Plan developed that ensures regular contact with key stakeholders</td>
<td>OEA, Title I, Communications</td>
</tr>
<tr>
<td>Communication plan finalized</td>
<td>Index can be run based on updated cut score data</td>
<td>OEA, DWR Staff</td>
</tr>
<tr>
<td>NAEP-based cut scores incorporated into data warehouse</td>
<td>Internal leadership is engaged and has opportunities to provide input</td>
<td>DPI Leadership</td>
</tr>
<tr>
<td><strong>April 2012</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Standards Setting Held</td>
<td>Rigorous but achievable cut-scores established for accountability determination categories and sub-scale areas</td>
<td>DPI Staff, External partners</td>
</tr>
<tr>
<td>Key Tasks/Milestones</td>
<td>Outcome(s)</td>
<td>Resource(s) Involved</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
<td>---------------------------------------</td>
</tr>
<tr>
<td><strong>April 2012 (continued)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TAC follow-up</td>
<td>Confirmation of steps taken since TAC meeting</td>
<td>TAC members, DPI Staff</td>
</tr>
<tr>
<td>R-code updated</td>
<td>Report development will be automated to the fullest extent possible</td>
<td>OEA Staff</td>
</tr>
<tr>
<td>Initial, field test, accountability reports run for current and prior years</td>
<td>Internal staff have opportunity to review and improve upon accountability reports</td>
<td>DPI Staff</td>
</tr>
<tr>
<td>Field test reports reviewed and updated</td>
<td></td>
<td>DPI staff; external stakeholders (district staff)</td>
</tr>
<tr>
<td>Peer Review, Department of Education comments on DPI’s waiver application received</td>
<td>Ongoing input improved the accountability index and other components of DPI’s proposed accountability system, including interventions and supports</td>
<td>DPI Staff</td>
</tr>
<tr>
<td>Accountability Webinars Planned</td>
<td>Transparency of Accountability Index and overall accountability system</td>
<td>OEA, Title I Staff</td>
</tr>
<tr>
<td>Cabinet, State Superintendent Update</td>
<td>Internal leadership is engaged and has opportunities to provide input</td>
<td>DPI Leadership</td>
</tr>
<tr>
<td><strong>May 2012</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Index adjustments</td>
<td>Index updated to reflect standards setting and Peer Review, Department of Education Comments</td>
<td>OEA Staff</td>
</tr>
<tr>
<td>R-code finalized</td>
<td>Internal capacity of produce accountability reports ensured</td>
<td>OEA Staff</td>
</tr>
<tr>
<td>Accountability reports run, reviewed, and updated</td>
<td>On-track to field testing accountability reports</td>
<td>OEA Staff</td>
</tr>
<tr>
<td>Key Tasks/Milestones</td>
<td>Outcome(s)</td>
<td>Resource(s) Involved</td>
</tr>
<tr>
<td>----------------------</td>
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<td>----------------------</td>
</tr>
<tr>
<td>District accountability index communications drafted and finalized</td>
<td>Ensuring stakeholders are engaged and included in accountability field test as much as possible</td>
<td>OEA , Communications Staff</td>
</tr>
<tr>
<td>May 2012 (continued)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Final, field test accountability reports run</td>
<td>Districts have access to field test data that may inform the accountability transition process</td>
<td>OEA Staff, District Staff</td>
</tr>
<tr>
<td>Field test reports loaded into secure system for district access</td>
<td>DPI has data, including response from districts, to inform accountability transition planning</td>
<td></td>
</tr>
<tr>
<td>Districts contacted to view field test accountability reports</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accountability Webinars</td>
<td>Transparency of Accountability Index and overall accountability system</td>
<td>OEA, Title I Staff</td>
</tr>
<tr>
<td>Cabinet, State Superintendent Update</td>
<td>Internal leadership is engaged and has opportunities to provide input</td>
<td>DPI Leadership</td>
</tr>
<tr>
<td>June 2012</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accountability Webinars</td>
<td>Transparency of Accountability Index and overall accountability system</td>
<td>OEA, Title I Staff</td>
</tr>
<tr>
<td>Feedback collected on field test reports</td>
<td>DPI has information to inform accountability transition planning and improve upon accountability reports</td>
<td>OEA Staff</td>
</tr>
<tr>
<td>Cabinet, State Superintendent Update</td>
<td>Internal leadership is engaged and has opportunities to provide input</td>
<td>DPI Leadership</td>
</tr>
<tr>
<td>July 2012 - Ongoing</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development of Reward, Focus, and Priority school lists</td>
<td>Waiver requirement for submission of final lists of Reward, Focus, and Priority schools met</td>
<td>OEA, Title I Staff</td>
</tr>
<tr>
<td>Cabinet, State Superintendent Updates</td>
<td>Internal leadership is engaged and has opportunities to provide input</td>
<td>DPI Leadership</td>
</tr>
</tbody>
</table>
TAC Involvement points

- Consultation on standards setting process
- Review of current index proposal; address specific questions
  - Weighting
  - Independence of sub-score areas (non-duplication)
  - AMOs
  - Cut scores and goal setting
  - Schools outside the K-5, 6-8, 9-12 model
  - Identification of schools for supports, interventions, and rewards – best way
- Review of final index

Communication Planning

- Dates for external consults
- Dates for release of info (notices, reports, press info, etc.)
- Dates for internal, cross-team consults
- Dates for Cabinet review
- Stakeholders (not an exhaustive list)

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Wisconsin Association of School Boards</th>
<th>Wisconsin Association of School Business Officials</th>
</tr>
</thead>
<tbody>
<tr>
<td>School Administrators Alliance (principals and superintendents)</td>
<td>Wisconsin Association of School Boards</td>
<td>Wisconsin Association of School Business Officials</td>
</tr>
<tr>
<td>CESA Statewide Network (regional service agencies)</td>
<td>Title I Network and Committee of Practitioners</td>
<td>Teachers unions</td>
</tr>
<tr>
<td>Disability advocates</td>
<td>Advocates for English language learners</td>
<td>Legislative staff</td>
</tr>
<tr>
<td>Institutions of Higher Education</td>
<td>Internal DPI Teams</td>
<td>DPI Leadership</td>
</tr>
</tbody>
</table>
### Appendix 12—Requirements for All Schools Meeting Some Expectations

<table>
<thead>
<tr>
<th>Accountability Rating</th>
<th>Requirements</th>
</tr>
</thead>
</table>
| **Meeting Some Expectations** (Including Title I Focus Schools) | • Complete online self-assessment  
  • Develop and document RtI implementation plan to identify differentiated student needs, align them to appropriate interventions and resources, and monitor their progress.  
  • Participate in RtI training and technical assistance from RtI center  
  • Implement RtI with fidelity to serve individual student needs  
  • Consistently analyze early warning indicator data using the statewide student information system to identify students at-risk of falling behind  

**Re-identified After Three Years of Implementation**  
• Participate in onsite diagnostic review conducted by the RtI Center.  
• Implement targeted interventions aligned to identified needs and approved by DPI |
| **Meeting Few Expectations** (Including Title I Focus Schools) | • Complete online self-assessment  
  • Develop and document RtI implementation plan to identify differentiated student needs, align them to appropriate interventions and resources, and monitor their progress.  
  • Participate in RtI training and technical assistance from RtI center  
  • Implement RtI with fidelity to serve individual student needs  
  • Consistently analyze early warning indicator data using the statewide student information system to identify students at-risk of falling behind  

**Re-identified After Three Years of Implementation**  
• Participate in onsite diagnostic review conducted by the RtI Center.  
• Implement targeted interventions aligned to identified needs and approved by DPI |
| **Persistently Failing to Meet Expectations** (Including Title I Priority Schools) | • Participate in state contracted diagnostic review conducted by external expert  
  • Partner with a state-approved external vendor to implement reforms aligned to identified needs  
  • Develop (in cooperation with external vendor) and document school reform plan for state approval  
  • Enter into a performance agreement with DPI (charter and Parental Choice Program schools only)  
  • Close the school.  

**Re-identified After Three Years of Implementation**  
• The state superintendent may utilize his/her authority to intervene and appoint a special master to the school.  
• Close the school.  
• Revoke the charter (charter schools only)  
• Remove the school from the Parental Choice Program (Parental Choice Program schools only) |
### High School Indicators

#### Team Structure

| 2354 | The Leadership Team regularly examines individual and collective student data (e.g., course grades and completion, overall grade point average, attendance rates, behavior referrals, suspensions, end-of-course exams, state exam results) to identify areas for improvement across all content areas and throughout the school. |
| 2355 | The Leadership Team monitors rates of student transfer, dropout, graduation, and post-high school outcome (e.g., student enrollment in college, students in careers) using a longitudinal data system. |
| 2356 | The Leadership Team implements, monitors, and analyzes results from an early warning system at the school level using indicators (e.g., attendance, academic, behavior monitoring) to identify students at risk for dropping out of high school. |

#### Principal’s Role

| 2357 | The traditional roles of the principal and other administrators (e.g., management, discipline, security) are distributed to allow adequate time for administrative attention to instruction and student supports. |

#### Opportunity to Learn

**Content Mastery and Graduation**

| 2358 | The school confirms that a student has mastered prerequisite content knowledge before allowing the student to take higher-level courses. |
| 2359 | All students demonstrating prerequisite content mastery are given access to higher-level courses. |
| 2360 | The curriculum and schedule provide pathways for all students to acquire missing content knowledge. |
| 2361 | The school provides all students with academic supports (e.g., tutoring, co-curricular activities, tiered interventions) to keep them on track for graduation. |
| 2362 | The school provides all students extended learning opportunities (e.g., summer bridge programs, after-school and supplemental educational services, Saturday academies, enrichment programs) to keep them on track for graduation. |
| 2363 | The school provides all students with opportunities for content and credit recovery that are integrated into the regular school day to keep them on track for graduation. |

## Opportunity to Learn

### Post-Secondary School Options

| 2364 | Guidance counselors provide all students with feedback and reports on their assessment results (academic, aptitude, interest) to facilitate student-driven decisions about their own work and college and career goals. |
| 2365 | The school provides all students with opportunities to enroll in and master rigorous coursework for college and career readiness. |
| 2366 | The school provides all students with academic supports (e.g., supplemental interventions) when needed to enable them to succeed in rigorous courses designed for college and career readiness. |
| 2367 | The school provides all students with supports and guidance to prepare them for college and careers (e.g., career awareness activities, career exploration, college visits, advising). |
| 2368 | All teachers integrate college and career guidance and supports relevant to their subject areas into their taught curricula. |
| 2369 | The school routinely provides all students with information and experience in a variety of career pathways. |
| 2370 | The school provides all students with access to relevant data to make decisions about their course of study as they progress toward their college and career goals. |
| 2371 | The school provides all students with information, guidance, and support to secure financial assistance and scholarships for college or other post-secondary education. |

## Opportunity to Learn

### Extended Learning Opportunities

| 2372 | The school expects all students to participate in activities to develop skills outside of the classroom (e.g., service learning, athletics, enrichment, internships). |
The school provides all students with opportunities to learn through nontraditional educational settings (e.g., virtual courses, dual enrollment, service learning, work-based internships).

The school provides all students with formal supports and a network of contacts with school personnel, community members, and workplace personnel to ensure the social capital necessary to make informed life decisions.

<table>
<thead>
<tr>
<th>Opportunity to Learn</th>
<th>Transitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2375 The school provides freshman students with formal supports as they make the transition to high school (e.g., summer bridge programs, freshman academies).</td>
<td></td>
</tr>
<tr>
<td>2376 The school provides senior students with formal supports as they make the transition out of high school (e.g., college and career planning, job fairs).</td>
<td></td>
</tr>
<tr>
<td>2377 The school tracks the post-secondary school placements and experiences of their graduates and reports the results to the school board, faculty, and school community.</td>
<td></td>
</tr>
</tbody>
</table>
## Response to Intervention Indicators

### Leadership

<table>
<thead>
<tr>
<th>RTI-LD1</th>
<th>The principal provides resources of staff, time, and materials to support the RTI process.</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTI-LD2</td>
<td>The principal provides managerial leadership for a 3-Tier model for focused academic and discipline/student management processes.</td>
</tr>
<tr>
<td>RTI-LD3</td>
<td>The principal provides clear direction for assessment strategies, including determination for universal screening.</td>
</tr>
<tr>
<td>RTI-LD4</td>
<td>The principal participates actively with the RTI Team.</td>
</tr>
<tr>
<td>RTI-LD5</td>
<td>The principal keeps a focus on instructional improvement and student learning outcomes.</td>
</tr>
<tr>
<td>RTI-LD6</td>
<td>The principal celebrates individual, team, and school successes, especially related to student learning outcomes.</td>
</tr>
</tbody>
</table>

### Leadership

<table>
<thead>
<tr>
<th>RTI-LD7</th>
<th>The principal routinely monitors the fidelity of ongoing RTI implementation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTI-LD8</td>
<td>The principal systematically assesses RTI fidelity at least twice a year and prepares a summary report of findings and recommendations.</td>
</tr>
<tr>
<td>RTI-LD9</td>
<td>The principal monitors curriculum and classroom instruction regularly.</td>
</tr>
</tbody>
</table>

### Leadership

<table>
<thead>
<tr>
<th>RTI-LD10</th>
<th>The principal ensures that all staff receive on-going RTI training.</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTI-LD11</td>
<td>The principal participates in on-going RTI training.</td>
</tr>
<tr>
<td>RTI-LD12</td>
<td>Staff development for RTI is built into the school schedule for support staff as well as classroom teachers.</td>
</tr>
<tr>
<td>RTI-LD13</td>
<td>New staff members are trained and included in the RTI process.</td>
</tr>
</tbody>
</table>

### Teams and Processes

<table>
<thead>
<tr>
<th>RTI-TM1</th>
<th>The RTI Team includes a core membership of teachers and professional staff with various roles and expertise to provide critical input to the process.</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTI-TM2</td>
<td>The RTI Team meets regularly and for a sufficient amount of time to conduct the business of the team.</td>
</tr>
<tr>
<td>RTI-TM3</td>
<td>The RTI team operates with agendas and minutes for their meetings, and these documents are maintained in a file by a person designated by the team and also by the principal.</td>
</tr>
<tr>
<td>RTI-TM4</td>
<td>All core members consistently attend team meetings.</td>
</tr>
<tr>
<td>RTI-TM5</td>
<td>The RTI Team meetings include additional people with pertinent information about a particular student under review, such as parents, referring teacher, speech-language pathologist, gifted/talented, Title I, English language learning.</td>
</tr>
</tbody>
</table>
### Teams and Processes
#### RTI Team Resources

| RTI-TM6 | The RTI Team has inventoried schoolwide resources and created a resource map that it uses in team interventions. |
| RTI-TM7 | The RTI Team has inventoried community resources and created a resource map that it uses in team interventions. |
| RTI-TM8 | The RTI Team regularly updates its resource maps. |
| RTI-TM9 | The RTI Team maintains a list of RTI-related resources to access beyond the school for consultation, advice, and support. |

### Teams and Processes
#### RTI Team Culture

| RTI-TM10 | The RTI Team focuses on student outcomes rather than eligibility for special education services. |
| RTI-TM11 | The RTI Team fosters an atmosphere in which the entire school community is welcomed and supported. |
| RTI-TM12 | The RTI Team provides a system of support for teachers through coaching, resource materials, mentoring, peer observations, and problem-solving. |

### Teams and Processes
#### The Referral and Intervention Process
##### Identify and Define

| RTI-TM13 | The RTI Team receives referrals from teams, teachers, other staff, and parents about a student or group of students whose academic progress and/or behavior suggests a possible need for intervention. |
| RTI-TM14 | The RTI Team collects background and baseline data on the referred student(s) to be used at the initial intervention meeting. |
| RTI-TM15 | The RTI Team defines the specific area of need(s) based on the data collected. |

### Teams and Processes
#### The Referral and Intervention Process
##### Analyze for Causes

| RTI-TM16 | The RTI Team considers a variety of data sources in determining the cause of the problem and if an intervention is necessary. |
| RTI-TM17 | The RTI Team considers a variety of data sources in determining whether the situation calls for a standard treatment protocol or individual problem solving. |

### Teams and Processes
#### The Referral and Intervention Process
##### Develop a Plan

| RTI-TM18 | The RTI Team sets clear, objective, measureable goals for student progress in the student's Individual Intervention Plan. |
| RTI-TM19 | The Individual Intervention Plan includes specific tasks, persons responsible, and timelines for completion. |

### Teams and Processes
#### The Referral and Intervention Process
##### Implement and Monitor the Plan

| RTI-TM20 | The RTI Team documents the quality of the implementation of the Individual Intervention Plan to assure intervention integrity. |
| RTI-TM21 | The RTI Team holds follow-up meetings with the referring teacher and parents to review student progress and judge whether the intervention is effective. |
### Teams and Processes
#### The Referral and Intervention Process
**Evaluate and Adjust the Plan**

| RTI-TM22 | The RTI Team, at key decision points, determines the degree to which the intervention has been adequately executed to evaluate its effectiveness. |
| RTI-TM23 | The RTI Team, at key decision points, determines whether the intervention should be continued, adjusted, or terminated. |

---

### Assessment
#### Information Systems

| RTI-AS1 | The school maintains a current inventory of selected screening measures, diagnostic assessments, progress monitoring assessments and tools, and outcome assessments. |
| RTI-AS2 | A data management system is in place with necessary technology support to provide the School Support Team, teachers, and professional staff with timely information on each student. |
| RTI-AS3 | Data included in the management system are data collected from a variety of sources; i.e. academic, medical, developmental, vision/hearing, familial/cultural, curriculum-based measures, parent and student interviews, and behavioral and classroom management data. |

---

### Assessment
#### Screenings

| RTI-AS4 | A written universal screening system plan is in place and used by the school to assess the academic and behavioral strengths and needs of all students. |
| RTI-AS5 | Screening assessments are conducted 3 or 4 times a year. |
| RTI-AS6 | The school's teams (Leadership, Instructional, RTI, for example) each meets to examine the building-wide data after each screening to consider core effectiveness and instructional groups. |

---

### Assessment
#### Diagnostic Assessments

| RTI-AS7 | Diagnostic assessments are conducted for individual students as needed to adapt instruction and support interventions to student needs. |

---

### Assessment
#### Progress Monitoring

| RTI-AS8 | Progress monitoring data is sufficiently designed and collected to make clear decisions about the effectiveness of an intervention. |
| RTI-AS9 | Academic and behavioral progress is monitored with increasing frequency as students receive additional tiered interventions. |
| RTI-AS10 | Progress monitoring assessments are conducted monthly for those receiving supplemental instruction (as Tier 2) and weekly or bi-weekly for those receiving intensive instruction. |
| RTI-AS11 | The RTI Team bases decisions about interventions (instructional and support) on data from continuing progress monitoring throughout the three-tiered process. |

---

### Assessment
#### Professional Development

| RTI-AS12 | School staff receive ongoing professional development on all assessments and assessment procedures. |
### Family Community Engagement

| RTI-FC1 | Parents are informed of the RTI process and it is made clear that the process is not intended to delay referral for special education evaluation. |
| RTI-FC2 | Parents are informed of the RTI process and intervention options available for their child before interventions are implemented. |
| RTI-FC3 | Written information is given to parents at Tier 2 that addresses the concerns and needs of students who show emerging deficits. |
| RTI-FC4 | Information is gathered from parents about how the child functions in a variety of settings (e.g. family and home, church, childcare, community activities). |
| RTI-FC5 | Parent and student interviews are conducted covering the child's history and any significant events occurring in the life of the child or the family. |
| RTI-FC6 | Individualized Intervention Plans address the family culture and resources available to the child. |
| RTI-FC7 | Community resources (individuals, organizations, programs) are included in Intervention Plans when appropriate. |

### Curriculum and Instruction

#### Curriculum

| RTI-CI1 | The school maintains an official document that clearly defines the curriculum and instruction for each of three tiers in reading, mathematics, written language, and social behavior. |
| RTI-CI2 | All teachers are guided by an evidence-based core curriculum. |
| RTI-CI3 | All teachers are guided by a document that aligns standards, curriculum, instruction, and assessment. |

#### Instruction

| RTI-CI4 | All teachers differentiate assignments (individualize instruction) in response to individual student performance on pre-tests and other methods of assessment. |
| RTI-CI5 | All teachers assign learning tasks in a variety of formats such as auditory, visual, tactile, motor, and hands-on for all students. |
| RTI-CI6 | Units of instruction include standards-based objectives and criteria for mastery. |
| RTI-CI7 | All teachers use a variety of instructional modes (whole-class, small group, computer-based, individual, homework, for example). |
| RTI-CI8 | All teachers have access to evidence-based instructional interventions for students identified at risk (Tier 2). |
| RTI-CI9 | All teachers have access to evidence-based instructional enhancements for students identified as achieving above the general class level. |

### Professional Development

<p>| RTI-CI10 | School staff receive ongoing professional development on the subject content they are expected to teach. |
| RTI-CI11 | School staff receive ongoing professional development on instructional methodology for the programs they are expected to teach. |
| RTI-CI12 | School staff receive ongoing professional development on social behavior and classroom management strategies for the programs they are expected to teach. |</p>
<table>
<thead>
<tr>
<th>District Response to Intervention Success Indicator</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTI-DT1</td>
<td>The district has an RTI team that regularly supports and evaluates the school RTI implementation to assure fidelity.</td>
</tr>
<tr>
<td>RTI-DT2</td>
<td>District leadership has developed a written policy and/or procedures, approved by the school board, to insure consistency of RTI implementation across the district.</td>
</tr>
<tr>
<td>RTI-DT3</td>
<td>The district provides schools with technology, training, and support for integrated data collection, reporting, and analysis systems.</td>
</tr>
<tr>
<td>RTI-DT4</td>
<td>The district sets district, school, and student subgroup achievement targets.</td>
</tr>
<tr>
<td>RTI-DT5</td>
<td>The district regularly reallocates resources to support school, staff, and instructional improvement.</td>
</tr>
</tbody>
</table>
**ELL Indicators – District Level**

### District Context and Support for School Improvement - Improving the school within the framework of district support

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>IA07</td>
<td>The district sets district, school, and student subgroup achievement targets. (7)</td>
</tr>
<tr>
<td>IA09</td>
<td>The superintendent and other central office staff are accountable for school improvement and student learning outcomes. (9)</td>
</tr>
<tr>
<td>IA11</td>
<td>The district ensures that key pieces of user-friendly data are available in a timely fashion at the district, school, and classroom levels. (11)</td>
</tr>
<tr>
<td>IA13</td>
<td>The district works with the school to provide early and intensive intervention for students not making progress. (13)</td>
</tr>
<tr>
<td>IA14</td>
<td>The district recruits, trains, supports, and places personnel to competently address the problems of schools in need of improvement. (14)</td>
</tr>
</tbody>
</table>

### District Context and Support for School Improvement - Clarifying district-school expectations

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>IC07</td>
<td>Professional development is built into the school schedule by the district, but the school is allowed discretion in selecting training and consultation that fit the requirements of its improvement/restructuring plan and its evolving needs. (34)</td>
</tr>
</tbody>
</table>

**ELL Indicators – School level**

### School Leadership and Decision Making - Establishing a team structure with specific duties and time for instructional planning

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ID13</td>
<td>Instructional Teams meet for blocks of time (4 to 6 hour blocks, once a month; whole days before and after the school year) sufficient to develop and refine units of instruction and review student learning data. (48)</td>
</tr>
</tbody>
</table>

### School Leadership and Decision Making - Focusing the principal's role on building leadership capacity, achieving learning goals, and improving instruction

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>IE04</td>
<td>The principal models and communicates the expectation of improved student learning through commitment, discipline, and careful implementation of sound practices. (55)</td>
</tr>
</tbody>
</table>

### School Leadership and Decision Making - Aligning classroom observations with evaluation criteria and professional development

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>IF08</td>
<td>Professional development for the whole faculty includes assessment of strengths and areas in need of improvement from classroom observations of indicators of effective teaching. (72)</td>
</tr>
</tbody>
</table>

### School Leadership and Decision Making - Helping parents to help their children meet standards

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>IG01</td>
<td>Parents receive regular communication (absent jargon) about learning standards, their children's</td>
</tr>
</tbody>
</table>
progress, and the parents’ role in their children’s school success. (76)

Curriculum, Assessment, and Instructional Planning - Engaging teachers in aligning instruction with standards and benchmarks

IIA01 Instructional Teams develop standards-aligned units of instruction for each subject and grade level. (88)

Curriculum, Assessment, and Instructional Planning - Engaging teachers in assessing and monitoring student mastery

IIB04 Teachers individualize instruction based on pre-test results to provide support for some students and enhanced learning opportunities for others. (94)

Curriculum, Assessment, and Instructional Planning - Engaging teachers in differentiating and aligning learning activities

IIC02 Instructional Teams develop materials for their standards-aligned learning activities and share the materials among themselves. (97)

Curriculum, Assessment, and Instructional Planning - Assessing student learning frequently with standards-based assessments

IID06 Yearly learning goals are set for the school by the Leadership Team, utilizing student learning data. (104)
IID08 Instructional Teams use student learning data to assess strengths and weaknesses of the curriculum and instructional strategies. (106)

Classroom Instruction - Expecting and monitoring sound instruction in a variety of modes - Preparation

IIIA06 All teachers test frequently using a variety of evaluation methods and maintain a record of the results. (115)
IIIA07 All teachers differentiate assignments (individualize instruction) in response to individual student performance on pre-tests and other methods of assessment. (116)

Classroom Instruction - Expecting and monitoring sound homework practices and communication with parents

IIIB06 All teachers systematically report to parents the student’s mastery of specific standards-based objectives. (155)

Classroom Instruction - Expecting and monitoring sound classroom management

IIIC12 All teachers engage all students (e.g., encourage silent students to participate). (167)

November 28, 2011
## Special Education Indicators

### School Leadership and Decision Making

**Establishing a team structure with specific duties and time for instructional planning**

Teams of special educators, general education teachers, and related service providers meet regularly to enhance/unify instructional planning and program implementation for students with disabilities. (2407)

<table>
<thead>
<tr>
<th><strong>School Leadership and Decision Making</strong></th>
<th><strong>Focusing the principal’s role on building leadership capacity, achieving learning goals, and improving instruction</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Teams of special educators, general education teachers, and related service providers meet regularly to enhance/unify instructional planning and program implementation for students with disabilities.</strong> (2407)</td>
<td><strong>The principal participates actively with the school’s teams.</strong> (56)</td>
</tr>
</tbody>
</table>

### Curriculum, Assessment, and Instructional Planning

**Engaging teachers in aligning instruction with standards and benchmarks**

Instructional Teams develop standards-aligned units of instruction for each subject and grade level. (88)

<table>
<thead>
<tr>
<th><strong>Curriculum, Assessment, and Instructional Planning</strong></th>
<th><strong>Engaging in assessing and monitoring student mastery</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Instructional Teams develop standards-aligned units of instruction for each subject and grade level.</strong> (88)</td>
<td><strong>Unit pre-tests and post-tests are administered to all students in the grade level and subject covered by the unit of instruction.</strong> (92)</td>
</tr>
<tr>
<td><strong>Units of instruction and activities are aligned with IEP goals and objectives for students with disabilities.</strong> (2408)</td>
<td><strong>Unit pre-test and post-test results are reviewed by the Instructional Team.</strong> (93)</td>
</tr>
<tr>
<td><strong>Teachers individualize instruction based on pre-test results to provide support for some students and enhanced learning opportunities for others.</strong> (94)</td>
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</tr>
</tbody>
</table>

### Curriculum, Assessment, and Instructional Planning

**Assessing student learning frequently with standards-based assessments**

The school tests each student at least 3 times each year to determine progress toward standards-based objectives. (100)

<table>
<thead>
<tr>
<th><strong>Curriculum, Assessment, and Instructional Planning</strong></th>
<th><strong>Assessing student learning frequently with standards-based assessments</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Instructional Teams use student learning data to assess strengths and weaknesses of the curriculum and instructional strategies.</strong> (106)</td>
<td><strong>The school tests each student at least 3 times each year to determine progress toward standards-based objectives.</strong> (100)</td>
</tr>
<tr>
<td><strong>Instructional Teams use student learning data to plan instruction.</strong> (107)</td>
<td><strong>Instructional Teams use student learning data to identify students in need of instructional support or enhancement.</strong> (108)</td>
</tr>
<tr>
<td><strong>Instructional Teams use student learning data to identify students in need of instructional support or enhancement.</strong> (108)</td>
<td><strong>Instructional teams track and maintain records of student learning data to determine progress toward meeting goals as indicated in students’ IEP’s.</strong> (2409)</td>
</tr>
<tr>
<td><strong>Instructional teams utilize student learning data to determine whether a student requires a referral for special education services (e.g., Response-to-Intervention).</strong> (2410)</td>
<td><strong>Instructional teams utilize student learning data to determine whether a student requires a referral for special education services (e.g., Response-to-Intervention).</strong> (2410)</td>
</tr>
</tbody>
</table>
### Classroom Instruction

**Expecting and monitoring sound instruction in a variety of modes**

<table>
<thead>
<tr>
<th>Computer-Based Instruction</th>
</tr>
</thead>
<tbody>
<tr>
<td>Students with disabilities are provided with and taught effective ways to use assistive technology to support their individual learning needs. (2411)</td>
</tr>
</tbody>
</table>

### Classroom Instruction

**Expecting and monitoring sound homework practices and communication with parents**

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>All teachers systematically report to parents the student’s mastery of specific standards-based objectives. (155)</td>
</tr>
</tbody>
</table>

* New Special Education Indicators
Wisconsin Response to Intervention: A Guiding Document
November 15, 2010

Dear Educator:

Wisconsin's long-standing commitment to public education continues to earn nation-leading graduation rates, college entrance exam scores, and a growing number of students taking rigorous college-level courses. We have a tradition of excellence, and there is much to celebrate. At the same time, we cannot afford to rest on our laurels.

We must ensure that Wisconsin’s vision of excellence, achievement, and readiness is accessible to every student. Data reveals significant opportunity gaps between students of color and white students, and a static overall achievement rate persists. To address these issues, I have identified Response to Intervention (RtI) as a process that will help Wisconsin move toward my vision of every child a graduate.

RtI is a way to systematize high quality instruction, balanced assessment systems, and collaboration. It is this systematic process that will ensure that all students have equal access to supports that will ensure their long-term success. RtI will create collaborative systems among educators; assist in using data to make informed decisions about students, staff, and resources; and provide a framework for seeking success for all students. RtI will offer a process to examine gaps in opportunity and learning and assist in building systems so that every child is a graduate.

Emergent research suggests that RtI is effective for helping to improve academics and behavior among students. To support high quality learning, the Department of Public Instruction (DPI) and Cooperative Educational Service Agencies (CESAs) have partnered to create the Wisconsin RtI Center, a state-wide resource network that will provide educators with the knowledge and expertise to implement this important process.

Wisconsin is making other significant changes that will assist in supporting a comprehensive and unified state-level vision for RtI, including:

- adopting the Common Core State Standards for English language arts and mathematics that are rigorous, clear, and aligned for college and career readiness;
- phasing out the Wisconsin Knowledge and Concepts Examinations in favor of assessments that provide targeted and timely information to educators, students, and their parents; and
- supporting the Culturally Responsive Training for All: Training and Enhancement network, a consortium of Wisconsin schools and districts focused on culturally responsive practices.

These initiatives are not separate of RtI; they are integrated in my vision of a high quality RtI system.

All children have a right to a public education that charts a path to success. All children deserve highly qualified teachers in their classrooms and equal access to the best instructional materials, strategies, and interventions available. I believe RtI will help Wisconsin enhance this equity of access and ensure that every child is a graduate, prepared for further education and the workforce. Thank you for your ongoing commitment to all learners in Wisconsin.

Sincerely,

Tony Evers, PhD
State Superintendent
To assist Wisconsin education leaders with planning for Response to Intervention (RtI), DPI, in partnership with Wisconsin education stakeholders, has developed this informational brief. This brief is intended to provide guidance for implementation of RtI and should not be read as administrative rule. This brief provides Wisconsin’s vision for RtI, shares a definition and an accompanying visual model for RtI, reviews essential elements of RtI, highlights existing state resources for getting started, responds to frequently asked questions, and includes a glossary of terms. Bolded words are defined in the glossary. The information presented in this brief reflects research, evidence-based practice, and high quality pedagogy. For more information on RtI, see www.dpi.wi.gov/rti/index.html.
In Wisconsin’s vision for RtI, the three essential elements of high quality instruction, balanced assessment, and collaboration systematically interact within a **multi-level system of support** to provide the structures to increase success for **all** students. **Culturally responsive practices** are central to an effective RtI system and are evident within each of the three essential elements. In a multi-level system of support, schools employ the three essential elements of RtI at varying levels of intensity based upon student responsiveness to instruction and intervention. These elements do not work in isolation. Rather, all components of the visual model inform and are impacted by the others; this relationship forms Wisconsin’s vision for RtI.
What Are Culturally Responsive Practices, and Why Are They at the Center of the Graphic?

Culturally responsive practices account for and adapt to the broad diversity of race, language, and culture in Wisconsin schools and prepare all students for a multicultural world. Within Wisconsin’s vision for RtI, culturally responsive practices are evident in and infused throughout all levels of each of the three essential elements.

Nationally, race has been a predictor of success in schools for decades. Called “the achievement gap,” “the opportunity gap,” “the equity gap”—all phrases speak to the long-standing educational inequities in our system. Both national data and Wisconsin state data show that in nearly every measurable area—academic achievement, discipline, gifted and talented placement, and graduation rates—students of color have statistically significant lower rates of success as compared to their white peers.[1] To address these gaps in opportunity, Wisconsin has situated culturally responsive practices as central to a RtI system.

Specifically, there are three reasons RtI in Wisconsin is centered on culturally-responsive practices:

First, Wisconsin students are increasingly diverse. Our curriculum, instruction, and supports must reflect this diversity and be intentionally inclusive of the many cultures in our communities.

Second, culturally responsive practices make a difference. In Wisconsin, school districts have changed race-based patterns of success and failure through attention and intention.

Third, RtI is a systems change model, and to implement RtI without continual reflection on who is academically and behaviorally successful (and who is not) will not lead to systems change. It is critical to examine core practices, and to monitor who is successful with and without interventions/additional challenges, and which interventions/additional challenges are more successful with various cultural, racial, and ethnic groups.

[1] Readers interested in further reading or research on the persistent nature of the achievement gap http://www.agi.harvard.edu/
A Note on the RtI Triangle

RtI is often represented visually by a triangle separated into three tiers that depict levels of intensity based on student need. Due to the widespread prevalence of this model, many have asked, “Why no triangle in Wisconsin?”

While many districts may choose to use a three-tiered system to organize their RtI system, the way a district chooses to structure their RtI system is a local control decision left to individual districts. Districts have varying resources, programs, and practices that will likely influence the building of their unique RtI system. Districts may use tiers or find that other multi-level systems or processes work well in their district. The Wisconsin visual model outlines the parameters of a high quality RtI system while maintaining the flexibility that districts require to build systems to meet local needs.

In Wisconsin, culturally responsive practices are central to the state’s RtI vision and infused throughout the three essential elements. The central role of culturally responsive practices in RtI is graphically depicted in the state visual. Additionally, the circular model is a RtI systems level view of the process, while the triangle depicts a student level view. Districts may find that a triangle or other visual representation best fits their vision for meeting the needs of their distinct populations and that many RtI models fit within the state’s visual model and definition.
In Wisconsin, Response to Intervention (RtI) is defined as a process for achieving higher levels of academic and behavioral success for all students. Rigorous implementation of RtI includes a combination of high quality instructional practice, balanced assessment, and collaboration, all of which are infused with culturally responsive practices. Further, RtI systems use a multi-level system of support to identify and respond to student need. Implementation of a multi-level system of support includes meaningful family involvement, data-based decision making, and effective leadership. Comprehensive RtI implementation will contribute to increased instructional quality, equitable access to high quality and effective programming, and will assist with the identification and support of learners with varied abilities and needs. The Wisconsin RtI Roadmap (page 8) illustrates how the three essential elements function within an enacted RtI system and how the system adjusts to meet the needs of students.

This document will further expand on the three essential elements of RtI and illustrate their connectedness to culturally responsive practices. The three essential elements are:

- High Quality Instruction
- Balanced Assessment
- Collaboration.

**What is Unique about RtI in Wisconsin?**

Wisconsin’s vision for RtI addresses both academics and behavior, employs culturally responsive practices within each of the three essential elements, and uses a strengths-based model to systematically provide ALL students with the supports they need to succeed. Wisconsin stakeholders have developed the following guiding principles that provide the philosophical underpinning to RtI and also serve as a reflective checkpoint to assess an enacted system:

- RtI is for ALL children and ALL educators
- RtI must support and provide value to effective practices
- Success for RtI lies within the classroom through collaboration
- RtI applies to both academics and behavior
- RtI supports and provides value to the use of multiple assessments to inform instructional practices
- RtI is something you do and not necessarily something you buy
- RtI emerges from and supports research and evidence-based practice.
The Wisconsin RtI Roadmap (http://dpi.wi.gov/rti/pdf/rti-roadmap.pdf) illustrates how the three essential elements function within an enacted RtI system and how the system adjusts to meet the needs of students.
High Quality Instruction

High quality instruction (curriculum, instruction, and assessment) is engaging, standards-based, data-driven, and research-based. Curriculum, instruction, and assessment that are grounded in the culturally responsive practices of relevance, identity, belonging, and community will serve to best engage all students. High quality curriculum and instruction should be culturally appropriate for the students being served and prepare all students for a multicultural world.

All students should receive high quality, culturally responsive core academic and behavioral instruction that is differentiated for student need and aligned with the Common Core State Standards (CCSS) for mathematics and English language arts and other state and local standards. Standards assist in providing consistent grade-level benchmarks. Core instruction refers to the curriculum, instruction, and assessment that all students receive. Core curriculum stems from and is directly shaped by the standards, the district curricular framework, and the effective use of formative, summative, and benchmark assessments. All curriculum and instructional practices should be examined against their evidence base and the educational context within which they will be implemented.

Intervention and additional challenge: Providing high quality instruction by responding to student need

Interventions are intended to increase student performance in the general curriculum for students who are not meeting benchmarks in a particular curricular area. Additional challenges are intended to meet the needs of students who are exceeding benchmarks. For students whose screening data indicate they are either likely to not meet benchmarks or are likely to exceed benchmarks in a particular instructional area, educators use data in a collaborative process to determine appropriate interventions or additional challenges, which are matched to a student’s particular area of need. Within this process, the intensity of intervention or additional challenge is also determined. Students continue to access core curriculum, instruction, and assessment in addition to these small group or individual interventions or additional challenges. In certain cases when students exceed benchmarks, a collaborative team may determine that an additional challenge may most appropriately take place in lieu of core instruction.
The process of identifying and using interventions and additional challenges is flexible and fluid. The intensity and nature of the interventions or additional challenges should be adjusted based on a student’s responsiveness as evidenced by multiple data sources. Instructional time, frequency of instructional sessions, size of the instructional group, level of instruction, instructional technique, and instructional provider are examples of adjustments that can be made to respond to student need. Interventions and additional challenges, as components of high-quality instruction, should each be culturally responsive and appropriate for the students being served.

**Balanced Assessment System for Continuous Review of Student Progress**

Continuous review of student progress within a RtI system involves a balanced, systematic process of constant inquiry that uses multiple measures to determine the current skill level of a student or group of students, how students are responding to core curriculum and instruction, and how students are responding to interventions or additional challenges. No single test score should determine a student’s experience at any phase of a RtI system. Rather, multiple types of data should be gathered, and their evidence should be considered. Educator and family input should also be sought in making decisions about the kinds of data collected (e.g. teacher observation, family interview, benchmark assessment scores, student self assessment) and should be considered as part of understanding the whole picture of a student’s performance. In seeking broad experience and expertise in choosing and implementing assessment procedures, schools will be better equipped to enact culturally responsive practices that reflect the identity, community, sense of belonging, and relevance of the group of students and families served. Within a RtI system, universal screening and progress monitoring play a critical role in determining how best to respond to student need.

**Universal screening** is a process in which data from multiple measures are analyzed to determine whether each student is likely to meet, exceed, or not meet benchmarks and can be constructed for both academic and behavioral purposes. A screener is an assessment given as one part of the
screening process to establish a baseline from which students are beginning and to align the instructional starting point to student need. Screeners are typically a form of data collection designed to be easy, quick, and repeatable. Again, no single piece of data should determine a student’s experience within a RtI system; multiple types of data (survey, interview, teacher observation, etc.) should be collected to assist in a complete universal screening process. Data from the universal screening process are used to make decisions about interventions and additional challenges. It is also important to note that universal screening data can be examined to determine if a change in core curriculum and instruction is needed.

Progress monitoring is a process used to assess a student’s academic and behavioral performance, to measure student improvement or responsiveness to instruction, and to evaluate the effectiveness of instruction. This process is also used to monitor a student’s response to specific interventions or additional challenges. Progress monitoring can be formal (quantifiable, norm-referenced tools) or informal (teacher-developed formative tools) and can be implemented with individual students or an entire class. The frequency of progress monitoring will increase with the intensity of an intervention or additional challenge. Like universal screening, progress monitoring is a process, and thus data should include multiple pieces of evidence with a focus on individual student improvement as well as small group improvement.

RtI is a system for increased success for all students, and universal screening and progress monitoring are central to this system. RtI may also be used as a method for identifying students with specific learning disabilities (SLD). As a student moves further toward a process of a SLD determination, by rule, the criteria of progress monitoring tools becomes more stringent to ensure strict consistency, fidelity, and reliability across the state. Making educational decisions based on multiple types of data is equally important to this process. For more information on the SLD determination process as it relates to a RtI system, see http://dpi.wi.gov/sped/ld.html.

Collaboration

Collaboration is a process where people work together toward common goals. Collaboration as part of a RtI system includes educators, families, and communities working together both formally and informally. This partnership builds and implements a model that identifies and provides supports to students to increase their academic and behavioral success through data-based decision making. Collaborative protocols such as problem-solving processes and profes-

Professional learning communities (PLC) can be used to systematize discussions of student, class, grade, school, district, and state-level data. The frequency and intensity of collaborative teaming should increase with the intensity of student need.

Collaboration across subject areas, job titles, and among schools in a district also helps to establish a systemic and systematic approach to student support. Shared discussion around school schedules, course offerings, budget, staffing, and resource allocation can help to support decision making within a RtI system that maximizes local resources. As with other practices within a RtI system, all topics, formats, and outcomes should consider how culturally responsive practices such as relevance, identity, community, and sense of belonging impact collaboration.

**Multi-level System of Support**

Historically, school reform efforts often emphasized collaboration, high quality instruction, and balanced assessment. RtI provides a systematic approach that integrates these three essential elements within a multi-level system of support to maximize student achievement. A multi-level system of support is the practice of systematically providing differing levels of intensity of supports (interventions/additional challenges, collaborative structures, monitoring of student progress) based upon student responsiveness to instruction and intervention. Within a RtI system schools: use data to identify students at risk for poor learning outcomes or in need of increased challenge, monitor student progress, intervene based on student need, and adjust the intensity and nature of interventions or challenges depending on a student’s responsiveness. Factors, such as effective leadership, meaningful family and community involvement, and data-based decision-making, enhance a multi-level system of support.
Where does a district or school begin?

To begin, many local decisions must be made to set up systems that are best for the unique population and circumstances of the school and district. DPI encourages local education agencies (LEAs) to meaningfully include educators, families, and community members when making these decisions to ensure that local RtI systems are effective for their specific students. Examples of these decisions include core curriculum and instructional practices, universal screening and progress monitoring tools and processes, collaborative systems, best use of staff and resources to support all students, specific systems of support (e.g. the use of levels/tiers, thresholds for increased supports), etc.

What are some DPI tools and resources to help a district or school implement RtI?

- **The Wisconsin RtI Self-Assessment Tool** ([http://dpi.wi.gov/rti/pdf/rtiselfassess.pdf](http://dpi.wi.gov/rti/pdf/rtiselfassess.pdf)) is intended to assist school or district level teams who wish to discuss and reflect on their readiness to implement a RtI system and to provide ongoing opportunities for open-ended reflection, discussion, and planning.


- **The Wisconsin RtI Center** ([www.wisconsinrticenter.org](http://www.wisconsinrticenter.org)) is a collaborative project between DPI and the twelve CESAs to provide high quality RtI professional development and technical assistance regionally throughout Wisconsin. The Wisconsin Positive Behavioral Interventions and Supports (PBIS) ([www.wisconsinpbisnetwork.com](http://www.wisconsinpbisnetwork.com)) Network operates within the RtI Center.

- **Culturally Responsive Education for All: Training and Enhancement** (CREATE) ([www.createwisconsin.net](http://www.createwisconsin.net)) is a DPI funded statewide project to provide supports to districts with the goal of transforming schools and unlocking the potential of all students.

- **Common Core State Standards for English Language Arts and Mathematics** ([www.corestandards.org](http://www.corestandards.org)) are the newly adopted (June, 2010) Wisconsin English and mathematics standards.

How will DPI support districts implementing RtI?

DPI has created web-based tools to help districts build and implement their RtI systems. For more information see [www.dpi.wi.gov/rti/index.html](http://www.dpi.wi.gov/rti/index.html). In addition, DPI has partnered with the twelve CESAs to create the Wisconsin RtI Center to coordinate statewide efforts between the CESAs and professional organizations and to support schools and districts implementing RtI. Visit the Wisconsin RtI Center website at [www.wisconsinrticenter.org](http://www.wisconsinrticenter.org) for information on resources, tools, and professional learning.

What is DPI’s guidance on assessment tools used as part of a RtI system?

DPI does not advocate for any specific assessment in a RtI system, nor does the department have a policy that would specify certain assessment tools that a district must use in a RtI process. These are local decisions to be discussed with local education stakeholders. Within a RtI process, DPI encourages educators to use a balanced assessment system. This balanced assessment system would include benchmark, formative, and summative assessments. For more information on balanced assessment see [www.dpi.wi.gov/oea/nbasp.html](http://www.dpi.wi.gov/oea/nbasp.html).

As a particular student moves closer to a specific learning disability (SLD) determination process, certain other requirements for assessments may apply. For more information on using RtI processes for SLD determination, see [http://dpi.wi.gov/sped/ld.html](http://dpi.wi.gov/sped/ld.html).

What is the connection between RtI and Positive Behavioral Interventions and Supports (PBIS)?

PBIS is one national model for implementing RtI to address behavior. It is a positive, school-wide, systematic approach based on a proactive RtI model. For more information on PBIS, visit the Wisconsin PBIS Network at [www.wisconsinpbisnetwork.org](http://www.wisconsinpbisnetwork.org).

How does a RtI system benefit English Language Learner (ELL) students, and what are the special considerations?

A RtI system takes into account students’ English language proficiency, academic proficiency, previous educational experiences, and cultural background. Given the unique characteristic of ELL
students, a RtI system responds to the students’ educational needs and offers an enhanced platform for learning. The systematic approach to RtI provides the necessary structures to give all students the opportunity to learn the content through standards-based instruction and assessment and the equitable opportunity to reach mastery of such content.

How does a RtI system benefit students with disabilities, and what are the special considerations?

RtI offers a systematic way of providing a comprehensive picture of student needs to make instructional decisions to respond to those needs. The systematic approach to RtI provides the necessary structures to give all students the opportunity to learn the content through standards-based instruction and assessment and the equitable opportunity to reach mastery of such content. For students with disabilities, their Individualized Education Program (IEP) drives programming based on the student’s disability related needs. For information on using a RtI model for identifying students with specific learning disabilities (SLD), see http://dpi.wi.gov/sped/ld.html.

How does a RtI system benefit students who are exceeding benchmarks, and what are the special considerations?

A RtI system can be successfully used to identify the needs of and provide appropriate programming for students with gifts and talents, as required by State Statute. Since RtI is a school-wide initiative (i.e. systemic), it is an effective way to provide systematic and continuous services beyond the core curriculum for high-ability students. A RtI system uses balanced assessment to provide a comprehensive picture of student needs in order to make instructional decisions to respond to those needs. Progress monitoring ensures that these learning opportunities are appropriate and result in student growth. For additional information on gifted and talented education, please refer to the Gifted and Talented Resource Guide published by the Wisconsin Department of Public Instruction at http://dpi.wi.gov/cal/pdf/gtguide.pdf.
Additional challenges
Additional challenges are research-based strategies that are systematically used with a student or group of students whose screening data indicate that they are likely to exceed benchmarks.

The intensity of the challenge is matched to the intensity of student need and can be adjusted through many dimensions including length, frequency, and duration of implementation.

Core instruction
Core instruction refers to the curriculum, instruction, and assessment that all students receive.

Culturally responsive practices
Culturally responsive practices account for and adapt to the broad diversity of race, language, and culture in Wisconsin schools and prepare all students for a multicultural world. Within Wisconsin’s vision for RtI, culturally responsive practices are evident in and infused throughout all levels of each of the three essential elements.

Data-based decision making
Data-based decision making is the process of making instructional decisions for student success (both academically and behavioral) through ongoing collection and analysis of data.

Differentiated instruction
Differentiated instruction is culturally and linguistically appropriate and reflects a dynamic adjustment to student needs such as readiness, interest, or learning style.

Intervention
Academic or behavioral interventions are research-based strategies that are systematically used with a student or group of students whose screening data indicate that they are likely to not meet benchmarks. The intensity of interventions is matched to the intensity of student need and can be adjusted through many dimensions including length, frequency, and duration of implementation.

Multi-level system of support
The practice of systematically providing differing levels of intensity of supports (interventions/additional challenges, collaborative structures, monitoring of student progress) based upon student responsiveness to instruction and intervention.

Progress monitoring
Progress monitoring is a process used to assess students’ academic and behavioral performance, to measure student improvement or responsiveness to instruction, and to evaluate the effective-
ness of instruction. The frequency of progress monitoring increases with the intensity of an intervention or additional challenge.

**Response to Intervention (RtI)**
RtI is a process for achieving higher levels of academic and behavioral success for all students. The three essential elements of high quality instruction, balanced assessment, and collaboration systematically interact within a multi-level system of support to provide the structures to increase success for all students. Culturally responsive practices are central to an effective RtI system and are evident within each of the three essential elements. In a multi-level system of support, schools employ the three essential elements of RtI at varying levels of intensity based upon student responsiveness to instruction and intervention.

**Screening**
See Universal Screening.

**Specific Learning Disability (SLD)**
Sec. 300.8(c)(10) Specific learning disability. (i) General. Specific learning disability means a disorder in one or more of the basic psychological processes involved in understanding or in using language, spoken or written, that may manifest itself in the imperfect ability to listen, think, speak, read, write, spell, or to do mathematical calculations, including conditions such as perceptual disabilities, brain injury, minimal brain dysfunction, dyslexia, and developmental aphasia.

For information on using a RtI model for identifying students with a specific learning disability (SLD), see [http://dpi.wi.gov/sped/ld.html](http://dpi.wi.gov/sped/ld.html).

**Universal screening**
Universal screening is a process through which data from multiple measures is accurately analyzed to determine whether each student is likely to meet, exceed, or not meet benchmarks and can be constructed for both academic and behavioral purposes.
Trainings for Response to Intervention in Wisconsin

2011-2012

The Wisconsin RtI Center’s vision is to bring about systems change in Wisconsin school communities in order to maximize opportunities for all students to achieve success academically and behaviorally. Addressing the needs of all students through a quality Response to Intervention (RtI) system will become standard practice for districts and schools. The Wisconsin RtI Center accomplishes this goal by supporting schools as they learn how to implement RtI and make their systems sustainable. The Wisconsin RtI Center exists to provide high quality professional development and technical assistance, as well as to gather and disseminate RtI implementation data to support schools’ implementation process.

www.wisconsinRtIcenter.org
Recommended Scope & Sequence

Implementing a quality Response to Intervention (RtI) system is a process that takes several years to implement. Educational leaders starting their schools on the process towards sustainability should begin with purpose building sessions. These trainings will provide a crucial overview of the Wisconsin RtI Framework. During this time, school leadership teams also complete the Wisconsin RtI School-wide Implementation Review (SIR) on the Wisconsin RtI Center website. Teams use the results of the SIR to action plan for the following years and prioritize trainings to take in the following phase. Schools typically spend a year in the purpose building phase reaching consensus. During years two through five, building leadership teams can move on to implementation trainings, which will help schools layer on supports as they implement RtI. Implementation takes several years and multiple changes to go through in order to have quality implementation. Full implementation trainings are useful for schools as they continue to practice RtI with fidelity and monitor students’ progress.

See the following page for a chart detailing the recommended continuum of professional development for schools working toward full implementation. The trainings in subsequent pages of this document are expected to be available in 2011–2012.

The Wisconsin RtI Center is partnering with the Cooperative Educational Service Agencies (CESAs), with support from the Wisconsin Department of Public Instruction, to create a network of trainers skilled in the Wisconsin RtI Framework. In addition to detailed descriptions of the purpose building sessions directly provided by Wisconsin RtI Center trainers, this document contains a listing of implementation trainings that can be accessed via this CESA Statewide Trainer’s Network supported and trained by the Wisconsin RtI Center.

There are many workshops and trainings offered by various agencies and professional organizations across Wisconsin that are related to and support the Wisconsin RtI Framework. A complete and up-to-date list of Wisconsin RtI Center network of CESA statewide trainers & trainings can be found on the Wisconsin RtI Center website at www.wisconsinRtIcenter.org.
RtI Professional Development Continuum for systems change

Year 1
Purpose Building

Determine needs
Take purpose building workshops; complete Wisconsin RtI School-wide Implementation Review (SIR) to determine needs.

Workshops
RtI Foundational Overview
RtI Framework Mapping

Year 2-5
Implementation

Train and implement based on needs
Your SIR results will direct you the implementation trainings and supports that would benefit your team the most.

Elements on SIR
- High quality instruction (universal)
- Collaboration
- Balanced assessment
- High quality instruction (selected/intensive)
- Culturally responsive practices
- Family engagement

Training & Supports
- Universal Instructional Practices
- Professional Learning Communities
- Data Analysis Screening & Progress Monitoring
- Evidence-based Practices
- CREATE
- Family Engagement online module

Year 5+
Full Implementation

Maintain, refine skills, and exchange data stories
Once you reach full implementation, maintain and refine skills and exchange data stories and strategies.

Supports
- Featured success stories
- Recognized schools

Additional Supports for All Stages:
- Student Intervention Monitoring System
- Assessment Literacy online module
- Resources on Wisconsin RtI Center website

RtI Systems Coaching Skills Training & Supports
Purpose Building

**WISCONSIN RtI FOUNDATIONAL OVERVIEW**

**Description:** This session is an overview or informational workshop designed for school building teams working to design, implement, evaluate, and/or refine their building’s RtI framework.

**Participants:** This session is designed for building level leadership teams. Key individuals who should be included are principals along with a cross section of staff. Parent representation on the team is encouraged.

**Support Documents to Use:** DPI RtI guiding documents, Wisconsin RtI School-wide Implementation Review, local achievement data, and current building-level goals

**Training Sequence:** This session is the beginning of a suggested sequence of RtI professional development opportunities. It provides a foundation to starting, further exploring, or evaluating a RtI framework within a school level building, and should be completed prior to participating in further Wisconsin RtI Center trainings and tools.

**Aim:** To provide an understanding of a RtI framework and to begin the determination of priorities and plan for action for the leadership teams.

**Objectives:**

1. Provide a foundational overview of the Wisconsin RtI Framework.
2. Provide an opportunity for participants to consider the rationale of embracing and implementing a RtI framework in their school and their current “readiness” for the work.
3. Provide activities to support the selection and actions of a building RtI leadership team.
4. Present the Wisconsin RtI School-wide Implementation Review to teams for baseline evidence of current RtI practices in implementation.
5. Time to integrate or “braid” the identified priority into current building level goals and improvement plans.

**Learning Outcomes:** Upon completion of the Wisconsin RtI Foundational Overview, teams will be able to:

1. Understand the elements, components, and principles of the Wisconsin RtI Vision.
2. Create awareness of the rationale for change and to help determine readiness of the district/school to move forward with a RtI framework implementation.
3. Understand the factors to consider when selecting the RtI leadership team members.
4. Analyze baseline evidence of RtI components implementation determined by the completion of the Wisconsin RtI School-wide Implementation Review.
5. Integrate or braid initial action plans for implementation and professional development.

**In Delivery**

**Length:** Full-day session

**Cost:** Funded by the Wisconsin RtI Center with nominal fee for teams to cover materials & food

**When and Where:** Offered regionally throughout the year in partnership with the CESAs. Location is determined by CESAs for greatest accessibility for school teams

**Delivered by:** Wisconsin RtI Center
**RtI Framework Mapping**

**Description:** This session provides a process whereby school teams articulate or “map” current resources, practices, and processes in place that enhances their RtI framework. The teams map their multi-level systems of support around the essential elements of high quality instruction, collaboration, and balanced assessments. Strengths, gaps, and future steps for implementation are determined through probing questions and reflective analysis of the completed map.

**Participants:** This workshop is designed for grade-level/content-area leadership teams. Key individuals who should be included are grade-level/content-level teams focused on curriculum, instruction, and assessment.

**Support Documents to Use:** DPI RtI guiding documents, Wisconsin RtI School-wide Implementation Review, local curriculum articulation documents

**When Provided:** This session has been specifically designed to occur second in a sequence of professional development opportunities. RtI Framework Mapping is recommended to all schools after participating in the Wisconsin RtI Foundational Overview and prior to participation in the further specific RtI trainings.

**Aim:** To provide a process to articulate or “map” a building’s current level of RtI implementation directly related to multi-level systems of support around high quality instruction, collaboration, and balanced assessment; to help teams determine what current school structures to build on, determine area of need, and develop next step actions.

**Objectives:**

1. Provide further understanding and deeper familiarity with the Wisconsin RtI Framework.
2. Provide teams the time and direct facilitation activities to “map” or define their current reality specifically aligned with the Wisconsin RtI School-wide Implementation Review.
3. Organizationally map the RtI components that are established/systematic and those components still needing implementation within your building.
4. Understand how to braid current efforts of school improvement around the Wisconsin RtI Framework.

**Learning Outcomes:** Upon completion of RtI Framework Mapping, teams will be able to:

1. Map or define a grade level’s or content area’s current level of RtI implementation around the three essential elements of high quality instruction, collaboration, and balanced assessment.
2. Become more time efficient and effective when responding to both system and student needs.
3. Efficient and consistent communications regarding systems practices and resources.
4. Further articulate strengths and gaps regarding the Wisconsin RtI Framework.
5. Determine a “braided” next step plan of action to develop, implement, or sustain practices within the essential elements.

**In Delivery**

**Length:** Full-day session

**Cost:** Funded by the Wisconsin RtI Center with nominal fee for teams to cover materials & food

**When and Where:** Offered regionally throughout the year in partnership with the CESAs. Location is determined by CESAs for greatest accessibility for school teams

**Delivered by:** Wisconsin RtI Center
**Universal Instructional Practices Review (Reading/Math)**

**Description:** A critical review of universal programming requires objective and in-depth analysis. This training will offer the recommendations and procedures for analyzing critical elements of a building’s universal instructional programs. Questions are addressed regarding the importance and process of a core program. Guidelines regarding best practices, common core, and alignment to other state academic standards, instructional time, differentiated instruction, and assessment are discussed.

**Creation:** Fall 2011  
**Delivery to Schools:** Winter 2012  
**Trainer of Trainer Series:** Spring 2012  
**Delivered by:** CESAs & Statewide Network list of trainers

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**Professional Learning Communities**

**Description:** Using the Solution Tree model and materials, teams are led through facilitated activities to create an effective system of collaboration focusing on student achievement results. Activities, tools, and guidance offered in this series address readiness and foundational components necessary to be in place for continued success with RtI implementation.

**Trainer of Trainer Series:**  
**Current**  
**Delivered by:** CESAs & Statewide Network list of trainers

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**Data Analysis: Screening & Progress Monitoring**

**Description:** Implementing and analyzing data from an effective screening and progress monitoring process are addressed. Aligned with the DPI balanced assessment materials, teams engage in practices that effectively analyze data at each level of commitment: student, classroom, content, school, and district.

**Creation:** Summer 2011  
**Delivery to Schools:** 9/2011  
**Trainer of Trainer Series:** Winter 2011–2012  
**Delivered by:** CESAs & Statewide Network list of trainers

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**Assessment Literacy Modules**

**Description:** Online modules and supporting toolkits provide teams the following modules of information: 1) Fundamentals of Assessment, 2) Assessment OF Learning, 3) Assessment FOR Learning, and 4) Assessment AS Learning. In addition, the materials will include the integration of DPI’s balanced assessment chart and will bring in knowledge and skills related to “screeners” and “progress monitoring tools.” Lastly this module series include a needs assessment tool that districts can use in order to assess their current balanced assessment system.

**Available:** Fall 2011  
**Accessed through:**  
www.wisconsinRtIcenter.org
EVIDENCE-BASED PRACTICES

Description: Resources and processes for implementing evidence-based practices as well as assessing current practices for evidence of effectiveness will be covered. This includes the addressing the implementation of interventions for students below benchmark and challenges for students above benchmark in order to deliver high quality instruction to all.

Delivery to Schools: Spring 2012
Trainer of Trainer Series: Fall 2012
Delivered by: CESAs & Statewide Network list of trainers
**SYSTEMS COACHING IN A RTI FRAMEWORK**

**Description:** Coaches Training Series and regional supports coordinated by the Wisconsin RtI Center.

**Participants:** Internal district coaches and external coaches supporting any systems change process such as RtI, PBIS, CREATE, school improvement, etc.; instructional and literacy coaches; principals and district leaders.

**When Provided:** Annually

**Aim:** To provide school- and district-level coaches with the skills to effectively coach individuals and teams through their systems change efforts.

**Objectives:**

1. Provide general effective coaching skills training and tools.
2. Provide content specific knowledge and skills.
3. Provide structured network between coaches across the state.

**Learning Outcomes:**

1. Learn and practice coaching strategies for systems change.
2. Learn and practice coaching strategies for individuals and teams for the implementation of high quality instruction, balanced assessment, collaboration, and culturally responsive practices with fidelity and mastery, in a multi-level system of support.
3. Acquire and practice effective coaching skills and dispositions.
4. Learn and use the coaching format in a variety of coaching situations with both individuals and teams.
5. Understand the mentoring-coaching continuum and differentiate coaching strategies in response to individuals’ and teams’ knowledge, skills and needs, stages of change implementation, and levels of development.
6. Establish coaching as ongoing aspect of a school’s or district’s culture and the capstone of a systematic professional development program aligned with goals and plans for improved student learning.

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**FAMILY ENGAGEMENT IN A RTI FRAMEWORK**

**Description:** Online modules and supporting toolkits provide teams, inclusive of family representatives, information on the fundamentals of RtI for families, and link this information to research-based best practices in meaningful family-school-community engagement. Activities will integrate the fundamental

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**Beginning:** Winter 2011

**Length:** 6 sessions

**Cost:** $300 per participant

**When and Where:** locations across the state, selected for accessibility to participants

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**Available:** Fall 2011

**Accessed through:** www.WisconsinRtICenter.org
components of the Wisconsin RtI Framework at the universal, supplemental, and intensive levels with family engagement activities identified in Epstein’s six types of family involvement.

**DEMONSTRATION SITES**

**Description:** Through an invitation to apply and selection process, schools partner with the Wisconsin RtI Center for the purpose of piloting and/or studying a specific approach, strategy, or tool. The school receives Wisconsin RtI Center technical assistance support and access to training in exchange for agreeing to participate in structured data collection with the Center.

**Participants:** Contact the Wisconsin RtI Center for more information

**Criteria for Participants:** Annual application process

**Aim:** To facilitate systems change on a case study basis in order to share and disseminate evidence-based practices.

**Objectives:**

- Provide direct support to school level teams in exchange for evidence of effective practice.

**FEATURED SUCCESS STORIES/RECOGNIZED SCHOOLS**

**Description:** School sites share their implementation story and example resources and/or to receive recognition as a Wisconsin RtI systems site.

**Aim:** To provide peer-to-peer sharing as well as community recognition to schools reaching goals while providing a network model to others.

**Objectives:**

1. Provide the school-level team recognition of efforts.
2. Provide the state a network of school-level models of effective processes and practices.
3. Facilitate organized networking between schools in order to support and enhance their efforts.
Appendix 16 - Full Literature Synthesis of RtI, Including Citations

References

Sources cited in the above literature review:


References
Matthew K. Burns, Ph.D., at the University of Minnesota, conducted a literature synthesis for the RtI Network in 2010: Response-to-Intervention Research: Is the Sum of the Parts as Great as the Whole? http://www.rtinetwork.org/learn/research/response-to-intervention-research-is-the-sum-of-the-parts-as-great-as-the-whole
Retrieved 1/15/2011
Sources cited in the above literature review:


<table>
<thead>
<tr>
<th>Emails sent to State Superintendent on Wisconsin's draft waiver</th>
</tr>
</thead>
<tbody>
<tr>
<td>I support the DPI waiver for all publicly funded schools, including charter and virtual.</td>
</tr>
<tr>
<td>I support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. As Wisconsin applies to the federal government for a waiver of NO CHILD LEFT BEHIND requirements, please do not cave to lobbyists who want voucher and charter schools excluded from accountability requirements such as AYP.</td>
</tr>
<tr>
<td>I urge you to continue to keep the pressure on to hold charter schools accountable in the same way the public schools are accountable. All taxpayer funded schools should have the same requirements for testing and</td>
</tr>
<tr>
<td>I support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. As Wisconsin applies to the federal government for a waiver of “No Child Left Behind” requirements, the voucher school lobby is pressuring the State Superintendent to exclude voucher and charter schools from the accountability to which public schools will be subject. Charter and voucher schools cannot get a free ride, while public schools are held accountable. I am a public school teacher. I just spent $150 in January to provide materials for my special education needs students. It is wrong for taxpayer funds to support a &quot;cherry-picked&quot;</td>
</tr>
<tr>
<td>I support the DPI waiver, especially the plan to hold all taxpayer-funded schools accountable, including vouchers</td>
</tr>
<tr>
<td>Dear Mr. Evers, As a parent of 3 students who love their Magnet school I applaud your new plan to be exempted from NCLB and I thank you for making the private voucher schools every bit as accountable as the publics. Keep protecting public education b/c it's under attack by the Radical Right and their privatization agenda. Thanks.</td>
</tr>
<tr>
<td>I support the DPI waiver, especially the plan to hold all taxpayer-funded schools accountable, including vouchers</td>
</tr>
<tr>
<td>I support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. As Wisconsin applies to the federal government for a waiver of “No Child Left Behind” requirements all Wisconsins schools must be held accountable to the same standards. Do not let the voucher school lobby pressure you to exclude voucher and charter schools from the accountability to which public schools will be subject. Charter and</td>
</tr>
<tr>
<td>Just letting you know that I believe that charter and voucher schools should not get a free ride, with “No Child Left Behind” while public schools are held accountable. I don't understand how you would allow some children to be &quot;left behind&quot; just because the type of school that they are enrolled in. It is just not right. Either it is for all</td>
</tr>
<tr>
<td>Please hold voucher and charter schools to the same standards, the same accountability, as all public schools are held. Any waiver of accountability to voucher and charter schools, especially in this time of extreme cuts, is another nail in the coffin of our public schools. Public schools are the foundation and the protection of</td>
</tr>
<tr>
<td>All schools need to be held accountable for test scores. Picking and choosing which schools do not need to meet the same standards as others is unfair and wrong. This change should not happen!</td>
</tr>
<tr>
<td>I strongly agree that all schools, including voucher and charter schools, should be held accountable as the public schools are during the federal waiver application process. Any school that receives state or federal funding must have the same requirements in order to have equity in education. There should be no exceptions. Please hold</td>
</tr>
<tr>
<td>I support the plan for Wisconsin to apply for a waiver for NCLB. I am especially concerned that ALL schools be held accountable. If they get taxpayer funding, they need to be accountable!</td>
</tr>
<tr>
<td>Dear Superintendent Evers: I support the DPI waiver, especially the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. Keep up the good work. You have my support.</td>
</tr>
<tr>
<td>I would like to voice the importance of this waiver and one of its key provisions. It is very important that all schools hold the same accountability standards.</td>
</tr>
<tr>
<td>I support the DPI’s efforts to find a better way to measure how our school’s are performing with your waiver application. I am very glad that included in the waiver are provisions that hold all schools that receive taxpayer funding to the same accountability standards. My hope is that in your final application you will include all subjects, such as art, music and physical education. Because these also help to create a well-rounded student.</td>
</tr>
</tbody>
</table>
Dear Dr. Evers, Please continue your outstanding leadership of Wisconsin Schools and make sure that all schools are held to Wisconsin’s high standards. Please do all you can to stop voucher school lobbyists to allow exemptions for voucher and charter schools from the accountability standards that will apply to our public schools in meeting “No Child Left Behind” requirements. The funding drain must stop and fairness must return to Wisconsin.

Please consider my support of the NCLB waiver: I support the DPI waiver, because it plans to hold all taxpayer-funded schools accountable, including vouchers and charter schools. Thanks -

We support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools.

Please support public schools who value art, music and physical education. These subjects are what our students get excited about...what they need to be well rounded. All our students need and deserve a balanced education to become a balanced adult. Let the politicians know that Wisconsin values all our teachers.

I support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. Charter and voucher schools cannot get a free ride, while public schools are held accountable.

I support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. As Wisconsin applies to the federal government for a waiver of “No Child Left Behind” requirements, please do NOT exclude voucher and charter schools from the accountability to which public schools will be subject.

Please know that I do not want charter and voucher schools to be held to a lower standard than public schools.

I feel it is important to let you know that I support the plan to hold all taxpayer-funded schools accountable, including voucher and charter schools. Do NOT exclude voucher and charter schools from accountability that the public schools are subject too. These schools should NOT get a free ride and must be held accountable, even if they are taxpayer-funded.

Please hold all Wisconsin schools, public - voucher - charter, accountable since they are all supported with taxpayer fund. Voucher and charter schools should not be exempt from what is expected of the public schools in Wisconsin.

I support the plan to hold all taxpayer-funded schools accountable, including charter and voucher schools, accountable to the same standards as regular public schools.

I support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. Please do not exclude voucher and charter schools from the accountability to which public schools will be subject. Charter and voucher schools cannot get a free ride, while public schools are held accountable.

I support the DPI waiver application to the federal No Child Left Behind law. It is essential that all schools that receive taxpayer funding be held to the same accountability standards, including voucher and charter schools. It is also essential that accountability measures be crafted with educators at the table, not by politicians with their thumbs up.

I am a Wisconsin taxpayer and public school teacher who supports the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. Please do NOT exclude voucher and charter schools from accountability that the public schools are subject to. Charter and voucher schools should not get a free ride, while public schools are held accountable. That makes absolutely no sense.

I do not want my tax dollars drained. Voucher and charter schools should not be exempt from accountability standards.

I support the plan to hold ALL taxpayer-funded schools accountable, including vouchers and charter schools. I just really don’t understand how they are taxpayer-funded and not held accountable. Mind boggling. PLEASE understand that charter and voucher school should not get a free ride while our public schools are held accountable.

Good evening, I am writing to let you know that I believe that voucher and charter schools should be subject to the same requirements as public schools. How can you measure progress or compare them when you don't use the same form of accountability? As I see it, vouchers are draining our public school resources, so if they must I am writing to let you know that I support the plan to hold all taxpayer-funded schools accountable, including voucher and charter schools. Those schools, voucher and charter, should not be excluded from the accountability to which public schools will be subject. Thank you for your consideration in this matter.

I believe all schools, public, charter, private, or voucher, should be held accountable to the same standards. The way things are taught in order to achieve those goals is up to the schools, but the standards should be the same.

I believe all schools that receive public funds should be held to the same level of accountability. While this is a good first step, there are some areas not measured in this waiver which we hope will be included in the final application, such as art, music, physical education and others designed to create well-rounded students.

Just writing to let you know that I support the plan to hold ALL taxpayer-funded schools accountable, including vouchers and charter schools. I just really don’t understand how they are taxpayer-funded and not held accountable. Mind boggling. PLEASE understand that charter and voucher school should not get a free ride while our public schools are held accountable.
Dear Mr. Evers,

I wanted to take a moment to applaud you for applying for a waiver to the federal No Child Left Behind law. I think it is important to hold all schools accountable to the same standard, since they are all receiving taxpayer funding. I also think linking exams to common core standards is great. Finally, I think it is important to evaluate teachers, administrators, and schools on multiple factors. I worry about putting too much emphasis on one test on one particular day. I appreciate all the work you put in on this and your inclusion of voucher and charter schools.

I support the DPI waiver, especially the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. It is really important that ALL schools in Wisconsin submit a waiver application that is comprehensive and designed to improve the quality of our schools. I am requesting that you officially go on record about key provisions, such as holding all schools that receive taxpayer funding to the same accountability standards. I support support the DPI waiver application to the federal No Child Left Behind law, especially the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. Thank you for all that you do to strengthen our state's public schools. I recently saw a story in the online version of the Wisconsin State Journal (http://tinyurl.com/6qcmhwy) explaining that you are planning to include voucher and charter schools in the state's accountability plan for ESEA Flexibility. I wholeheartedly support your efforts to do this as this is an issue of basic fairness and as a supporter of public education, I want the tax dollars that I invest in public education to be spent wisely. Charter and voucher schools should be held to the same standard.

Sincerely,

[Signature]
I am writing to let you know that I support the DPI waiver for the No Child Left Behind, especially the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools.

Voucher and charter school must be held accountable! Don't let this get by!

Dear Superintendent Evers, I am pleased to hear the state is revising the accountability process for our public school system. In reading through the DPI’s Accountability Reform Overview I have two pressing comments. 1. In the suggested increase for high school credits, I noticed there are no credits required for fine arts. Yes, I understand these may be considered "electives" in the fine print. However, how will our students become cultured, creative thinkers if they are never taught to be so? Well-taught fine arts classes bring together multiple subject areas and make history and culture tangible. They also allow students to excel in areas other than traditional academics, giving more students opportunities for leadership. In order for students to fully develop their minds, I feel 1 fine arts credit should be added to the list. 2. It is difficult for us in the education
The following worksheet lists all responses to Wisconsin's waiver survey.

**Question No.**

<table>
<thead>
<tr>
<th>Question text</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. What best describes your role?</td>
</tr>
<tr>
<td>2. How familiar are you with the current requirements of the Elementary and Secondary Education Act (ESEA) / No Child Left Behind (NCLB)?</td>
</tr>
<tr>
<td>3. Should Wisconsin request a waiver of any ESEA/NCLB requirements?</td>
</tr>
<tr>
<td>4. The narrative clearly explains how Wisconsin will implement College and Career Readiness standards and assessments for all students.</td>
</tr>
<tr>
<td>5. The narrative clearly describes a focused plan toward improving college and career readiness for all students.</td>
</tr>
<tr>
<td>6. The actions described clearly show how the college and career readiness standards and assessments will help improve outcomes for English Language Learners (ELLs).</td>
</tr>
<tr>
<td>7. What strategies/supports/resources could be provided to better address the needs of ELLs in the area of college/career standards and assessments?</td>
</tr>
<tr>
<td>8. The actions described clearly show how the college and career readiness standards and assessments will help improve outcomes for Students with Disabilities (SWD).</td>
</tr>
<tr>
<td>9. What strategies/supports/resources could be provided to better address the needs of SWDs in the area of college/career standards and assessments?</td>
</tr>
<tr>
<td>10. How will transitioning to college and career readiness standards and assessments impact the preparation of Wisconsin’s high school graduates for postsecondary education, workforce training, or immediate employment?</td>
</tr>
<tr>
<td>11. (Educators only) ...Please identify specific Wisconsin Statutes, Administrative Rules, or DPI requirements that could be modified or eliminated to reduce duplication and unnecessary burden in the area of college and career ready standards and assessments.</td>
</tr>
<tr>
<td>12. The narrative clearly explains how Wisconsin will develop a statewide system of support based on differentiated accountability.</td>
</tr>
<tr>
<td>13. The four priority areas (achievement, growth, closing gaps, and on-track/postsecondary readiness) will result in the proper identification of schools along a performance</td>
</tr>
<tr>
<td>14. The multiple measures included in the accountability index are meaningful indicators of college and career readiness.</td>
</tr>
<tr>
<td>15. Reporting an annual accountability score, based on the index described in Principle 2, will provide valuable information about school performance.</td>
</tr>
<tr>
<td>16. The accountability determinations [Significantly Exceeding Expectation, Exceeding Expectations, Meeting Expectations, Not Meeting Expectations, Significantly Below Expectations, Persistently Failing to Meet Expectations] are clear and appropriate ratings for a differentiated accountability system.</td>
</tr>
<tr>
<td>17. Do you have suggestions for different labels?</td>
</tr>
<tr>
<td>18. The supports and interventions described clearly show how a statewide system of support based on differentiated accountability will help improve outcomes for English Language</td>
</tr>
<tr>
<td>19. What strategies/resources could better address the needs of ELLs in the area of supports and interventions?</td>
</tr>
</tbody>
</table>
The supports and interventions described clearly show how a statewide system of support based on differentiated accountability will help improve outcomes for Students with
What strategies/resources could better address the needs of SWD in the area of supports and interventions?
What are some powerful incentives that can have the greatest impact on a school’s performance? Please share 2 or 3 incentives.
What supports have the greatest impact in improving student learning in a short period of time? Please share 2 or 3 of the most critical/high leverage supports.
On a scale of 1 to 10 please rank the following interventions as to which you believe have the greatest impact on a school that is not performing well, with 1 being the most effective intervention.
Other suggestions?
NCLB requires SIFI to provide SES. Do you agree or disagree with the proposed modifications to SES as outlined in Principle 2?
(Educators only) ...Please identify specific Wisconsin Statutes, Administrative Rules, or DPI requirements that could be modified or eliminated to reduce duplication and unnecessary burden in the statewide system of support.
What are some ways we can increase rigor and personalize learning?
The narrative clearly explains how Wisconsin will implement the Educator Effectiveness (EE) system for teachers and principals.
The narrative clearly describes a focused plan toward improving educator practice.
The actions described clearly show how the EE system will help improve outcomes for English Language Learners (ELLs).
What strategies/supports/resources could be included in the EE system to better address the needs of ELLs?
The actions described clearly show how the EE system will help improve outcomes for Students with Disabilities (SWD).
What strategies/supports/resources could be included in the EE system to better address the needs of SWDs?
(Educators only)...Please identify specific Wisconsin Statutes, Administrative Rules, or DPI requirements that could be modified or eliminated to reduce duplication and unnecessary burden in the educator effectiveness system.
What other comments or suggestions do you have?
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Resources need to be made available to remediate students. This is currently not practical given the scope of this issue.

Access to computer based instruction, more human resources to provide intervention and follow-up.
Don't understand why ELL have their support changed. A 3 language level really is not going to meet needs with targets moved up.

Again, they seem to be pulling supports from these kids and raising bar. To be special ed one must already be two years behind, now they are four.

choice of parents to opt out of tests at 4, 8, 12 remove some of paperwork because information is in data base Look at some of the requirements put on schools to take care of all needs of students (ie homeless transportation that has huge costs) Don't open up open enrollment so it lasts forever Give us time to implement things well.
I'm concerned about schools that have a high percentage of ELL students will be labeled "failing" - when in reality, they just have a majority of kids taking the test in their 2nd language.

I'm concerned that schools with high levels of poverty will be labeled "not meeting expectations" - when in reality, they just have a majority of kids taking the test who don't have consistent food/shelter/etc.

Improve oversight and enforcement of compliance by schools and districts with IEPS and requirements of IDEA. Support parents of SwDs so they are aware of rights under IDEA and ADA.

Funding support so that small rural districts with limited ELLs can pool resources for services through a CESA.

A rating scale does not present the entire picture of a district. I would expect that a narration would accompany any rating to provide a complete picture of the district's unique situation.

Don't test or impede students who have shown good academic ability simply because a second language is spoken in the home.

Create expectations that are reasonable and useful. Continuous progress should be important but equal progress is often unrealistic.
We have identified a need for parent and student groups to sit together to learn about college applications, financial aid, ACT/SAT testing, etc. While we do this in large groups, we found that the ELL family is likely to not go, can't go because of work, do not have the requisite background personally, etc. We are piloting specific ELL family meetings to work with families to plan, teach, support students and families prepare for post secondary options.

This would be the benefit of Smarter Balance Assessment be the ACT or Work Keys. If not, then something similar to help students understand the skill base necessary for post secondary success. I know that NWEA have produced a report that correlates MAP results to EXPLORE readiness. I have not studied this well, but the concept is promising.

Less local control and stronger frameworks. School districts are duplicating so much work. Currently, in CESA 1 we are trying to work together more. Too many changes require large amounts of time and expert knowledge that all districts do not have.

"Educator practice will count for half of the evaluation; student outcomes will count for half of the evaluation." I am concerned since I teach remedial reading that 1/2 of my evaluation will be from student outcomes. Sometimes a small gain on paper is actually a large gain for the student. Will their be consideration of situations such as these? What about the students who refuse to learn no matter how many interventions, second chances, etc. are given to them? What about the students who see the testing as a waste of time and don't really try because it doesn't affect them? Tying my evaluation to those types of students is not right. I have no control of who is placed in my classroom. I expect that I am accountable for my actions in the classroom, and the students need to be learning. However, I am concerned about the evaluation not being an accurate indicator.
I support the purpose and goals of the Common Core. However, the EPAS assessment system, including the ACT, are already research based and have buy-in from parents, educators, and students. Development of another standardized assessment just for the Common Core will take a lot of resources and years to implement. I'm also concerned about buy-in. There is enough overlap with the CCRS and the Common Core that the EPAS assessment system should be adopted as our state assessment.

Six levels or differentiation is too many. Four would do in most rubrics. Also, with the variety of accountability measures noted above, Academic Growth, needs to be the primary focus and measuring stick for individual students, schools, and school districts. We need to have a "value added" system.

My hope is the new student data system will decrease the cost and time for current reporting. If the state is going to add a year of math and science, either funding needs to be provided or districts will need to cut other areas.

I am not in favor of labeling school districts. No - but what exactly does each of the levels mean? We tried this on report cards and parents didn't get it. They still want grades which do not work well when you are trying to have individual learning rates with various objectives for varying levels of students.
Have a separate standards, and assessments for students with disabilities. Do not include these students with all students. This is not the least restrictive environment for these students.

If this is a National requirements the Department of Education should be creating the Standards so EVERY State in our Union will be working on the same standards. They should develop and distribute a ready made model for every state to follow. We have a lot of clueless curriculum directors and administrators in charge of the different states and districts.

Could there be some sort of requirement for professional development for current general education professionals to inform them of multicultural philosophies and the impact upon English Language Learners? Also, a requirement for training that has evidence of transference to practice whereby educators are taught interventions and supports that can be delivered within the general education setting? Lastly, requiring pre-service training in both of the above mentioned areas prior to granting an educator's license.

Require evidence of instructional practices that support SWD's in the educator evaluation instrument.
Training of school counselors in cultural expectations (family expectations) of the cultures in the school in which the counselor works (high school and middle school levels)

Nothing new here. Transition programming has been a significant part of the IDEA for years.
Increased funding - change in formula

See above

Not different labels but a better understanding of state agencies on what public schools are facing in terms of needing additional resources for a growing number of severe issues families bring. The increase in Autistic students is putting a strain on supports in schools.

Need more support and training for staff to work with students with ELL needs.

I believe having each student take the EXPLORE, PLAN, ACT, and Work keys assessments is a step in the right direction--however it won't happen without the state supporting the cost. I think the state needs to work closer with the university system to find a way for us to track how specific students do after they leave high school. This data is imperative to improving our high schools.

Allowing schools to have access to how students are performing at the university level is imperative to this goal. We currently collaborate with our local technical colleges this way and it has done wonders for the work we do. However, the majority of our students go on to a 4 year college and we cannot track their progress so it cannot help to inform our instruction. I would like to see the ACT become the assessment used to assess students at the junior level and it is connected directly to the college readiness standards.
Everything is too vague...and from past experiences they change at a moments notice. There is no follow through and schools are expected to meet criteria but with no support from DPI who implements rules.

Not all students will be able to go to college. To force a student who clearly is not college material to strive for that goal will only cause them to drop out because they can never achieve that standard. Where do these children go then? Does it make me a bad school because I can not get them to college? Not all children are alike and you are still trying to make everyone the same, which was the problem with no child left behind.

Special Education also includes higher level learners. How are children that are labelled gifted and talented going to receive services. Too often this group of kids gets little funding and support because their test scores are high. Wisconsin state law requires that ALL student needs are met, not just the children with the lowest test scores.

I think it needs to be very clear what these labels mean. It shouldn't be different in every district.

Alternatives to traditional requirements for a diploma. Given language barriers and vast differences in life experiences, expecting ELL students to achieve at the same level and students whose whole school experience prepares them to success at the HS level is unrealistic.

Maintain accommodations currently available for the WKCE. Maintain the standard that most SWD students take the same test as non-SWD students.
The threat that looms over not focusing on the WKCE is a roadblock to making the necessary changes to core curricular areas. Everyone who has worked with standardized testing knows that making major curricular changes will result in a "one step back before making several steps forward." With the proficiency percentages increasing, we cannot afford to take the one step back and not chance making AYP. We are at a time when politics have shaken public trust of public schools. The impact of not reaching AYP will be detrimental in our communities. We are committed to the Common Core Standards because they "begin with the end in mind." They provide feedback. Most recently the Governor has laid out the Read to Lead initiative. This is a noble initiative; however, he is basing his results on the randomness of NAEP. We need to understand the target. Now we have the three targets of the WKCE (based on model academic standards), the NAEP (which frankly is to random to even consider), and the newer balanced assessment based on the recommendation of the Next Generation task force (based on the Common Core Standards). Let's put the WKCE behind us and move forward with the Common Core Standards. As long as WKCE will determine our worth, we will not ignore it.
Allow districts an alternative system based on life experiences and education to assess if a potential teacher is qualified. DPI makes this process very burdensome when its requirements are based on Praxis scores and college equivalency of coursework for individuals who received their education abroad. I know of a Japanese educator living in WI who applied for Japanese teaching licensing with the DPI and was deemed unqualified to teach their native language by these requirements. Instead they were given a license to teach ELL and English Literature based on coursework. This makes no sense that this individual is qualified to teach English but not their own language, even having taken coursework in second language acquisition skills as part of ELL coursework. At the same time this occurred, three districts had to cancel their Japanese distance learning program because they could not find a licensed teacher when the previous teacher changed positions. The DPI itself failed to provide an environment in which schools and districts have the flexibility to focus on what’s best for students by not looking at the life experiences of this individual. Basically, it came down to a lack of credits in Japanese coursework. You would think that having a high school diploma or college degree with multiple teaching certifications from Japan would meet the requirement of knowing the language.
Besides a new assessment of English acquisition should there be an alignment of curriculum? I know the new WIDA standards are aligned with the CCSS but are the district curriculums?

Teacher development IAW PI 34. The current state plan is excellent. It needs to be enforced.

Make sure that staff members who have an ELL student are kept informed of what level they are functioning at in terms of their English Language and what is in their annual plan.

Vocational Assessment; Discuss Assessment with student and key adults in students life; Share results of vocational assessment and IEP with college or vocational school that student is enrolled in after High School Graduation.

These labels do not take local economic into consideration. The Beloit School District is a good example of a district that needs financial help before it can be compared to more affluent districts.
You need to include Library Media Specialists in your choices! Yes, we are teachers & certified but leaving us out displays a lack of concern at the State level. This shows across the State as many library jobs are cut, librarians are added more duties and more buildings (as library staff retire), and funds are cut. It amplifies lack of concern that shows up by legislators in trying to take money away from the Common School Fund which is the sole budget for many libraries in school districts in Wisconsin.

What about pass/fail. Too many labels adds a lot of work, testing, reporting specific changes, etc. It also fails to allow schools to try something to see if it will work.

The waiver request is woefully inadequate with regards to identifying the SPECIFIC supports and/or resources that will be provided ELLs. The application simply bullet points vague ways to measure ELL deficiencies and even more vague intervention, resources, and supports. There is no actual, methodical plan for support and intervention.

The states omission of any meaningful plan or SWDs is even more egregious. The application states that “supports and interventions will match the severity of the problems.” How? What are the specific supports planned or provided? How will they be implemented, managed, measured?

I think the labaels are fine, however, I fail to see why a school “meeting expectations” would be identified as a REWARD school. Why does that make any sense? For simply meeting what was expected of you, you are rewarded? That methodology is flawed.
Our school needs more ELL teachers to help the students with their school work. Testing them isn't teaching them.

Schools need more SWD teachers and assistants. Our school has been seeing more and more special need students but staff increases are very slow, if at all.

Need for bilingual programs in k-12 settings. Need for training programs for these teachers.

Simplify categories of licensure to be much more general.

One on one tutoring with the help of interpreter

every body's needs are different

Involve parents and highlight the need of education

Improvement in Reading should be top priority
More Staff trained to help those students in need of ELL assistance. Currently our district has two individuals attempting to serve the entire ELL population. Both are spread very thin and unable to do their jobs effectively due to the huge discrepancy between the ratio of teachers and students.

There is no concrete methods provided. None

NCLB lack of funding to low performing schools. Those schools need greater funding not less. They deal with social economic levels that far lower yet are expected to have scores equal to those areas that are much higher.

It's not the labels that are the problem. The problem lies with how schools are expected to meet those labels. We are asked to do more with less. When schools preform low, they receive less funding. The cycle will continue no matter the label. The issue is not with the schools alone. The home issues must be addressed.

Let small rural districts receive Title III funds directly instead of channeling through CESA so we can better support ELL families in our district. It all helps, even if it is a small amount of grant funding.

SWDs need assessment based on reasonable expectations of their attainable outcomes. Some can potentially achieve college/career readiness while others could never be expected to.

I did not see specific address to Spanish speaking students who are US citizens, but Spanish is their first language. How will they prepared for college, since their parents are not educated in our university system?

more support staff
Resolve the illegal immigrant situation. Offer more grants and scholarships. Offer support for students with special education needs. Offer more programs in student's native language.

More supports. A minimum required by each institution receiving federal funds to recruit students. Additional attainable programs with modifications and accommodations.

IEP documents are too extensive and costly to school districts. These should be in a friendlier language and subsidized by the government. The opportunity for teachers to move up to their professional licenses without the non-sense PDP plans that really do not make an impact in teaching with quality. All teachers efforts should go to the classroom. Doctors do not have to do PDP plans to keep their licenses neither lawyers, why teachers seem to be always penalized and their profession taken as nothing. We need to respect teachers and make their careers more rewarding and sensible to their needs to give all their efforts to educate children not to keep their licenses.

Stop the bureaucratization of districts including administrative personal, regional executives, etc. and put the money where it is used and needed the most! STUDENTS FIRST, NOT SPECIAL INTEREST GROUPS AND LOBBYISTS! Stop hiring people - to make decisions - that have never taught in the classroom. People that have taught decades ago, have no understanding of how students' societal, social, emotional background looks like. Teachers that are currently teaching should have a say in what is right and good for students in order for them to achieve and be ready for college or a career. PS. NOT every student is made for college! STOP pushing people through the system. INFLATION of grades is not the panacea!

DON'T fix what ain't broken! POURING money into failing schools is not going to make a difference. Look at well performing schools with high academic achievement, adapt their model, modify it for the various failing schools and apply it to their individual needs.

STOP with the abundance of acronyms! What a bunch of BS. Again, stop bureaucratization of schools and districts and hold parents and students accountable! IF PARENTS can't be guiding role models, do not punish schools for the failures of the students. Parents NEED to start parenting, and schools need to be let alone for educating/teaching!
Early intervention and high quality instruction at the early grade levels is key for improving outcomes for ELL's. Resources should be focused at the 4K-3 level in order to help English Language Learners be "on track" for college and career. High quality assessment and instruction in early literacy is also critical for ELL's and all students.

Districts that are already using highly valid and reliable assessment measures such as Individual Growth & Development Indicators, DIBELS, AIMSweb, Measures of Academic Progress (MAP), Explore/Plan/ACT should not be required to duplicate their efforts by taking state-mandated assessments (kindergarten screening, third grade reading, etc.)

Better training and supervision on the transition plan area of the IEPs. I sit on IEP teams and have seen special education teachers do brilliant work in this area. Unfortunately, I have seen abysmal work as well. Better training is needed for the teachers as well as better supervision by SEAs.

The September 1 start date for ALL Wisconsin schools. It is much easier to teach students the last week of August than it is the second week of June.

Have staff available at the secondary level to assist in providing instruction and assessment in the ELL student’s language of choice. I believe them to be adequate under the current guidelines for SWDs.
Mentors and tutors would be most helpful in hopes of helping individuals meet their goals.

Bosses who understand the needs of those with disabilities and how they could be productive citizens within the work force. I have two examples of students who would benefit from this understanding. One would be in the area of child care where the individual could read to young child, assist with art and snack preparation, etc. The critical piece would be that this individual could never be left alone or responsible for a group of children. Another area would be in the area of factory work where the job was repetitive in nature. Grooming students with disabilities would be beneficial to all.

Too much emphasis is placed on test scores. Perhaps an evaluation by a principal or teacher could be greater emphasis in accepting how students will do. I would not be a principal today if test scores were considered the only viable assessment as to how an individual will do in life.

Many an individual knows theory (book learning) but has missed the necessary components of application—communication, breaking a concept down so it is understandable. An anecdotal form with specific examples of what is accomplished would be more helpful in determining a good fit for a position.
Labels are OK, but should be applied to each category separately. A school with low relative achievement, but demonstrating growth and closing gaps should be recognized as a successful school.

Mastery, Advanced, Proficient, Average, Developing, Minimal, Not Meet or Fail

1. Change RtI to RtI/MLSS. The U.S. Dept of Education has taken to calling Response to Intervention by the new descriptor Multi-Level System of Support. 2. Is FAY gone? How do we account for mobile students in school accountability measures? 3. Change SLOs to PLOs…the acronym will sound offensive to some. 4. With more schools included due to decreased cell size, we will need to be sure we dont get an unintended consequence of segregating students with disabilities. 5. When describing the Attainment Gap, we reference five racial/ethnic subgroups/Will that change with new reporting requirements? 6. Under Parent Involvement, we list a number of parent involvement initiatives; include Wisconsin Statewide Parent/Educator Initiative (WSPEI), a $800,000 yearly grant to improve parent involvement for families of students with disabilities. Our State Personnel Development Grant (SPDG) also funds a number of parent involvement initiatives. 7. Suggest we use IDEA discretionary dollars to fund a RtI initiative to improve culturally responsive classroom practices, aligning with our CREATE work. 8. Suggest also we expand their capacity to deal with gaps for students with disabilities in Focus schools.

1. Our SIS work to permit LEAs' IEP teams to complete IEPs on-line AND develop programming to 1. align IEP goals with CCSS and 2. ensure compliance. 2. This is an opportunity to applaud our state's commitment to begin transition services to students with disabilities at age 14 (instead of 16 as required in IDEA).
Please do not assess ESL students until they have had sufficient time to learn to speak, read and write English well. Testing children before they have had needed time produces poor results for schools and creates low self-concepts for the children.

Require culturally relevant instructional practices to be implemented for all.
Professional development on co-teaching, both purpose for and styles of co-teaching. There needs to be mandated trainings so that teachers understand that collaboration between a general educator and an ESL teacher falls under best practices. Mandated trainings would show teachers, who just want to close their door and teach, that stronger collaboration between different kinds of teachers leads to better academic gains among all learners.

Principals should not be responsible for conducting professional reviews/evaluations of the educators in the individual principal's school building. Fidelity checks and informal observations are not an issue. However, outside reviewers should be scheduled to conduct teacher evaluations. The principal and teacher need to be more trustworthy of each other. The relationship between the pair is somewhat diminished knowing that the principal is making formal evaluations. Principals should be more like instructional coaches, team players, collaborators. When they are given the task of evaluating their teachers, I believe, teachers react too negatively and, in turn, principals maintain a dominating, somewhat threatening presence in the school building. I think, teachers would see their principals as being more competent and helpful if principals did less evaluating and more modeling/coaching/problem solving. Yes, teacher evaluations are necessary, but the district should send in someone else to do the job. No, no new positions need to be created for this, but rather creative revamping of professional duties of the current positions.
For both ELLs and native English speakers, I have to question whether putting so much emphasis on online testing is going to yield better results. The current ACCESS testing is based on authentic performance (reading, writing, listening, speaking). This kind of assessment for both ELLs and English speakers is more true to the skills graduates will need and use in the real world as opposed to online multiple choice testing.

I think it is essential for some kind of reporting on the % of low-income students that a school serves to be included on this rating system of (Significantly Exceeding Expectations, Exceeding Expectations, etc.) as it is common knowledge that there is a huge impact of poverty on student achievement. It would be unfair to the public to rank certain schools in affluent districts as exceeding expectations, for example, without also somehow noting that the population they serve is better prepared for success by virtue of their home life. At minimum, including a column on the rating report that acknowledges the percentage of low-income students in a school would be appropriate.

From my experience with ELL students they do need some 1:1 time to really discover their language weakness. For example at fourth grade I discovered 2 of my students did not understand that the vowel sounds could be different. This was huge...once they truly understood how to say the vowels in different words their comprehension and reading took off! So some 1:1 time is needed.

Every child is unique in many ways...behavior and emotional is a huge one when it comes to disabled students of varying degree. This population needs extra 1:1 CARE if they are to make progress depending upon how severe their disability is. It usually takes 2 adults to a classroom to help when severe students are integrated.

The sad thing is before no child left behind...which was poorly implemented throughout the state...no one was doing the same thing...or even close. Some schools spent more money and got no results! When do parents become accountable to read with their child?
We have talked a lot about how are students are not ready for the work force. I have seen a lot of educational proposed improvements by educators and people involved in the educational process. I have not seen much input from the customer we as educators/educational community serve. The business community. We can also need to develop standards to get parents involved - if we do not get parents involved in the educational process all this work will be for naught. The money spent will not improve the system and time/money wasted as we will not move the educational bar. We place to much emphasis on the school system to be everything for everyone. We need to develop student curiosity in learning - they want to learn and explore. Once you develop a standard that everyone teaches to - this is lost.

More opportunities for work study type programs to earn credit and work at the same time.
VERY FEW teachers/administrators in WI know much about language acquisition, bilingualism, biliteracy, etc.- including staff at DPI. This has resulted in consistently poor services being provided to ELLs for 4K -12th grade. To be able to make it to college- or be career ready you must have had equal opportunity to learn. With limited or adequate knowledge about how to most effectively teach ELLs, schools do many ineffective- and even illegal things. CHANGE the licensure requirements under PI34 for all educators to include course work about teaching ELLs. Provide extensive PD for DPI staff- and support bilingualism.

How about ADDING a requirement that all licensed educators in WI take coursework related to meeting the needs of ELLs? Research shows consistently that bilingual education (Late-exit, Dual language Immersion programs) produce the highest academic achievement ( Collier, etc.).

Appropriate levels of funding instead of cuts in school funding

Reduce health, PE, financial education graduation requirement. CD students should be exempt from state-required tests.

Make sure not to test more than necessary. Try not to have two different tests (ie WKCE and Smarter Balanced) in the same year.
Asking for the ability to provide a more accurate assessment of ELLs content knowledge via portfolio assessment, perhaps as a supplement to the required English language version of the standardized assessment required by Federal Law.

keep the legislators out of this one and let people in education design this

There is limited credibility of the ACT products.
ELL students as well as other groups of students who have historically not achieved at levels commensurate with Caucasian, non-disabled students, need significant instruction that emphasizes general language and vocabulary development in their first language as well as in English, from the pre-school level on up through the grades. Without this emphasis, other interventions will likely not make the necessary impact. This means that all teachers at all grades need to be trained in instructional strategies that enhance general language development. The gap is there from the moment that the students start school and without schools focusing on language development, the gap just widens over time.

For those who have the potential for college, SWDs should be provided with whatever tools necessary so that their disabilities don't have to impair their ability to achieve. For those who are more likely to be successful in entering a career through other means than college, more direct vocational training while in school and apprenticeship programs, transitional employment, etc need to be options. High Schools in our state have gradually decreased the vocational options available to non-college bound students. Students used to be able to develop marketable skills while still in high school but such programs are rare today.

Act 10 could be repealed so that the unnecessary burden of teachers having less disposable income and thus less ability to provide from their own pockets materials needed for effective instruction and the dramatic cuts to public schools need to be eliminated because they place unnecessary burden of insufficient funding on districts that want to put more resources into strategies to reduce achievement gap but are stretched to the limit to just cover existing programs, which they are now having to cut or slim down.

Not meeting Expectations - School needing additional support to meet expectations
Significantly Below Expectation - School needing significant additional support and resources to meet expectations
Persistently Failing to meet Expectations - School needing very significant assistance, support and additional resources to meet expectations

To make sure CTE teachers are hired or and retained. Carl Perkins money should be funneled more easily to help those programs.

More individualized help and support for students.

Nothing at this time besides getting the Governor out of office.
I sent a lengthy e-mail addressing these issues.
I don’t agree with the credit increases in math and science. I believe too many high school students are graduating unprepared with life skills, i.e., financial literacy, computer literacy, domestic relationships (marriage and parenthood), etc. Having students take another math or science class is not going to help the state or country with all the problems with the aforementioned life skills. How about requiring personal financial literacy instead of the math class? I read on the DPI website that personal financial literacy is a PRIORITY...not according to this new proposal it isn’t...can you say hypocrisy? You get what you pay for...right now the state is not paying for any type of requirement to make sure high school graduates are financially literate. To anybody reading this...ask yourself this question and then answer it honestly. What would have benefited you and your family more in life...an extra math or science class in high school, or a financial literacy class where you learned about money management, saving and investing, insurance, credit and debt, etc? I already know the answer so don’t waste your breath. THEN WHY DON’T WE REQUIRE IT? It is equally important as the Phy Ed and Health requirement if not more. It is COMMON SENSE!!!! Why isn’t COMMON SENSE COMMON PRACTICE. FYI...there are some states that do have a graduation requirement for personal financial literacy.
Simply assessing students more will not improve outcomes. Testing does not equal learning.

More assessments will not help improve outcomes.

On-line writing assessment software/services

Access to more technology

We need to have the resources to do more pull-out classes for SWD and LD students. They have become so malgamated that we can't give them the services they need.

"Expectations" are too vague.
Aside from providing interpreters to help with the language barrier, there is nothing else to be done. The students themselves have to take the initiative to learn English so that they can succeed. The burden has to be placed on them. If they are not willing to do their part, then nothing proposed will ever make a difference.

The District I work for has no problems in this area. We have no need to make changes when things are being done in accordance with Federal guidelines. I'm assuming all school districts would be following the same guidelines so there should be no need to make any other changes.

The labels are meaningless, because the measurements are meaningless. The goal of making everyone achieve more is an idealistic one. We are attempting to improve one of the best overall PUBLIC educational systems that leaves few students behind if they are motivated to succeed. The one exception to this fact is Milwaukee where the voucher system has gutted the public schools by denying that system the funding they need to bring themselves up to the level of the rest of state.
I do know from past experience that many ELLs arrive at either college or technical college and simply do not have the grammar skills or background knowledge in many areas to make sense of the course work. Even if they manage to graduate, they have often found themselves unable to be hired for certain jobs as a result of the inadequacies and end up with jobs that are no where near the field of study. This is not true of all, but many.

Keeping general education class sizes reasonable so that students with disabilities are not in large classes with 30 students. This way, everyone will have access to teacher time and all students will do well.

What is in place seems to be working if student is committed to be engaged.

Possibly..... I think more could be done perhaps focus on the whole person and evaluate the requirements that a student absolutely needs to accomplish to more ahead.

I am not sure; this seems very vague to me.

Still seems very vague to me. I am not sure. All of seems too vague for me to make any recommendations.
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**Culturally responsive training methods.**

There needs to be training for SPED staff and accountability for skill instruction ESPECIALLY at the high school level. If there are clear learning targets in place, support teachers will be MUCH better equipped to teach missing skills toward a standard.

Statewide graduation requirements (see Indiana Core 40 w/ Academic and/or Technical Honors. Streamline the Programs of Study Model and partner with technical schools to offer credit for programs that local schools cannot support due to staffing or equipment shortages. Partner with technical colleges for remediation...they are already doing this for students that are not prepared currently because K-12 did not do its job. Support multiple paths to attainment of standards. Thirty kids and 1 teacher sitting in desks is not going to cut it in the 21st century, especially if they can't read and compute!
Personally, I feel that more time needs to be added to the school day for all kids with plans to get the extra support they need.

See previous comment.

Theoretical framework is there but I am not sure how mapping gets us from the present to a future of success for kids with disabilities. From what I’ve seen of the fair and balanced test protocol great difficulty will be faced by students and their teachers.

Using these accountability determinations will require defining ratings in a way that can be understood by parents, the press, teachers, and others. Without an agreement we can look forward to finger-pointing, complaining, excuse making and other responses.

Full time ELL staff; resource centers near bigger populations.
Reduce number of standards, Gifted and Talented, K-12 Guidance & Counseling, Nursing, At-Risk. Give schools flexibility in determining where they need to use limited resources.

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<th>Preparation for post-secondary placement tests as well as successfully taking post-secondary placement tests</th>
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**Additional Notes:**
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| Progress monitoring availability for language domains throughout the year instead of once a year. |
|---|---|---|---|
| A lot more work on respect and behaviors of students in public schools. Paper tigers will not help students learn until there is much improved discipline. I suggest that a large panel of judges try to teach in the public schools for a while. Go to the average schools; not those where students have been trained to behave as they should so that all students are able to learn in a safe, respectable environment. |
| Measures based on success of graduates. |
Reduce testing as now found in ESEA regulations that cause teachers to teach to a test not teach what is necessary for their individual success.

Many schools do not even have a professional to teach ELLs due to budget cuts. How is that being addressed?

Many of these students will not attend college. Many do not have the ability to function independently. Where is this considered?

What besides student test scores will be considered? The number of SWD in the tested group? Socio-economic status? The number of ELLs? It makes a difference.
More collaboration between Universities and especially at the elementary level. All teachers should be on board with ways on how to implement college/career standards and assessments. There should be resources available for teachers to access on how to better implement college/career standards and assessments. There should be a liaison person between home and schools to connect the importance of a continuing education and/or career options even at the elementary level.

Funding
A requirement of Personal Finance from a Business Education instructor
Attendance/truancy support. The current systems which involves fines and court appearances when first implemented seemed to work but as time as gone on the judges have become annoyed and hostile towards administrators instead of the student/parent(s). Why have mandatory attendance if no one wants to enforce it. From my position in a large high school I see this lack of support for all students, not just ELL students, a primary reason why so many students are not successful. We somehow need to get students excited about their education and where it can take them so they want to attend. But until we find out how to do that penalties need to be in place and administrators should be treated with respect in a courtroom. Otherwise how would you get a student to attend school if the judge doesn’t impress upon them either with fines, overnight jail stays or other means but belittles the one person that followed the truancy model.

Many SWD need an aide throughout their school day and many colleges do not have the resources to continue to provide that.

I am a big believer in A-F grading scale. I really don’t believe that most parents will take the time to read through a report card if it too wording.

Students should be held accountable for their individual results with differentiating diplomas. If schools and individual teachers are to be held accountable, so also the individual students.
After school programs to help with homework

There is too much testing of gifted and proficient learners for RtI. The good basic premise has been turned into a ridiculous amount of testing that doesn't inform instruction.

There is nothing in the document related to native language

Depending on when the ELL student enters our system their journey will become more challenging the older they are when they enter.

There will be SWD students that cannot meet the CCSS standards no matter what strategy is put into place.

Please produce a state wide curriculum that needs to be followed by all districts. Eliminate the number of days required and raise the number of minutes required. What do we do with the student that cannot meet the CCSS and/or cannot pass the assessments at the required level?
Clarification of the growth model as it relates to students with disabilities. Any assessment required by ESEA should be administered to students with disabilities within the parameters specified in the students' IEPs. Accommodations stated on the IEPs and used throughout the year should be allowed during testing.

Clarification of the growth model related to English Language Learners.

Clarification of the growth model related to post-secondary goals in the areas of education, employment/training, and independent living.

Commencement of school term. Except as provided in subs. (2) and (3), beginning in the year 2000, no public school may commence the school term until September 1. If you want to encourage dual enrollment programs (e.g., between high schools and colleges) then this rule needs to go. Many colleges start their terms before September 1st.
Am not an expert in this area

1. While I support the creation of “Standards, Instruction & Assessment Center,” I am concerned over the failure to identify the timeline during which it will be created.
2. I support the SIA Center creating materials to support teaching & learning for all students, including SWD. I also support the fact that DPI is interested in partnerships with higher ed. faculty, but am concerned that there is no detail as to how this partnership (which currently doesn’t exist) will be created. Therefore, I am concerned about the lack of a plan for implementation of this laudable goal.
3. I support the proposal to increase Math & Science HS credit requirement from 2-3. However, I am concerned about the failure to identify the need to obtain legislative approval and the fact that this may not happen in the waning days of the legislative session as there has been no bill introduced to accomplish this laudable goal, and the legislative session is done in March 2012.
4. While I support DPI’s intent to field test use of new cut scores, I am concerned that the draft waiver contains no plan for when this will happen or in what manner.
5. While I support the general concept of Reducing Duplication & Unnecessary Burden, I am concerned that there is no reference to including required IDEA data in this unified system. In particular, IDEA Indicator 14 should be enhanced to get a better picture of no - these are good

Provide strong, effective professional development about the CCSS and effective instructional strategies to the students’ general education and ELL teachers.

Really need to emphasize teacher training in differentiated instruction, accommodations and Universal Design for Learning strategies and techniques. For ALL teachers, not just special education teachers. Also need to require and support collaboration between general education and special education teachers. Too many general education do not understand special education law, rights and how to effectively instruct and support their students with disabilities.
There needs to be support for their time management and organizational skill so that they can become more independent learners.

The accountability scores do not reflect value added.
Increasing the required number of required math and science credits for H.S. graduation from 2 to 3 will lead to unintended negative consequences (i.e. lower graduation rates) for students of all types, including ELLs and SWDs. I would prefer allocating resources to effectively support the individual needs of our diverse ELL population (see later open ended comments), rather than being mandated to add math & science requirements for students who become more engaged from course offerings. In our HS, many students already take more than 2 credits of math or science because they are interested or advised to because of their future plans. Given the role technology continues to play with individualized instruction (i.e. online apps, collaborative learning groups, etc.) support strategies to ensure broader awareness and usage of tools that support ELL teaching & learning.

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5. While we support the general concept of Reducing Duplication and Unnecessary Burden, we are concerned that there is no reference to including required IDEA data in this unified system. In particular, IDEA Indicator 14 should be enhanced to get a 3. Our concern is not with the labels. Rather, our concern is with the draft waiver’s failure to be sufficiently detailed. Please see the next answer for further concerns.

6. LEAs need flexibility to target resources and interventions towards ELLs, and DPI’s help and guidance with providing specific, research based, effective interventions designed to address the needs of ELLs in an urban education setting.

7. LEAs need flexibility to target resources and interventions towards SWDs, and DPI’s help and guidance with providing specific, research based, effective interventions designed to address the needs of SWDs in an urban education setting.

8. With the two-week comment period along with the 2-day notice there was not sufficient time to develop a suggestion. There is an agreement with the choice of 6 categories so that schools do not fall into a middle category that is undefined. There is a concern that missing one index/flag for one subgroup of 20 students would automatically identify a school as a focus or priority school. In addition if one school in the district falls into the persistently failing to meet expectations category the district will be flagged (page 50).
Due to learning gaps, I suggest a grade level be listed in which the child is performing, i.e., B-3 or B to the 3rd power. Then the next year the teacher should begin where the student ended the year before. Learning gaps cause much confusion, and inability to understand the material at hand. Getting a solid foundation makes success possible in middle and high school. Because the student can experience success there are less disciplinary problems and dropouts. As educators we must remember all children to not learn to walk at the same age so all children do not learn to read at the same age. For some it takes longer but they can learn given proper learning skills and more time.

The qualitative labels provide clarity and description not otherwise captured in other labels, such as grading.
The elimination of grade-level assessments and a move toward mastery/outcome/skills-based assessment strategy. We have known for a long time that not all children will learn at the same pace and it is our belief that an assessment system may be created that holds education systems more realistically accountable. ESEA goals are noble; however, the current system does not support the goals—never will.

Meets expectations: Yes or No? Why? (Provide evidence)

-- Support “Standards, Instruction and Assessment Center” approach. -- Concerned this center does not have a specific deadline for creation, and lacks specificity on what resources it would have. -- There is no mention of UDL (university design for...
Significant funding should be provided for training, prior to assessment.
Bilingual programs where feasible, so that they build on the strengths of their home language. Professional staff development that is lead by expert teachers in the area.

The students need more support from teachers helping in the classroom to prepare for the exams.

Common Core Standards for social studies will not be released in time for the 2014-2015 deadline. Secondary social studies teachers will be teaching the state standards for a while yet, but the new tests will focus on the CCS. Should teachers focus on the state standards or the social studies literacy component of the Language Arts CCS? Trying to focus on both seems inefficient, as we will need to redo our curriculum twice during this time period.

Based on the realities of socioeconomic status variations and the need for local control in our districts, I think the expectations should be determined by district based on a range of possible goals provided by the state. MPS and Door County aren't working with the same raw materials, so they aren't going to be able to produce the same results. I know that we can't label student populations as more or less likely to succeed, but we can determine our expectations locally.
I have serious doubts about grading schools based on the criteria in the waiver. While I can see designating schools in need of help, I think other labels will cause more harm than good. In Madison, kids who are above the poverty line do really well. But, the schools they attend may not get a good label because there are lots of low-income or disabled kids at the school, and the bad label will scare middle class kids into other districts, and this will cause the district to perform worse.

Tell the Republicans to stop defunding public education and make them abandon their plans to shift public money to private religious schools.
Systemic program evaluation requirement/provision for review and improvement of instructional programs inclusive of all populations including ELL’s.

Currently it is difficult for some schools, especially for private schools participating in the choice voucher program, to attain sufficiently trained educators and aides proficient in ELL instruction. Access to training, especially for aides, is limited. With new standards, increasing the number of well-trained instructors will likely be made all the more difficult and the need for access to quality training all the more necessary.

The waiver provides little information on how and what kind of supports will be provided to improve the outcomes and growth of students with disabilities, especially for private schools participating in the choice voucher program.

Oftentimes these distinctions are not useful unless the intended audience is familiar with the accepted definitions for the designations. Parents and those in community may find a numeric ranking or grading system more familiar.
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Seeing children succeed from teacher team collaboration and work Community praise and recognition Blue ribbon awards BUT NOT money to teachers, it will kill us as school districts who have worked so hard on PLCs

Professional Development !!!!!!!! Intervention time built in, and use of clear data

Effective educators working in the schools with a single purpose - improved student growth.

High-quality professional development
<table>
<thead>
<tr>
<th>5</th>
<th>Positive School Culture</th>
<th>Properly used Title I resources for rural schools with low income and high needs</th>
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<tbody>
<tr>
<td>5</td>
<td>Increased sparsity aid for rural schools to draw and keep quality instructors</td>
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<td>5</td>
<td>1:1 interventions with the lowest students performed by highly qualified teachers</td>
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<td>5</td>
<td>Increased aid to schools in high poverty areas to draw and keep quality instructors</td>
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<td>4</td>
<td>Small class sizes - adequate ELL/SEA support for teachers. These may not be incentives, but they are things that have a great impact on school performance.</td>
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<td>4</td>
<td>Fund after-school academic enrichment programs. Many schools have no funding for any type of extended day programs.</td>
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<td>4</td>
<td>Need to systematically monitor effectiveness of programs and implementation and take prompt action to eliminate programs that don't work and systems or personnel that are inefficient or incompetent.</td>
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<td>4</td>
<td>Parental school choice - the ability to exit a poor school for a better one. Termination of personnel in leadership positions who cannot effectively lead or manage.</td>
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<tr>
<td>4</td>
<td>High quality curriculum rich in content. Classroom management and school culture conducive to learning without distractions</td>
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<td>Need to systematically monitor effectiveness of programs and implementation and take prompt action to eliminate programs that don't work and systems or personnel that are inefficient or incompetent.</td>
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<td>Parental school choice - the ability to exit a poor school for a better one. Termination of personnel in leadership positions who cannot effectively lead or manage.</td>
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<td>2</td>
<td>A focus on the strengths of a district with a reference to areas needing additional attention rather than a focus on the deficits and shaming where deficits are reported publicly.</td>
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<td>The greatest impact on student learning resides in the quality of the teacher and the ability of that teacher to have a meaningful &quot;connection&quot; to students. Financial support for professional development and flexibility in contact minutes can keep a teacher current.</td>
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<tr>
<td>1</td>
<td>A focus on the strengths of a district with a reference to areas needing additional attention rather than a focus on the deficits and shaming where deficits are reported publicly.</td>
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<tr>
<td>1</td>
<td>The greatest impact on student learning resides in the quality of the teacher and the ability of that teacher to have a meaningful &quot;connection&quot; to students. Financial support for professional development and flexibility in contact minutes can keep a teacher current.</td>
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<td>Funding that will allow professional development time and materials.</td>
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<td>High quality educators who have had professional development and mentoring in best practices.</td>
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<td>I would like to see some scenarios for different ELL levels.</td>
<td>I would like to see some scenarios for different areas of SPED. I believe that this is OK for LD, 504, etc. I worry about our low IQ students and our autistic students.</td>
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<td>The students need to have more rewards/consequences based on their improvement. It seems like a lot of high stakes for the schools who are testing their students who might not have any vested interest in the results. Also, where is the parent responsibility related to school performance?</td>
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<td>Need to re-evaluate if the student is capable of being a learner in the environment as opposed to being in a school based daycare environment. Some students are not capable of learning and showing progress due to the severity of their disability. It appears to use large amounts of the school's resources to provide services to these students who show minimal if any gains academically.</td>
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<td>School districts need more support and guidance in the implementation of Response to Intervention. We currently do not have the flexibility to utilize our special education, at-risk, and regular education staff in a flexible way that will better serve all of our students including ELL. We are behind many states in the implementation of RTI and stuck in the old &quot;labeling and funding&quot; model of special education.</td>
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<td>5</td>
<td>Interventionist would be a benefit, but most districts can not afford the positions.</td>
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<td>5</td>
<td>See comments for ELL. We must move to a system of data driven decision-making for students resulting in interventions, monitoring progress, and ongoing adjustments rather than &quot;identification of disabilities.&quot;</td>
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<td>Student success in completion of high school and transition to post-secondary goals is the biggest incentive. Recognition of academic growth is next.</td>
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<td>Interventionist would be a benefit, but most districts can not afford the positions. We need to consider a more work days for teachers for professional development. We need to provide on going professional development out side of the student day. In order to get this done we need more time with teachers. Our teacher need to become all year professional instead of seasonal professional.</td>
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<td>Monetary or achievement awards for being the best.</td>
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<td>Give back Collective Bargaining</td>
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<th>mentoring internships field trips money field trips</th>
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<th>- formative feedback given to schools and districts that shares strengths and areas of weakness - once a school/district exceeds a threshold of success for a period of time, it is not required to participate in annual reviews of progress, rather be - individualized learning plans for all students performing below the standards that are reviewed every 6 - 8 weeks for progress and revision - flexibility in daily schedules to accommodate intensive interventions - utilizing technologies an</th>
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of course money to maintain standards. Expanding offerings in arts, science labs and tech ed.

involvement of community and parents. partnerships with area businesses.

Reward students at various success levels with tuition reduction or waivers to technical and 2 year colleges. Make it easier for schools to align curriculum with tech and 2 year colleges to help students attain advanced standing at no cost to the district.

Success, relevance, integration of technology. Soft skills seem not to be part of the plan. But assessment and development of them can lead to greater motivation and success on the part of students.

Professional development for staff in literacy initiatives across content areas. The district would, under this plan, choose the professional development (including presenters, facilitators, trainers, etc.). Funding for this purpose would be the incentive.

High quality professional development for teachers.
Adequate funding - years of lag in paying off districts for services given.

Merit Pay based on voluntary time spent outside contract hours in supporting students and families.

Report card on parent participation

Until you provide more support for these students at the local level, there will not be an improvement in this area.

There is nothing in the narrative that would suggest that this will help improve the outcomes for SWDs. Clearer expectations for these students and the interventions that are being used and tracked would help these students. Just because they are in special education does not mean we stop the intervention, it means we try more interventions and track their progress. I don't feel that this always happens, especially at the middle and high school level. It is more about getting through the work then improving skills.

Allowing staff time to collaborate professionally is a great incentive to increase a school's performance. Staff work together to improve what is happening at the building level. Staff don't compete, they work together.

Increased collaboration time amongst staff so they have time to work with the data and use it to inform instruction. Without this time together, improvements will not be long lasting.
Measuring all children through the same testing is not right. It gives a glimpse of the inequity. It is currently difficult to get children labeled as SWD, most parents do not allow that, in the future it will be even harder. Who will help the children that just can’t do what someone else can do to a disability of some kind? We do not have enough resources to handle these children. Not all schools have the resources, yet we must accept them. Perhaps we should have special schools, but that has not worked either. Then we are discriminating. Too many questions and no answers.

All schools should have the same general rules. If I am required to perform audits or measurements, then all schools must do the same. Knowing there is equality across the board would be a powerful tool. Having resource help available, making sure the criteria is fair and equitable. Having said resource help available in a timely fashion. Letting schools identify the children that need help and working with them rather than waiting for a parent to initiate help. If we are partnering for the sake of the child, we should have some say in the outcome.

Attainable goals. Elementary schools should not have to worry about getting children ready for college. We should get them ready for middle school. Each school should prepare for the next level. If we each do our job, then the child will reach as many of these goals as possible. Getting funding into the schools and away from administrative costs. Have each school work with in their budget. All students should receive the same amount from the state, whether private or public. All schools should have to be audited and prove they spend the money on education.

How are gifted and talented programs looked at? Gifted kids are considered special education. How are schools required to meet their needs?

Report individual school and district results. Link student performance to admission standards at state universities and the state Voc.Tech system schools. Current there is no reason for students to strive for high levels of academic achievement. Link student test performance to work permits and driver’s licenses. Prioritize instruction based on student needs. Weaknesses in reading, writing, and mathematics should lead to a reduction of general elective options and more instruction in key skill areas.
The only incentive we need is an assurance that doing well is a good predictor the student has the skills necessary to meet the goals of the common core standards. Obviously, we cannot control life events, motivation, or work ethic.

Programs that provide continuity with a systematic approach.
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<td>Parent/Community accountability for truancy</td>
<td>Support of ACT process to provide consistent data</td>
<td>System based intervention practice...specific best practice models would help districts.</td>
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<td>Increased funding in general</td>
<td>Models of best practice to address the schools that have SWD achievement gaps</td>
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<td>Increased wages for educators</td>
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As long as students are being compared against themselves, keeping their educational history, years in US schools, etc. We should be looking for growth and not expecting them to meet the same criteria as English dominate students.

All new teachers, regardless of discipline, should have a Spanish Minor on their transcripts. It should be part of the licensing process. Yes, it can be done.

There are degrees of disabilities. Schools with severely handicapped students need more financial assistance. There are too many incentives to over-label students with less serious disabilities.

High performing staffs with merit pay for the best and fair, consistent non-renewals for bad teachers. This would be the most powerful incentive of all.

Anything that can reduce student/teacher ratios. SAGE is a wonderful program that needs to be reintroduced and proliferated.
This is a tough area as it takes money. Money isn’t available in rural schools. We have a larger Hmong population and a few years ago we had to hire an interpreter. None were available so we had to hire someone from the Hmong community at $50 an hour! So we need available cost effective solutions especially for Hmong, Hispanic, deaf, etc. We do what we can but the sources aren’t equal across the State.

Seems like a lot of duplication as disabilities are broken down and specialized teachers are needed for specific areas. We also spend a lot of money on wheelchairs, training staff (feeding tube care, etc.). This area is taking more of our budget as Federal and State funding is reduced.

Go back to requiring each CESA in Wisconsin to have a SWD area with staff and allows to work with severe cases of students with disabilities. Money should come from the Federal & State to pay for this program for CESA (including transportation costs) and not from each school district! Our liability increases drastically due to some of these students being fragile, constantly getting infections, choking, needed help in the bathroom (HS SWD students). Add to this fact many students that are more “At Risk” seem to be popping up in these classes (whether they should be or not).

Continuing mandated Supplemental Educational Services or requiring Extended Learning opportunities meaningfully tied to set aside dollars is the ONLY way to ensure that schools and districts will take seriously the work of providing supports and interventions. SES and School Choice MUST CONTINUE to be a facet of the accountability framework. The DPI calls this accountability but it is not. There are no consequences for underperforming schools or schools that fail ELLs, SWD, or low income and minority students equally so that small and rural districts don’t get screwed!

Again, there must be some mandated interventions and set asides in the Federal funding formula for SWDs. Otherwise, there is a serious threat of those vulnerable populations going underserved.

THERE ARE NO CONSEQUENCES.

1. Break the Milwaukee School District into 3-4 districts. They are dragging the State’s performance levels down. 2. Have the Federal Government end the voucher system and reduce Charter Schools, and online schools. You can mandate to public school for these waivers but the growth in other educational choices does not mean all schools (nonpublic) will be performing and improving academic achievement. Charter Schools can drop students after they get money from the State.

Online School have also had scandals and mismanagement as Charter Schools. Most students that leave public school for online come back to public schools the following year. The students don’t work, don’t have the initiative, parents can’t get them to do the courses, etc. We waste a lot of State and Federal dollars on schools that should not be licensed at the expense of student funding in public schools! 3. Not all students want 12 years or education! Offer a option with High Schools and Tech. schools for a better option to train students that want to work in industry (ie. Journeyman approach) as a carpenter, plumber, electrician, mechanic, etc.

More funding for needed general purpose students and programs. Smaller class sizes, more course offerings (not laying of teachers), being able to buy current textbooks (and not reusing old texts), being able to update technology and not at the expense of other programs.

Less testing - let teachers teach! Stop with all the changes and let teachers get settled into teaching. Everytime we turn around standards are changed and curriculum then changes - sometime flipping to a different grade level. Teachers are getting confused and irritated as it destroys continuity in learning. We could easily raise standards with less of these changes - something we did years ago (like Charter Schools do now) with less Big Brother watching over our every move.

Equalize student funding across Wisconsin. No extra add on’s for Milwaukee, poverty rankings, minority status, etc. Treat all students equally so that small and rural districts don’t get screwed!

There is a high degree of hypocrisy in this application. The application flatly states that SES will no longer be mandated. In its place, it requires that districts “submit a plan for extended learning opportunities for eligible children” is that all, submission of a plan? What determines eligibility in the Extended Learning opportunity? How does DPI ensure it is properly funded? SES IS A PLAN FOR EXTENDED LEARNING OPPORTUNITIES FOR ELIGIBLE CHILDREN! Its already in place? Where is the discussion on improving that but maintaining the set aside requirement for persistently low performing schools? Schools have these students all day long, extended time that is fundamentally the same as teh school day will not be effective. Varied interventions, not all provided by school staff, must be made available to parents.
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<tr>
<th>Rank</th>
<th>Suggestion</th>
<th>Details</th>
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<td>5</td>
<td>Attending to Non-School Factors Such as Poverty, Student Health, etc.</td>
<td>Survey of Teacher Working Conditions, Inducements, Salary, Mentoring/Induction, Supportive School Leadership</td>
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<td>More teaching staff</td>
<td>Recognition of successful schools, Recognition of people implementing successful teaching, Recognition of students who have made large improvements in learning, More staff to help individual or group of students learn concepts at their learning level</td>
<td>4 3 0 9 6 0 7 0 0 10</td>
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<td>Involve everyone and make them aware of their importance of involvement</td>
<td>Better jobs and better life overall, Reading and Math is most important</td>
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<td><strong>3</strong></td>
<td>More teacher to student ratio</td>
<td>Providing necessary funding to those schools who need more teachers so their is a greater student to teacher ratio. Greater student to teacher ratio. Especially at the early elementary level.</td>
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<td>Allocate Title III funds directly to school district no matter how small.</td>
<td>Get DPI and CESAs to provide more affordable professional development opportunities in subject areas that meet student needs as reflected in assessments. Allow for extra learning time on subjects addressed in testing. Good communication with parents &amp; community to provide support to student needs. Less restrictions on how funds can be used to allow for innovative approaches to learning.</td>
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<td>We need to identify and embrace the diversity of the state. Most of these needs speak to urban schools- most of Wisconsin schools are not urban.</td>
<td>A clearer understanding and identification of the demographics we serve. Parental involvement and student work ethic. see above</td>
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monetary rewards to high achieving school districts, publication of results in community newspapers and online, recognition by public figures, legislators, etc.

Community involvement, volunteers in the schools, excellent leadership

DON'T fix what ain't broken!

Accountability, Accountability - all I hear is accountability and all these other acronyms. No one knows anymore what that all stands for: CLIP, FOI, DIBELS, MAP, RTI, etc. FACE reality! A country is going down the tubes!

PARENT INVOLVEMENT!

Looking at individual needs and resources powerful professional development respect for individual teachers parent involvement knowledgeable teachers and administrators focused learning excellent materials

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<th>2</th>
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<th>Extra bonuses for instructors whose students show the most growth from one year to the next. Bonus for all teachers whose students (95%) show expected growth.</th>
<th>Interventions in one-on-one or small group (no more than 3 students).</th>
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<tr>
<td>5</td>
<td>5</td>
<td>Additional people to work directly with those with high need</td>
<td>Very small group instruction (no more than 4 or 5)</td>
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I would like to see more money put into training individuals for a position. The real experience and watching that individual deal with the experience will be provide information in determining the factors of success.

Let all have a chance to prove themselves. Experiencing what is expected will provide meaningful information as to where to place an individual for greatest productivity and success.

Working directly with companies. Having mentors/coaches available. Monetary incentives. Mentors Counselors

It is not clear to me that test participation continues to be a flag for accountability. Not including this measure jeopardizes the high rates we have seen for students with disabilities. With more accountability, the elimination of test participation rates could result in more students being "counseled out" of testing.
1. A number of the supports available to students with disabilities and their families are not included such as our statewide parent grant (WSPEI); our Parents in Partnership work, and the State Personnel Development Grant activities that support families.  
2. Recommend that the State Supt approve our new vision for the Transition Grant and Post-secondary Followup Grant.  
3. Allocate some IDEA discretionary funding to expand capacity of the RtI Center to address gaps for students with disabilities in Focus Schools.

1. Effective publicity that includes opportunities for school staff to talk about their work, through conferences, videos, etc.  
2. Support to find funding sources and strategies to sustain work.

1. Accelerated learning works well for students with disabilities who are struggling; don’t slow down the pace.  
2. An effective PBIS system is one of the best ways to engage students and personalize learning.  
3. We must be sure they are fed. Consider a mandatory breakfast program at least in those schools with the highest free/reduced lunch numbers.
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<th>Require culturally relevant instruction and interventions...not just say it, but require proof.</th>
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<td>Staff professional development funding; Incentivize the opportunity for an alternative year calendar so that “summer drop” can be eliminated</td>
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<td>I’m not seeing any reference to expectations for the severely handicapped students. Are students with sub 50 IQs going to be expected to be performing at grade level? Will staff be evaluated poorly if low functioning students show improvement but not to grade level?</td>
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<td>Supports that address issues that students bring with them to school. IE: is it reasonable to assume that homeless children who haven’t been fed and don’t know where they are going to sleep that night are going to come to school ready to learn?</td>
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I don't have a suggestion for making this work, but ESL teachers need to be present more in the general education setting and be spending fewer instructional hours conducting pull-out services for ELs. I fall back on pull-out of my 50 EL's because the classroom teachers are too frustrated with all they are required to do to even think about planning with me. Two individual teachers and I attempted to co-teach reading and writing at the beginning of the school year, but everything fell through. An ESL teacher is not a para. We didn't plan together to make the most of the co-teaching experience. Classroom teachers need more opportunities to learn about the benefits of co-teaching.

<p>| School session ends one day sooner; so, traditional schools, for example, would get released one day earlier that other schools in June. Coverage for classroom teachers is provided so that teachers can have a few hours on a given day to collaborate with other teachers over lunch. School-wide pizza party for staff and students. | More time given at staff meetings and on Banking days for teachers to problem solve/address various issues that often times get discussed by individuals but not understood and addressed by the school staff. Better communication and opportunities to refine interventions and supports is greatly needed, so that all staff is aware and ready to carry out their role in implementation. |</p>
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<td><strong>1.</strong> Having all teachers and administrators take the sample WKCE assessment the students have to take and then discuss how they teach to prepare students for the challenges on that assessment. All K-12th grade teachers should take the WKCE assessments that are used for their grade level and/or the grade level above the grade they teach.</td>
<td><strong>2.</strong> Doing more content-area writing in all grade levels would help.</td>
<td><strong>3.</strong> Have students make up their own simulated WKCE test questions to help them understand and work with the standard a particular question is asking.</td>
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<td>One incentive is to actually hold the students accountable for their performance. Right now a student can fail, guess on standardized tests or choose not to do anything, and schools are held accountable for his/her choice. Until we put in some sort of consequence for failure, it's unfair to hold a school accountable.</td>
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<td>See above.</td>
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The state should get out of funding schools. Local dollars should stay at the local level. Communities should be able to define what needs are required to meet community education objectives. The state should be involved in building facilities (schools). If the state takes on this role a standard set of building plans should be developed and the state should fund the buildings to that point. If the community wants something more the community should be responsible for that funding.

Parent involvement is the most powerful impact. The school system, state and teachers union make it to easy for parents to write a check - thus they turn the students over to the school system in the morning and pick them up at the end of the day. We serve breakfast at school - easy for the parent not to get involved. We serve dinner/evening snack - easy for the parent not to get involved. Like any business schools cannot be everything to everyone. This is a recipe for failure. School need to get back to the core competencies of educating students. The State needs to move some of the social problems out of schools and into areas that can better serve the need. Some classes have a 1 to 2 teacher/student ratio. This is unsustainable funding model. School districts should not be required to take care of these problems. They should be placed in areas that are better equipped to handle problem situations.

Parents should be required to get involved. If they are not proficient in helping their children learn or choose not to get involved in the learning process - they should be required to volunteer to help the school in a different way or pay for the increased charges. Parents that have students achieving the standards should not be required to pay for parent who choose not to get involved with the student.
The systems and supports will not be successful because DPI and districts (LEAs) do not have sufficient staff with the needed knowledge to ensure that or provide PD so that quality education for ELLs takes place. Who will provide the statewide system of support? In the area of Special Ed—it seems VERY unlikely that you would have staff with no training or certification or experience working with special education students provide support to ensure their success. However, this happens with ELLs. My fear is that staff who are not bilingual, have no training or certifications in linguistics, ESL, experience teaching content to ELLs, etc. will be asked to support schools who are not succeeding in equitably educating ELLs.

- Second language acquisition strategies for all students - provided 100% by all teachers - Academic vocabulary embedded in all content teaching.

Parental involvement, interest, and support. Supportive administration which listens to staff.

Provide teachers with adequate compensation, and a strong voice in decisions regarding school climate.

Provide adequate, highly qualified teachers to insure small class sizes.
It is clear that many districts need support/guidance in maintaining compliance with State statutes and Federal law regarding the implementation of programming for students learning English. Not only in the basic outline of developing programming, but choosing curriculum, hiring qualified teachers and including professional development for teachers and staff as populations of English language learners increase around the state.

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<td>Investment in curriculum development and professional development for teachers, with the time included to implement curriculum changes.</td>
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<td>letting teachers deal with behavior problems empowering teachers in this time when they feel worthless include educators in make the decisions - bottom up</td>
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<td>parents educators</td>
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<td>I do believe that tying student success to teachers' performance is important, but should not be the sole measure or strongest measure due to the fact that it will influence educators willingness to work in those challenging classes or schools</td>
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<td>increased community support</td>
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<td>Parental involvement</td>
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I discussed this previously. Much more emphasis on general language and vocabulary development in first language and in English.

2 Additional funding so that the ratio of SWD to Special Ed Teacher is decreased so that the SWD get more time with the special Ed teacher in instruction instead of just being helped by peers or an SEA to do the classroom assignments that may be at too high of an academic level, thus completing the assignment does not really help the student improve skills. SWDs need more individualized instruction for more time by trained special ed teachers. SWDs in the area of Emotional/Behavioral Disability need to have a different support system than students with academic skill needs which may not now be being addressed with the emphasis of putting all Special Ed Students into the classroom and teaching academics so that those specially trained teachers are not available to work with the student on social and emotional skills needed to succeed in the curriculum and learning environment. Student with EBD needs are not currently being very well served.

Much more money available to significantly reduce class size and provide for more student services staff and Educational assistants who can help struggling students. Additional monies to support upgraded technology and increase technology options, use of state of the art software and web-based resources, with money to pay for the needed training in use of this technology for school staff. With the years and years of huge cuts in funding each, there is insufficient funding to really make significant changes. Teachers are already stressed trying to do more with less and it is unreasonable to think that they can miraculously increase what they are doing even more without a big infusion of money.

More use of technology in teaching, significantly reduce class size at all grade levels, heavy emphasis on vocabulary and general language development, providing sufficient funding so that staffing levels are increased, allowing teachers to have more to get to know students on a more individual level so that every student has at least one teacher with whom the student has a personal relationship.

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TECHNOLOGY - Such as Fast Forward, Skills Tutor, Aleks, and similar interventions

Making sure all schools have strong CTE programs.

Project based learning.
May I address testing from a conservative teacher's viewpoint? 1. A quality annual testing instrument is an essential diagnostic tool that helps teachers accurately identify and meet the academic needs of students. 2. Testing motivates students to set personal academic goals. 3. Test results provide essential information from an impartial third party thereby improving teacher-student working relationships. 4. Test results give parents and students objective reasons to support academic recommendations for individual students. While teaching in Minnesota, I found that MAPS test scores provided specific information about the skill level of each student. This information took "guesswork" out of the process. I was able to provide lessons that addressed the specific needs of each student and the results were evident in subsequent test scores. (I can provide proof if you wish.) Test results motivate students. Students memorized their test scores. In Minnesota, a growth of six points represented a full year of academic growth. When the students knew this, each student set specific academic goals for himself. Because students saw their test results, they were aware of skill areas that needed extra effort on their part. This was an automatic motivator.
The problem is the incentive should not be on the school...it should be on the student. Fix the problem, not the symptom. The problem with schools today is not the teachers, the curriculum, the tests, the buildings, etc., the problem is parents/students who don’t value education...they are the ones that need the incentive! How about some of these incentives: Don’t graduate...no driver’s license! Not passing all required courses...no work permits (no McDonald’s jobs until you do school first). Don’t do school...try the military...mandatory boot camp! You want better standardized test scores? Hold students accountable for their individual scores, not the schools...COMMON SENSE!!! Holding schools accountable for how students’ perform on their tests is like holding doctors and hospitals accountable for people smoking, not exercising, drinking, and eating junk food...FUNNY HUH? This is the reason people laugh at public education.

STUDENT ACCOUNTABILITY!!!!!!!!!!!!!!!!!!!!!! Attach strings/incentives to student achievement...they want immediate payback for what they do, not delayed gratification. They want money...they want food...they want to drive (license)...they want freedom...they want choices...and they want it NOW! We have trained them to their whole lives...it should not be a big surprise. If somebody wanted to revolutionize education...they would develop a system that would work off these incentives somehow. This proposal is just another attempt to create a cure for a symptom, not the real problem. Even if it is adopted as written, it won’t be around 10 years from now. How much did NCLB “change” education for the positive? This proposal isn’t any better...it is just a little different that’s all. The real problem is lack of accountability on the students themselves!

Practical, realistic and ready-to-be implemented curriculum. Do not give teachers 1,000 standards and no clue how to begin integrating them into preexisting curriculum OR how to amend curriculum to better meet the standards.
Stable economy. Students who don’t have to work to contribute to parent income and can study. Students who are fed. Food banks. Unemployment benefits.

Students. We don’t need incentives.

Smaller class sizes, Access to valuable education technologies.
| Teachers with a decent compensation package that feel respected, supported, and valued. | Integration of technology and support personnel in the classroom assisting. |
None. They do a specific job of translation, and to help explain concepts. What more can be done beyond that if the student does not make full use of that?

I'm not aware there is an issue. Then again, we have a very strong support system in the District that I work for which does an amazing job not only in identifying problems, but in helping getting those needs resolved as needed.

Nothing outside of what has been done will make any difference. If anything, adding more to the teaching staff will cause more problems than any good done.
1. Allowing a school district to include school performance as a part of the evaluation of its teachers (i.e., not basing layoffs on seniority alone).
2. Teacher pay scales look at credits earned and years in the district. Add a 3rd tier based on school performance (i.e., school performance will have an impact on salaries earned).
3. Administrator pay scales would no longer be based on position/title and length of time in the district. Pay scale would depend on district performance and position.

1. Having one-to-one support available for students who struggle at the earlier grade levels (K-3) in order to get them on track before they are completely lost. This support does not necessarily have to be paid support, but could be volunteer support.

2. More content based computer generated testing rather than just an overall reading test and this would be aligned with curricular benchmarks.

2. Smaller class sizes and relevant instruction.

5.Continued support for teacher professional development. Not having teachers performance based on students' test scores.

5. Formative assessment within the classroom.
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<td>5</td>
<td>Funding needs to be in place to sufficiently meet the needs of SWD without paraprofessionals being stretched too thin be students needing 1-on-1 attention.</td>
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<td>Hmmmm, incentives for whom? There is a great lack of training and skills to pull off this sort of change, so training, replacing and/or hiring people with skills to do these things will be critical to the success of this initiative. The current structure (teachers teach 5-6 hours each day with no time for prep or collaboration or training) will ensure a failure. Three administrators, with little or no skill in instruction or curriculum cannot supervise 100+ staff in a building. At this point there is no accountability on any level for anything. Beginning to measure success based on what students can ACTUALLY do, will be a radical change.</td>
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<td>High Quality Staff, Community Support, Partnerships with stakeholders (local IHE, DPI, and other community agencies, organizations and businesses). The school need not do it all separate from the work of other groups.</td>
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<td>Parent and community buy-in</td>
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<td>More educators in school with lower performance</td>
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Parental involvement specifically in holding their children accountable after the school day is done. Time for interventions that does not require them to miss other learning or worktime. Interventions should not cause the children to fall farther behind in their work/studies.

ELL students face issues that most other students do not and until quality services are dispersed across the state, the mountain will be high and the downside will be significant.

Tying services and results to RTI will require many more resources that are available in this state. We need more subject area specialists, people competent in subject area literacy, team teaching in the core like those arrayed in the St. Clair River intermediate unit in Minnesota. Wisconsin is significantly behind in having this level of resource particularly in small rural school districts.

Incentives for schools are difficult to pin down. What - works in one probably will not work in the one just next door.

One-on-one teaching, family and parent support services, quality staff development...
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<td>You won't impact a poor school's performance unless you impact the school climate and staff culture (beliefs). The teacher evaluation component will help, but administrators will need more flexibility in dealing with toxic staff who undermine efforts to implement change.</td>
<td>Increasing parent involvement including student in identifying what is to be learned Celebrating student success</td>
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<td>Time for teachers to collaborate within the school day.</td>
<td>Extra time with the appropriate instructor</td>
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<td>Field trips Kiosks Computers Experiential learning Mentors Inquiry/problem solving</td>
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<td>Tiered recognition, as stated, fosters the 'push' to stretch and perform at a higher level.</td>
<td>Coaching and collaboration via recognized sites</td>
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Data points that require more focus in
Current data points of achievement:
Talented educators / staff development /
collaboration / Allignment of curriculum /
communication / Buy-in of stakeholders

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Parents being involved with their kids and sending them to school.

More diversity and culture training for students.

Help from peer mentors.

Small group, one-on-one, intensive teaching.
A reduced student teacher ratio. Adequate funding. Smaller class sizes, provide for social and emotional needs of students

Are these students provided with an ELL teacher? What supports will they get? How are they funded? Many schools can no longer afford services they once provided for these students. "Rosetta Stone" is not the answer.

Extra support, access to technology, training in Reading. Are his/her students expected to show adequate yearly progress at the same rate as non-disabled students?

Extra support, access to technology, training in Reading. Extra support needed. How much is based on student outcomes and what percentage is based on teacher's best practice? What if the teacher teaches SWD? Are his/her students expected to show adequate yearly progress at the same rate as non-disabled students?

One-on-one and small group instruction. Quality instruction provided by a professional educator. Extra support needed. Are his/her students expected to show adequate yearly progress at the same rate as non-disabled students?

Reading classes at the high school level. Respect and recognition. Real teaching, not just presenting material. Going over homework, helping students see mistakes so they will not make them again. Practice and practice with homework.

What percentage of eval is based on student outcomes and what percentage is based on teacher's best practice? What if the teacher teaches SWD? Are his/her students expected to show adequate yearly progress at the same rate as non-disabled students?
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<td>Like Finland, help teachers get masters degrees. Help and reward teachers apply for and complete National Board Certification process.</td>
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<td>Highly effective teachers in sensible class sizes.</td>
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<td>Recognition and further financial support.</td>
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<td>Professional development and resources (financially, staffing, and etc.)</td>
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<td>proper financial education</td>
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<td>increased funding to districts meeting state stds in ESEA/NCLB</td>
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<td>increased personal finance education</td>
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<td>hands on applications introduction, repeat, review</td>
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Attendance again to me is there biggest hurdle.

The problem with incentives is many classrooms start with an average of 28 students at the beginning of the school year but by the end maybe only 1/4 of the original students remain. It is hard to be accountable for 3/4 of you classrooms test scores, etc if they were not with you the whole year. How will DPI make sure that teachers are not penalized for poor performance of these students? Especially if they are transient. We have got to figure out a way for students to stay put so teachers can help them succeed. One way would be the elementary principal in Las Vegas who verbally contracts with families to get them to stay so she can help their children be successful. But this takes the whole community and a lot of volunteers and donations.

School culture and climate are the biggest incentives for students and teachers. External recognition and awards only suppor what is already there.

Merit pay, if not a game of who is friend of whom study of Greek and Latin roots study of Greek and Latin roots
Once again, native language is not an option. One of the 21st Century Skills is to be bilingual, yet our state has yet to embrace that. The state of UTAH has embraced it and wants all of its students bilingual. They are encouraging immersion programs for all students.

An ELL student cannot achieve grade level performance in one academic year. They need time over a number of years to gain the language foundations to function at the level of the CCSS. They need to be looked at differently.

We are not able to cure our SWD students. We work with them in an alternative way to allow them to grow with their disability. They will not be at the CCSS level of achievement. They need to be looked at differently.

When Teacher and Principal pay is attached to the academic growth of their students. When the student is not allowed to progress to the next grade level if content is not mastered.

Year round school calendar: 9 weeks on 3 weeks off... teachers get only one of those weeks off and return to the classroom for Professional development. The students would retain information and the system could have students move fluidly into the next level of content mastery when they are ready. We must stop sorting by grade and age and begin sorting by mastery of content. We must change the nine months on and 3 months off task of schooling thinking that we can accomplish what is needed when the students forget so much of what they have been taught.
Clearly identify the criteria/elements of UDL and how those relate to IEP specific accommodations and supports.

Funding, of course, but also recognition of schools, programs, and even individual efforts - teachers and students.

Funding is the most obvious incentive. If schools don't have the resources to make the changes then something else is "robbed" in order to institute the change. This just means the quality of that instruction is reduced.

Excellent teachers. All teachers should be competent in ALL areas the state requires for licensing. The use of emergency licenses should not be "standard operating procedure" but rather should be used only in true emergencies. If it means that salaries rise in order to find competent people then so be it. Interns should not be used to teach classes--only licensed teachers.

Community partnerships. When community members are invested in their schools they can make things happen in short order.

Service-learning, place-based projects for example can make learning more relevant. Education for sustainability principles (e.g., system approach) that use integrated instruction are also great leverage supports.
1. As currently drafted, the waiver request simply identifies 3 potential qualifiers to recognize high performing schools (increases in math & reading performance & closing achievement gaps). While I support these, I think reading & math should be separately identified as there are far different teaching & learning strategies required and schools should be rewarded for accomplishment in either area. 2. I believe the entire waiver request contains little analysis of the impact of student behavior and school discipline practices on student learning & achievement. Accordingly, not only should these areas be analyzed for accountability & reporting purposes, but high achievement in these areas should also be rewarded. 3. I strongly support the creation of Spotlight Schools Diagnostic Reviews, but am concerned with the draft waiver’s failure to identify where the funding will come from for providing the necessary resources and staffing, as well as the failure to identify the amount of funding necessary to accomplish these reviews.

I strongly support applying the accountability system to all publicly-funded schools. But, I believe this accountability must include the ability (or lack thereof) of SWD to attend & succeed at charter and voucher schools. 2. I am concerned that there is no mention of the likely to be adopted new vocational diploma and the support which WDPI can give to its creation. This tool can become an excellent incentive for non-college bound learners to become career ready. 3. I strongly support prioritizing improvements at the district level if the diagnostic review demonstrates that systemic challenges are at the LEA level. However, the waiver needs to be specific as to how WDPI will determine if school-based challenges are indeed exacerbated by systemic LEA challenges.

Get the proper training to the teachers and administrators working with ELLs.

Reporting how students with disabilities is not what will drive improvement - if that were the case it would have happened under NCLB. Providing training and strategies to their teachers on how to engage students of all ability levels is much more useful. Also need to address culturally responsive instruction and culturally able teachers.

Intensive teacher training with ongoing professional development and support.
We know that public embarrassment is not a motivator; I am concerned about qualifications and perspectives of the TAC team, and the State approved experts/vendors that must be consulted. What evidence must they show of their ability to improve instruction in reading and mathematics utilizing curriculum-based measurements.

In regard to the overall approach for support and interventions, further detail is needed to determine what assistance will be provided and the degree to which they are mandated.

I think that these are a starting point but we need to be open to changing as we realize how these strategies and resources are working or not working.

Again, no system is best for every student but I do think that by providing these across the state we will see how they are positive or negative but we need to be able to adapt and modify as we realize what is or is not working.

Administrator with a powerful vision and outlook that is communicated to the entire staff and the school community, community support and family support, teacher are generally good at their part.

Public Recognition  Flexibility  Funding
This question suggests that educators need to be incentivized to improve what they do for students. I do not believe this is the case. Rather, providing necessary resources, time for Professional Learning Communities, coaching support for all staff, and assessments that reflect what is important in terms of college and career readiness and get out of the way.
Can’t decide if this suggestion falls more in Principle 2 or 3. Expand the use of proven & effective distance teaching & learning instructional systems/technologies to facilitate effective sharing/collaboration of innovative instructional strategies on an as needed basis for instructors (i.e., a more robust version of TM spotlight practices website [X concept discussed elsewhere]). Such systems exist in other areas such as medicine and custom design (tapping into a vast database & network of resources by typing in keywords that identify specific situation to find potential ideas/suggestions for consideration). For the ELL population, this holds great potential. Depending on the design, this limits disruption of student learning in the schools by enabling instructors to tap into resources as needed, stay closer to their students and provides flexibility for teachers to research/learn when their schedules permit. Done properly, this increases the possibility for a more engaged professional learning community around the state. Bottom line: addressing the learning needs of special students (relatively few in an individual LEA) by providing professionals easy access to resources and lessons learned, at the time of need, is preferred (vs. waiting for professional development).

- Provide access to appropriate technologies and support (not just money to buy/build access and tools, but to tap into support resources for help with effective use/implementation of that technology). Funds to build/remodel something that matters to that local community of learners (set a goal, work hard, get something in return). Funds to maintain appropriate class sizes (esp. at elementary & middle school levels).

- Student mentor/buddy programs (adults, peers) focused on individualized instruction/support. Dedicated resource(s) to help LEAs establish/manage productive win-win partnerships with their municipalities (i.e., public libraries, community centers) & area businesses. Support/enable proven after school activities/programs that keep students engaged with their communities, further individualized learning and help build life/work-based skills such as (collaboration and communication). Some phenomenal, established and well-supported programs already exist [X yet often misunderstood in terms of the scope of their offerings. One great example is FFA (which would also be particularly appropriate for Wisconsin)!
Our main concern here is that there is no mention of relating students' IEPs to their academic performance. We support Common Core Standards based IEPs. In addition, while we support the turnaround experts, we are concerned that there is no mention of subgroup expertise, including the SWD subgroup expertise for these experts.

1. As currently drafted, the waiver request simply identifies 3 potential qualifiers to recognize high performing schools, namely increases in math and reading performance and closing achievement gaps. While we support recognition of these accomplishments, we believe that reading and math should not be lumped together as they are far different teaching and learning strategies and schools should be rewarded for accomplishment in either area. 2. We believe that the entire waiver request contains little analysis of the impact of student behavior and school discipline practices on student learning and achievement. Accordingly, not only should these areas be analyzed for accountability and reporting purposes, but high achievement in these areas should be rewarded. 3. We support the creation of Spotlight Schools Diagnostic Reviews, but we are concerned with the draft waiver's failure to identify where the funding will come from providing the necessary resources and staffing, as well as the failure to identify the amount of funding necessary to accomplish these reviews.

1. We strongly support applying the accountability system to all publicly funded schools. However, we believe this accountability must include the ability (or lack thereof) of students with disabilities to attend and succeed at charter and voucher schools. 2. We are concerned that there is no mention of the likely to be adopted new vocational diploma and the support which DPI can give to its creation. This tool can become an excellent incentive for non-college bound learners to become career ready. 3. We strongly support the draft waiver's call for a quick turnaround of assessment results as the long history of failing to do that in Wisconsin has made the assessments completely useless for assessing the current needs of students and addressing them quickly. 4. Assessments must have nationally normed accommodations for students with disabilities and those should be included within the transition period. 5. We strongly support the establishment of state supported turnaround experts to assist with targeted school reform. However, these turnaround experts must have expertise in behavior management and discipline practices. 6. We strongly support prioritizing improvements at the district level if the diagnostic review demonstrates that systemic challenges are at the LEA level. However, the waiver needs to be specific as to how DPI will determine if school based support to targeted school reform. 7. Critical/high leverage supports include: Targeting professional development to the needs of teachers that includes a feedback loop of observation, identification of needs, professional development, in-class modeling, practice, coaching, and reflection.

If the DPI could provide instructional coaches to schools that need improvement to help with teacher development.
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<td>1</td>
<td>Parents must be involved either through outreach or coercion.</td>
<td>1. 15 or 16 students per class.</td>
<td>2. Group children by moving to different classes so they can learn at their own pace.</td>
<td>3. Non-grade the primary school. There are huge differences already in kindergarten.</td>
<td>Teach through 2 or 3 senses. Just talking doesn’t do it. Most students learn better and faster using multiple senses. Have quiet and attention during presentations. Work in carefully created learning pairs to complete the lesson. The next day follow up with a quick review and assessment. Do not keep moving ahead if the students are not ready.</td>
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<td>The reduction of cell size in reporting students with disabilities should remain at 40</td>
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While I disagree, I also understand that our current system is not where it needs to be. Though IDEA is well-intentioned, the stigma inadvertently attached to those who qualify for SWD services cannot be remedied within the current structure. Personalized learning for all students will be the vehicle for improving the outcomes sought.

Personalized learning  Elimination of grade levels  Blended learning  Positive parental encouragement/engagement  Highly effective teaching  Student engagement

-- Lack of connection between students' IEPs and their academic performance. -- Turnaround experts are a positive idea, but there is no mention of subgroup expertise, such as expertise working with significant behaviors, significant cognitive disabi

-- While reading/math and achievement gaps are important, the overall waiver overlooks the impact of Student behavior and appropriate behavioral supports on all Student achievement. Behavior needs to be included in the accountability and reporting system, with recognized achievement rewarded to those with high scores in this area. -- Diagnostic reviews do not spell out where funding will come.

-- Accountability system also needs to in some way reflect overall access to all options. For instance, are SWD and low-income students able to access charter/voucher schools in the same proportions as the general population?

-- Strongly support quick

There should be consideration of different incentives for schools with different populations, e.g., affluent, suburban vs. high poverty schools. In high poverty schools, you may be assessing more society's performance than school performance (i.e., basic needs not being met doesn't allow learning readiness).
Quality teaching and parental/community support. Teachers have greater freedom in curriculum planning and sharing curriculum ideas.
I don't see it very clearly addressed.

Positive reinforcement. Reward high quality schools and those making significant gains rather than focusing on punishing bad schools.

Empowering teachers to use data driven instruction rather than a one size fits all approach.
Small class sizes, giving teachers the flexibility to respond to individual learners' needs, bottom-up approaches to problem solving.

My school is an alternative school within the MPCP that is doing an excellent job preparing students for high school. Many of our students receive high honors in their high schools, public and private around SE Wisconsin. Our incentives are day-to-day, intrinsic within the curriculum and the teachers and students are proud of their work.

Motivating the students with the stories and achievements of their fellow human beings throughout history.

emphasize small class sizes and highly qualified teachers who are licensed by DPI. Make 4K the law of the land and expand it to 3K. Kids are hungry to start learning by age 3.

small class sizes, highly qualified teachers with advanced degrees.
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<tr>
<th></th>
<th>Systemic program evaluation requirement/provision for review and improvement of instructional programs similar but building on the old SEC model.</th>
<th>Intensive professional development for teachers on Common Core aligned instructional practices and differentiation.</th>
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<td>Intensive professional development for teachers on Common Core aligned instructional practices and differentiation.</td>
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<td>5</td>
<td>No information is provided on how ELLs will be identified in private schools participating in the choice voucher program, or once identified, how supports sufficient to meet the needs of these students will be provided.</td>
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<td>No information is provided on how students with disabilities will identified in private schools participating in the school choice voucher program, or once identified, how supports sufficient to meet the needs of these students will be provided.</td>
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<td>3</td>
<td>Increased/decreased access to funding</td>
<td>Access to, and greater participation in development of, resources</td>
<td>Public recognition</td>
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<td>4</td>
<td>As a policy advocate, I would defer the recommendations of school educators and administrators.</td>
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Mixed age groups Charter Schools Free choice to attend schools of choice
If school districts can make their own decisions they can remove teachers who are not effective, or a principal. But numbers don't tell the entire story.

More AP classes Align to college and career readiness standards

Provide support as they learn English, so it's not cut back

Same for these children

"Replacing ineffective administrators" would rank much higher than "Replacing administration at the school and/or district level"

Focus on common core state standards Emphasis on recommendations of the Digital Learning Advisory Council Educators familiar with their district's Response to Intervention multi-level system of support for social-emotional-behavioral and academic growth

Improved preservice and inservice professional development for special educators in the area of reading and mathematics
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<td>2</td>
<td>Smaller class sizes; more EL/SEA/Social work support; longer school year; longer day</td>
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<td>Give parents the ability to choose better schools for their children by allowing a congenial environment for opening new and innovative school models and by expanding ability to transfer intra and interdistrict</td>
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<td>Emphasize content and require high subject matter competence by teachers</td>
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<td>Measure actual achievement by students instead of using only course enrollment or graduation rates to claim “success”</td>
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<td>1</td>
<td>IEPs need to have meaningful goals and special educators should be held accountable for IEP compliance</td>
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<td>Link teacher evaluation to student achievement.</td>
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<td>One to one technology will help personalize learning.</td>
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<td>Additional time and funding for professional development. Frequent and relevant assessment tools. Clear and concise standards for each grade level.</td>
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<td>Make ILP's an integral part of student's education. Working with students to take responsibility for learning goals, etc. Making this part of the secondary experience. Flexibility is giving credits for unique educational opportunities for all students.</td>
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<td>What funding is going to be provided from the state to implement these systems?</td>
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Reducing class size, allowing the underachieving students to be in classes apart from students who are achieving at expected levels for more intensive instruction or using alternative delivery methods.

Focus on academic growth as measured by the EPAS system. State-wide support of the implementation of the RTI model. Support of a wrap-around model including mental health support for at-risk students. Continue to narrow the number of academic standards and skills. Depth over breadth as used in countries such as Finland.

This scale would be different for each school. I do not believe there is one ranking for every situation or school.

Provide more time for teacher professional development. The state should consider a state wide calendar which could provide for quality and consistent professional development.

You need to define what math classes are needed for graduation. The school board here is discussing a low level math class if three years are required for graduation. Obviously this will not help students. At a minimum I believe all students should be required to take Algebra & Geometry in high school.
Parents are a key part of the puzzle. Many parents in high poverty areas need support to learn and enforce good parenting. The best and most innovative charter schools in the country are making parents equal partners and involving them from birth.

- encourage direct links between local businesses and secondary schools to design curriculum and instruction centered on a specific industry with direct applications to that industry (i.e., core subjects are designed around the medical field applications)
- increase funding for smaller schools so they can retain the special teachers
- create consortiums like OK that focus on technology that students with particular interests can be bused to in rural areas where the schools can't offer as many specialized subjects
- allowing teachers to be treated as professionals
small study groups for AP courses built into
the school day and monitored by mentors (business leaders). More writing labs and
meaty assignments, not just one monumental
term paper. More types of writing i.e.
opinion papers, how to manual type writing,
science based writing assignments etc.

Utilize technology as a remediation tool at no
cost to districts. Quality programs with
artificial intelligence designs are available that
engage students, select and pace instruction
to meet individual needs. A statewide
purchase of such a tool would be a real help
to districts that are spending duplicative time
and resources. Certain achievement levels
could be required before a student could
apply to post secondary thus reducing
remediation costs at the post secondary level.

Give the broad range of teacher assignments
a system that takes into account the synergy
of a staff, rather than just the work of an
individual teacher is critical.
Providing contracted time for staff to extend day. Adopt a student lead conference using student produced portfolios. Provide more days without students for staff to collaborate and meet with families.

Additional contracted time for staff

Days of instruction should be modified so schools can better adjust their scheduled to meet the needs of students.

Connect curriculum closely to college readiness standards. Assess using EXPLORE, PLAN, ACT. Teach critical thinking and problem solving skills in class. Level the classes so students are with other students of similar ability so they can be challenged at their level.

There is nothing in the narrative that talks about how this will improve outcomes for ELLs. I believe that you would have to look at some sort of growth model that would have to take into account how long that students had been in your school/district.

There is nothing in the narrative that talks about how this will improve outcomes for SWDs. I believe that you would have to look at some sort of growth model that would have to take into account how long that students had been in your school/district.
Make a survey that you can use the radio buttons on. I agree with all the statements, the first three are 1’s. As a private school we already have this to some degree, but it would be nice to see across the board.

One of our problems is we keep increasing the rigor of K-12 education and somehow expect a majority of students to achieve at a high level with challenging content. Despite our slogans, not all students can learn or desire to learn at the same level. Furthermore, the public and many teachers, insist on keeping a 7-hour school day and a 180 day school year. Oh, and we must keep our traditional A-F grading and credit-accumulation system at the same time we look more carefully at individual performance levels. There are some significant incongruities between our educational goals for students today and the structure of our educational system that make achievement at a high level unlikely for a significant number of our students.

I think Special Ed Directors and university professors who student SWD learning needs and train teachers should be intimately involved in developing approaches.
Incentives to Technical College that use creative scheduling to partner with public high school. Technical Colleges have state of the art equipment that would allow all students to use the latest. Emphasize skill building and extension activities at the elementary and more work related application to specific course work at the middle and high school levels.
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<td>Increased cultural awareness of diverse populations within a school and strategies to address cultural barriers within the classroom setting through professional development.</td>
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<td>Reduced caseloads for teachers of SWDs. Especially, for those with a higher percentages of low functioning higher needs students or extreme behavioral incidences. Increase in (paid) professional development opportunities for paraprofessionals working with SWDs.</td>
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<td>Increase financial support for implementation of STEM. Increase school year expectations for professional development time</td>
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<td>5</td>
<td>Increase financial support for implementation of STEM. Increase school year expectations for professional development time</td>
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<td>have all curriculum aligned to CCSS and</td>
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<td>clear definition of what ELL teachers are responsible for teaching across schools and districts</td>
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<td>There is nothing wrong with public education that could not be solved with selfless leaders in school administration. We have too many self-serving bureaucrats in school administration who expect school boards to &quot;drink the Kool-aid&quot;. At least one 4-credit course in leadership should be part of the licensing process for school administrators.</td>
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<td>All newly hired teachers need to be fluent in Spanish. All teachers in Norway have to be fluent in English. This is a realistic goal for Wisconsin.</td>
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<td>More support for highly qualified para-professionals. They are the closest to the SWD.</td>
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# 1. My friends with children in Charter Schools tell me that they are working. # 2. The nine month school year dates back to a time when boys were needed for farm work. Our world has changed in the past 50 years but our schools have not.
Break out of past ideas and look to the future. Many of the above have been tried and extensions given. Milwaukee has had many chances and are still not improving! DO SOMETHING TODAY! “At Risk” seems to be increasing. However these students get extra help even help in doing homework and testing. Stop enabling! Don’t pass students to the next grade level if they cannot read, write, etc. Require them to attend after school, weekend, or summer sessions. Stop wasting money on summer weight lifting, horse back riding, bowling, etc. and only do mandated remedial studies. If a student fails 3 years in a roll too bad. Eventually they will want to learn and will pass. At younger ages this needs to happen NOW. Stop passing on problems to the next grade levels. Reduce funding for school districts that have failed constantly, have high drop out rates, where students health and safety is at risk, etc.

Mandated interventions such as SES. DPI must think more about what’s best for the individual student and family and less about what’s best for a school or its employees.

1. Work with the business and industrial world to make sure what students learn in college, tech schools, and high schools are what they need. 2. Many school districts have outdated equipment (especially smaller and rural districts) - provide them the funding they need. 3. Offer FREE internet access to public school districts, UWS, Tech. schools, etc. We have lots of providers in many areas with competitive prices but in rural areas not so much... The State should swing deals with companies that have fiber cables running school districts (but won’t hook them up). Work out tax deals for free access to the above and higher internet speeds. This will allow districts, Colleges, & Tech schools money that they now spend to be used on their needs.

Well, how about just 1 example of the “multiple measures” of educator practice? Just one. How can DPI honestly expect to submit something so vague and aspirational and in exchange be granted broad flexibility?
More collaboration between the public schools and the universities. I mentor Science Olympiad at the middle school and am supposed to have college students mentor different groups of students. When they are here (which is seldom) students learning increases greatly while they really look up to people that age.

In my district, students are so busy after school with sports that many rush through homework. Parents complain when expectations are increased while it may take more time for them to work on homework at night. Sports need to take a back seat to learning, at least in my district. Increase availability of effective teaching units that permit students to do more individualized learning. Students doing independent work take a longer time to cover topics than it does with traditional teaching methods. Help teachers make good decisions about their curriculum by supporting it with meaningful, supportive assessments.

Staff development should be supplied to a group of teachers from different districts so the teachers can learn together and share effective teaching practices. Our school provides its own staff development but it is very ineffective.

Testing isn’t teaching. These students need support in the regular classroom and with their work.

Education is a requirement not a choice

Make things/rules easy and short not complicated

Divide classes according to the ability and efforts of students and work with their field of interest

Competent teachers and effective teaching style

Make education interesting and according to the ability of student
Your criteria of labeling a teacher as ineffective based on state and national test scores is unfounded. Teachers cannot control how some students perform because they come to school at a disadvantage due to their home life. A student from a family who’s priority is not education, will never out perform a student who’s family supports education as a top priority. This is a proven fact. Social economics and environment play a huge role in the success of all students not just the school or teacher. Changing the home life has to be as high a priority as labeling schools or teachers.

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<th>Numbers</th>
<th>Measures truly need to be meaningful and interventions reasonable - not costly, burdensome and labor intensive to implement.</th>
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<th>Numbers</th>
<th>Require all school districts to make reading at a very early age a priority. Double the amount of instruction time for all students who have low incoming reading and math scores so they are caught up by the time they reach 3rd grade.</th>
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<th>Numbers</th>
<th>Districts problems vary. Each district knows what the problems are and should be allowed to address and correct them at the local level.</th>
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<td>5</td>
<td>Duplication of testing course work that requires students to apply learned principles and create</td>
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<tr>
<td>3</td>
<td>Small class sizes and effective teachers are the key to success and academic growth! Effective teachers, well-rested students, educated parents</td>
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<td>5</td>
<td>Collaboration among similar districts to discuss what is working</td>
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<td>5</td>
<td>Opportunities to collaborate with schools that have been effective</td>
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**DON'T FIX WHAT AIN'T BROKEN! HOLD PARENTS AND STUDENTS ACCOUNTABLE!**
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<th></th>
<th>Continue support statewide for PBIS initiatives.</th>
<th>Allow districts to begin/end school year without state mandated Sept. 1 start date.</th>
<th>Allow more instruction time for math and less for music in the dpi suggested time allowances.</th>
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<tbody>
<tr>
<td>2</td>
<td>This whole thing sounds like a lot of paperwork.</td>
<td>Don't require algebra 2, trig, etc. for students that are not going into a math-related field.</td>
<td>Don't require English lit/writing for students not becoming authors or journalists or tech writers. We are just wasting time. Instead, go to a more voc-tech style with more hands-on learning for specific skills, especially for those not going to a college or univ.</td>
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<td>5</td>
<td>Hopefully the student reporting system that Wisconsin is implementing will automatically enter test results so there is not a need to hire people to enter data.</td>
<td>Do not require English lit/writing for students not becoming authors or journalists or tech writers. We are just wasting time. Instead, go to a more voc-tech style with more hands-on learning for specific skills, especially for those not going to a college or univ.</td>
<td>Don't require algebra 2, trig, etc. for students that are not going into a math-related field.</td>
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Family structure is one of the greatest deterrents to educational improvement—especially families in poverty. Having school that starts on Monday morning and ends at noon on Fridays, so that young people have consistency and established routines in a safe environment may be the best way to improve our educational system. Cost is a huge factor in running such a program, but can translate into a great investment.

DPI rule requires Milwaukee Parental Choice Programs to have an auditor from DPI audit the audit. The cost of this takes away from children’s education and creates a lack of trust in the system. With an accountant and an auditor plus treasury people this seems like overkill. Also, the testing in the Fall is ridiculous. The students barely have time to get adjusted and then we are required to test. For new students this just doesn’t make sense.

Increase funding so schools can afford a second person to mentor students in areas they are weak. Also, this provide more of a safe environment for our children. Set a limit on the number of children with disabilities a classroom can accommodate. In some of our classrooms half the class has some form of learning disability based on testing and IQ scores. While parents don’t necessarily take them to the doctor for diagnoses, educators need to accommodate in terms of students learning needs. This seems to be an area that is increasing particularly in the city of Milwaukee.

Having an individual on staff that is of the same background as the students can be most helpful. Language and cultural differences are an ongoing area for the professional educator to study in hopes of relating to the individual student.

Much of education is having the student buy in to what is being taught. On top of this is the instruction itself plus the need to interpret to make it meaningful for the student. I'm not talking of a language barrier only, but also learning styles as well.

We need much more detail about how educators of students with disabilities will be evaluated....and it is not sufficient to point to the addition of a growth model since we also have not specified what that will be.
Focus on the attainment goals--students in advanced courses, etc. and the supports to help reduce the gaps in participation across groups. Reduce the number of different standardized tests so that this can be the focus. This proposal appears to increase them.

Use of Technology for individual strategies and personally designed Student Led instruction.

Fix the question above...the program does not permit a "most effective" check more than once...I believe a couple of these are "most effective" and that most of them hold some promise.

1. Approve the addition of a UDL/AT consultant on the Special Education Team, to "level the playing field" for students with disabilities. This would support our efforts to increase rigor and personalize learning for our students.

We reference growth models but don't describe them. I am concerned about a timeline that will pilot an EE evaluation in the coming school year, without a clear idea how we will address the issues involved in evaluating students with more significant cognitive, learning or emotional disabilities.
No where is culturally relevant instruction and practices mentioned. My fear is we do any of the above with the same lens, attitudes, beliefs and practices as we have for 50+ years and give it another name = zero impact... Racial equity and culturally relevant practices must be identified and documented/measured in some way. Otherwise...we will continue to blame, ignore, make excuses, etc for all the same kids who aren’t achieving...

I would rate the last 3 as 1s, but the computer isn’t letting me.

We need to develop programs for all levels of instruction. Courses must be designed and assessed to meet Common Core standards. Technology must be implemented into the school systems including sufficient professional development for teachers to be successful at using the technology.
Have realistic expectations for the progress of ELLs. Research says that it takes the average ELL 5 - 7 years to fully grasp academic English. There should be no consequences for students or teachers who are working hard if a student is not proficient before that amount of time has passed.

Have realistic expectations for the progress of SWDs. All students are not capable of being "proficient."
There needs to be one person responsible for ESL. In my district, the curriculum specialist for ESL is also responsible for Bilingual, World Languages, and now Refugee services. One individual cannot adequately address the needs associated with closing the achievement gap between EL’s and monolingual students as well as the needs of bilingual students. ESL needs its own district specialist. My ESL supervisor works very hard! And, she is extremely knowledgeable! But, she doesn’t have enough time and sanity to do what needs to be done to really support us ESL teachers with meeting the needs of the EL’s in the district. Our EL’s and us ESL teachers deserve a full-time ESL specialist.
Making sure the administration at the school, district and state levels truly understand the best practices in teaching literacy and assessment before decisions are made. The book entitled Best Practices: Teaching and Learning in America’s Schools by Zemelman, Daniels and Hyde should be required reading for all administrators, teachers and preservice teachers.

In elementary schools, promote the use of “The Daily 5” classroom organization to support literacy learning. This allows teachers the set-up to promote 1:1 student conferencing as well as small group instruction for both reading and writing. Promote the use of running records and writing samples as informal authentic performance assessments to drive instruction. A state-wide writing rubric for grades k-3 would be very helpful as well as benchmarks set at the state level for both reading and writing.

See above. Strong consequences for students who choose not to succeed.

Placing kids in proper class levels would help. I have an English class with students who are very low with the same students who are extremely high in their abilities. It’s hard to differentiate to 30 students when they are lumped together. Tracking would help. Online classes would help as well with curriculum that adjusts to the students’ abilities. Maybe we should go the route of SWD students... If they get an IEP, why shouldn’t all students?

With the variety of languages used across the state, are there some online resources, websites that would support second language learning in small districts that have few resources to do that?
This should be handled at the local school board level. Standards should be developed, if the system is under performing the board should have the autonomy to make the required changes needed for improvement.
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<td>Examine mobility: change attendance areas, bussing etc. so that kids can stay in one school.</td>
<td>Increase technology access create statewide online learning resources for K-2 students</td>
<td>Require administrators (even current ones) to participate in course work/PD. This could be done via an online course.</td>
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<td>More demanding curriculum More requirements for all subjects</td>
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<td>Training and support is always more effective than throwing people out.</td>
<td>Allow multiple paths to graduation.</td>
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<td>While it's great to monitor reading progress at the 3rd grade level, there needs to be emphasis placed on reading and reading interventions BEFORE students reach 3rd grade. Resources need to be invested in reading interventionists and learning literacy skills at the early childhood level, especially for at-risk students. Also, the current proposal to require 3 credits of science and math should be increased to 4 credits of each to increase the rigor and provide students with more preparedness to enter a variety of fields after graduation.</td>
<td>Require districts to provide professional development and outline specific curricular resources being used to address the needs of ELLs. This professional development should NOT be limited to teachers or staff whose work title suggests that they are the only service providers for ELLs as we know that EVERYONE in the school building comes in to contact DAILY with students learning English (e.g. Music, Art and Gym teachers, nursing staff, counseling staff, etc.) and those individuals should also have a stake in ensuring the success of every student.</td>
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<td>get rid of walker and his assists who have no idea about public education and want to get rid of it to establish their private schools</td>
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<td>provide professional development for teacher to do this—many are not prepared to personalize learning. Test results in timely manner (not take the test in Nov. and get the results in spring— it’s too late by then)</td>
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<td>Implement MAP testing state-wide and provide PD for optimal use of these data.</td>
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Reduce the amount of standardized testing, which is now seemingly nearly continuous through-out the school year so that enormous amounts of instructional time is lost. Such over testing does not help students learn and develop skills. Testing should be used only when the results can be effective in informing instruction. Testing for the sake of grading schools or evaluating teachers does not help students learn or improve skills. Punishments are not effective in motivating teachers or schools to improve. Teachers are teachers because they have a passion for teaching children, intrinsically motivated. What will help the most is to free up their time, encourage their creativity, give them adequate financial resources, give them adequate pay the is commensurate with their level of education and the awesome responsibility that our society places upon them and that matches with the importance of their mission. Provide teachers with an effective voice in job conditions and direct involvement in designing intervention strategies.

Reduce student teacher ratios so that each student can have the chance to develop a real relationship with at least one teacher and so that teachers have the time to devote to assisting struggling students, gifted and talented students and the average range students so that each child can be assisted in achieving to his/her potential. Provide extensive training to teachers about how to incorporate effective instructional strategies that focus on improving the general vocabulary and language skills of students at all grade levels and in all content areas.

Tests are an issue for admin/teacher responsibility. Which teacher at which grade level is responsible for poor student performance in Nov of Grade 4? Grade 3 earlier? Or is it the student or group of student's ability?

In general, teachers aren't really the problem, it's the system that places ineffective individuals in leadership positions. Our focus for years has been on "college prep and we are still failing of achieving that goal". When will implement teaching "student how to learn!!"

Learning with mastery goals. Not dividing by age, but by skill attainment.
I sent an e-mail about this topic. Require mastery of basic skills at the K-6 level. Stop the censorship of conservative ideologies in History, Social Studies, and Political Science classes. Stop using core subjects to advance social justice curricula. I can provide dozens of examples of each!!! Language is vague and open for interpretation too often.
2 choices included the word "students".
8 choices should include the word students
1 choice the teachers
1 choice the administration
Administrative changes don't change anything in the classroom...it is just like this proposal...it won't change anything in the trenches of the classroom.
Are there some bad teachers out there? Yes, and there are going to be a lot more of them if the profession continues to suffer like it has politically and financially...remember...you get what you pay for! Very few of the best and brightest students are aspiring to be future teachers...I wonder why that is? I wonder where "no high school diploma...no driver's license" would get ranked on the list? If good administrators hire good teachers and the school still performs poorly, do you really think hiring a different administrator or teacher is going to make a difference.
ANALOGY: NFL...Indianapolis Colts lose almost every game of the season...so what does management do? Fire the coach!!! You don't think it had anything to do with Peyton Manning not being the QB do you?? They need a new QB, not a new coach!!!! In school, we cannot trade our students like the NFL can their players. We have to play them all everyday...no matter their skill level...and believe me some of them are severely lacking.

STUDENT ACCOUNTABILITY!

Teachers need smaller class sizes and longer class periods. If students were focused on 4-5 main courses at a time, like in a college or career prep program, they will be better able to get in-depth. Teachers, too, will have less grading and more time to invest in planning stronger lessons and in giving individual feedback.
The most important thing is for students to have access to teachers, and this cannot happen in overcrowded classrooms. This can’t happen period until the state changes the funding scheme, so schools can hire teachers. Are the students supposed to differentiate their own learning, or is each secondary teacher supposed to personalize learning experiences for 150 students a day, five days a week?
How do you determine who is effective in a school? Who determines who is effective? Is effectiveness determined simply through test scores? What about accountability for the students themselves? Or their parents? Who will pay for all of the additional help at risk students will need?

Decrease the amount of testing and allow teachers to TEACH

Parents have got to realize that kids have to work for grades. That rigor means high level work and a commitment to learning. Personalizing learning is difficult with packed classrooms and limited materials.

More team taught classes.
1. Project based learning    2. Collaborate with higher education institutes and reform the current ECASD curriculum

2

More AP Classes offered    Smaller class sizes

3

Making any of the changes suggested above without understanding the underlying cause makes no sense. Without understanding where a potential problem lies, we cannot make changes that are guaranteed to have a positive result.

4

Nothing can be done to make a net change in a positive manner. The students who want to go to college are going to college. The only caveat to that is financial issues that delay some people who want to go to college. Many of the kids not going to a college either have no desire to, or are not acknowledged because they go into the Technical College system which is viewed differently than the traditional four year college system.
Tapping in to the strengths of successful instructors by offering training in techniques used that are proven to be successful. Perhaps you would have a couple of “district trainers” who would meet with instructors who are having successful outcomes, learn from these strategies, and then hold inservice sessions for instructors to attend. There needs to be a way of passing along the good strategies to other instructors without burdening the instructor who is doing well!

Tailor classes and schedules to meet post secondary readiness goals for students.

We need a way to get students to want to be in school and do well. We have a societal dilemma where many students do not want to be in school (because it is work and they don’t see a reward...........they have too much instant gratification now so they don’t respond to education which will pay dividends for them in the future not the now. maybe we need to tie educational performance to ability to obtain drivers licenses/work permits?? something to get the kids here and trying!

Parent accountability to provide a home environment that helps a student be able to focus on school work.....

more writing homework a requirement deadlines needed to show students that whenever is not acceptable

Providing time for teachers of the same discipline in the building to collaborate together to share effective teaching strategies.
Require strong content knowledge by teachers. Test students in ALL content areas, not merely stressing math and science. Consider non-college bound students in requirements.

This is a strange way to survey for this information. All are critical. Research suggests that these are all CRITICAL to the process of improvement. The most effective change is rigorous instruction by high quality teachers who respond to data collected at all levels. That requires a strong leader. A strong leader should be able to have significant autonomy, but we have very few strong leaders currently.

Special Education staff can and should be utilized in more broad ways than they currently are. Teacher licensing processes and PI 34 are cumbersome and do not necessarily lead to better evaluation systems. No business would operate that way. Districts should be able to promote strong teachers, create administrative paths and offer re-certification processes separate from or in concert with a HE. Becoming a teacher should be much more difficult than it is currently changing tracks once a teacher consistently demonstrates mastery in the profession. If teachers were hired for longer contracts, we would likely see pay structures change. Teachers held accountable to high standards should make high incomes.

Clear learning goals, common assessments, curriculum aligned to CCSS, ACT, and other college benchmarks. Academic support skills need to be an essential component to the curriculum. Truancy needs to be taken seriously at the building and county level.
Holding parents accountable for implementing intervention plans as well as teachers. Teachers alone cannot close the gap, parents need to be held accountable for what their children do as well.

Parental involvement is the single largest factor in this equation; when parents care and actively promote and participate in their children’s academic, intellectual, and social/emotional development, kids tend to succeed to a much higher degree than when parents do not do these things. Parenting is the key here, not the schools.

This only allows for a few responses allow for closer working relationships with business encourage technical colleges to have more impact on high school students and even those and middle school improve teacher training in the area of collaboration I’m not sure a good case is made for any of these for ELL or others same response as above
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<td>1</td>
<td>Students have to feel safe, respected and engaged in the learning process. Curriculum has to be appropriate - too easy or too difficult creates behavior issues. Ongoing formative assessment is critical.</td>
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<td>5</td>
<td>Provide more clerical support so teachers can teach and do less copying, etc.</td>
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<tr>
<td>5</td>
<td>What has been proposed is clear and understood. We have no additions.</td>
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differentiation in instructional methods, means of delivery, etc. Youth options, work study & apprentice programs. Volunteerism with set learning standards.

have higher expectations of our students! Make them more rigorous and support students.

increase available resources to ELL needs for instruction time and curriculum supports.
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<td>Develop a general education version of individualized learning plan.</td>
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<td>increasing number of credits required for Math</td>
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<td>increasing number of credits required for Science to better prepare our students to meet our common core</td>
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<td>Provide incentives for National Board Certification</td>
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<td>Need to increase parental and student motivation to learn. Take the money you will spend on all of these improvements and put them into scholarships to top performing students in the state.</td>
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<td><strong>3</strong></td>
<td><strong>Make sure that teachers have training in this and they don’t have so many students that it becomes an impossible task.</strong></td>
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<td><strong>offering more authentic tasks/courses for students to attend</strong></td>
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<td><strong>2</strong></td>
<td><strong>having bilingual resources available for students and support to the home too</strong></td>
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<td><strong>Providing personal finance at edel, JH and HS level</strong></td>
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<td><strong>3</strong></td>
<td><strong>Including Personal Finance in all graduation requirements taught by a Licensed Business Education instructor</strong></td>
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<td><strong>2</strong></td>
<td>*<strong>more support/resources in student’s first/primary language due to the fact that they could learn the second language faster</strong></td>
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<td><strong>5</strong></td>
<td>*<strong>more support/resources available to help professionals be more effective in the instruction of these ELs</strong></td>
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Modeling after the elementary principal in Las Vegas.

I am disappointed that attendance is not an element of evaluation of schools. It is still a powerful indicator of student and school success. See the recent brief by “Attendance Works.” Additionally, there’s not enough attention to the importance of art, music, world languages, physical education, and other electives. This can be the core motivator for some students.

Project-based learning holds real promise to motivate students to work together and learn beyond the curriculum. More emphasis must be placed on interconnecting the curriculum. The real workplace doesn’t just use math or English, but draws on the full array of subject areas.

Hold individual students accountable for their results. Reasonable class sizes.
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<th>Rank</th>
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<td>4</td>
<td>Focus on the quality of the teacher. Ask any teacher, student or parent who</td>
<td>Effective teachers should be kept and the rest, who block the work of the good teachers, should</td>
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<td>the most effective teachers are, and keep those teachers. Get rid of the</td>
<td>be removed from the system. This will allow districts to allocate resources more effectively.</td>
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<td>rest who block the work of the good teachers.</td>
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<td>Allow districts as many seats as they need in alternative education settings</td>
<td>Disruptive students can be removed from the system and no longer create a barrier for other</td>
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<td>so the disruptive students can be removed and no longer create a barrier</td>
<td>students’ education. This will allow teachers to focus more on teaching instead of discipline.</td>
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<td>for others students education. Teachers spend too much time disciplining</td>
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<td>students. Parents need to be held responsible for ensuring their children</td>
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<td>complete homework in the evenings.</td>
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<td>Redesign the school year to make it more important to have consistency in</td>
<td>A year-round school calendar with 9 weeks on and 3 weeks off, with teachers having one week off</td>
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<td>learning. A year-round school calendar would be a good step. 9 weeks on 3</td>
<td>for Professional Development, would allow for more consistency in learning.</td>
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<td>weeks off with the teacher having one week off and returning for Professional</td>
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<td>Development.</td>
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<td>Academic requirements should be changed. Perhaps we should only be teaching</td>
<td>Core academic content should be taught in public schools. The Arts, Healthy Living, Wellness,</td>
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<td>the CORE academic content in public schools. The Arts, Healthy Living,</td>
<td>Physical activity, sports, and extra curricular activities should become the community</td>
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<td>Wellness, Physical activity, sports and extra curricular activities should</td>
<td>responsibility. All of the time during the 7-hour school day should focus only on Reading,</td>
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<td>become the community responsibility. All of the time during the 7-hour</td>
<td>Language skills, Math, Science, Technology and Foreign Languages. Teachers work with a</td>
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<td>school day should focus only on Reading, Language skills, Math, Science,</td>
<td>personalized computer-based curriculum. Teachers are used to facilitate their ability to use their</td>
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<td>Technology and Foreign Languages. Teachers are used to facilitate their</td>
<td>individualized program. Teachers become the resource, the coach, students move through their</td>
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<td>ability to use their individualized program. Teachers become the resource,</td>
<td>personalized program at their own pace. They come together to experience group projects with</td>
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<td>the coach, students move through their personalized program at their own</td>
<td>students of similar ability across ages.</td>
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<td>pace. They come together to experience group projects with students of</td>
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<td>More time does not always equal more learning. The student has to have the</td>
<td>More time does not always equal more learning. The student has to have the capacity for the</td>
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<td>capacity for the learning.</td>
<td>learning. The student has to have the capacity for the learning.</td>
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<td>Teachers can only do so much with what they have. The student has to be</td>
<td>Teachers can only do so much with what they have. The student has to be a willing learner with</td>
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<td>a willing learner with the capacity to do the learning. The parents have</td>
<td>the capacity to do the learning. The parents have to be vested in the students’ learning and</td>
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<td>to be vested in the students learning and support the need for more</td>
<td>support the need for more intensive learning and more time invested into the task of learning.</td>
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<td>intensive learning and more time invested into the task of learning.</td>
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Make learning relevant. For example in service-learning and environmental education citizen action participation pedagogies, the students themselves have a voice in their learning opportunities are. We say we want students to be self-motivated life-long learners but we rarely give them opportunities to do this.

Schools should be able to obtain services from CESA's other than the one they are geographically located within. Some CESA's for example provide grant writing services, others do not. School districts should also be able to share resources and/or participate in state-wide buying contracts for things that all schools need like paper, duplicating, printing etc.

Increase the credit limit (it is currently just 18) of the Youth Options program. School districts may offer more, but in these tight budget times most do not. Many states have "Governor Schools" during the summer. WCATY is offering programs for GT students but these are not free. PRE-TEST students. We are wasting a lot of time by teaching children things they already know. The tests don't have to be on a statewide scale. Local testing (by giving students the final exam at the start of the year) could be very informative. Reduce class sizes. With classes of 30+ it is hard to personalize/differentiate learning. Enable students to work with adult mentors; increase apprenticeship programs.
| 1. Wisconsin's Flexibility Request should provide detail on how the state will transition students taking the alternate assessment on alternate academic achievement standards (AA-AAS) to common core standards. The application should also state that teachers of students who participate in AA-AAS are specifically included in all training & rollout of the common core standards, and in every other facet of Wisconsin's pro 2. While this application refers to students who participate in AA-AAS, it should consistently refer to this group as "STUDENTS WITH THE MOST SIGNIFICANT DISABILITIES" (p. 16 & 23). It is also important to be clear that in Wisconsin, 1% of students DO NOT TAKE the AA-AAS currently, in fact the number is lower and a 1% should not become a new target. Current US DOE WI assessment data (09-10) shows the % of SWDs on AA-AAS: 8.8% in Reading; 8.9% in Math. Wisconsin quality assessments for all students. 3. For SWD, this discussion must include reference to how accommodations will be addressed. Wisconsin's waiver proposal should include a plan for reviewing and matching current accommodations policy with new accommodations which will be implemented with new assessments. THIS is particularly important because USDOE reported data shows 58% of Wisconsin's SWD using test accommodations in 2010. I support the draft waiver's guiding principle that "Every Student has the Right to Learn," which references the Common Core Standards as the "foundation of instruction and assessment for students with cognitive disabilities. 2. Support proposed participation in SMARTER Balanced Assessment Consortium - good choice - love the connection with technology. 3. I am concerned that subgroups (especially SWD subgroups) will not be factored into overall accountability. THIS IS MY PRIMARY CONCERN WITH THE ENTIRE WAIVER. 4. I am concerned that the Stars award program does not account for post HS employment. 5. I am concerned that high schools are being left out of growth gap despite current 10th grade testing. I believe that all grades should be tested in the future. 6. I am concerned that the optional comprehensive and content-cluster measures are optional and question whether they will be designed for SWD. 7. I am concerned that the "On-Track Indicator" only looks at attendance, without mentioning behavior and discipline and the impact those practices have on attendance. 8. I am very concerned that the focus for SWD appears to be only to reduce identification rates and FAILS to focus on increasing learning. 9. I am concerned that there are no exit criteria proposed for priority or focus schools. 10. I believe Wisconsin should adopt Common Core standards. |

| 1. Concern that the proposed waiver's listing of stakeholders involved in developing the framework shows that there were no parents, disability groups, or special educators involved. So, future development MUST include all 3 of these groups. 2. Concern that the draft waiver, in discussing student achievement & principal evaluation, fails to mention SWDs and how principals attain achievement for them. 3. I support that the draft waiver states that an educator will not be allowed to remain at the developing level "indefinitely" but I am concerned that no time frame is identified for exiting inadequate educators out of the profession. | | |
I will say that streamlining and integrating data to help all facets of a district’s effectiveness is met with some degree of optimism. The key is to assure that the data is clean and free of error. Systems such as Educator Licensing Online (ELO) is dependent upon user input for accuracy. It has great potential, but comes with some concerns.

Common Core State Standards in mathematics and language arts are helping; we need to have science and social studies completed soon. More understanding must be established by between higher ed and k-12. “Passion-based” learning is engaging, inherently rigorous, and effective.

Providing a variety of classes at all levels, adding flexibility perhaps add'l time at the middle level, flexible scheduling at the high school level to access other opportunities outside the school building.

A statewide system that includes a learner’s profile or dashboard depicting each student’s achievement, learning style, etc.
Linking student outcomes to teacher effectiveness will be an extremely challenging project. Fidelity of implementation will require extensive training of administrative and teaching staff. I hope this has been thought through and necessary funding provided.
1) Do not mandate all students take 3 credits of math and/or science for graduation. Many of our HS students already take 3+ credits due to individual interest or are advised to because of future plans. Such a requirement limits other learning opportunities for all students and may turn some students off, thereby increasing dropout rates. It will negatively impact our arts programs and participation in our proven school-to-work coop & apprenticeship programs for juniors and seniors. Stated elsewhere in the document is recognition that teaching math & science in context engages students. I agree. There are other ways to do this. (Examples include: math & business; science & ag; physics & music; project-based learning principles applied in all courses.) Finally, STEM is appropriately highlighted as an excellent, well funded model. I encourage our DPI to look to the growing evidence-based research, and support, for the STEAM model (STEM) where the Arts. (Ref: 12/7/11 EdWeek article which states “The intersection of the arts with the STEM fields can enhance student engagement and learning, and even help unlock creative thinking and innovation.”)

2) Provide support for schools to implement quality career planning programs that have already been developed but might not be in place locally. Specifically, (a) implementation of the Comprehensive Guidance Model to plan what (Stated earlier & repeated here.) Expand the use of proven & effective distance teaching & learning instructional systems/technologies to facilitate effective sharing/collaboration of innovative instructional strategies on an as needed basis for instructors (i.e., a more robust version of “spotlight practices” concept discussed elsewhere). Such systems exist in other areas such as medicine and custom design tapping into a vast database & network of resources by typing in keywords that identify specific situation to find potential ideas/suggestions for consideration). For the ELL population, this holds great potential. Depending on the design, this limits disruption of student learning in the schools by enabling instructors to tap into resources as needed, stay closer to their students and provides flexibility for teachers to research/learn when their schedules permit. Done properly, this increases the possibility for a more engaged professional learning community around the state. Bottom line: addressing the learning needs of special students (relatively few in an individual LEA) by providing professionals easy access to resources and lessons learned, at the time of need, is preferred (vs. waiting for professional development).
Wisconsin’s Flexibility Request should provide detail on how the state will transition students taking the alternate assessment on alternate academic achievement standards (AA-AAS) to common core standards. The application should also state that teachers of students who participate in the AA-AAS are specifically included in all training and rollout of the common core standards, and in every other facet of Wisconsin’s proposal that applies to other all other students, including teacher evaluation. When the application refers to students who participate in AA-AAS, it should consistently refer to this group as ‘students with the most significant disabilities’ (pages 16 and 23). It is also important to be clear that in Wisconsin, 1% of students do not take the AA-AAS currently, in fact the number is lower and a 1% should not become a new target. Current USDOE WI data assessment data (2009-2010) shows the percent of SWDs on AA-AAS: 8.8% in Reading; 8.9% in Math. Wisconsin’s should be congratulated for participating in consortiums to develop high quality assessments for all students. For students with disabilities, this discussion must include reference to how accommodations will be addressed.

Wisconsin’s waiver proposal should include a plan for reviewing and matching current accommodations policy with new accommodations which will be implemented.

It is not practicable to rank order the above strategies in isolation. Startegies should be aligned to the schools needs and not provided in isolation but with multiple other supports to ensure success. For example replacing least effective teachers will not in itself turn around a school. The terminology is subjective in that a least effective teacher at one school may be a very effective teacher at another. It is suggested replacing ineffective teachers. Either way terminology would need to be defined.

The current corrective action requirements that will continue through this waiver lack the flexibility to target supports and interventions for the students that need it the most. Instead it is a one-size fits all approach to reform.

1) We support the draft waiver’s guiding principle that “Every Student has the Right to Learn” which references the Common Core Standards as the “Foundation of instruction and assessment for students with cognitive disabilities.”

2) We support proposed participation in the SMARTER Balanced Assessment Consortium.

3) We are concerned that the optional comprehensive and content-cluster measures are optional and question whether they will be designed for students with disabilities.

4) We are concerned that subgroups will not be factored into overall accountability. We are concerned that the Stars award program does not account for post HS employment.

5) We are concerned that high schools are being left out of the growth gap despite current 10th grade testing. We believe that all grades should be tested in the future.

6) We are concerned that the ‘On-Track Indicator’ only looks at attendance, without mentioning behavior and discipline and the impact those practices have on attendance.

7) We are very concerned that the focus for students with disabilities appears to only be to reduce identification rates and fails to focus on increasing learning.

8) We are concerned that there are no exit criteria proposed for priority or focus schools.

9) We believe Wisconsin should adopt Common Core Standards based IEPs.

10) We support that the draft waiver states that an educator will not be allowed to remain at the developing level “indefinitely” but we are concerned that no time frame is identified for exiting inadequate educators out of the profession.

We are concerned that the proposed waiver’s listing of stakeholders involved in developing the framework shows that there were no parents, disability groups, or special educators involved. So, future development must include all 3 of these groups.

We are concerned that the draft waiver, in discussing student achievement and principal evaluation, fails to mention SWDs and how principals attain achievement for them.

We support that the draft waiver states that an educator will not be allowed to remain at the developing level “indefinitely” but we are concerned that no time frame is identified for exiting inadequate educators out of the profession.
All of the above should be a number one to have a successful learning environment. These 10 interventions are a must.

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The regular classroom is disrupted when outburst are going on during learning and teaching. Behavioral disabled children should not be allowed in the regular classroom. There should be a holding school for them until they can be assessed and then provide for their needs.

Clarification on the measures used for special education teachers.
| 3 | Finalizing the move toward a state-wide SIS | Eliminate grade levels  
Text/blended learning  
Move toward e-  
Move toward year-round schedules | 2 | 2 | 2 |
| 0 | Include students with the most significant disabilities, including intellectual disabilities, in participation in the Common Core Standards.  
Factor subgroups into overall accountability even in small districts/schools  
Concern that Stars await | 3 | 3 | 5 |
| 5 | A stronger safety net is needed for at-risk students outside of school. | 1. Infuse reading and writing into all subjects  
2. Set/maintain high standards of writing for teacher education candidates | 2 | 5 | 5 |

--- Noticeable lack of involvement by stakeholders, including families, disability groups, special educators.  
Draft waiver does not mention students with disabilities when discussing student achievement and principal evaluation.  
Good step that
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<td><strong>Hold parents accountable for student absence and misbehavior.</strong></td>
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<td><strong>Low-income schools are failing, and it's a tragedy. We need more equality in education.</strong></td>
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<td><strong>[Answer too lengthy for this space but is provided as an Appendix.]</strong></td>
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All of the preceding suggestions are solid but require knowledge that we don’t yet have. If you replace a poorly performing administration with a different, yet equally poor administration, then that intervention will have no affect. No intervention will work in each and every case. Interventions must fit the school and student population specifically, not be applied uniformly to all schools.

Give teachers resources to learn and implement data driven instruction and then give them the flexibility to run their own classroom and make their own decisions. Reward entire schools for improving student achievement.
The above 1-10 scoring system is not working on my computer, so I'll comment instead. I think ineffective teachers should be replaced, but their effectiveness shouldn't be based on test scores. The best teachers are often given the most challenging students. More learning time is definitely a good thing. Top-down approaches that emphasize administrative interventions and mandated professional development are not a good strategy. Safe schools are key.

I agree with having core standards that encourage high achievement. In Madison, there is a push towards standardizing the curriculum, which I think is going to lower standards. I also think we need to get away from rewarding and punishing students based on standardized test scores, as this inadvertently lowers rigor. Teachers are far more focused on bringing low performers up to minimal standards than helping other students excel. In districts and schools where there are huge ranges in achievements, offering specialized classes for different learning levels (especially in middle and high school) is probably necessary. Honors students get what they need, but kids who are smart but not honors students need challenging classes where they are not held back by kids who are more challenged at school, or who don't care or want to be there.

I am opposed to top-down approaches to educator effectiveness that emphasize testing data. This is going to drive creative, intelligent people out of the teaching profession.

This will demand a great deal of new personnel at all levels and new responsibilities to implement, monitor and take corrective actions. Where will the burden fall, besides on all of us? It will cripple our independent school, already struggling with a budget of $6442 per MPCP students.

1) Adapt Waldorf philosophy and principles 2) Come to realize that testing and measurements do not provide answers beyond who performs well on the test 3) Realize that no student was influenced and motivated by the teacher who taught to the test.

Teachers can't do it alone and it all begins at home. So anything that helps parents help their kids is good.

It all starts with getting all children learning as early as possible. When they are kindergarten ready the learning is easier and they can learn more advanced topics earlier. So start mandatory education earlier especially in the impoverished low s.e.s. areas.
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<td>Provide professional development on differentiation. Develop and implement digital personal learning supports/plans. Implement assessments and provide professional development for teachers that emphasize depth of knowledge and rigor in instructional practices and assessment design. Directly align state assessments with college placement systems.</td>
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<td>1</td>
<td>The utilization of value-added is a good step. Also emphasize learning goals for all students in SLO's.</td>
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<td>5</td>
<td>System reform should maintain the autonomy and independence of schools, allowing them to offer innovative options in education. There also needs to be well-developed systems of support commensurate to any heightened accountability requirements.</td>
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<td>1</td>
<td>The utilization of value-added is a good step. Also emphasize learning goals for all students in SLO's. SLO's for special education teachers must be focused on student learning and not on functional/behavioral objectives.</td>
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<td>By offering a variety of high quality educational opportunities that are sensitive to the needs of students, including permitting students to attend charter or choice voucher schools. Develop a system of assessment that is value-added and measures student growth and attainment.</td>
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<td>Regardless of what strategies/supports/resources are developed, all should be made available to educators, administrators, and schools statewide, in both rural and urban areas, and the public and private sector.</td>
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All with schools being accountable for student achievement, parents and students must be held accountable as well. Achievement is a three legged stool and only one leg is being addressed in all of this.

I just hope we don’t fall into the practice of rating schools by their population. It may be that a good school is starting with less prepared kids and will be labelled a bad school despite having quality education. It is true, however, that all schools should continue to improve and this might be a good system to help identify strengths and weaknesses of schools.
Please be aware that schools need to make decisions that affect their kids and community. Laws that are federal that do not match state or vice versa are not helpful. For example, highly qualified teacher where the state gives an emergency but the federal government says no you have to report a teacher who is not highly qualified. All kids must test, but Wis has opt out at 4th, 8th and 10th. Now Wis says higher standards for teachers in college, that is fine but federal govt saying individuals with other degrees can teach - really? They don't need specific courses? Extra training? Because I am an engineer I can teach? Very frustrating to all in education.

We need to get better at teaching and measuring 21st skills that are embedded in the CCSS; e.g., creativity, teamwork, problem-solving, etc.

Wisconsin should have a high school fine arts requirement of 1 credit. If we want well-rounded students then there needs to be a balance to the additional math and science credits being proposed; otherwise, we will continue to see a narrowing of the curriculum and the non-mandated areas will continue to be seen as less valuable and more expendable.
Thank you for taking the time to create this application for waiver. We need to be able to demonstrate our growth, efforts and work.

The language seems like it has a lot of gray areas in it for schools. What funding is the state going to give for these new mandates? I am concerned about the funding for all of these new programs. I am also concerned that the new requirements are not going to accurately assess student learning. I am also don’t see any student or parent accountability for low performing students. It seems like it is high stakes for teachers and administration, but no stakes for parents and students. Since there are so many factors that are out of the schools control (i.e. families that live in the district and their unique needs), the accountability system doesn’t seem to do enough to consider it. Also, there seem to be a lot of new requirements, and recently a lot of reduced funding from the state.
Pi 34 has been an improvement to ongoing teacher development. The required involvement of a post-secondary educator continues to be a challenge. Many of our teacher preparation college programs are not using “best-practice” in the use of data to drive instruction and development of common formative and summative assessments. We focus on lesson design and delivery, but not measurement of student learning.

Two main areas of frustration: meaningless state assessment for improving instruction—please look at EPAS rather than development of another assessment AND lagging behind other states in the flexibility of funding and use of special ed staff to implement RTI.

You will need to define courses for all graduation requirements, otherwise it will not work well. Also, I love that you are looking to the ACT set of examinations.
Fund our Public Schools. Eliminate School Vouchers, why do you need to make two classes in our education system. Don’t take any advice from our Governor. He is a college dropout. He doesn’t value education.

Has there been consideration for rural schools with small class sizes? In a class of 20 two or three students who choose not to test or are unable to test well can throw off the whole results. Why aren’t all school administrators included in the evaluation process? Principals can shape a district, but so do the superintendents. They are public employees and should be rated and ranked too. Wouldn’t it be important for a district to be able to critically examine a person’s abilities before they are hired?

The survey jumped from page 10 to 12. Did it skip page 11 or is it numbered incorrectly? Why is the math standard lower than the reading standard (I know it follows NAEP, but why does it have to be lower)? The “labels for schools” indicates there must be a minimum of 10% of schools with a “not meeting or significantly below” label and 5% with a “persistently significantly below” label. Does that mean that even if all schools are showing growth and improving there will ALWAYS be schools in those categories? That doesn’t seem right if that’s the case. Why aren’t central office administrators, superintendents, and board of education members being included in the EE System? If communities had information about board members, in particular, who cannot show specific evidence of helping to improve their schools, it might influence community ownership of the improvement of the education for its students.
I applaud this effort. I would suggest implementation in a way that exempts districts that are already achieving at a certain level or of a certain size. Smaller districts that are successful with their students may be overwhelmed with all of the logistical aspects of implementation. If they could be phased on at a later point in time, the higher priority districts could be focused on. NCLB seems to be designed for larger systems. There is a real lack of understanding of the burden all these layers and reports places on small systems with limited person power to implement. The personal relationships and stability in these districts often creates success. If so, leave them alone and concentrate where needs are greatest.
I think that the state needs to come up with an efficient and effective teacher evaluation tool. If it is too lengthy and involved it loses its effectiveness.

I like the focus on college and career readiness, I believe that is on the right track. I think for this to be effective and implemented appropriately, the state needs to provide training in teacher evaluation (how teachers are evaluated in Superior should be the same as in Milton). The cost of this can't be another item tacked onto school district's budgets, it needs to come from the state for it to be effective.
Please have working plans in place before implementing. Make sure they are in place at the start of a school year...do not interrupt a learning year with new items. New testing should be tested and developed. WKCE’s are not enough to measure by. We have been hearing about new tests being developed and still no test is available. Testing should be done twice a year, a one time test is not fair or equitable. Not all students test well and their future is at stake by one test.

This effort is risky from a PR standpoint. With Milwaukee performing at the bottom nationally, with African American students and Latino students performing well below Anglo students, any effort to move away from NCLB will be perceived as the education establishment trying to hide from its failures. This better be sold as even more demanding than the national effort. Even in this hyper partisan political climate, NCLD received maybe the most bipartisan support of any federal legislation. Wisconsin better raise not lower the bar for the performance of its schools and sell cynical members of the public of this fact.
Thank you for addressing this.
Along with creating low morale in the school environment by removing collective bargaining, decreased funding across the board for education by our governor is not focused on what is best for students. It is not practical to expect educators to do more with less, especially after the politics of the last year.

Being able to hang an award in the school gymnasium based on the 0-100 point system sounds nice. But it is not really that motivating when the rest of the world operates on cash incentives for work production. At what point do teachers get recognized and compensated accordingly for doing all the great things that are continually being expected of them? Especially, when data supports their efforts!
Send a message to WEAC to stop telling teachers that they are not appreciated. Teachers are appreciated. Some of them are underpaid but their efforts are still appreciated. WEAC is largely to blame for low teacher morale.
See above suggestions. Enough surveys and studies. You know what is needed - DO SOMETHING!

Overall, I don’t see how you can call it accountability if there are no consequences. What if DPI doesn’t provide appropriate interventions? What if they don’t make improvements? What if they don’t or can’t develop the assessments, evaluation frameworks, and teacher eval systems? What if they can’t get buy in from the unions? Seems like another generation of underprivileged students will rot away in low performing schools and face a bleak future as unskilled, non-literate adults, as DPI tries yet again to reinvent itself.
Needs to be a stronger standards-based focus on teacher development, both in terms of induction program standards and standards for on-going professional development for veteran educators.

I believe 99% of the teachers and administrators are giving as much energy as they can to help their students be successful. All students start at a different place and have different needs. I hope schools that are low performing will be given help to improve, not just negative consequences.

Most of the requirements are unnecessary. Students need to be interested and taking education seriously; no matter what level they are on. Teachers and parents can make it work if they support each other to make sure that their child is learning and knows what he/she needs to succeed in life.
Again, teacher effectiveness has to be data-driven but the social economics of all students must be applied to any equation in school improvement.

<table>
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<tr>
<th>Educators are professionals who should be consulted and placed on all think tanks and committees that develop any type of school improvement strategies. Who better to improve the schools than the teachers themselves? They are the most informed on the topic as they are living in the environments that are supposedly not producing effective students. Also, as I've pointed out many times, considering a person's environmental and social economics must play a role when determining any form of school reform.</th>
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<th>The evaluation measures for teachers &amp; principals should take into account the family environment. Does the parent help or hinder student success? Many parents are very supportive, but others do not value education for anyone. It is not fair, valid, or reliable to ignore this factor.</th>
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<th>For years, teachers could get lifetime certifications... and those educators, with out pay or push for it obtained master's degrees and professional development. A good teacher will get professional development on his/her own let them do it. Good teacher= effective educational goals. Sometimes the profession is overregulated by people who know it only from the outside.</th>
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Everything as previously stated! I can't believe you actually hired a bunch of people that earn 6 digit to look and evaluate this survey. PUT THE MONEY where it helps the most - in the classroom. What are students without desks, books or pencils. It's like robbing a handicapped person the wheelchair!

STOP BUREAUCRATIZATION OF SCHOOLS AND DISTRICTS!

Let schools try some different ways of working with students and let teachers use what works for students.
Get rid of the dead wood sooner rather than later. Protecting lesser performing individuals through years of mentoring/relearning/etc. is just keeping the problem in place. There are plenty of competent people looking for jobs that would love to replace the slackers and underachievers. We as teachers have problems when it comes to protecting our own. It’s bad for the entire group.

WEAC has some stake in this, but we wouldn’t be in the position we are now if it wasn’t for foot-dragging by WEAC (and certain bureaucrats) when it comes to reforms. Keep pushing with or without the union backing.
Please look at different ways to assess students. Doing normed test seems like the easy way out and is not a fair and equitable way of measuring student success. I have been advocating for this since 1979 when I graduated. My children and I, all of which are college graduates should never have been successful based on those tests. A huge sales job on each of our parts had to be done just so colleges and universities would give us a chance.
Thank you for changing the system, even in a highly-politicized environment. Dr. Ever’s actions are applauded and thank you DPI for your work around this issue. It’s the right thing to do for our WI students.
Classroom make up needs to be considered when evaluating teachers. For example, some classes are set up as ELL cluster classrooms. Teachers in these rooms may be outstanding teachers whose students have simply not had enough time working in English to be proficient. Also many administrators place the most challenging students in their best teachers' classrooms. This can affect the performance of students in these classrooms. Teachers should not be penalized if their classroom is not meeting performance expectations if there are factors like these that affect the class' performance. Also, by using test scores to evaluate teacher effectiveness, everything that has been gained in terms of collaboration in the past few years may be lost. Teachers may decide to focus on only their own students rather than investing time in the students of another classroom. Also, if test scores are used to evaluate teacher effectiveness, what will prevent some teachers from helping their students cheat. What impartial person will be administering and protecting the tests?
Do not encourage or support the use of AIMSWEB or DIBELS as literacy assessments in the state. They do not yield meaningful information and are using up valuable instructional time in schools. They also send the wrong message to children that reading words fast and reading nonsense words are what the teacher is looking for. Kids can turn their brains off and just say words fast. Don’t we want to teach our students to think more analytically and deeply? The 21st century goals for our students are to 1. Investigate the world, 2. Recognize perspectives, 3. Communicate ideas, and 4. Take action. While we want our students to be able to do those things, AIMSWEB and DIBELS are doing just the opposite.

I applaud your efforts in making this shift in the state during this challenging time. If you have questions about comments I have included, please contact me at kbblaker@comcast.net. Thank you and good luck!

Please look at ways to hold not just teachers and administrators accountable, but students as well. Right now a middle school student in my district can fail all of his/her classes and still get to high school. These students aren’t held back and aren’t give consequences for their choices. Instead, the school is penalized for trying everything they can do to help them.
Make sure the final bill makes it possible to more easily get rid of ineffective educators.
| WI DPI has not created much statewide PD via technology. I understand the "local control" issue, but having the resources create, and available may increase the likelihood that schools/districts would take advantage of this. WIDA could develop these for you. |
| Be sure to support teachers instead of blaming them. |
| Focus on student accountability is of more value than focus on teacher accountability. Most teachers are highly effective, but are limited by student apathy and lack of consequences for students who choose not to learn. |
| Include student and family accountability in the system. |
I am EXTREMELY concerned about the impact of what will be an even more focused approach to teaching science, math and reading/language arts will have on Social Studies education which is already extremely marginalized in many of the elementary schools around the state. How can we expect to have educated and engaged citizens if we take away the learning in this area.
already answered in previous similar questions.

It appears we still have the unrealistic expectation that all students will be at grade level in reading by 3rd grade. There are so many variables that are involved in a student’s achievement beyond the curriculum and instruction they are provided and schools cannot impact many of those factors. And being able to read is not the same thing as doing well on a test.

| How are we going to be able to afford the computers for MAPs and the WKCE? |
PROMISE YOU WILL GO VISIT A COUPLE SCHOOLS IN SOME PLACES WHERE YOU KNOW EDUCATION IS STRUGGLING BEFORE YOU MOVE FORWARD WITH ANYTHING ON THIS...YOU OWE IT TO THE STUDENTS AND TEACHERS IN THE TRENCHES EVERYDAY TO DO SO BEFORE ATTEMPTING TO IMPLEMENT SOME SORT OF SYSTEM BY WHICH TO MEASURE AND EVALUATE THEM. HOW ARE YOU EVALUATED IN YOUR JOB? IS IT RIGHT? IS IT FAIR? IS IT MAKING YOU BETTER? IT IS COMMON SENSE? FOR YOUR SAKE, I HOPE IT IS.
Any system of evaluating teachers on principals is ridiculous, when teachers have zero control over who comes into their class. I have 5 sections of the lower students, and the teacher next door teaches 3 second of average students and 2 sections of advanced students. So his scores will say that he is 50% better at his job than me. I don’t think so.
this plan was not written with the parents of students in mind. Parents and students are the client and it's clear that this plan is not parent friendly. Giving a two week turnaround for the public to reply, doesn't even afford parents the chance at learning how to interpret this plan, yet alone to ask questions and receive answers. DPI says they support parent engagement in schools, yet you roll out this plan with no way to make it parent friendly. My biggest question is who is going to fund all these mandates that are placed on low performing schools? My child's school is already broke, looking at class sizes of 31 for 4 year olds (with no aides or paras). I can't imagine having to take out more money from my child's class to fund these mandates you created, without any parent participation in here. DPI should have had a panel of parents they consulted with throughout the state, to have representatives from urban, rural, and suburban areas.
To truly make students college ready in grade school the change needs to happen asap and needs to be in every classroom starting at kindergarten. Only providing college knowledge and education to high school students would be the least effective way to make college ready students.

Teachers will leave low economic areas and struggling school districts to avoid being penalized for poor student performance. Educator effectiveness is a vague term... what will be criteria? Student opinion? This is an overall vague document with little specifics. It offers very little facts and leaves the door open for the state to really do anything they like.

We need time to discuss and review this before taking this survey! There has been no communication about this previously.
Many students do well in standard classroom settings where all students are expected to move at about the same rate of speed. However, there are students who would do better if they were on some sort of individualized track where they could have the flexibility of moving forward or backwards as needed for learning information. This secondary track would offer more remedial assistance when the student needs time to review before moving ahead to new information. I truly don’t know how this could work, but there just has to be a way for us to stop assuming that “one size fits all learning” will work for everybody.

I’m not sure.

If we are going to use the new test replacing the WKCE to be an evaluation of teachers/students then there needs to be something attached to the test that makes it “important” to the students. It needs to be a graduation requirement, or something so that they see it as important and try their best. The kids get tested to death and when the state tests roll around for high school kids, a lot of kids just don’t care as it doesn’t impact them (or at least that is how they see it).

Simplify. Please do not make this look like a contract that will be difficult to embrace.

I am not sure. I thought some of this was very vague for me to make some solid suggestions for you. Sorry.
Wow...This is for real, very exciting for Wisconsin!!

Parent effectiveness should also be rated with appropriate interventions/consequences for parents who do "not meet standard expectations". Schools can not be expected to educate students who are not physically, mentally and emotionally prepared to learn.
Who is going to do the work of rolling this out if the waiver is approved?
Flexibility in operations allow us to look at teacher effectiveness via student achievement, surveys, performance reviews as well as seniority. It will be important to maintain this flexibility as opposed to past structures in which we were bound only by a review of seniority.
Educator effectiveness measures need to consider an entire school community's impact on the student, as many "special" teachers and aides may make a positive or negative impact on the student's achievement and growth as well. These measures also need to consider the environment in which the learning takes place (students' personal/home/societal challenges; composition of the classrooms the student learns within, etc.)

My only concern is the issue of time-needed to implement and maintain the evaluation program. A true evaluation takes time - pre-mtg; observation; post-mtg; follow-up. Most administrators and teachers are so fully scheduled that trying to find the time to do all will be an issue. This may mean the implementation (with pay) of an extended day, which should also be used for increased collaboration and professional development.
This plan must be equally applied to all taxpayer funded, charter and voucher schools in the state. No exceptions.

I made my comments as I went along in the survey, and as they applied to the topic surveyed.

Do not increase math and science credits. There is not enough money in the schools budgets to take this extra burden. More teachers would need to be hired, more rooms would be needed to teach in, and more resources needed. It is hard enough to get some students thru the basic requirements of 2 years. The willing and motivated take the 3 years already. So you would be mandating it to the students who do not want it.
The best way to improve education is to help teachers get further education and support to use the data. Teachers must have reasonable class sizes or they won’t be able to accomplish the many other tasks involved in individualized instruction. Teachers need time. Education needs support, support, and support.

Using real life hands on demonstrations, assignments and fewer moments of memorizing spelling words—more instruction on grammar and requiring a second language for all students k-12
I think Wisconsin is a great state to raise children and that is why my husband and I chose to live here. The recent cuts to education from the governor make me sad and frustrated. Why when we need education the most to continue making our economy and citizens strong would he cut education? In my eyes all he is doing is making more people dependent on government programs not less. There has to be a happy medium. If students can't learn the skills they need to be successful in the workplace they are more likely to be in need of government assistance. If we don't figure out what the future needs for jobs we will have failed. Technical, charter technical, etc high school might be the answer but with educational cuts that seems like a pipe dream. And if lower and middle income families continue to struggle financially the need for a stronger education becomes even more urgent and also ways to help transient families increase their children's odds for a stable education.
Again, change the academic calendar, the days of instruction, and the academic requirements. We all have students, perhaps 25% or more, that will not be able to meet the CCSS no matter how much time they are given and how many strategies are used. We need to develop a system of different pathways for different students. ALL students should not be college bound, all students should not be intellectually inclined, because we are not all born with the same capacity for intellect. Why can't a system be designed that meets the capacity of all of our learners.............2 or 3 different pathways that all have merit and employment as the final outcome.
The requirement of having to be recommended by a University in order to obtain a teaching license is obsolete. It is also meaningless; since all the University programs vary so much. Rather than abdicating the process of determining whether an individual is qualified to be an effective educator to the various colleges and universities (who typically just base it on seat time in a particular series of courses) the Department should retain this critically important responsibility. The Department hasn’t had the resources to perform the audits that are required by state statute so it really has no idea whether mandates regarding teacher preparation are being followed.

It has been said, what get's measured is what get's done. Moving to SMARTER Balanced Assessment Consortium and EXPLORE-PLAN-ACT suite of tests means the state will have even less control over the content of the assessment tools it is using to measure student achievement. It appears environmental literacy, financial literacy, civic literacy, music appreciation, etc. will not longer be factors in the equations used to determine whether students and schools are successful. We need to be developing well-rounded critical thinkers—not just students who can meet basic math, reading, and writing thresholds.
Much work and thought has obviously been involved with this waiver development on the part of the WI DPI - which is most appreciated. It is obvious from my survey comments that I believe additional attention needs to be placed on SWD.

Include requirements for anyone observing teachers for evaluative purposes to have ongoing training, rigorous certification and proof of being highly capable of identifying teacher performance.

Really important to promote and reward effective collaboration by all teachers to meet the needs of students with disabilities and ELLs. Graduation and accountability process is not mentioning how needs of students with significant cognitive disabilities will be addressed. And what about students who are guaranteed FAPE until 21 years of age and who may legally and appropriately take more than 6 years to graduate high school?
Establishing the SLOs (Student Learning Outcomes) will be critical work. Folks in the field are extremely anxious about the equity of the proposed Educator Effectiveness model. Special educators, non-core educators, secondary educators, etc., are particularly vocal about their concerns.

We have reviewed the information from the Wisconsin Department of Public Instruction and the U.S. Department of Education NCLB Flexibility Waiver as well as the Accountability Reform Overview from the Wisconsin Department of Public Instruction. We are very pleased that someone had taken the time to prepare this information however, there are several areas of concern, questions, and suggestions which we have included in this document for you to review. We would ask that you please review these prior to making any decisions.

Concerns

Using NAEP assessments to create new cut scores for next year will likely result in lower proficiency rates as the NAEP. This is providing districts less than one year to align benchmarks in accordance with NAEP before being held accountable. If the above is truly important to do right away, and change the cut scores immediately, then we should also change the testing window to the spring immediately in order to truly identify the student’s achievement at grade level.

There needs to be greater weight and focus on annual learning and achievement through emphasis on the growth model rather than on point in time tests.

Regarding the four-year adjusted graduation cohort: District credit requirements already exceed the new expectations but concern...
The Wisconsin ESEA Flexibility Request provides a rigorous and ambitious framework to increase college and career readiness expectations for all students while supporting high levels of accountability and support for schools and districts founded upon increased teacher and administrator effectiveness expectations. The plans documented within this request raise the following questions and concerns pertaining to the identified principles: College and career ready expectations for all students.  

<table>
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<th>Standards and Assessments</th>
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| SMARTER Balanced Assessment System: Will computer access and bandwidth poise issues for schools and districts as the grades 3-8 and 11 assessments are administered?  
| EXPLORE-PLAN-ACT + WorkKeys package (ACT Suite): How appropriate is it for all students to participate in the ACT Suite knowing that a large percentage of students do not go onto or complete their education at a 4 year institute of higher education, but enroll at a technical college for a certificated program of study or an associate degree?  
| What does the research suggest pertaining to the appropriateness of all students taking the ACT Suite?  
| What strategies do we have to provide relevance to all students participating in the ACT Suite which will provide the intrinsic motivation to fully engage the students in the assessment system? |
Thank you for pursuing this waiver and for asking for public input. In principle, the document reflects what you already know the Department of Education is looking for. I am hopeful there continues to be recognition of the importance of a well-rounded education, rather than too much focus on English, math and science. (Refer to core subjects & skills as identified by Partnership for 21st Century Skills). I am fearful there is not enough attention being paid to the importance of the arts and creativity, something China and other Eastern economies are currently ramping up their own efforts on within their own school systems. Let’s not take a step backwards. Music and the arts are good for the body, spirit and mind. They help get our brains wired for learning and teach students how to think outside the box, not to mention relieve stresses that can affect our physical health. In our ever more wired & data-rich world, employers continue to say not only are the soft skills becoming that much more important, they seek creative people who show the ability to find/ask the right question rather than simply find the “right” answer. Good luck!
The urban school situation especially in Milwaukee needs much help. I am a former teacher of central city students for 35 years and now a volunteer tutor. School discipline needs an across the board agreement and follow through with consequences. No excuses. Believe the children can excel. I think wearing uniforms could change a lot of behavior. Pants should be up and belted around the hips or waist. This a small way to prepare for the employment world. Clothes change behavior.

It is imperative that all students with disabilities and English Language Learners be assessed utilizing a growth model rather than attainment only. It is also imperative that accommodations be outlined for appropriate participation on statewide assessments for SWDs and ELLs and that the decision making process involving statewide assessment participation and accommodations determination remains with the IEP team. The IEP team must also maintain authority to determine graduation requirements as appropriate for the student.
Overall, improved/more information/strategies/accountability on:  
   -- Universal Design for Learning  
   -- Positive behavior supports/intervention  
   -- Connecting ALL SWD to common core standards  
   -- Connection of assessment to IEP process  
   -- Accountability, targeted intervention for SWD, including those with the most significant disabilities and those with behavioral challenges.

There’s mention of support for the non-core areas, but I’m not sure how clearly that’s reflected in the plan. I also wonder about the extent to which interdisciplinary education is encouraged, such as the state’s plan for K-12 environmental literacy. Interdisciplinary approaches reflect the “real world” and have been shown to be effective in improving student performance across the disciplines.
To whom it may concern,

Thank you for this opportunity to provide feedback on DPI’s draft Waiver from NCLB request. I am concerned about the way that students and ultimately teachers, administrators and schools will be evaluated. I am troubled that the test used will be high stakes for teachers, administrators, and schools, but for those taking the tests, students, it has little individual relevance or consequence. As a result, students may not be adequately motivated to do their best on these tests. Moreover, and equally troubling, the replacement of WKCE norms with the NAEP norms. Historically, students taking the NAEP assessment have scored significantly lower in areas tested than they do on the WKCE test. Do the NAEP tests measure what is being done within Wisconsin’s classrooms based on our state standards? Are we prepared to explain the likely significant drop in the number of students deemed as proficient on the new assessment? Research suggests that SES and cultural background and language proficiency are highly correlated with academic success on tests. And while I am aware that some plan is in place to "compensate" for these factors, I am deeply concerned about the details and the potential disadvantages faced by schools with . . .

I feel that we need to expect more from students. Learning requirements have softened over the last 30-40 years.

[Answer too lengthy for this space but is provided as an Appendix.]
This waiver destroys the charter school program in Wisconsin. Charter schools must be held accountable by their authorizer, not by a third party. If DPI is concerned with the quality of charter schools, hold authorizers accountable for closing poorly performing schools and opening only those with promise. The proposal negates current charter school law, and in some places replicates part of what the charter school movement is already doing, sending a mixed message to educators about their place in WI education. National charter school groups have advocated for initial 5 year contracts to allow for school culture and practices to be able to take hold before performance follows. This proposal, with its three year window, will de-incentivize innovation, by empowering a non stakeholding group (DPI) to override their contract without compromise. DPIs suggestion to force turnaround plans on schools defeats the purpose of a charter i the first place. Their second suggestion of a performance contract with DPI SHOULD ALREADY EXIST WITH THE AUTHORIZER. In my opinion, this waiver is reactionary. It looks at the system we have and punishes it into being better (which we know won’t work). I propose being proactive. Implement a system that first tries to empower and reward people, schools, authorizers, districts
I realize you have to work with the US Department of Education, but this document is far too focused on data, testing, and scores. Children are far more complex than their test scores will ever reveal. The best teachers nurture and care for every child, and no test can ever capture this. Teachers need to lead the way to finding solutions. They know what is going on in their classrooms better than any administrator. I am extremely wary of the interventions suggested for failing schools. I’m not sure who will be brought on as a “turnaround agent,” but as a voter and taxpayer, I’m not enthusiastic about the state being able to take over my locally elected school board. Combined with the wrong legislation, this could open the door for districts to be taken over by national charter school corporations and privatization of our public schools.

I can appreciate that this Waiver provides flexibility. We are one of the MPCP schools, not connected with a religion, on Brady St. in Milwaukee. We are recognized by the other high performing MPCP school leaders as doing an outstanding job, but achieving results with very different means than traditional accountability measures. We are doing an outstanding job preparing students for life. Mayor Norquist’s son attend for 8 years before they moved to Chicago. Come and visit us and you will understand just how much these new measures would do a severe disservice to our students and the parents who have chosen Waldorf education, a worldwide movement, for their children.

Public education is under attack. “School Choice” already exists within the public system through the wonderful Magnet School program. You need to counter the radical right’s privatization schemes by asserting the fact that school choice already exists and its called the magnet schools and they are great!
Set the goals high. Aligning our proficiency scale to NAEP is an excellent first step. Further, participate in international alignment studies that will provide us with an accurate assessment of where we stand as a state with high achieving national education systems. Supporting professional development and a longer school year (similar to Canadian provinces) will help achieve the objectives of this accountability waiver.

Although the Department of Public Instruction (DPI) is required to "meaningfully engage and solicit input from diverse stakeholders," the waiver request as drafted does not adequately address the concerns for private schools that participate in the choice voucher programs. There is concern that the new accountability measures do not recognize the limited information that is currently available or collected by private schools as regards choice voucher students; the over-identification of choice students in the assessment process; the ability to accurately measure school performance based solely on choice student performance within a school; and the level of state agency intervention in choice voucher program participating schools under the new accountability system. The ability to reflect upon solutions and suggestions to address these concerns was significantly limited as the waiver draft itself was not made publicly available until January 23, 2012, providing less than two weeks to review and analyze the proposal. The draft also does not include appendices and is frequently missing detailed information, making it difficult to adequately assess whether certain objectives are achievable, or even fully comprehend the possible logistical or legal
Survey Results

This is a summary of results collected during the ESEA waiver public comment period.

Respondents
N=711

- 78.3% School & District Staff (educators 49.0%, administrators 29.3%)
- 8.1% Parents
- 1.9% DPI Staff
- 2.4% IHE Staff
- 1.4% Organizations (professional, membership, research, philanthropy)
- 1.5% Community members (business, technology, nonprofit leaders)
- 0.1% Students
- 6.0% Other stakeholder
- 0.3% Invalid responses

Overall

- 74.6% are familiar or very familiar with NCLB/ESEA
- 74.7% believe we should request waiver out of NCLB/ESEA (17.6% unsure/don’t know)

Principle 1 – CCR for all

- 64.8% agree narrative clearly explains how WI will implement CCR standards and assessments
- 72.4% agree the narrative describes a focused plan toward improving CCR for all students
- 54.0% agree the actions described show how CCR standards and assessments will improve ELL outcomes (22.1% unsure/don’t know)
- 49.3% agree the actions describe show how CCR standards and assessments will improve SWD outcomes (21.1% unsure/don’t know)
- 79.8% agree the CCR standards and assessments will improve the preparation of HS grads (11.8% unsure/don’t know)

Principle 2 – differentiated accountability and support

- 65.5% agree narrative clearly explains how WI will develop SSOS based on a differentiated accountability system
- 68.0% agree the four Priority Areas will result in proper identification of schools along the performance continuum (12.1% unsure/don’t know)
• 62.9% agree the multiple measures used in the accountability index are meaningful indicators of CCR (13.9% unsure/don’t know)
• 54.1% agree reporting an annual accountability score will provide valuable information about school performance
• 65.2% agree the accountability determinations are clear and appropriate ratings for a differentiated accountability system (14.2% unsure/don’t know)
• 43.5% agree the supports and interventions clearly show how SSOS will help improve ELL outcomes (31.2% unsure/don’t know)
• 39.5% agree the supports and interventions clearly show how SSOS will help improve SWD outcomes (29.5% unsure/don’t know)
• 51.9% agree with the proposed modifications to SES (28.9% unsure/don’t know)
• Respondents were asked to rank ten interventions regarding their impact on a school that is not performing well, where 1 is most effective and 10 is least effective. These interventions were ranked in the top three spots in this order (educator only question)
  1. Implement a system that ensures all students receive support while those at greatest risk receive the most intensive and customized interventions
  2. Establishing a school environment that is safe and conducive to students’ social, emotional and health needs.
  3. Using data to inform instruction and continuous improvement
  4. Provide ongoing opportunities for family and community involvement.
  5. Redesign school schedule to include time for teacher collaboration
  6. Replacing least effective teachers
  7. Providing administrators more autonomy and decision-making authority
  8. Replacing administration at the school and/or district level
  9. Mandated PD for teachers and administrators in those content areas that match needs of students
  10. Redesign the school schedule to include additional learning time for students

**Principle 3 – educator effectiveness**

• 56.2% agree narrative clearly explains how WI will implement EE system for teachers and principals
• 51.7% agree the narrative clearly describes a focused plan toward improving educator practice
• 34.2% agree the actions clearly show how EE system will help improve ELL outcomes (33.9% unsure/don’t know)
• 33.8% agree the actions clearly show how EE system will help improve SWD outcomes (32.8% unsure/don’t know)

**Predominant Themes**

The comments received on the survey were extensive. There were a number of recurring themes:

• The importance of more and even better professional development, especially targeted for instruction of students with disabilities and English language learners, i.e., differentiating instruction
• Time should be allocated for teacher collaboration
• Linking individualized education plans with college- and career-readiness planning to personalized learning
• The value of using technology to engage students
• Including advanced students in planning as well as lower-performing students
• The importance of Universal Design for Learning and how this relates to specific accommodations
• Proposed use of portfolio assessments
• Need for more bilingual programs
• Increasing graduation requirements is important; consider including requirements for fine arts and foreign language credits; financial literacy should be a graduation requirement
• Linking graduation requirements to experiences outside the classroom (i.e., internships, work-study, and service learning)
• More vocational training is important
• Parent participation is a key indicator in school and student success
• There should be flexibility to have longer school years or days
• Life skills are important in addition to academic skills
• Consider requirements for pre-service teachers to have coursework in instruction for SWD and ELL and coursework in UDL.
The following worksheet lists all responses to Wisconsin's waiver survey

**Question No.** | **Question text**
--- | ---
1 | What best describes your role?
2 | How familiar are you with the current requirements of the Elementary and Secondary Education Act (ESEA) / No Child Left Behind (NCLB)?
3 | Should Wisconsin request a waiver of any ESEA/NCLB requirements?
4 | The narrative clearly explains how Wisconsin will implement College and Career Readiness standards and assessments for all students.
5 | The narrative clearly describes a focused plan toward improving college and career readiness for all students.
6 | The actions described clearly show how the college and career readiness standards and assessments will help improve outcomes for English Language Learners (ELLs).
7 | What strategies/supports/resources could be provided to better address the needs of ELLs in the area of college/career standards and assessments?
8 | The actions described clearly show how the college and career readiness standards and assessments will help improve outcomes for Students with Disabilities (SWD).
9 | What strategies/supports/resources could be provided to better address the needs of SWDs in the area of college/career standards and assessments?
10 | How will transitioning to college and career readiness standards and assessments impact the preparation of Wisconsin's high school graduates for postsecondary education, workforce training, or immediate employment?
11 | (Educators only) Please identify specific Wisconsin Statutes, Administrative Rules, or DPI requirements that could be modified or eliminated to reduce duplication and unnecessary burden in the area of college and career ready standards and assessments.
12 | The narrative clearly explains how Wisconsin will develop a statewide system of support based on differentiated accountability.
13 | The four priority areas (achievement, growth, closing gaps, and on-track/postsecondary readiness) will result in the proper identification of schools along a performance.
14 | The multiple measures included in the accountability index are meaningful indicators of college and career readiness.
15 | Reporting an annual accountability score, based on the index described in Principle 2, will provide valuable information about school performance.
16 | The accountability determinations \([Significantly Exceeding Expectation, Exceeding Expectations, Meeting Expectations, Not Meeting Expectations, Significantly Below Expectations, Persistently Failing to Meet Expectations]\) are clear and appropriate ratings for a differentiated accountability system.
17 | Do you have suggestions for different labels?
18 | The supports and interventions described clearly show how a statewide system of support based on differentiated accountability will help improve outcomes for English Language.
19 | What strategies/resources could better address the needs of ELLs in the area of supports and interventions?
The supports and interventions described clearly show how a statewide system of support based on differentiated accountability will help improve outcomes for Students with

What strategies/resources could better address the needs of SWD in the area of supports and interventions?

What are some powerful incentives that can have the greatest impact on a school’s performance? Please share 2 or 3 incentives.

What supports have the greatest impact in improving student learning in a short period of time? Please share 2 or 3 of the most critical/high leverage supports.

On a scale of 1 to 10 please rank the following interventions as to which you believe have the greatest impact on a school that is not performing well, with 1 being the most effective intervention.

Other suggestions?

NCLB requires SIFI to provide SES. Do you agree or disagree with the proposed modifications to SES as outlined in Principle 2?

(Educators only) Please identify specific Wisconsin Statutes, Administrative Rules, or DPI requirements that could be modified or eliminated to reduce duplication and unnecessary burden in the statewide system of support.

What are some ways we can increase rigor and personalize learning?

The narrative clearly explains how Wisconsin will implement the Educator Effectiveness (EE) system for teachers and principals.

The narrative clearly describes a focused plan toward improving educator practice.

The actions described clearly show how the EE system will help improve outcomes for English Language Learners (ELLs).

What strategies/supports/resources could be included in the EE system to better address the needs of ELLs?

The actions described clearly show how the EE system will help improve outcomes for Students with Disabilities (SWD).

What strategies/supports/resources could be included in the EE system to better address the needs of SWDs?

(Educators only) Please identify specific Wisconsin Statutes, Administrative Rules, or DPI requirements that could be modified or eliminated to reduce duplication and unnecessary burden in the educator effectiveness system.

What other comments or suggestions do you have?
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<th>Record ID</th>
<th>Access to computer based instruction, more human resources to provide intervention and follow-up.</th>
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<td>Resources need to be made available to remediate students. This is currently not practical given the scope of this issue.</td>
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Don't understand why ELL have their support changed. A 3 language level really is not going to meet needs with targets moved up.

Again, they seem to be pulling supports from these kids and raising bar. To be special ed one must already be two years behind, now they are four.

choice of parents to opt out of tests at 4, 8, 12 remove some of paperwork because information is in data base. Look at some of the requirements put on schools to take care of all needs of students (ie homeless transportation that has huge costs). Don't open up open enrollment so it lasts forever. Give us time to implement things well.
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I'm concerned about schools that have a high percentage of ELL students will be labeled "failing" - when in reality, they just have a majority of kids taking the test in their 2nd language.

I'm concerned that schools with high levels of poverty will be labeled "not meeting expectations" - when in reality, they just have a majority of kids taking the test who don't have consistent food/shelter/etc.

Improve oversight and enforcement of compliance by schools and districts with IEPS and requirements of IDEA. Support parents of SWDs so they are aware of rights under IDEA and ADA.

Funding support so that small rural districts with limited ELLs can pool resources for services through a CESA.

A rating scale does not present the entire picture of a district. I would expect that a narration would accompany any rating to provide a complete picture of the district's unique situation.

Don't test or impede students who have shown good academic ability simply because a second language is spoken in the home.

Create expectations that are reasonable and useful. Continuous progress should be important but equal progress is often unrealistic.
We have identified a need for parent and student groups to sit together to learn about college applications, financial aid, ACT/SAT testing, etc. While we do this in large group, we found that the ELL family is likely to not go, can't go because of work, do not have the requisite background personally, etc. We are piloting specific ELL family meetings to work with families to plan, teach, support students and families prepare for post secondary options.

This would be the benefit of Smarter Balance Assessment be the ACT or Work Keys. If not, then something similar to help students understand the skill base necessary for post secondary success. I know that NWEA have produced a report that correlates MAP results to EXPLORE readiness. I have not studied this well, but the concept is promising.

Less local control and stronger frameworks. School districts are duplicating so much work. Currently, in CESA 1 we are trying to work together more. Too many changes require large amounts of time and expert knowledge that all districts do not have.

"Educator practice will count for half of the evaluation; student outcomes will count for half of the evaluation." I am concerned since I teach remedial reading that 1/2 of my evaluation will be from student outcomes. Sometimes a small gain on paper is actually a large gain for the student. Will their be consideration of situations such as these? What about the students who refuse to learn no matter how many interventions, second chances, etc. are given to them? What about the students who see the testing as a waste of time and don't really try because it doesn't affect them? Tying my evaluation to those types of students is not right. I have no control of who is placed in my classroom. I expect that I am accountable for my actions in the classroom, and the students need to be learning. However, I am concerned about the evaluation not being an accurate indicator.
I support the purpose and goals of the Common Core. However, the EPAS assessment system, including the ACT, are already research based and have buy-in from parents, educators, and students. Development of another standardized assessment just for the Common Core will take a lot of resources and years to implement. I’m also concerned about buy-in. There is enough overlap with the CCRS and the Common Core that the EPAS assessment system should be adopted as our state assessment.

Six levels or differentiation is too many. Four would do in most rubrics. Also, with the variety of accountability measures noted above, Academic Growth, needs to be the primary focus and measuring stick for individual students, schools, and school districts. We need to have a “value added” system.

My hope is the new student data system will decrease the cost and time for current reporting. If the state is going to add a year of math and science, either funding needs to be provided or districts will need to cut other areas.

I am not in favor of labeling school districts. No - but what exactly does each of the levels mean? We tried this on report cards and parents didn’t get it. They still want grades which do not work well when you are trying to have individual learning rates with various objectives for varying levels of students.
Money

4 Have a separate standards, and assessments for students with disabilities. Do not include these students with all students. This is not the least restrictive environment for these students.

If this is a National requirements the Department of Education should be creating the Standards so EVERY State in our Union will be working on the same standards. They should develop and distribute a ready made model for every state to follow. We have a list of clueless curriculum directors and administrators in charge of the different states and districts

Could there be some sort of requirement for professional development for current general education professionals to inform them of multicultural philosophies and the impact upon English Language Learners? Also, a requirement for training that has evidence of transference to practice whereby educators are taught interventions and supports that can be delivered within the general education setting? Lastly, requiring pre-service training in both of the above mentioned areas prior to granting an educator’s license.

Require evidence of instructional practices that support SWD's in the educator evaluation instrument.

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Training of school counselors in cultural expectations (family expectations) of the cultures in the school in which the counselor works (high school and middle school levels)

Nothing new here. Transition programming has been a significant part of the IDEA for years.
Increased funding - change in formula

See above

Not different labels but a better understanding of state agencies on what public schools are facing in terms of needing additional resources for a growing number of severe issues families bring. The increase in Autistic students is putting a strain on supports in schools.

Need more support and training for staff to work with students with ELL needs.

I believe having each student take the EXPLORE, PLAN, ACT, and Work keys assessments is a step in the right direction—however it won't happen without the state supporting the cost. I think the state needs to work closer with the university system to find a way for us to track how specific students do after they leave high school. This data is imperative to improving our high schools.

Allowing schools to have access to how students are performing at the university level is imperative to this goal. We currently collaborate with our local technical colleges this way and it has done wonders for the work we do. However, the majority of our students go on to a 4-year college and we cannot track their progress so it cannot help to inform our instruction. I would like to see the ACT become the assessment used to assess students at the junior level and it is connected directly to the college readiness standards.

No
Everything is too vague...and from past experiences they change at a moment's notice. There is no follow through and schools are expected to meet criteria but with no support from DPI who implements rules.

Not all students will be able to go to college. To force a student who clearly is not college material to strive for that goal will only cause them to drop out because they can never achieve that standard. Where do these children go then? Does it make me a bad school because I cannot get them to college? Not all children are alike and you are still trying to make everyone the same, which was the problem with No Child Left Behind.

Special Education also includes higher level learners. How are children that are labelled gifted and talented going to receive services. Too often this group of kids gets little funding and support because their test scores are high. Wisconsin state law requires that all students’ needs are met, not just the children with the lowest test scores.

I think it needs to be very clear what these labels mean. It shouldn’t be different in every district.

Alternatives to traditional requirements for a diploma. Given language barriers and vast differences in life experiences, expecting ELL students to achieve at the same level and students whose whole school experience prepares them to succeed at the HS level is unrealistic.

Maintain accommodations currently available for the WKCE. Maintain the standard that most SWD students take the same test as non-SWD students.
The threat that looms over not focusing on the WKCE is a roadblock to making the necessary changes to core curricular areas. Everyone who has worked with standardized testing knows that making major curricular changes will result in a “one step back before making several steps forward.” With the proficiency percentages increasing, we cannot afford to take the one step back and not chance making AYP. We are at a time when politics have shaken public trust of public schools. The impact of not reaching AYP will be detrimental in our communities. We are committed to the Common Core Standards because they “begin with the end in mind.” They provide feedback. Most recently the Governor has laid out the Read to Lead initiative. This is a noble initiative; however, he is basing his results on the randomness of NAEP. We need to understand the target. Now we have the three targets of the WKCE (based on model academic standards), the NAEP (which frankly is too random to even consider), and the newer balanced assessment based on the recommendation of the Next Generation task force (based on the Common Core Standards). Let’s put the WKCE behind us and move forward with the Common Core Standards. As long as WKCE will determine our worth, we will not ignore it.
Allow districts an alternative system based on life experiences and education to assess if a potential teacher is qualified. DPI makes this process very burdensome when its requirements are based on Praxis scores and college equivalency of coursework for individuals who received their education abroad. I know of a Japanese educator living in WI who applied for Japanese teaching licensing with the DPI and was deemed unqualified to teach their native language by these requirements. Instead they were given a license to teach ELL and English Literature based on coursework. This makes no sense that this individual is qualified to teach English but not their own language, even having taken coursework in second language acquisition skills as part of ELL coursework. At the same time this occurred, three districts had to cancel their Japanese distance learning program because they could not find a licensed teacher when the previous teacher changed positions. The DPI itself failed to provide an environment in which schools and districts have the flexibility to focus on what’s best for students by not looking at the life experiences of this individual. Basically, it came down to a lack of credits in Japanese coursework. You would think that having a high school diploma or college degree with multiple teaching certifications from Japan you can raise the standards for students as much as you want, but until the state and/or federal gov’t does something to allow students who have grown up in WI, but are not legal citizens, afford college or study for a career it doesn’t matter the standards. Year, after year, I work with English Learners and assist them in their applications for colleges or prepare them for work, but many of them aren’t able to achieve their ‘American Dream,’ because they aren’t American.

IEP requirements to be standards based and assessment data against the grade level standards.
Besides a new assessment of English acquisition should there be an alignment of curriculum? I know the new WIDA standards are aligned with the CCSS but are the district curriculums?

Teacher development IAW PI 34. The current state plan is excellent. It needs to be enforced.

More and better training opportunities for para-professionals who are the ones closest to the students.

These labels do not take local economic into consideration. The Beloit School District is a good example of a district that needs financial help before it can be compared to more affluent districts.

Make sure that staff members who have an ELL student are kept informed of what level they are functioning at in terms of their English Language and what is in their annual plan.

Vocational Assessment; Discuss Assessment with student and key adults in students' life; Share results of vocational assessment and IEP with college or vocational school that student is enrolled in after High School Graduation.
You need to include Library Media Specialists in your choices! Yes, we are teachers & certified but leaving us out displays a lack of concern at the State level. This shows across the State as many library jobs are cut, librarians are added more duties and more buildings (as library staff retire), and funds are cut. It amplifies lack of concern that shows up by legislators in trying to take money away from the Common School Fund which is the sole budget for many libraries in school districts in Wisconsin.

What about pass/fail. Too many labels adds a lot of work, testing, reporting specific changes, etc. It also fails to allow schools to try something to see if it will work.

The waiver request is woefully inadequate with regards to identifying the SPECIFIC supports and/or resources that will be provided ELLs. The application simply bullet points vague ways to measure ELL deficiencies and even more vague intervention, resources, and supports. There is no actual, methodical plan for support and intervention.

The states omission of any meaningful plan or SWDs is even more egregious. The application states that "supports and interventions will match the severity of the problems." How? What are the specific supports planned or provided? How will they be implemented, managed, measured?

I think the labels are fine, however, I fail to see why a school "meeting expectations" would be identified as a REWARD school. Why does that make any sense? For simply meeting what was expected of you, you are rewarded? That methodology is flawed.
Our school needs more ELL teachers to help the students with their school work. Testing them isn't teaching them.

Schools need more SWD teachers and assistants. Our school has been seeing more and more special need students but staff increases are very slow, if at all.

Need for bilingual programs in K-12 settings. Need for training programs for these teachers.

Simplify categories of licensure to be much more general.

Every body's needs are different

Involve parents and highlight the need of education

Improvement in Reading should be top priority
More Staff trained to help those students in need of ELL assistance. Currently our district has two individuals attempting to serve the entire ELL population. Both are spread very thin and unable to do their jobs effectively due to the huge discrepancy between the ratio of teachers and students.

There is no concrete methods provided. None

NCLB lack of funding to low performing schools. Those schools need greater funding not less. They deal with social economic levels that far lower yet are expected to have scores equal to those areas that are much higher.

It's not the labels that are the problem. The problem lies with how schools are expected to meet those labels. We are asked to do more with less. When schools perform low, they receive less funding. The cycle will continue no matter the label. The issue is not with the schools alone. The home issues must be addressed.

Let small rural districts receive Title III funds directly instead of channeling through CESA so we can better support ELL families in our district. It all helps, even if it is a small amount of grant funding.

SWDs need assessment based on reasonable expectations of their attainable outcomes. Some can potentially achieve college/career readiness while others could never be expected to.

I did not see specific address to Spanish speaking students who are US citizens, but Spanish is their first language. How will they prepared for college, since their parents are not educated in our university system?

more support staff
Resolve the illegal immigrant situation. Offer more grants and scholarships. Offer support for students with special education needs. Offer more programs in students' native language.

More supports. A minimum required by each institution receiving federal funds to recruit students. Additional attainable programs with modifications and accommodations.

IEP documents are too extensive and costly to school districts. These should be in a friendlier language and subsidized by the government. The opportunity for teachers to move up to their professional licenses without the non-sense PDP plans that really do not make an impact in teaching with quality. All teachers efforts should go to the classroom. Doctors do not have to do PDP plans to keep their licenses neither lawyers, why teachers seem to be always penalized and their profession taken as nothing. We need to respect teachers and make their careers more rewarding and sensible to their needs to give all their efforts to educate children not to keep their licenses.

Stop hiring people - to make decisions - that have never taught in the classroom. People that have taught decades ago, have no understanding of how students' societal, social, emotional background looks like. Teachers that are currently teaching should have a say in what is right and good for students in order for them to achieve and be ready for college or a career. PS. NOT every student is made for college! STOP pushing people through the system. INFLATION of grades is not the panacea!

DON'T fix what ain't broken! POURING money into failing schools is not going to make a difference. Look at well performing schools with high academic achievement, adapt their model, modify it for the various failing schools and apply it to their individual needs.

Stop the bureaucratization of districts including administrative personal, regional executives, etc. and put the money where it is used and needed the most! Students first, not special interest groups and lobbyists!

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Stop the bureaucratization of districts including administrative personal, regional executives, etc. and put the money where it is used and needed the most! Students first, not special interest groups and lobbyists!
Early intervention and high quality instruction at the early grade levels is key for improving outcomes for ELL's. Resources should be focused at the 4K-3 level in order to help English Language Learners be "on track" for college and career. High quality assessment and instruction in early literacy is also critical for ELL's and all students.

High expectations

Better training and supervision on the transition plan area of the IEPs. I sit on IEP teams and have seen special education teachers do brilliant work in this area. Unfortunately, I have seen abysmal work as well. Better training is needed for the teachers as well as better supervision by SEAs.

The September 1 start date for ALL Wisconsin schools. It is much easier to teach students the last week of August than it is the second week of June.
Mentors and tutors would be most helpful in hopes of helping individuals meet their goals.

Bosses who understand the needs of those with disabilities and how they could be productive citizens within the work force. I have two examples of students who would benefit from this understanding. One would be in the area of child care where the individual could read to young child, assist with art and snack preparation, etc. The critical piece would be that this individual could never be left alone or responsible for a group of children. Another area would be in the area of factory work where the job was repetitive in nature. Grooming students with disabilities would be beneficial to all.

Too much emphasis is placed on test scores. Perhaps an evaluation by a principal or teacher could be greater emphasis in accepting how students will do. I would not be a principal today if test scores were considered the only viable assessment as to how an individual will do in life.

Many an individual knows theory (book learning) but has missed the necessary components of application-communication, breaking a concept down so it is understandable. An anecdotal form with specific examples of what is accomplished would be more helpful in determining a good fit for a position.
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1. Change RtI to RtI/MLSS. The U.S. Dept of Education has taken to calling Response to Intervention by the new descriptor Multi-Level System of Support. 2. Is FAY gone? How do we account for mobile students in school accountability measures? 3. Change SLOs to PLOs…the acronym will sound offensive to some. 4. With more schools included due to decreased cell size, we will need to ensure that we don't get an unintended consequence of segregating students with disabilities. 5. When describing the Attainment Gap, we reference five racial/ethnic subgroups/Will that change with new reporting requirements? 6. Under Parent Involvement, we list a number of parent involvement initiatives; include Wisconsin Statewide Parent/Educator Initiative (WSEPI), a $800,000 yearly grant to improve parent involvement for families of students with disabilities. Our State Personnel Development Grant (SPDG) also funds a number of parent involvement initiatives. 7. Suggest we use IDEA discretionary dollars to fund a RtI initiative to improve culturally responsive classroom practices, aligning with our CREATE work. 8. Suggest also we expand their capacity to deal with gaps for students with disabilities in Focus schools. 9. Our SIS work to permit LEAs' IEP teams to complete IEPs on-line AND develop programming to 1. align IEP goals with CCSS and 2. ensure compliance. 2. This is an opportunity to applaud our state's commitment to begin transition services to students with disabilities at age 14 (instead of 16 as required in IDEA).
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Professional development on co-teaching, both purpose for and styles of co-teaching. There needs to be mandated trainings so that teachers understand that collaboration between a general educator and an ESL teacher falls under best practices. Mandated trainings would show teachers, who just want to close their door and teach, that stronger collaboration between different kinds of teachers leads to better academic gains among all learners.

Principals should not be responsible for conducting professional reviews/evaluations of the educators in the individual principal’s school building. Fidelity checks and informal observations are not an issue. However, outside reviewers should be scheduled to conduct teacher evaluations. The principal and teacher need to be more trustworthy of each other. The relationship between the pair is somewhat diminished knowing that the principal is making formal evaluations. Principals should be more like instructional coaches, team players, collaborators. When they are given the task of evaluating their teachers, I believe, teachers react too negatively and, in turn, principals maintain a dominating, somewhat threatening presence in the school building. I think, teachers would see their principals as being more competent and helpful if principals did less evaluating and more modeling/coaching/problem solving. Yes, teacher evaluations are necessary, but the district should send in someone else to do the job. No, no new positions need to be created for this, but rather creative revamping of professional duties of the current positions.
For both ELLs and native English speakers, I have to question whether putting so much emphasis on online testing is going to yield better results. The current ACCESS testing is based on authentic performance (reading, writing, listening, speaking). This kind of assessment for both ELLs and English speakers is more true to the skills graduates will need and use in the real world as opposed to online multiple choice testing.

I think it is essential for some kind of reporting on the % of low-income students that a school serves to be included on this rating system of (Significantly Exceeding Expectations, Exceeding Expectations, etc.) as it is common knowledge that there is a huge impact of poverty on student achievement. It would be unfair to the public to rank certain schools in affluent districts as exceeding expectations, for example, without also somehow noting that the population they serve is better prepared for success by virtue of their home life. At minimum, including a column on the rating report that acknowledges the percentage of low-income students in a school would be appropriate.

From my experience with ELL students they do need some 1:1 time to really discover their language weakness. For example at fourth grade I discovered 2 of my students did not understand that the vowel sounds could be different. This was huge...once they truly understood how to say the vowels in different words their comprehension and reading took off! So some 1:1 time is needed.

Every child is unique in many ways...behavior and emotional is a huge one when it comes to disabled students of varying degree. This population needs extra 1:1 CARE if they are to make progress depending upon how severe their disability is. It usually takes 2 adults to a classroom to help when severe students are integrated.

The sad thing is before no child left behind...which was poorly implemented throughout the state...no one was doing the same thing...or even close. Some schools spent more money and got no results! When do parents become accountable to read with their child?
We have talked a lot about how are students are not ready for the work force. I have seen a lot of educational proposed improvements by educators and people involved in the educational process. I have not seen much input from the customer we as educators/educational community serve. The business community. We can also need to develop standards to get parents involved - if we do not get parents involved in the educational process all this work will be for naught. The money spent will not improve the system and time/money wasted as we will not move the educational bar. We place to much emphasis on the school system to be everything for everyone. We need to develop student curiosity in learning - they want to learn and explore. Once you develop a standard that everyone teaches to - this is lost.

More opportunities for work study type programs to earn credit and work at the same time.
VERY FEW teachers/administrators in WI know much about language acquisition, bilingualism, biliteracy, etc.- including staff at DPI. This has resulted in consistently poor services being provided to ELLs for 4K-12th grade. To be able to make it to college- or be career ready you must have had equal opportunity to learn. With limited or adequate knowledge about how to most effectively teach ELLs, schools do many ineffective- and even illegal things. CHANGE the licensure requirements under PI34 for all educators to include course work about teaching ELLs. Provide extensive PD for DPI staff- and support bilingualism.

How about ADDING a requirement that all licensed educators in WI take coursework related to meeting the needs of ELLs? Research shows consistently that bilingual education (Late-exit, Dual language Immersion programs) produce the highest academic achievement ( Collier, etc.).

Appropriate levels of funding

Appropriate funding levels instead of cuts in school funding

Reduce health, PE, financial education graduation requirement. CD students should be exempt from state-required tests.

Make sure not to test more than necessary. Try not to have two different tests (ie WKCE and Smarter Balanced) in the same year.
Asking for the ability to provide a more accurate assessment of ELLs content knowledge via portfolio assessment, perhaps as a supplement to the required English language version of the standardized assessment required by Federal Law.

keep the legislators out of this one and let people in education design this

There is limited credibility of the ACT products.
ELL students as well as other groups of students who have historically not achieved at levels commensurate with Caucasian, non-disabled students, need significant instruction that emphasizes general language and vocabulary development in their first language as well as in English, from the pre-school level on up through the grades. Without this emphasis, other interventions will likely not make the necessary impact. This means that all teachers at all grades need to be trained in instructional strategies that enhance general language development. The gap is there from the moment that the students start school and without schools focusing on language development, the gap just widens over time.

For those who have the potential for college, SWDs should be provided with whatever tools necessary so that their disabilities don't have to impair their ability to achieve. For those who are more likely to be successful in entering a career through other means than college, more direct vocational training while in school and apprenticeship programs, transitional employment, etc need to be options. High Schools in our state have gradually decreased the vocational options available to non-college bound students. Students used to be able to develop marketable skills while still in high school but such programs are rare today.

Act 10 could be repealed so that the unnecessary burden of teachers having less disposable income and thus less ability to provide from their own pockets materials needed for effective instruction and the dramatic cuts to public schools need to be eliminated because they place unnecessary burden of insufficient funding on districts that want to put more resources into strategies to reduce achievement gap but are stretched to the limit to just cover existing programs, which they are now having to cut or slim down.

To make sure CTE teachers are hired or and retained. Carl Perkins money should be funneled more easily to help those programs. More individualized help and support for students.

Nothing at this time besides getting the Governor out of office.
I sent a lengthly e-mail addressing these issues.
I don't agree with the credit increases in math and science. I believe too many high school students are graduating unprepared with life skills, i.e., financial literacy, computer literacy, domestic relationships (marriage and parenthood), etc. Having students take another math or science class is not going to help the state or country with all the problems with the aforementioned life skills. How about requiring personal financial literacy instead of the math class? I read on the DPI website that personal financial literacy is a PRIORITY...not according to this new proposal it isn’t...can you say hypocrisy? You get what you pay for...right now the state is not paying for any type of requirement to make sure high school graduates are financially literate. To anybody reading this...ask yourself this question and then answer it honestly: What would have benefited you and your family more in life...an extra math or science class in high school, or a financial literacy class where you learned about money management, saving and investing, insurance, credit and debt, etc? I already know the answer so don’t waste your breath. THEN WHY DON’T WE REQUIRE IT? It is equally important as the Phy Ed and Health requirement if not more. It is COMMON SENSE!!!! Why isn’t COMMON SENSE COMMON PRACTICE. FYI...there are

You can’t make good blueberry ice cream with rotten blueberry’s. What goes up most come down. What if we rated all businesses the way you want to hold schools accountable? Some very good companies would persistently fail to meet expectations. Every year brings different economic variables to the table...you can’t change/control what happens to them before they come. Some years you get a good crop...some years you get a bad crop...comparing them to each other somehow to determine how the school is doing is ridiculous!
Simply assessing students more will not improve outcomes. Testing does not equal learning.

More assessments will not help improve outcomes.

On-line writing assessment software/services

Access to more technology

We need to have the resources to do more pull-out classes for SWD and LD students. They have become so malgamated that we can't give them the services they need.

"Expectations" are too vague.
Aside from providing interpreters to help with the language barrier, there is nothing else to be done. The students themselves have to take the initiative to learn English so that they can succeed. The burden has to be placed on them. If they are not willing to do their part, then nothing proposed will ever make a difference.

The District I work for has no problems in this area. We have no need to make changes when things are being done in accordance with Federal guidelines. I'm assuming all school districts would be following the same guidelines so there should be no need to make any other changes.

The labels are meaningless, because the measurements are meaningless. The goal of making everyone achieve more is an idealistic one. We are attempting to improve one of the best overall PUBLIC educational systems that leaves few students behind if they are motivated to succeed. The one exception to this fact is Milwaukee where the voucher system has gutted the public schools by denying that system the funding they need to bring themselves up to the level of the rest of state.
I do know from past experience that many ELLs arrive at either college or technical college and simply do not have the grammar skills or background knowledge in many areas to make sense of the course work. Even if they manage to graduate, they have often found themselves unable to be hired for certain jobs as a result of the inadequacies and end up with jobs that are no where near the field of study. This is not true of all, but many.

Keeping general education class sizes reasonable so that students with disabilities are not in large classes with 30 students. This way, everyone will have access to teacher time and all students will do well.

What is in place seems to be working if student is committed to be engaged. Possibly..... I think more could be done and perhaps focus on the whole person and evaluate the requirements that a student absolutely needs to accomplish to more ahead.

I am not sure; this seems very vague to me. Still seems very vague to me. I am not sure. All of seems too vague for me to make any recommendations.
Culturally responsive training methods.

There needs to be training for SPED staff and accountability for skill instruction ESPECIALLY at the high school level. If there are clear learning targets in place, support teachers will be MUCH better equipped to teach missing skills toward a standard.

Creation of statewide graduation requirements (with courses aligned to CCSS) common to all districts that ensure matriculation to UW System School and passing placement tests for all programs offered by Wisconsin Technical Schools. Graduation requirements should not be subject to local board discretion.

Statewide graduation requirements (see Indiana Core 40 w/ Academic and/or Technical Honors. Streamline the Programs of Study Model and partner with technical schools to offer credit for programs that local schools cannot support due to staffing or equipment shortages. Partner with technical colleges for remediation...they are already doing this for students that are not prepared currently because K-12 did not do its job. Support multiple paths to attainment of standards. Thirty kids and 1 teacher sitting in desks is not going to cut it in the 21st century, especially if they can’t read and compute!
Personally, I feel that more time needs to be added to the school day for all kids with plans to get the extra support they need.

See previous comment.

Theoretical framework is there but I am not sure how mapping gets us from the present to a future of success for kids with disabilities. From what I've seen of the fair and balanced test protocol great difficulty will be faced by students and their teachers.

Using these accountability determinations will require defining ratings in a way that can be understood by parents, the press, teachers, and others. Without an agreement we can look forward to finger-pointing, complaining, excuse making and other responses.

Full time ELL staff; resource centers near bigger populations.
Reduce number of standards, Gifted and Talented, K-12 Guidance & Counseling, Nursing, At-Risk. Give schools flexibility in determining where they need to use limited resources.

Mentoring programs, service learning, and visits to IHE

Preparation for post-secondary placement tests as well as successfully taking post-secondary placement tests

Preparation for post-secondary placement tests

Additional consistency/flexibility in licensing. Currently a high school math or English teacher can teach any math or English class, but a social studies teacher must have a specific certification to teach history, sociology, etc. The same is true for science. We currently limit students' ability to take extended courses in content areas because of this.
progress monitoring availability for language domains throughout the year instead of once a year.

Let Scotty fix it; he knows it all.

A lot more work on respect and behaviors of students in public schools. Paper tigers will not help students learn until there is much improved discipline. I suggest that a large panel of judges try to teach in the public schools for a while. Go to the average schools; not those where students have been trained to behave as they should so that all students are able to learn in a safe, respectable environment.

Measures based on success of graduates.
Reduce testing as now found in ESEA regulations that cause teachers to teach to a test not teach what is necessary for their individual success.

Many schools do not even have a professional to teach ELLs due to budget cuts. How is that being addressed?

Many of these students will not attend college. Many do not have the ability to function independently. Where is this considered?

What besides student test scores will be considered? The number of SWD in the tested group? Socio-economic status? The number of ELLs? It makes a difference.
More collaboration between Universities and especially at the elementary level. All teachers should be on board with ways on how to implement college/career standards and assessments. There should be resources available for teachers to access on how to better implement college/career standards and assessments. There should be a liaison person between home and schools to connect the importance of a continuing education and/or career options even at the elementary level.

Funding

A requirement of Personal Finance from a Business Education instructor
Attendance/truancy support. The current systems which involves fines and court appearances when first implemented seemed to work but as time as gone on the judges have become annoyed and hostile towards administrators instead of the student/parent(s). Why have mandatory attendance if no one wants to enforce it. From my position in a large high school I see this lack of support for all students, not just ELL students, a primary reason why so many students are not successful. We somehow need to get students excited about their education and where it can take them so they want to attend. But until we find out how to do that penalties need to be in place and administrators should be treated with respect in a courtroom. Otherwise how would you get a student to attend school if the judge doesn’t impress upon them either with fines, overnight jail stays or other means but belittles the one person that followed the truancy model.

Many SWD need an aide throughout their school day and many colleges do not have the resources to continue to provide that.

I am a big believer in A-F grading scale. I really don’t believe that most parents will take the time to read through a report card if it is too wordy.

Students should be held accountable for their individual results with differentiating diplomas. If schools and individual teachers are to be held accountable, so also the individual students.
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Link more clearly to IDEA requirements for transition age students in regard to post-secondary goals in the areas of education, employment/training, and independent living.

Clarification of the growth model related to English Language Learners.

Clarification of the growth model as it relates to the students with disabilities. Any assessment required by ESEA should be administered to students with disabilities within the parameters specified in the students’ IEPs. Accommodations stated on the IEPs and used throughout the year should be allowed during testing.

Commencement of school term.

Except as provided in subs. (2) and (3), beginning in the year 2000, no public school may commence the school term until September 1. If you want to encourage dual enrollment programs (e.g., between high schools and colleges) then this rule needs to go. Many colleges start their terms before September 1st.
1. While I support the creation of "Standards, Instruction & Assessment Center," I am concerned over the failure to identify the timeline during which it will be created.
2. I support the SIA Center creating materials to support teaching & learning for all students, including SWD. I also support the fact that DPI is interested in partnerships with higher ed. faculty, but am concerned that there is no detail as to how this partnership (which currently doesn't exist) will be created. Therefore, I am concerned about the lack of a plan for implementation of this laudable goal.
3. I support the proposal to increase Math & Science HS credit requirement from 2-3. However, I am concerned about the failure to identify the need to obtain legislative approval and the fact that this may not happen in the waning days of the legislative session as there has been no bill introduced to accomplish this laudable goal, and the legislative session is done in March 2012.
4. While I support DPI's intent to field test use of new cut scores, I am concerned that the draft waiver contains no plan for when this will happen or in what manner.
5. While I support the general concept of Reducing Duplication & Unnecessary Burden, I am concerned that there is no reference to including required IDEA data in this unified system. In particular, IDEA Indicator 14 should be enhanced to get a better picture of no - these are good
Strong reading support at the middle school and into high school

there needs to be support for their time management and organizational skill so that they can become more independent learners

The accountability scores do not reflect value added.
Increasing the required number of required math and science credits for H.S. graduation from 2 to 3 will lead to unintended negative consequences (i.e. lower graduation rates) for students of all types, including ELLs and SWDs. I would prefer allocating resources to effectively support the individual needs of our diverse ELL population (see later open ended comments), rather than being mandated to add math & science requirements for students who become more engaged from course offerings. In our HS, many students already take more than 2 credits of math or science because they are interested or advised to because of their future plans. Given the role technology continues to play with individualized instruction (i.e. online apps, collaborative learning groups, etc.) support strategies to ensure broader awareness and usage of tools that support ELL teaching & learning.

> Given the role technology continues to play with individualized instruction (i.e. online apps, collaborative learning groups, etc.) support strategies to ensure broader awareness and usage of tools that support SWD teaching and learning.
While we support the creation of the Standards, Instruction and Assessment Center, we are concerned over the failure to identify the timeline during which it will be created. We support the SIA Center creating materials to support teaching and learning for all students, including SWD. We also support the fact that DPI is interested in partnerships with higher ed. faculty, but we are concerned that there is no detail as to how this partnership (which currently doesn’t exist) will be created. Therefore, we are concerned about the lack of plan for implementation of this laudable goal. We support the proposal to increase Math and Science HS credit requirement from 2-3. However, we are concerned about the failure to identify the need to obtain legislative approval and the fact that this may not happen in waning days of the legislative session as there has been no bill introduced to accomplish this laudable goal, and the legislative session is done in March. We support DPI’s intent to field test use of new cut scores, we are concerned that the draft waiver contains no plan for when this will happen or in what manner. While we support the general concept of Reducing Duplication and Unnecessary Burden, we are concerned that there is no reference to including required IDEA data in this unified system. In particular, IDEA indicators should be enhanced to get a more accurate picture of student needs. Our concern is not with the labels. Rather, our concern is with the draft waiver’s failure to be sufficiently detailed. Please see the next answer for further concerns.

LEAs need flexibility to target resources and interventions towards ELLs, and DPI’s help and guidance with providing specific, research based, effective interventions designed to address the needs of ELLs in an urban education setting.

LEAs need flexibility to target resources and interventions towards SWDs, and DPI’s help and guidance with providing specific, research based, effective interventions designed to address the needs of SWDs in an urban education setting.

With the two-week comment period along with the 2-day notice there was not sufficient time to develop a suggestion. There is an agreement with the choice of 6 categories so that schools do not fall into a middle category that is undefined. There is a concern that missing one index/flag for one subgroup of 20 students would automatically identify a school as a focus or priority school. In addition if one school in the district falls into the persistently failing to meet expectations category the district will be flagged (page 50).
Due to learning gaps I suggest a grade level be listed in which the child is performing, i.e. B-3 or B to the 3rd power. Then the next year the teacher should begin where the student ended the year before. Learning gaps cause much confusion, and inability to understand the material at hand. Getting a solid foundation makes success possible in middle and high school. Because the student can experience success there are less disciplinary problems and dropouts. As educators we must remember all children do not learn to walk at the same age so all children do not learn to read at the same age. For some it takes longer but they can learn given proper learning skills and more time.

The qualitative labels provide clarity and description not otherwise captured in other labels, such as grading.
The elimination of grade-level assessments and a move toward mastery/outcome/skills-based assessment strategy. We have known for a long time that not all children will learn at the same pace and it is our belief that an assessment system may be created that holds education systems more realistically accountable. ESEA goals are noble; however, the current system does not support the goals—never will.

— Support “Standards, Instruction and Assessment Center” approach. -- Concerned this center does not have a specific deadline for creation, and lacks specificity on what resources it would have. -- There is no mention of UDL (university design for

-- The labels aren’t the issue. The bigger issue is concern with the waiver’s lack of detail.
Significant funding should be provided for training, prior to assessment.
Bilingual programs where feasible, so that they build on the strengths of their home language. Professional staff development that is lead by expert teachers in the area.

The students need more support from teachers helping in the classroom to prepare for the exams.

Common Core Standards for social studies will not be released in time for the 2014-2015 deadline. Secondary social studies teachers will be teaching the state standards for a while yet, but the new tests will focus on the CCS. Should teachers focus on the state standards or the social studies literacy component of the Language Arts CCS? Trying to focus on both seems inefficient, as we will need to redo our curriculum twice during this time period.

Based on the realities of socioeconomic status variations and the need for local control in our districts, I think the expectations should be determined by district based on a range of possible goals provided by the state. MPS and Door County aren't working with the same raw materials, so they aren't going to be able to produce the same results. I know that we can't label student populations as more or less likely to succeed, but we can determine our expectations locally.
I have serious doubts about grading schools based on the criteria in the waiver. While I can see designating schools in need of help, I think other labels will cause more harm than good. In Madison, kids who are above the poverty line do really well. But, the schools they attend may not get a good label because there are lots of low-income or disabled kids at the school, and the bad label will scare middle class kids into other districts, and this will cause the district to perform worse.

Tell the Republicans to stop defunding public education and make them abandon their plans to shift public money to private religious schools.
Systemic program evaluation requirement/provision for review and improvement of instructional programs inclusive of all populations including ELL's.

Currently it is difficult for some schools, especially for private schools participating in the choice voucher program, to attain sufficiently trained educators and aides proficient in ELL instruction. Access to training, especially for aides, is limited. With new standards, increasing the number of well-trained instructors will likely be made all the more difficult and the need for access to quality training all the more necessary.

The waiver provides little information on how and what kind of supports will be provided to improve the outcomes and growth of students with disabilities, especially for private schools participating in the choice voucher program.

Oftentimes these distinctions are not useful unless the intended audience is familiar with the accepted definitions for the designations. Parents and those in community may find a numeric ranking or grading system more familiar.
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The only incentives that work are intrinsic. Schools that consistently do what is best for kids and truly care about kids are already doing their best.

Positive relationships with parents, students, and school staff have the greatest impact on achievement.

financial - bonuses; penalties other - free travel/educational opportunities; sabbaticals
Seeing children succeed from teacher team collaboration and work. Community praise and recognition. Blue ribbon awards. BUT NOT money to teachers, it will kill us as school districts who have worked so hard on PLCs. Professional Development !!!!!!!! Intervention time built in, and use of clear data.

Effective educators working in the schools with a single purpose - improved student growth. High-quality professional development.
<table>
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<tr>
<th></th>
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<th>Positive School Culture</th>
<th>Title I resources properly used</th>
<th>Increased sparsity aid for rural schools with low income and high needs</th>
<th>1:1 interventions with the lowest students performed by highly qualified teachers</th>
<th>Increased aid to schools in high poverty areas to draw and keep quality instructors</th>
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<tr>
<td>5</td>
<td>5</td>
<td>Small class sizes - adequate ELL/SEA support for teachers. These may not be incentives, but they are things that have a great impact on school performance.</td>
<td>Fund after-school academic enrichment programs. Many schools have no funding for any type of extended day programs.</td>
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<td>4</td>
<td>Need to systematically monitor effectiveness of programs and implementation and take prompt action to eliminate programs that don’t work and systems or personnel that are inefficient or incompetent.</td>
<td>Parental school choice - the ability to exit a poor school for a better one. Termination of personnel in leadership positions who cannot effectively lead or manage.</td>
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<td>1</td>
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<td>A focus on the strengths of a district with a reference to areas needing additional attention rather than a focus on the deficits and shaming where deficits are reported publicly.</td>
<td>The greatest impact on student learning resides in the quality of the teacher and the ability of that teacher to have a meaningful &quot;connection&quot; to students. Financial support for professional development and flexibility in contact minutes can keep a teacher current.</td>
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<td>Funding that will allow professional development time and materials.</td>
<td>High quality educators who have had professional development and mentoring in best practices.</td>
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<td>5</td>
<td>I would like to see some scenarios for different ELL levels.</td>
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<td>I would like to see some scenarios for different areas of SPED. I believe that this is OK for LD, 504, etc. I worry about our low IQ students and our autistic students.</td>
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<tr>
<td>2</td>
<td>2</td>
<td>2</td>
<td>Intense coaching of teachers in classrooms</td>
<td>6</td>
<td>7</td>
<td>3</td>
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<tr>
<td>0</td>
<td>0</td>
<td>0</td>
<td>Intense intervention to standards and immediate feedback</td>
<td>0</td>
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<td>3</td>
<td>3</td>
<td>The students need to have more rewards/consequences based on their improvement. It seems like a lot of high stakes for the schools who are testing their students who might not have any vested interest in the results. Also, where is the parent responsibility related to school performance?</td>
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Need to re-evaluate if the student is capable of being a learner in the environment as opposed to being in a school-based daycare environment. Some students are not capable of learning and showing progress due to the severity of their disability. It appears to use large amounts of the school's resources to provide services to these students who show minimal if any gains academically.

School districts need more support and guidance in the implementation of Response to Intervention. We currently do not have the flexibility to utilize our special education, at-risk, and regular education staff in a flexible way that will better serve all of our students including ELL. We are behind many states in the implementation of RTI and stuck in the old "labeling and funding" model of special education.

See comments for ELL. We must move to a system of data-driven decision-making for students resulting in interventions, monitoring progress, and ongoing adjustments rather than "identification of disabilities."

Student success in completion of high school and transition to post-secondary goals is the biggest incentive. Recognition of academic growth is next.

Continued training and access to research-based best practices for Culturally Relevant Instruction, RTI, and CCRS. Then the resources and flexibility to develop appropriate processes and structures with highly qualified staff.

Interventionist would be a benefit, but most districts cannot afford the positions.

We need to consider a more work days for teachers for professional development. We need to provide ongoing professional development outside of the student day. In order to get this done we need more time with teachers. Our teacher need to become all year professional instead of seasonal professional.

Focused professional development with support during the school day.

Monetary or achievement awards for being the best.

High expectations. Parent support.
Give back Collective Bargaining

mentoring internships field trips money field trips

- formative feedback given to schools and districts that shares strengths and areas of weakness
  - once a school/district exceeds a threshold of success for a period of time, it is not required to participate in annual reviews of progress, rather be individualized learning plans for all students performing below the standards that are reviewed every 6-8 weeks for progress and revision
  - flexibility in daily schedules to accommodate intensive interventions
  - utilizing technologies an
of course money to maintain standards. Expanding offerings in arts, science labs and tech ed.

involvement of community and parents. partnerships with area businesses.

Reward students at various success levels with tuition reduction or waivers to technical and 2 year colleges. Make it easier for schools to align curriculum with tech and 2 year colleges to help students attain advanced standing at no cost to the district.

Success, relevance, integration of technology. Soft skills seem not to be part of the plan. But assessment and development of them can lead to greater motivation and success on the part of students.

Professional development for staff in literacy initiatives across content areas. The district would, under this plan, choose the professional development (including presenters, facilitators, trainers, etc.). Funding for this purpose would be the incentive.

High quality professional development for teachers.
Adequate funding - years of lag in paying off districts for services given.

Merit Pay based on voluntary time spent outside contract hours in supporting students and families.

Report card on parent participation

Until you provide more support for these students at the local level, there will not be an improvement in this area.

There is nothing in the narrative that would suggest that this will help improve the outcomes for SWDs. Clearer expectations for these students and the interventions that are being used and tracked would help these students. Just because they are in special education does not mean we stop the intervention, it means we try more interventions and track their progress. I don’t feel that this always happens, especially at the middle and high school level. It is more about getting through the work then improving skills.

Allowing staff time to collaborate professionally is a great incentive to increase a school’s performance. Staff work together to improve what is happening at the building level. Staff don’t compete, they work together.

Increased collaboration time amongst staff so they have time to work with the data and use it to inform instruction. Without this time together, improvements will not be long lasting.
Measuring all children through the same testing is not right. It gives a glimpse of the inequity. It is currently difficult to get children labeled as SWD, most parents do not allow that, in the future it will be even harder. Who will help the children that just can’t do what someone else can do to a disability of some kind? We do not have enough resources to handle these children. Not all schools have the resources, yet we must accept them. Perhaps we should have special schools, but that has not worked either. Then we are discriminating. Too many questions and no answers.

All schools should have the same general rules. If I am required to perform audits or measurements, then all schools must do the same. Knowing there is equality across the board would be a powerful tool. Having resource help available, making sure the criteria is fair and equitable. Having said resource help available in a timely fashion. Letting schools identify the children that need help and working with them rather than waiting for a parent to initiate help. If we are partnering for the sake of the child, we should have some say in the outcome.

Attainable goals. Elementary schools should not have to worry about getting children ready for college. We should get them ready for middle school. Each school should prepare for the next level. If we each do our job, then the child will reach as many of these goals as possible. Getting funding into the schools and away from administrative costs. Have each school work with in their budget. All students should receive the same amount from the state, whether private or public. All schools should have to be audited and prove they spend the money on education.

How are gifted and talented programs looked at? Gifted kids are considered special education. How are schools required to meet their needs?

Report individual school and district results. Link student performance to admission standards at state universities and the state Voc.Tech system schools. Current there is no reason for students to strive for high levels of academic achievement. Link student test performance to work permits and driver’s licenses. Prioritize instruction based on student needs. Weaknesses in reading, writing, and mathematics should lead to a reduction of general elective options and more instruction in key skill areas.
The only incentive we need is an assurance that doing well is a good predictor the student has the skills necessary to meet the goals of the common core standards. Obviously, we cannot control life events, motivation, or work ethic.

Programs that provide continuity with a systematic approach.
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<th>Parent/Community accountability for truancy.</th>
<th>Increased funding in general.</th>
<th>Increased wages for educators.</th>
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<tbody>
<tr>
<td>2</td>
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<td>Support of ACT process to provide consistent data. Models of best practice to address the schools that have SWD achievement gaps</td>
<td>System based intervention practice...specific best practice models would help districts.</td>
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As long as students are being compared against themselves, keeping their educational history, years in US schools, etc. We should be looking for growth and not expecting them to meet the same criteria as English dominate students.

All new teachers, regardless of discipline, should have a Spanish Minor on their transcripts. It should be part of the licensing process. Yes, it can be done.

There are degrees of disabilities. Schools with severely handicapped students need more financial assistance. There are too many incentives to over-label students with less serious disabilities.

High performing staff with merit pay for the best and fair, consistent non-renewals for bad teachers. This would be the most powerful incentive of all.

Anything that can reduce student/teacher ratios. SAGE is a wonderful program that needs to be reintroduced and proliferated.
This is a tough area as it takes money. Money that isn’t available in rural schools. We have a larger Hmong population and a few years ago we had to hire an interpreter. None were available so we had to hire someone from the Hmong community at $50 an hour! So we need available cost effective solutions especially for Hmong, Hispanic, deaf, etc. We do what we can but the sources aren’t equal across the State.

Seems like a lot of duplication as disabilities are broken down and specialized teachers are need for specific areas. We also spend a lot of money on wheelchair, training staff (feeding tube care, etc.). This area is taking more of our budget as Federal and State funding is reduced. Go back to requiring each CESA in Wisconsin to have a SWD area with staff and aides to work with severe cases of students with disabilities. Money should come from the Federal & State to pay for this program for CESA (including transportation costs) and not from each school district! Our liability increases drastically due to some of these students being fragile, constantly getting infections, choking, needed help in the bathroom (HS SWD students). Add to this fact many students that are more “At Risk” seem to be popping up in these classes (whether they should be or not).

Continuing mandated Supplemental Educational Services or requiring Extended Learning opportunities meaningfully tied to set aide dollars is the ONLY way to ensure that schools and districts will take seriously the work of providing supports and interventions. SES and School Choice MUST CONTINUE to be a facet of the accountability framework. The DPI calls this accountability but it is not. There are no consequences for underperforming schools or schools that Fail ELLS, SWD, or low income and minority children. AND, if school persistently fail, public schools are left to state takeover, while private Choice schools and Charters are required to close...seems like a highly political and unbalanced way to mete out sanctions.

AGAIN, there MUST BE SOME MANDATED INTERVENTIONS AND SET ASIDES IN THE FEDERAL FUNDING FORMULA FOR SWDs. Otherwise, there is a serious threat of those vulnerable populations going underserved. THERE ARE NO CONSEQUENCES.

1. Break the Milwaukee School District into 3-4 districts. They are dragging the State’s performance levels down.
2. Have the Federal Government end the voucher system. That will be performing and improving academic achievement. Charter Schools can drop students after they get money from the State. Online School have also had scandals and mismanagement as Charter Schools. Most students that leave public school for online come back to public schools the following year. The students don’t work, don’t have the initiative, parents can’t get them to do the courses, etc. We waste a lot of State and Federal dollars on schools that should not be licensed at the expense of student funding in public schools!
3. Not all students want 12 years or education! Offer a option with High Schools and Tech. schools for a better option to train students that want to work in industry (ie. Journeyman approach) as a carpenter, plumber, electrician, mechanic, etc.

Merit teacher pay, block grant awards, special recognition, There is a high degree of hypocrisy in this application. The application flatly states that SES will no longer be mandated. In its place, it requires that districts "submit a plan for extended learning opportunities for eligible children" is that all, submission of a plan? What determines eligibility in the Extended Learning opportunity? How does DPI ensure it is properly funded? SES IS A PLAN FOR EXTENDED LEARNING OPPORTUNITIES FOR ELIGIBLE CHILDREN!! Its already in place? Where is the discussion on improving that but maintaining the set aside requirement for persistently low performing schools? Schools have these students all day long, extended time that is fundamentally the same as teh school day will not be effective. Varied interventions, not all provided by school staff, must be made available to parents.

1. More funding for needed general purpose students and programs. Smaller class sizes, more course offerings (not laying of teachers), being able to buy current textbooks (and not reusing old texts), being able to update technology and not at the expense of other programs.
2. Less testing - let teachers teach! Stop with all the standards changes and let teachers get settled into teaching. Everytime we turn around standards are changed and curriculum then changes - sometime flipping to a different grade level. Teachers are getting confused and irritated as it destroys continuity in learning. We could easily raise standards with less of these changes - something we did years ago (like Charter Schools do now) with less Big Brother watching over our every move.
3. Equalize student funding across Wisconsin. No extra add on’s for Milwaukee, poverty rankings, minority status, etc. Treat all students equally so that small and rural districts don’t get screwed!
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<tr>
<th>Rank</th>
<th>Page</th>
<th>Description</th>
<th>Survey of Teacher Working Conditions</th>
<th>Salary Inducements</th>
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<td>5</td>
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<td>Attending to Non-School Factors Such as Poverty, Student Health, etc.</td>
<td>School Breakfast/Lunch</td>
<td>New Teacher Mentoring/Induction</td>
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<td>Salary</td>
<td>Supportive School Leadership</td>
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<td>More teaching staff</td>
<td>Recognition of successful schools</td>
<td>More staff to help individual or group of students learn concepts at their learning level</td>
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<td>Recognition of people implementing successful teaching</td>
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<td>Recognition of students who have made large improvements in learning</td>
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<td>2</td>
<td>2</td>
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<td>Better jobs and better life overall</td>
<td>Reading and Math is most important</td>
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<td>2</td>
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<td>Involve everyone and make them aware of their importance of involvement</td>
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More teacher to student ratio

Providing necessary funding to those schools who need more teachers so there is a greater student to teacher ratio.

Greater student to teacher ratio. Especially at the early elementary level.

Allocate Title III funds directly to school district no matter how small.

Get DPI and CESAs to provide more affordable professional development opportunities in subject areas that meet student needs as reflected in assessments. Allow for extra learning time on subjects addressed in testing.

We need to identify and embrace the diversity of the state. Most of these needs speak to urban schools - most of Wisconsin schools are not urban.

A clearer understanding and identification of the demographics we serve.

Parental involvement and student work ethic. See above.
<table>
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<tr>
<th>5</th>
<th>monetary rewards to high achieving school districts, publication of results in community newspapers and online, recognition by public figures, legislators, etc.</th>
<th>Community involvement, volunteers in the schools, excellent leadership</th>
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<tbody>
<tr>
<td>3</td>
<td>DON'T fix what ain't broken!</td>
<td>Accountability, Accountability - all I hear is accountability and all these other acronyms. No one knows anymore what that all stands for - CLP, FOI, DIBELS, MAP, RTI, etc. FACE reality! A country is going down the tube!</td>
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<tr>
<td>5</td>
<td>Looking at individual needs and resources</td>
<td>powerful professional development respect for individual teachers, parent involvement</td>
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Showcasing districts with positive student outcomes on a state and/or national level (award/recognition system). This would need to be meaningful and based on reliable and valid indications of “successful” performance such as those outlined in the proposal.

Support for adult learning and professional development. This would include high quality training AND embedded coaching and evaluation processes.

One incentive would be money to hire parent involvement coordinators. Funding for additional planning time for staff to continue implementation of RTI and PBIS.

PBIS offers support for student behaviors, especially on the Tier Two level, which is often overlooked in its value for supporting student learning.

Extra bonuses for instructors whose students show the most growth from one year to the next. Bonus for all teachers whose students (95%) show expected growth.

Interventions in one-on-one or small group (no more than 3 students).

Additional people to work directly with those with high need

Very small group instruction (no more than 4 or 5)
I would like to see more money put into training individuals for a position. The real experience and watching that individual deal with the experience will be provide information in determining the factors of success.

Let all have a chance to prove themselves. Experiencing what is expected will provide meaningful information as to where to place an individual for greatest productivity and success.

Working directly with companies. Having mentors/coaches available. Monetary incentives.

Mentors Counselors

It is not clear to me that test participation continues to be a flag for accountability. Not including this measure jeopardizes the high rates we have seen for students with disabilities. With more accountability, the elimination of test participation rates could result in more students being "counseled out" of testing.
Additional resources at the school and district level to invest in and expand successful initiatives.

1. A number of the supports available to students with disabilities and their families are not included such as our statewide parent grant (WSPEI); our Parents in Partnership work, and the State Personnel Development Grant activities that support families. 2. Recommend that the State Supt approve our new vision for the Transition Grant and Post-secondary Followup Grant. 3. Allocate some IDEA discretionary funding to expand capacity of the RtI Center to address gaps for students with disabilities in Focus Schools.

1. Effective publicity that includes opportunities for school staff to talk about their work, through conferences, videos, etc. 2. Support to find funding sources and strategies to sustain work.

1. Accelerated learning works well for students with disabilities who are struggling; don’t slow down the pace. 2. An effective PBIS system is one of the best ways to engage students and personalize learning. 3. We must be sure they are fed. Consider a mandatory breakfast program at least in those schools with the highest free/reduced lunch numbers.
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<td>Require culturally relevant instruction and interventions...not just say it, but require proof.</td>
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<td>Staff professional development funding; Incentivize the opportunity for an alternative year calendar so that “summer drop” can be eliminated</td>
<td>Clear Scope and Sequences related to the Common Core for every subject and grade; Require more time in school for reading and math instruction (currency of learning is academically engaged time);</td>
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<td>I'm not seeing any reference to expectations for the severely handicapped students. Are students with sub 50 IQs going to be expected to be performing at grade level? Will staff be evaluated poorly if low functioning students show improvement but not to grade level?</td>
<td></td>
<td>Supports that address issues that students bring with them to school. IE: is it reasonable to assume that homeless children who haven’t been fed and don’t know where they are going to sleep that night are going to come to school ready to learn?</td>
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I don't have a suggestion for making this work, but ESL teachers need to be present more in the general education setting and be spending fewer instructional hours conducting pull-out services for EL's. I fall back on pull-out of my 50 EL’s because the classroom teachers are too frustrated with all they are required to do to even think about planning with me. Two individual teachers and I attempted to co-teach reading and writing at the beginning of the school year, but everything fell through. An ESL teacher is not a para. We didn't plan together to make the most of the co-teaching experience. Classroom teachers need more opportunities to learn about the benefits of co-teaching.

School session ends one day sooner; so, traditional schools, for example, would get released one day earlier that other schools in June. Coverage for classroom teachers is provided so that teachers can have a few hours on a given day to collaborate with other teachers over lunch. School-wide pizza party for staff and students.

More time given at staff meetings and on Banking days for teachers to problem solve/address various issues that often times get discussed by individuals but not understood and addressed by the school staff. Better communication and opportunities to refine interventions and supports is greatly needed, so that all staff is aware and ready to carry out their role in implementation.
1. Having all teachers and administrators take the sample WKCE assessment the students have to take and then discuss how they teach to prepare students for the challenges on that assessment. All K-12th grade teachers should take the WKCE assessments that are used for their grade level and/or the grade level above the grade they teach.  
2. Doing more content-area writing in all grade levels would help.  
3. Have students make up their own simulated WKCE test questions to help them understand and work with the standard a particular question is asking.  

One incentive is to actually hold the students accountable for their performance. Right now a student can fail, guess on standardized tests or choose not to do anything, and schools are held accountable for his/her choice. Until we put in some sort of consequence for failure, it's unfair to hold a school accountable.  

See above.
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<td>The state should get out of funding schools. Local dollars should stay at the local level. Communities should be able to define what needs are required to meet community education objectives. The state should be involved in building facilities (schools) if the state takes on this role a standard set of building plans should be developed and the state should fund the buildings to that point. If the community wants something more the community should be responsible for that funding.</td>
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<td>4</td>
<td>Parent involvement is the most powerful impact. The school system, state and teachers union make it to easy for parents to write a check - thus they turn the students over to the school system in the morning and pick them up at the end of the day. We serve breakfast at school - easy for the parent not to get involved. We serve dinner/evening snack - easy for the parent not to get involved. Like any business schools cannot be everything to everyone. This is a recipe for failure. School need to get back to the core competencies of educating students. The State needs to move some of the social problems out of schools and into areas that can better serve the need. Some classes have a 1 to 2 teacher/student ratio. This is unsustainable funding model. School districts should not be required to take care of these problems. They should be placed in areas that are better equipped to handle problem situations.</td>
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<td>Parents should be required to get involved. If they are not proficient in helping their children learn or choose not to get involved in the learning process - they should be required to volunteer to help the school in a different way or pay for the increased charges. Parents that have students achieving the standards should not be required to pay for parent who choose not to get involved with the student.</td>
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</table>
The systems and supports will not be successful because DPI and districts (LEAs) do not have sufficient staff with the needed knowledge to ensure that or provide PD so that quality education for ELLs takes place. Who will provide the statewide system of support? In the area of Special Ed—it seems VERY unlikely that you would have staff with no training or certification or experience working with special education students provide support to ensure their success. However, this happens with ELLs. My fear is that staff who are not bilingual, have no training or certifications in linguistics, ESL, experience teaching content to ELLs, etc. will be asked to support schools who are not succeeding in equitably educating ELLs.

- Second language acquisition strategies for all students - provided 100% by all teachers
- Academic vocabulary embedded in all content teaching.

- Parental involvement, interest, and support.
- Supportive administration which listens to staff.

- Provide teachers with adequate compensation, and a strong voice in decisions regarding school climate.
- Provide adequate, highly qualified teachers to ensure small class sizes.
It is clear that many districts need support/guidance in maintaining compliance with State statutes and Federal law regarding the implementation of programming for students learning English. Not only in the basic outline of developing programming, but choosing curriculum, hiring qualified teachers and including professional development for teachers and staff as populations of English language learners increase around the state.

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<td>3</td>
<td>Investment in curriculum development and professional development for teachers, with the time included to implement curriculum changes.</td>
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<th>Investment in curriculum development and professional development for teachers, with the time included to implement curriculum changes.</th>
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<td>letting teachers deal with behavior problems empowering teachers in this time when they feel worthless include educators in make the decisions - bottom up</td>
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<td>I do believe that tying student success to teachers’ performance is important, but should not be the sole measure or strongest measure due to the fact that it will influence educators willingness to work in those challenging classes or schools</td>
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<td>Increased community support Parental involvement</td>
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I discussed this previously. Much more emphasis on general language and vocabulary development in first language and in English.

Additional funding so that the ratio of SWD to Special Ed Teacher is decreased so that the SWD get more time with the special Ed teacher in instruction instead of just being helped by peers or an SEA to do the classroom assignments that may be at too high of an academic level, thus completing the assignment does not really help the student improve skills. SWDs need more individualized instruction for more time by trained special ed teachers. SWDs in the area of Emotion/Behavioral Disability need to have a different support system than students with academic skill needs which may not now be being addressed with the emphasis of putting all Special Ed Students into the classroom and teaching academics so that those specially trained teachers are not available to work with the student on social and emotional skills needed to succeed in the curriculum and learning environment. Student with EBD needs are not currently being very well served.

Much more money available to significantly reduce class size and provide for more student services staff and Educational assistants who can help struggling students. Additional monies to support upgraded technology and increase technology options, use of state of the art software and web-based resources, with money to pay for the needed training in use of this technology for school staff. With the years and years of huge cuts in funding each, there is insufficient funding to really make significant changes. Teachers are already stressed trying to do more with less and it is unreasonable to think that they can miraculously increase what they are doing even more without a big infusion of money.

Making sure all schools have strong CTE programs. Project based learning.

TECHNOLOGY - Such as Fast Forward, Skills Tutor, Aleks, and similar interventions

more use of technology in teaching, significantly reduce class size at all grade levels, heavy emphasis on vocabulary and general language development, providing sufficient funding so that staffing levels are increased, allowing teachers to have more to get to know students on a more individual level so that every student has at least one teacher with whom the student has a personal relationship.
May I address testing from a conservative teacher’s viewpoint? 1. A quality annual testing instrument is an essential diagnostic tool that helps teachers accurately identify and meet the academic needs of students. 2. Testing motivates students to set personal academic goals. 3. Test results provide essential information from an impartial third party thereby improving teacher-student working relationships. 4. Test results give parents and students objective reasons to support academic recommendations for individual students. While teaching in Minnesota, I found that MAPS test scores provided specific information about the skill level of each student. This information took “guesswork” out of the process. I was able to provide lessons that addressed the specific needs of each student and the results were evident in subsequent test scores. (I can provide proof if you wish.) Test results motivate students. Students memorized their test scores. In Minnesota, a growth of six points represented a full year of academic growth. When the students knew this, each student set specific academic goals for himself. Because students saw their test results, they were aware of skill areas that needed extra effort on their part. This was an automatic motivator.
The problem is that the incentive should not be on the school...it should be on the student. Fix the problem, not the symptom. The problem with schools today is not the teachers, the curriculum, the tests, the buildings, etc., the problem is parents/students who don’t value education...they are the ones that need the incentive! How about some of these incentives: Don’t graduate...no driver’s license! Not passing all required courses...no work permits (no McDonald’s jobs until you do school first). Don’t do school...try the military...mandatory boot camp! You want better standardized test scores? Hold students accountable for their individual scores, not the schools...COMMON SENSE!!! Holding schools accountable for how students’ perform on their tests is like holding doctors and hospitals accountable for people smoking, not exercising, drinking, and eating junk food...FUNNY HUH? This is the reason people laugh at public education.

STUDENT ACCOUNTABILITY!!!!!!!!!!!!!!!!!!!!
Attach strings/incentives to student achievement...they want immediate payback for what they do, not delayed gratification. They want money...they want food...they want to drive (license)...they want freedom...they want choices...and they want it NOW! We have trained them to their whole lives...it should not be a big surprise. If somebody wanted to revolutionize education...they would develop a system that would work off these incentives somehow. This proposal is just another attempt to create a cure for a symptom, not the real problem. Even if it is adopted as written, it won’t be around 10 years from now. How much did NCLB “change” education for the positive? This proposal isn’t any better...it is just a little different that’s all. The real problem is lack of accountability on the students themselves!

Practical, realistic and ready-to-be implemented curriculum. Do not give teachers 1,000 standards and no clue how to begin integrating them into preexisting curriculum OR how to amend curriculum to better meet the standards.
Stable economy. Students who don't have to work to contribute to parent income and can study. Students who are fed. Food banks. Unemployment benefits.

Students. We don't need incentives.

Smaller class sizes, Access to valuable education technologies.
Teachers with a decent compensation package that feel respected, supported, and valued.

Integration of technology and support personnel in the classroom assisting.
None. They do a specific job of translation, and to help explain concepts. What more can be done beyond that if the student does not make full use of that?

I'm not aware there is an issue. Then again, we have a very strong support system in the District that I work for which does an amazing job not only in identifying problems, but in helping getting those needs resolved as needed.

Financial Jobs/Internships

Nothing outside of what has been done will make any difference. If anything, adding more to the teaching staff will cause more problems than any good done.
1. Allowing a school district to include school performance as a part of the evaluation of its teachers (i.e., not basing layoffs on seniority alone).  
2. Teacher pay scales look at credits earned and years in the district. Add a 3rd tier based on school performance (i.e., school performance will have an impact on salaries earned).  
3. Administrator pay scales would no longer be based on position/title and length of time in the district. Pay scale would depend on district performance and position.

1. Having one-to-one support available for students who struggle at the earlier grade levels (K-3) in order to get them on track before they are completely lost. This support does not necessarily have to be paid support, but could be volunteer support.

2. Smaller class sizes and relevant instruction.

2. More content based computer generated testing rather than just an overall reading test and this would be aligned with curricular benchmarks.

0. Teacher one on one guidance and listening and teaching.

5. Continued support for teacher professional development. Not having teachers performance based on students' test scores.

3. Formative assessment within the classroom.
Teachers with strong content knowledge.

Funding needs to be in place to sufficiently meet the needs of SWD without paraprofessionals being stretched too thin by students needing 1-on-1 attention.

Hmmmm, incentives for whom? There is a great lack of training and skills to pull off this sort of change, so training, replacing and/or hiring people with skills to do these things will be critical to the success of this initiative. The current structure (teachers teach 5-6 hours each day with no time for prep or collaboration or training) will ensure a failure. Three administrators, with little or no skill in instruction or curriculum cannot supervise 100+ staff in a building. At this point there is no accountability on any level for anything. Beginning to measure success based on what students can ACTUALLY do, will be a radical change.

High Quality Staff, Community Support, Partnerships with stakeholders (local HE, DPI, and other community agencies, organizations and businesses). The school need not do it all separate from the work of other groups.

Parent and community buy-in

More educators in school with lower performance
Parental involvement specifically in holding their children accountable after the school day is done. TIME for interventions that does not require them to miss other learning or worktime. Interventions should not cause the children to fall farther behind in their work/studies.

ELL students face issues that most other students do not and until quality services are dispersed across the state, the mountain will be high and the downside will be significant. Tying services and results to RTI will require many more resources that are available in this state. We need more subject area specialists, people competent in subject area literacy, team teaching in the core like those arrayed in the St. Clair River intermediate unit in Minnesota. Wisconsin is significantly behind in having this level of resource particularly in small rural school districts. Incentives for schools are difficult to pin down what - works in one probably will not work in the one just next door. One-on-one teaching, family and parent support services, quality staff development.
You won’t impact a poor school’s performance unless you impact the school climate and staff culture (beliefs). The teacher evaluation component will help, but administrators will need more flexibility in dealing with toxic staff who undermine efforts to implement change.

Increasing parent involvement including student in identifying what is to be learned

Celebrating student success

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<th>Time for teachers to collaborate within the school day.</th>
<th>Extra time with the appropriate instructor</th>
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<tr>
<td>Field trips  Kiosks Computers</td>
<td>Experiential learning  Mentors Inquiry/problem solving</td>
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<td>Tiered recognition, as stated, fosters the ‘push’ to stretch and perform at a higher level.</td>
<td>Coaching and collaboration via recognized sites</td>
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<th>Data systems that measure many factors in achievement</th>
<th>Talented educators and leaders</th>
<th>Sound long-range planning that incorporates needs, resources, communication, &amp; buy-in of stakeholders</th>
<th>Current data points of achievement</th>
<th>Talented educators / staff development / collaboration</th>
<th>Alignment of curriculum</th>
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- Data systems that measure many factors in achievement are useful for tracking progress and identifying areas for improvement.
- Talented educators and leaders are crucial for driving success and innovation.
- Sound long-range planning ensures that all stakeholders are aligned and committed.
- Current data points of achievement help in understanding where we stand and what needs improvement.
- Talented educators and staff development are important for continuous improvement.
- Alignment of curriculum is key for effective learning.

Additional comments:

- More diversity and culture training for students.
- Help from peer mentors.
- Parents being involved with their kids and sending them to school.
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<th>Page</th>
<th>Question</th>
<th>Answer</th>
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<td>2</td>
<td>Are these students provided with an ELL teacher? What supports will they get?</td>
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<td>Reading classes at the high school level.</td>
<td>Reading classes at the high school level.</td>
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<td>Respect and recognition</td>
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<td>Real teaching, not just presenting material.</td>
<td>Real teaching, not just presenting material.</td>
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<td>Going over homework, helping students see mistakes so they will not make them again. Practice and practice with homework.</td>
<td>Going over homework, helping students see mistakes so they will not make them again. Practice and practice with homework.</td>
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</table>
Like Finland, help teachers get masters degrees. Help and reward teachers apply for and complete National Board Certification process.

Highly effective teachers in sensible class sizes.

Recognition and further financial support.

Professional development and resources (financially, staffing, and etc.)

Increased funding to districts meeting state stds in ESEA/NCLB increased personal finance education

Hands on applications introduction, repeat, review
| Attendance again to me is there biggest hurdle. | 5 |
| The problem with incentives is many classrooms start with an average of 28 students at the beginning of the school year but by the end maybe only 1/4 of the original students remain. It is hard to be accountable for 3/4 of you classrooms test scores, etc if they were not with you the whole year. How will DPI make sure that teachers are not penalized for poor performance of these students? Especially if they are transient. We have got to figure out a way for students to stay put so teachers can help them succeed. One way would be the elementary principal in Las Vegas who verbally contracts with families to get them to stay so she can help their children be successful. But this takes the whole community and a lot of volunteers and donations. | 0 |
| School culture and climate are the biggest incentives for students and teachers. External recognition and awards only support what is already there. | 5 |
| study of Latin and Greek roots | 2 |
| merit pay, if not a game of who is friend of whom study of Greek and Latin roots | 2 |
Once again, native language is not an option. One of the 21st Century Skills is to be bilingual, yet our state has yet to embrace that. The state of UTAH has embraced it and wants all of its students bilingual. They are encouraging immersion programs for ALE students.

An ELL student cannot achieve grade level performance in one academic year. They need time over a number of years to gain the language foundations to function at the level of the CCSS. They need to be looked at differently.

We are not able to cure our SWD students. We work with them in an alternative way to allow them to grow with their disability. They will not be at the CCSS level of achievement. They need to be looked at differently.

When Teacher and Principal pay is attached to the academic growth of their students. When the student is not allowed to progress to the next grade level if content is not mastered.

Year round school calendar: 9 weeks on 3 weeks off... teachers get only one of those weeks off and return to the classroom for Professional development. The students would retain information and the system could have students move fluidly into the next level of content mastery when they are ready. We must stop sorting by grade and age and begin sorting by mastery of content. We must change the nine months on and 3 months off task of schooling thinking that we can accomplish what is needed when the students forget so much of what they have been taught.
<table>
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<th>Clearly identify the criteria/elements of UDL and how those relate to IEP specific accommodations and supports.</th>
<th>Funding is the most obvious incentive. If schools don't have the resources to make the changes then something else is &quot;robbed&quot; in order to institute the change. This just means the quality of that instruction is reduced.</th>
<th>Excellent teachers. All teachers should be competent in ALL areas the state requires for licensing. The use of emergency licenses should not be &quot;standard operating procedure&quot; but rather should be used only in true emergencies. If it means that salaries rise in order to find competent people then so be it. Interns should not be used to teach classes--only licensed teachers. Community partnerships. When community members are invested in their schools they can make things happen in short order. Service-learning, place-based projects for example can make learning more relevant. Education for sustainability principles (e.g., system approach) that use integrated instruction are also great leverage supports.</th>
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1. As currently drafted, the waiver request simply identifies 3 potential qualifiers to recognize high performing schools (increases in math & reading performance & closing achievement gaps). While I support these, I think reading & math should be separately identified as there are far different teaching & learning strategies required and schools should be rewarded for accomplishment in either area. 2. I believe the entire waiver request contains little analysis of the impact of student behavior and school discipline practices on student learning & achievement. Accordingly, not only should these areas be analyzed for accountability & reporting purposes, but high achievement in these areas should also be rewarded. 3. I support the creation of Spotlight Schools Diagnostic Reviews, but am concerned with the draft waiver’s failure to identify where the funding will come from for providing the necessary resources and staffing, as well as the failure to identify the amount of funding necessary to accomplish these reviews.

I strongly support applying the accountability system to all publicly-funded schools. But, I believe this accountability must include the ability (or lack thereof) of SWD to attend & succeed at charter and voucher schools. 2. I am concerned that there is no mention of the likely to be adopted new vocational diploma and the support which WDPI can give to its creation. This tool can become an excellent incentive for non-college bound learners to become career ready. 3. I strongly support the draft waiver’s call for a quick turnaround of assessment results as the long history of failing to do so in Wisconsin has made the assessments completely useless for assessing the current needs of students and addressing them quickly. 4. Assessments must have nationally-normed accommodations for students with disabilities and those should be included within the transition period. 5. I strongly support the establishment of state-supported turnaround experts to assist with targeted school reform. However, these turnaround experts must have expertise in behavior management and discipline practices. 6. I strongly support prioritizing improvements at the district level if the diagnostic review demonstrates that systemic challenges are at the LEA level. However, the waiver needs to be specific as to how WDPI will determine if school-based challenges are indeed exacerbated by systemic LEA problems.

Get the proper training to the teachers and administrators working with ELLs.

Reporting how students with disabilities is not what will drive improvement - if that were the case it would have happened under NCLB. Providing training and strategies to their teachers on how to engage students of all ability levels is much more useful. Also need to address culturally responsive instruction and culturally able teachers.

Intensive teacher training with ongoing professional development and support.
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<td>We know that public embarrassment is not a motivator; I am concerned about qualifications and perspectives of the TAC team, and the State approved experts/vendors that must be consulted. What evidence must they show of their ability to improve instruction in reading and mathematics utilizing curriculum-based measurements.</td>
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<td>In regard to the overall approach for support and interventions, further detail is needed to determine what assistance will be provided and the degree to which they are mandated.</td>
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<td>I think that these are a starting point but we need to be open to changing as we realize how these strategies and resources are working or not working.</td>
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<td>Again, no system is best for every student but I do think that by providing these across the state we will see how they are positive or negative but we need to be able to adapt and modify as we realize what is or is not working.</td>
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<td>Administrator with a powerful vision and outlook that is communicated to the entire staff and the school community.</td>
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<td>community support and family support. Teacher are generally good at their part.</td>
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This question suggests that educators need to be incentivized to improve what they do for students. I do not believe this is the case. Rather, providing necessary resources, time for Professional Learning Communities, coaching support for all staff, and assessments that reflect what is important in terms of college and career readiness and get out of the way.
[Can’t decide if this suggestion falls more in Principle 2 or 3.) > Expand the use of proven & effective distance teaching & learning instructional systems/technologies to facilitate effective sharing/collaboration of innovative instructional strategies on an as needed basis for instructors (i.e., a more robust version of ‘Spotlight practices’ website concept discussed elsewhere). Such systems exist in other areas such as medicine and custom design (tapping into a vast database & network of resources by typing in keywords that identify specific situation to find potential ideas/suggestions for consideration). For the ELL population, this holds great potential. Depending on the design, this limits disruption of student learning in the schools by enabling instructors to tap into resources as needed, stay closer to their students and provides flexibility for teachers to research/learn when their schedules permit. Done properly, this increases the possibility for a more engaged professional learning community around the state. Bottom line: addressing the learning needs of special students (relatively few in an individual LEA) by providing professionals easy access to resources and lessons learned, at the time of need, is preferred vs. waiting for professional development.

> Provide access to appropriate technologies and support (not just money to buy/build access and tools, but to tap into support resources for help with effective use/implementation of that technology). > Funds to build/remodel something that matters to that local community of learners (set a goal, work hard, get something in return). > Funds to maintain appropriate class sizes (esp. at elementary & middle school levels).

> Student mentor/buddy programs (adults, peers) focused on individualized instruction/support. > Dedicated resource(s) to help LEAs establish/manage productive win-win partnerships with their municipalities (i.e., public libraries, community centers) & area businesses. > Support/enable proven after school activities/programs that keep students engaged with their communities, further individualized learning and help build life/work-based skills such as (collaboration and communication). Some phenomenal, established and well-supported programs already exist (yet often misunderstood in terms of the scope of their offerings. One great example is FFA (which would also be particularly appropriate for Wisconsin)!
Our main concern here is that there is no mention of relating students’ IEPs to their academic performance. We support Common Core Standards based IEPs. In addition, while we support the turnaround experts, we are concerned that there is no mention of subgroup expertise, including the SWD subgroup expertise for these experts.

1. As currently drafted, the waiver request simply identifies 3 potential qualifier to recognize high performing schools, namely increases in math and reading performance and closing achievement gaps. While we support recognition of those accomplishments, we believe that reading and math should not be lumped together as they are far different teaching and learning strategies and schools should be rewarded for accomplishment in either area. 2. We believe that the entire waiver request contains little analysis of the impact of student behavior and school discipline practices on student learning and achievement. Accordingly, not only should these areas be analyzed for accountability and reporting purposes, but high achievement in these areas should be rewarded. 3. We support the creation of Spotlight Schools Diagnostic Reviews, but we are concerned with the draft waiver’s failure to identify where the funding will come for providing the necessary resources and staffing, as well as the failure to identify the amount of funding necessary to accomplish these reviews.

1. We strongly support applying the accountability system to all publicly funded schools. However, we believe this accountability must include the ability (or lack thereof) of students with disabilities to attend and succeed at charter and voucher schools. 2. We are concerned that there is no mention of the likely to be adopted new vocational diploma and the support which DPI can give to its creation. This tool can become an excellent incentive for non-college bound learners to become career ready. 3. We strongly support the draft waiver’s call for a quick turnaround of assessment results as the long history of failing to do that in Wisconsin has made the assessments completely useless for assessing the current needs of students and addressing them quickly. 4. Assessments must have nationally normed accommodations for students with disabilities and those should be included within the transition period. 5. We strongly support the establishment of state supported turnaround experts to assist with targeted school reform. However, these turnaround experts must have expertise in behavior management and discipline practices. 6. We strongly support prioritizing improvements at the district level if the diagnostic review demonstrates that systemic challenges are at the LEA level. However, the waiver needs to be specific as to how DPI will determine if school based started turnaround experts to assist with targeted school reform.
Parents must be involved either through outreach or coercion.

1. 15 or 16 students per class.
2. Group children by moving to different classes so they can learn at their own pace.
3. Non-grade the primary school. There are huge differences already in kindergarten.

Teach through 2 or 3 senses. Just talking doesn’t do it. Most students learn better and faster using multiple senses. Have quiet and attention during presentations. Work in carefully created learning pairs to complete the lesson. The next day follow up with a quick review and assessment. Do not keep moving ahead if the students are not ready.

The reduction of cell size in reporting students with disabilities should remain at 40.
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<td>While I disagree, I also understand that our current system is not where it needs to be. Though IDEA is well-intentioned, the stigma inadvertently attached to those who qualify for SWD services cannot be remedied within the current structure. Personalized learning for all students will be the vehicle for improving the outcomes sought.</td>
<td>Personalized learning - Elimination of grade levels - Blended learning - Positive parental encouragement/engagement - Highly effective teaching - Student engagement</td>
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<td>5</td>
<td>-- Lack of connection between students' IEPs and their academic performance. -- Turnaround experts are a positive idea, but there is no mention of subgroup expertise, such as expertise working with significant behaviors, significant cognitive disabilities.</td>
<td>-- While reading/math and achievement gaps are important, the overall waiver overlooks the impact of student behavior and appropriate behavioral supports on all student achievement. Behavior needs to be included in the accountability and reporting system, with recognized achievement rewarded to those with high scores in this area. -- Diagnostic reviews do not spell out where funding will come. -- Accountability system also needs to in some way reflect overall access to all options. For instance, are SWD and low-income students able to access charter/voucher schools in the same proportions as the general population? -- Strongly support quick</td>
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<td>There should be consideration of different incentives for schools with different populations, e.g., affluent, suburban vs. high poverty schools. In high poverty schools, you may be assessing more society's performance than school performance (i.e., basic needs not being met doesn't allow learning readiness).</td>
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<td><strong>Quality teaching and parental/community support</strong></td>
<td>Teachers have greater freedom in curriculum planning and sharing curriculum ideas.</td>
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9 8 7 5 10 3 4 2 6 1

1 2 3 0 5 8 4 7 6 9
I don't see it very clearly addressed.

Positive reinforcement. Reward high quality schools and those making significant gains rather than focusing on punishing bad schools.

Empowering teachers to use data driven instruction rather than a one size fits all approach.
Small class sizes, giving teachers the flexibility to respond to individual learners' needs, bottom-up approaches to problem solving.

My school is an alternative school within the MPCP that is doing an excellent job preparing students for high school. Many of our students receive high honors in their high schools, public and private around SE Wisconsin. Our incentives are day-to-day, intrinsic within the curriculum and the teachers and students are proud of their work.

Motivating the students with the stories and achievements of their fellow human beings throughout history.

Emphasize small class sizes and highly qualified teachers who are licensed by DPI. Make 4K the law of the land and expand it to 3K. Kids are hungry to start learning by age 3.

Small class sizes, highly qualified teachers with advanced degrees.
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<tr>
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<th>Systemic program evaluation requirement/provision for review and improvement of instructional programs similar but building on the old SEC model.</th>
<th>Intensive professional development for teachers on Common Core aligned instructional practices and differentiation.</th>
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<td></td>
<td>No information is provided on how ELLs will be identified in private schools participating in the choice voucher program, or once identified, how supports sufficient to meet the needs of these students will be provided.</td>
<td>No information is provided on how students with disabilities will identified in private schools participating in the school choice voucher program, or once identified, how supports sufficient to meet the needs of these students will be provided.</td>
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|   | 1) Increased/decreased access to funding  
2) Access to, and greater participation in development of, resources  
3) Public recognition | 2) As a policy advocate, I would defer the recommendations of school educators and administrators. |
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<td>Mixed age groups</td>
<td>Charter Schools Free choice to attend schools of choice</td>
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<td>2</td>
<td>More AP classes</td>
<td>Align to college and career readiness standards</td>
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<td>Provide support as they learn English, so don't cut back</td>
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<td>Focus on common core state standards</td>
<td>Emphasis on recommendations of the Digital Learning Advisory Council</td>
<td>educators familiar with their district's response to intervention multi-level system of support for social-emotional-behavioral and academic growth</td>
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<td>Improved preservice and inservice professional development for special educators in the area of reading and mathematics</td>
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*Replacing ineffective administrators* would rank much higher than *Replacing administration at the school and/or district level*.
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<td>2</td>
<td>Smaller class sizes; more EL/SEA/Social work support; longer school year; longer day</td>
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<td>4</td>
<td>Give parents the ability to choose better schools for their children by allowing a congenial environment for opening new and innovative school models and by expanding ability to transfer intra and interdistrict</td>
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<td>4</td>
<td>Emphasize content and require high subject matter competence by teachers. Measure actual achievement by students instead of using only course enrollment or graduation rates to claim &quot;success&quot;</td>
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<td>One to one technology will help personalize learning.</td>
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<td>1</td>
<td>Link teacher evaluation to student achievement.</td>
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<td>Additional time and funding for professional development. Frequent and relevant assessment tools. Clear and concise standards for each grade level.</td>
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<td>3</td>
<td>IEPS need to have meaningful goals and special educators should be held accountable for IEP compliance</td>
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<td>Make ILP’s an integral part of student’s education</td>
<td>Working with students to take responsibility for learning goals, etc.</td>
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What funding is going to be provided from the state to implement these systems?

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Reducing class size, allowing the underachieving students to be in classes apart from students who are achieving at expected levels for more intensive instruction or using alternative delivery methods.

Focus on academic growth as measured by the EPAS system. State-wide support of the implementation of the RTI model. Support of a wrap-around model including mental health support for at-risk students. Continue to narrow the number of academic standards and skills. Depth over breadth as used in countries such as Finland.

This scale would be different for each school. I do not believe there is one ranking for every situation or school.

Provide more time for teacher professional development. The state should consider a state wide calendar which could provide for quality and consistent professional development.

You need to define what math classes are needed for graduation. The school board here is discussing a low level math class if three years are required for graduation. Obviously this will not help students. At a minimum I believe all students should be required to take Algebra & Geometry in high school.
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<td>1</td>
<td>- encourage direct links between local businesses and secondary schools to design curriculum and instruction centered on a specific industry with direct applications to that industry (i.e. core subjects are designed around the medical field applications)</td>
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<td>increase funding for smaller schools so they can retain the special teachers and create consortiums like OK that focus on technology that students with particular interests can be bused to in rural areas where the schools can't offer as many specialized subjects</td>
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<td>3</td>
<td>Parents are a key part of the puzzle. Many parents in high poverty areas need support to learn and enforce good parenting. The best and most innovative charter schools in the country are making parents equal partners and involving them from birth.</td>
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small study groups for AP courses built into the school day and monitored by mentors (business leaders) More writing labs and meaty assignments, not just one monumental term paper. More types of writing i.e. opinion papers, how to manual type writing, science based writing assignments etc.

Utilize technology as a remediation tool at no cost to districts. Quality programs with artificial intelligence designs are available that engage students, select and pace instruction to meet individual needs. A statewide purchase of such a tool would be a real help to districts that are spending duplicative time and resources. Certain achievement levels could be required before a student could apply to post secondary thus reducing remediation costs at the post secondary level.

Give the broad range of teacher assignments a system that takes into account the synergy of a staff, rather than just the work of an individual teacher is critical.
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<th>Providing contracted time for staff to extend day. Adopt a student lead conference using student produced portfolios. Provide more days without students for staffs to collaborate and meet with families.</th>
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<th>Additional contracted time for staff</th>
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<th>Additional contracted time and support staff to assist students in LRE</th>
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<td>Days of instruction should be modified so schools can better adjust their scheduled to meet the needs of students. Connect curriculum closely to college readiness standards. Assess using EXPLORE, PLAN, ACT. Teach critical thinking and problem solving skills in class. Level the classes so students are with other students of similar ability so they can be challenged at their level.</td>
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<td>There is nothing in the narrative that talks about how this will improve outcomes for ELLs. I believe that you would have to look at some sort of growth model that would have to take into account how long that students had been in your school/district.</td>
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<td>There is nothing in the narrative that talks about how this will improve outcomes for SWDs. I believe that you would have to look at some sort of growth model that would have to take into account how long that students had been in your school/district.</td>
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Make a survey that you can use the radio buttons on. I agree with all the statements, the first three are 1’s. As a private school we already have this to some degree, but it would be nice to see across the board.

One of our problems is we keep increasing the rigor of K-12 education and somehow expect a majority of students to achieve at a high level with challenging content. Despite our slogans, not all students can learn or desire to learn at the same level. Furthermore, the public and many teachers, insist on keeping a 7-hour school day and a 180 day school year. Oh, and we must keep our traditional A-F grading and credit-accumulation system at the same time we look more carefully at individual performance levels. There are some significant incongruities between our educational goals for students today and the structure of our educational system that make achievement at a high level unlikely for a significant number of our students.

I think Special Ed Directors and university professors who student SWD learning needs and train teachers should be intimately involved in developing approaches.
Incentives to Technical College that use creative scheduling to partner with public high school. Technical Colleges have state of the art equipment that would allow all students to use the latest. Emphasize skill building and extension activities at the elementary and more work related application to specific course work at the middle and high school levels.
Increased cultural awareness of diverse populations within a school and strategies to address cultural barriers within the classroom setting through professional development.

Reduced caseloads for teachers of SWDs. Especially, for those with a higher percentages of low functioning higher needs students or extreme behavioral incidences. Increase in (paid) professional development opportunities for paraprofessionals working with SWDs.

Increase financial support for implementation of STEM. Increase school year expectations for professional development time.
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<td><strong>There is nothing wrong with public education that could not be solved with selfless leaders in school administration. We have too many self-serving bureaucrats in school administration who expect school boards to &quot;drink the Kool-aid&quot;. At least one 4-credit course in leadership should be part of the licensing process for school administrators.</strong></td>
<td><strong>#1. My friends with children in Charter Schools tell me that they are working.</strong></td>
<td><strong>#2. The nine month school year dates back to a time when boys were needed for farm work. Our world has changed in the past 50 years but our schools have not.</strong></td>
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Break out of past ideas and look to the future. Many of the above have been tried and extensions given. Milwaukee has had many chances and are still not improving! DO SOMETHING TODAY! "At Risk" seems to be increasing. However these students get extra help even help in doing homework and testing). Stop enabling! Don’t pass students to the next grade level if they cannot read, write, etc. Require them to attend after school, weekend, or summer sessions. Stop wasting money on summer weight lifting, horse back riding, bowling, etc. and only do mandated remedial studies. If a student fails 3 years in a roll too bad. Eventually they will want to learn and will pass. At younger ages this needs to happen NOW. Stop passing on problems to the next grade levels. Reduce funding for school districts that have failed constantly, have high drop out rates, where students health and safety is at risk, etc.

Mandated intervention such as SES. DPI must think more about whats best for the individual student and family and less about what’s best for a school or its employees.

1. Work with the business and industrial world to make sure what students learn in college, tech schools, and high schools are what they need. 2. Many school districts have outdated equipment (especially smaller and rural districts) - provide them the funding they need. 3. Offer FREE internet access to public school districts, UW’s, Tech. schools, etc. We have lots of providers in many areas with competitive prices but in rural areas not so much... The State should swing deals with companies that have fiber cables running school districts (but won’t hook them up). Work out tax deals for free access to the above and higher internet speeds. This will allow districts, Colleges, & Tech schools money that they now spend to be used on their needs.

Blended learning in classrooms and blended learning opportunities in extended learning programs Vocational ed for students on a non-academic track

Well, how about just 1 example of the “multiple measures” of educator practice? Just one. How can DPI honestly expect to submit something so vague and aspirational and in exchange be granted broad flexibility?
More collaboration between the public schools and the universities. I mentor Science Olympiad at the middle school and am supposed to have college students mentor different groups of students. When they are here (which is seldom) students learning increases greatly while they really look up to people that age.

In my district, students are so busy after school with sports that many rush through homework. Parents complain when expectations are increased while it may take more time for them to work on homework at night. Sports need to take a back seat to learning, at least in my district. Increase availability of effective teaching units that permit students to do more individualized learning. Students doing independent work take a longer time to cover topics than it does with traditional teaching methods. Help teachers make good decisions about their curriculum by supporting it with meaningful, supportive assessments.

Staff development should be supplied to a group of teachers from different districts so the teachers can learn together and share effective teaching practices. Our school provides its own staff development but it is very ineffective.

Testing isn’t teaching. These students need support in the regular classroom and with their work.

Make things/rules easy and short not complicated

Divide classes according to the ability and efforts of students and work with their field of interest

Competent teachers and effective teaching style

Make education interesting and according to the ability of student
Your criteria of labeling a teacher as ineffective based on state and national test scores is unfounded. Teachers cannot control how some students perform because they come to school at a disadvantage due to their home life. A student from a family who’s priority is not education, will never out perform a student who’s family supports education as a top priority. This is a proven fact. Social economics and environment play a huge role in the success of all students not just the school or teacher. Changing the home life has to be as high a priority as labeling schools or teachers.

Measures truly need to be meaningful and interventions reasonable - not costly, burdensome and labor intensive to implement.

Just make goals realistic.

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<td>require all school districts to make reading at a very early age a priority. Double the amount of instruction time for all students who have low incoming reading and math scores so they are caught up by the time they reach 3rd grade.</td>
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<td>4</td>
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<td>Measures problems vary. Each district knows what the problems are and should be allowed to address &amp; correct them at the local level.</td>
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Be realistic and have realistic objectives. 100% is not going to happen - why expect it? More upper level classes at the high school level. Also remember that the arts increase upper level thinking. So make sure the remain funded. Lastly, respect the profession. Teachers be blamed for everything... be realistic.
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<th>5</th>
<th>duplication of testing</th>
<th>course work that requires students to apply learned principles and create</th>
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<td>5</td>
<td>SMALL CLASS SIZES and effective teachers are the key to success and academic growth!</td>
<td>Effective teachers</td>
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<td>5</td>
<td>Collaboration among similar districts to discuss what is working</td>
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<td>5</td>
<td>opportunities to collaborate with schools that have been effective</td>
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<td>Continue support statewide for PBIS initiatives.</td>
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<td>2</td>
<td>Allow districts to begin/end school year without state mandated Sept. 1 start date. Allow more instruction time for math and less for music in the dpi suggested time allowances.</td>
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<td>2</td>
<td>This whole thing sounds like a lot of paperwork. Hopefully the student reporting system that Wisconsin is implementing will automatically enter test results so there is not a need to hire people to enter data.</td>
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<td>2</td>
<td>Don't require algebra 2, trig, etc. for students that are not going into a math related field. Do not require English lit/writing for students not becoming authors or journalists or tech writers. We are just wasting time. Instead, go to a more voc-tech style with more hands-on learning for specific skills, especially for those not going to a college or univ.</td>
<td>2</td>
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<td>3</td>
<td>Fund some more people to work with students in alternative settings. Fund some more people to work in small groups</td>
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Family structure is one of the greatest deterrents to educational improvement—especially families in poverty. Having school that starts on Monday morning and ends at noon on Fridays, so that young people have consistency and established routines in a safe environment may be the best way to improve our educational system. Cost is a huge factor in running such a program, but can translate into a great investment.

DPI rule requires Milwaukee Parental Choice Programs to have an auditor from DPI audit the audit. The cost of this takes away from children’s education and creates a lack of trust in the system. With an accountant and an auditor plus treasury people this seems like overkill. Also, the testing in the Fall is ridiculous. The students barely have time to get adjusted and then we are required to test. For new students this just doesn’t make sense.

Increase funding so schools can afford a second person to mentor students in areas they are weak. Also, this provide more of a safe environment for our children. Set a limit on the number of children with disabilities a classroom can accommodate. In some of our classrooms half the class has some form of Learning Disability based on testing and IQ scores. While parents don’t necessarily take them to the Doctor for diagnoses, educators need to accommodate in terms of students learning needs. This seems to be an area that is increasing particularly in the city of Milwaukee.

Having an individual on staff that is of the same background as the students can be most helpful. Language and cultural differences are an ongoing area for the professional educator to study in hopes of relating to the individual student.

Much of education is having the student buy in to what is being taught. On top of this is the instruction itself plus the need to interpret to make it meaningful for the student. I’m not talking of a language barrier only, but also learning styles as well.

We need much more detail about how educators of students with disabilities will be evaluated....and it is not sufficient to point to the addition of a growth model since we also have not specified what that will be.
Focus on the attainment goals—students in advanced courses, etc. and the supports to help reduce the gaps in participation across groups. Reduce the number of different standardized tests so that this can be the focus. This proposal appears to increase them.

Little detail provided in proposal

Use of Technology for individual strategies and personally designed Student Led instruction

We reference growth models but don’t describe them. I am concerned about a timeline that will pilot an EE evaluation in the coming school year, without a clear idea how we will address the issues involved in evaluating students with more significant cognitive, learning or emotional disabilities.

1. Approve the addition of a UDL/AT consultant on the Special Education Team, to "level the playing field" for students with disabilities. This would support our efforts to increase rigor and personalize learning for our students.
No where is culturally relevant instruction and practices mentioned. My fear is we do any of the above with the same lens, attitudes, beliefs and practices as we have for 50+ years and give it another name = zero impact. Racial equity and culturally relevant practices must be identified and documented/measured in some way. Otherwise...we will continue to blame, ignore, make excuses, etc for all the same kids who aren’t achieving...

Culturally relevant focus in instruction, practices, DPI rules and guidelines, etc.

Curriculum mapping software for Common Core already included

I would rate the last 3 as 1s, but the computer isn’t letting me.

We need to develop programs for all levels of instruction. Courses must be designed and assessed to meet Common Core standards. Technology must be implemented into the school systems including sufficient professional development for teachers to be successful at using the technology.
Have realistic expectations for the progress of ELLs. Research says that it takes the average ELL 5 - 7 years to fully grasp academic English. There should be no consequences for students or teachers who are working hard if a student is not proficient before that amount of time has passed.

Have realistic expectations for the progress of SWDs. All students are not capable of being "proficient."
There needs to be one person responsible for ESL. In my district, the curriculum specialist for ESL is also responsible for Bilingual, World Languages, and now Refugee services. One individual cannot adequately address the needs associated with closing the achievement gap between EL's and monolingual students as well as the needs of bilingual students. ESL needs it's own district specialist. My ESL supervisor works very hard! And, she is extremely knowledgeable! But, she doesn't have enough time and sanity to do what needs to be done to really support us ESL teachers with meeting the needs of the ELs in the district. Our EL's and us ESL teachers deserve a full-time ESL specialist.
Making sure the administration at the school, district and state levels truly understand the best practices in teaching literacy and assessment before decisions are made. The book entitled Best Practices: Teaching and Learning in America’s Schools by Zemelman, Daniels and Hyde should be required reading for all administrators, teachers and preservice teachers.

In elementary schools, promote the use of "The Daily 5" classroom organization to support literacy learning. This allows teachers the set-up to promote 1:1 student conferencing as well as small group instruction for both reading and writing. Promote the use of running records and writing samples as informal authentic performance assessments to drive instruction. A state-wide writing rubric for grades k-3 would be very helpful as well as benchmarks set at the state level for both reading and writing.

With the variety of languages used across the state, are there some online resources, websites that would support second language learning in small districts that have few resources to do that?

See above. Strong consequences for students who choose not to succeed.

Placing kids in proper class levels would help. I have an English class with students who are very low with the same students who are extremely high in their abilities. It’s hard to differentiate to 30 students when they are lumped together. Tracking would help. Online classes would help as well with curriculum that adjusts to the students’ abilities. Maybe we should go the route of SWD students... If they get an IEP, why shouldn’t all students?
This should be handled at the local school board level. Standards should be developed, if the system is under performing the board should have the autonomy to make the required changes needed for improvement.
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<td>2</td>
<td>Examine mobility, change attendance areas, bussing etc. so that kids can stay in one school.</td>
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<td>Increase technology access, create statewide online learning resources for K-2 students</td>
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<td>5</td>
<td>More demanding curriculum, more requirements for all subjects</td>
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<td>Training and support is always more effective than throwing people out.</td>
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<td>Allow multiple paths to graduation.</td>
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<td>While it's great to monitor reading progress at the 3rd grade level, there needs to be emphasis placed on reading and reading interventions BEFORE students reach 3rd grade. Resources need to be invested in reading interventionists and learning literacy skills at the early childhood level, especially for at-risk students. Also, the current proposal to require 3 credits of science and math should be increased to 4 credits of each to increase the rigor and provide students with more preparedness to enter a variety of fields after graduation.</td>
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<td>4</td>
<td>Require districts to provide professional development and outline specific curricular resources being used to address the needs of ELLs. This professional development should NOT be limited to teachers or staff whose work title suggests that they are the only service providers for ELLs as we know that EVERYONE in the school building comes in to contact DAILY with students learning English (e.g., Music, Art and Gym teachers, nursing staff, counseling staff, etc.) and those individuals should also have a stake in ensuring the success of every student.</td>
<td>4</td>
<td>Please see comment above regarding ELLs and apply to students with exceptional needs.</td>
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<td>get rid of walker and his assists who have no idea about public education adn want to get rid of it to establish their private schools</td>
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<td>provide professional development for teacher to do this-- many are not prepared to personalize learning, test results in timely manner (not take the test in Nov. and get the results in spring-- it's too late by then)</td>
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<td>Implement MAP testing state-wide and provide PD for optimal use of these data.</td>
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<td>5</td>
<td>Please see comment above regarding ELLs and apply to students with exceptional needs.</td>
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Reduce the amount of standardized testing, which is now seemingly nearly continuous throughout the school year so that enormous amounts of instructional time is lost. Such over testing does not help students learn and develop skills. Testing should be used only when the results can be effective in informing instruction. Testing for the sake of grading schools or evaluating teachers does not help students learn or improve skills. Punishments are not effective in motivating teachers or schools to improve. Teachers are teachers because they have a passion for teaching children, intrinsically motivated. What will help the most is to free up their time, encourage their creativity, give them adequate financial resources, give them adequate pay that is commensurate with their level of education and the awesome responsibility that our society places upon them and that matches with the importance of their mission. Provide teachers with an effective voice in job conditions and direct involvement in designing intervention strategies. Reduce student teacher ratios so that each student can have the chance to develop a real relationship with at least one teacher and so that teachers have the time to devote to assisting struggling students, gifted and talented students and the average range students so that each child can be assisted in achieving to his/her potential. Provide extensive training to teachers about how to incorporate effective instructional strategies that focus on improving the general vocabulary and language skills of students at all grade levels and in all content areas.

Tests are an issue for admin/teacher responsibility. Which teacher at which grade level is responsible for poor student performance in Nov of Grade 4? Grade 3 earlier? Or is it the student or group of student’s ability? In general, teachers aren’t really the problem, it’s the system that places ineffective individuals in leadership positions. Our focus for years has been on “college prep and we are still failing of achieving that goal”. When will implement teaching “student how to learn!!!” Learning with mastery goals. Not dividing by age, but by skill attainment.

Adequate staffing level so that individual IEPs can truly be implemented with sufficient individualization of instruction. Financial resources that will allow for more use of technology to assist the learning of these students. True vocational training and job placement for those SWD who are not likely candidates for college.
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<td>3</td>
<td>I sent an e-mail about this topic.</td>
<td>Require mastery of basic skills at the K-6 level. Stop the censorship of conservative ideologies in History, Social Studies, and Political Science classes. Stop using core subjects to advance social justice curricula. I can provide dozens of examples of each!!!</td>
<td>3 3 3 Language is vague and open for interpretation too often.</td>
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</table>
2 choices included the word "students".
8 choices should include the word "students"
1 choice the teachers
1 choice the administration
Administrative changes don't change anything in the classroom...it is just like this proposal...it won't change anything in the trenches of the classroom.
Are there some bad teachers out there? Yes, and there are going to be a lot more of them if the profession continues to suffer like it has politically and financially...remember...you get what you pay for!
Very few of the best and brightest students are aspiring to be future teachers...I wonder why that is?
I wonder where "no high school diploma...no driver's license" would get ranked on the list above????????????????????
If good administrators hire good teachers and the school still performs poorly, do you really think hiring a different administrator or teacher is going to make a difference.
ANALOGY...NFL...Indianapolis Colts lose almost every game of the season...so what does management do? Fire the coach!!! You don't think it had anything to do with Peyton Manning not being the QB do you?? They need a new QB, not a new coach!!!! In school, we cannot trade our students like the NFL can their players. We have to play them all...everyday...no matter their skill level...and believe me some of them are severely lacking......

STUDENT ACCOUNTABILITY!

Teachers need smaller class sizes and longer class periods. If students were focused on 4-5 main courses at a time, like in a college or career prep program, they will be better able to get in-depth. Teachers, too, will have less grading and more time to invest in planning stronger lessons and in giving individual feedback.
The most important thing is for students to have access to teachers, and this cannot happen in overcrowded classrooms. This can’t happen period until the state changes the funding scheme, so schools can hire teachers. Are the students supposed to differentiate their own learning, or is each secondary teacher supposed to personalize learning experiences for 150 students a day, five days a week?
How do you determine who is effective in a school? Who determines who is effective? Is effectiveness determined simply through test scores? What about accountability for the students themselves? Or their parents? Who will pay for all of the additional help at risk students will need?

Decrease the amount of testing and allow teachers to TEACH

Parents have got to realize that kids have to work for grades. That rigor means high level work and a commitment to learning. Personalizing learning is difficult with packed classrooms and limited materials.

More team taught classes.
1. Project based learning  
2. Collaborate with higher education institutes and reform the current ECASD curriculum

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Making any of the changes suggested above without understanding the underlying cause makes no sense. Without understanding where a potential problem lies, we cannot make changes that are guaranteed to have a positive result.

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Nothing can be done to make a net change in a positive manner. The students who want to go to college are going to college. The only caveat to that is financial issues that delay some people who want to go to college. Many of the kids not going to a college either have no desire to, or are not acknowledged because they go into the Technical College system which is viewed differently than the traditional four year college system.
Tapping into the strengths of successful instructors by offering training in techniques used that are proven to be successful. Perhaps you would have a couple of “district trainers” who would meet with instructors who are having successful outcomes, learn from these strategies, and then hold inservice sessions for instructors to attend. There needs to be a way of passing along the good strategies to other instructors without burdening the instructor who is doing well!

Tailor classes and schedules to meet post secondary readiness goals for students

We need a way to get students to want to be in school and do well. We have a societal dilemma where many students do not want to be in school (because it is work and they don’t see a reward...........they have too much instant gratification now so they don’t respond to education which will pay dividends for them in the future not the now. maybe we need to tie educational performance to ability to obtain drivers licenses/work permits?? something to get the kids here and trying!

Parent accountability to provide a home environment that helps a student be able to focus on school work.....

more writing homework a requirement deadlines needed to show students that whenever is not acceptable

Providing time for teachers of the same discipline in the building to collaborate together to share effective teaching strategies.
Require strong content knowledge by teachers. Test students in ALL content areas, not merely stressing math and science. Consider non-college bound students in requirements.

This is a strange way to survey for this information. All are critical. Research suggests that these are all CRITICAL to the process of improvement. The most effective change is rigorous instruction by high quality teachers who respond to data collected at all levels. That requires a strong leader. A strong leader should be able to have significant autonomy, but we have very few strong leaders currently.

Special Education staff can and should be utilized in more broad ways than they currently are. Teacher licensing processes and PI 34 are cumbersome and do not necessarily lead to better evaluation systems. No business would operate that way. Districts should be able to promote strong teachers, create administrative paths and offer re-certification processes separate from or in concert with a HE. Becoming a teacher should be much more difficult than it is currently changing tracks once a teacher consistently demonstrates mastery in the profession. If teachers were hired for longer contracts, we would likely see pay structures change. Teachers held accountable to high standards should make high incomes.

Clear learning goals, common assessments, curriculum aligned to CCSS, ACT, and other college benchmarks. Academic support skills need to be an essential component to the curriculum. Truancy needs to be taken seriously at the building and county level.
Holding parents accountable for implementing intervention plans as well as teachers. Teachers alone cannot close the gap, parents need to be held accountable for what their children do as well.

Parental involvement is the single largest factor in this equation; when parents care and actively promote and participate in their children’s academic, intellectual, and social/emotional development, kids tend to succeed to a much higher degree than when parents do not do these things. Parenting is the key here, not the schools.

This only allows for a few responses

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...allow for closer working relationships with business encourage technical colleges to have more impact on high school students and even those in middle school improve teacher training in the area of collaboration

...I'm not sure a good case is made for any of these for ELL or others

...same response as above
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<td>Students have to feel safe, respected and engaged in the learning process. Curriculum has to be appropriate - too easy or too difficult creates behavior issues. Ongoing formative assessment is critical.</td>
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<td>Provide more clerical support so teachers can teach and do less copying, etc.</td>
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<td>What has been proposed is clear and understood. We have no additions.</td>
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<td>This connects back to the need to ensure quality educators in each classroom. Nothing else matters if an effective classroom teacher is not in place.</td>
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<td>A strong literacy foundation and continued development.</td>
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<td>A strong literacy foundation and continued development.</td>
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differentiation in instructional methods, means of delivery, etc. Youth options, work study & apprentice programs Volunteerism with set learning standards

have higher expectations of our students! Make them more rigorous and support students

increase available resources to ELL needs for instruction time and curriculum supports
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<th>Develop a general education version of individualized learning plan.</th>
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<td>increasing number of credits required for Math increasing number of credits required for Science to better prepare our students to meet our common core</td>
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<td>Provide incentives for National Board Certification</td>
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<td>Need to increase parental and student motivation to learn. Take the money you will spend on all of these improvements and put them into scholarships to top performing students in the state.</td>
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Make sure that teachers have training in this and they don't have so many students that it becomes an impossible task.

offering more authentic tasks/courses for students to attend having bilingual resources available for students and support to the home too

Providing personal finance at 6th, JH and HS level

Including Personal Finance in all graduation requirements taught by a licensed Business Education instructor

*more support/resources in student's first/primary language due to the fact that they could learn the second language faster
*more support/resources available to help professionals be more effective in the instruction of these ELLs
Modeling after the elementary principal in Las Vegas.

I am disappointed that attendance is not an element of evaluation of schools. It is still a powerful indicator of student and school success. See the recent brief by “Attendance Works.” Additionally, there’s not enough attention to the importance of art, music, world languages, physical education, and other electives. This can be the core motivators for some students.

Project-based learning holds real promise to motivate students to work together and learn beyond the curriculum. More emphasis must be placed on interconnecting the curriculum. The real workplace doesn’t just use math or English, but draws on the full array of subject areas.

Hold individual students accountable for their results. Reasonable class sizes.
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<th>Focus on the quality of the teacher. Ask any teacher, student or parent who the most effective teachers are and keep those teachers. Get rid of the rest who block the work of the good teachers.</th>
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<tr>
<td>Allow districts as many seats as they need in alternative education settings so the disruptive students can be removed and no longer create a barrier for others students education. Teachers spend way too much time disciplining students. Parents need to be held responsible for ensuring their children complete homework in the evenings.</td>
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<td>Redesign the school year to make it more important to have consistency in learning. A year round school year calendar would be a good step. 9 weeks on 3 weeks off with the teacher having one week off and returning for Professional Development.</td>
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<td>Academic requirements should be changed. Perhaps we should only be teaching the CORE academic content in public schools. The Arts, Healthy Living, Wellness, Physical activity, sports and extra curriculars should become the community responsibility. All of the time during the 7 hour school day should focus only on Reading, Language skills, Math, Science, Technology and Foreign Languages.</td>
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<td>All students work with a personalized computer based curriculum. Teachers are used to facilitate their ability to use their individualized program. Teachers become the resource, the coach, students move through their personalized program at their own pace. They come together to experience group projects with students of their similar ability across ages.</td>
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<td>More time does not always equal more learning. The student has to have the capacity for the learning.</td>
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<td>Teachers can only do so much with what they have. The student has to be a willing learner with the capacity to do the learning. The parents have to be vested in the students learning and support the need for more intensive learning and more time invested into the task of learning.</td>
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1. Wisconsin’s Flexibility Request should provide detail on how the state will transition students taking the alternate assessment on alternate academic achievement standards (AA-AAS) to common core standards. The application should also state that teachers of students who participate in AA-AAS are specifically included in all training & rollout of the common core standards, and in every facet of Wisconsin’s pro.

2. While this application refers to students who participate in AA_AAS, it should consistently refer to this group as “STUDENTS WITH THE MOST SIGNIFICANT DISABILITIES” (p. 16 & 23). It is also important to be clear that in Wisconsin, 1% of students DO NOT TAKE the AA-AAS currently, in fact the number is lower and a 1% should not become a new target. Current US DOE WI assessment data (09-10) shows the % of SWDs on AA-AAS: 8.8% in Reading; 8.9% in Math. Wisconsin uality assessments for all students. For SWD, this discussion must include reference to how accommodations will be addressed. Wisconsin’s waiver proposal should include a plan for reviewing and matching current accommodations policy with new accommodations which will be implemented with new assessments. This is particularly important because USDOE reported data shows 58% of Wisconsin’s SWD using test accommodations.

1. I support the draft waiver’s guiding principle that “Every Student has the Right to Learn,” which references the Common Core Standards as the “foundation of instruction and assessment for students with cognitive disabilities.” 2. Support proposed participation in SMARTER Balanced Assessment Consortium - good choice - low the connection with technology. 3. I am concerned that subgroups (especially SWD subgroup) will not be factored into overall accountability. THIS IS MY PRIMARY CONCERN WITH THE ENTIRE WAIVER. 4. I am concerned that the Stars award program does not account for post HS employment. 5. I am concerned that high schools are being left out of growth gap despite current 10th grade testing. I believe that all grades should be tested in the future. 6. I am concerned that the optional comprehensive and content-cluster measures are optional and question whether they will be designed for SWD. 7. I am concerned that the “On-Track Indicator” only looks at attendance, without mentioning behavior and discipline and the impact those practices have on attendance. 8. I am very concerned that the focus for SWD appears to be only to reduce identification rates and FAILS to focus on increasing learning. 9. I am concerned that there are no exit criteria proposed for priority or focus schools. 10. I am concerned that the proposed waiver’s listing of stakeholders involving in developing the framework shows that there were no parents, disability groups, or special educators involved. So, future development MUST include all 3 of these groups. 2. Concern that the draft waiver, in discussing student achievement & principal evaluation, fails to mention SWDs and how principals attain achievement for them. 3. I support that the draft waiver states that an educator will not be allowed to remain at the developing level “indefinitely” but I am concerned that no time frame is identified for exiting inadequate educators out of the profession.

1. Concern that the proposed waiver’s listing of stakeholders involving in developing the framework shows that there were no parents, disability groups, or special educators involved. So, future development MUST include all 3 of these groups. 2. Concern that the draft waiver, in discussing student achievement & principal evaluation, fails to mention SWDs and how principals attain achievement for them. 3. I support that the draft waiver states that an educator will not be allowed to remain at the developing level “indefinitely” but I am concerned that no time frame is identified for exiting inadequate educators out of the profession.

2. Train all teachers in Universal Design for Learning principles and other effective strategies such as differentiate instruction.

3. Require all teachers get training on working with students with disabilities as part of EE.

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I will say that streamlining and integrating data to help all facets of a district's effectiveness is met with some degree of optimism. The key is to assure that the data is clean and free of error. Systems such as Educator Licensing Online (ELO) is dependent upon user input for accuracy. It has great potential, but comes with some concerns. Common Core State Standards in mathematics and language arts are helping; we need to have science and social studies completed soon. More understanding must be established by between higher ed and k-12. "Passion-based" learning is engaging, inherently rigorous, and effective.

Providing a variety of classes at all levels, adding flexibility perhaps add'1 time at the middle level, flexible scheduling at the high school level to access other opportunities outside the school building.

A statewide system that includes a learner's profile or dashboard depicting each student's achievement, learning style, etc.
Linking student outcomes to teacher effectiveness will be an extremely challenging project. Fidelity of implementation will require extensive training of administrative and teaching staff. I hope this has been thought through and necessary funding provided.
1) Do not mandate all students take 3 credits of math and/or science for graduation. Many of our HS students already take 3+ credits due to individual interest or are advised to because of future plans. Such a requirement limits other learning opportunities for all students and may turn some students off, thereby increasing dropout rates. It will negatively impact our arts programs and participation in our proven school-to-work coop & apprenticeship programs for juniors and seniors. Stated elsewhere in the document is recognition that teaching math & science in context engages students. I agree. There are other ways to do this. (Examples include: math & business; science & ag; physics & music; project-based learning principles applied in all courses.) Finally, STEM is appropriately highlighted as an excellent, well funded model. I encourage our DPI to look to the growing evidence-based research, and support, for the STEAM model (STEM where the Arts (Ref: 12/7/11 EdWeek article which states the intersection of the arts with the STEM fields can enhance student engagement and learning, and even help unlock creative thinking and innovation).)

2) Provide support for schools to implement quality career planning programs that have already been developed but might not be in place locally. Specifically, (a) implementation of the Comprehensive Guidance Model to plan what (Stated earlier & repeated here.) Expand the use of proven & effective distance teaching & learning instructional systems/technologies to facilitate effective sharing/collaboration of innovative instructional strategies on an as needed basis for instructors (i.e., a more robust version of the spotlight practices website/ concept discussed elsewhere). Such systems exist in other areas such as medicine and custom design (tapping into a vast database & network of resources by typing in keywords that identify specific situation to find potential ideas/suggestions for consideration). For the ELL population, this holds great potential. Depending on the design, this limits disruption of student learning in the schools by enabling instructors to tap into resources as needed, stay closer to their students and provides flexibility for teachers to research/learn when their schedules permit. Done properly, this increases the possibility for a more engaged professional learning community around the state. Bottom line: addressing the learning needs of special students (relatively few in an individual LEA) by providing professionals easy access to resources and lessons learned, at the time of need, is preferred (vs. waiting for professional development).
Assessment Wisconsin’s Flexibility Request should provide detail on how the state will transition students taking the alternate assessment on alternate academic achievement standards (AA-AAS) to common core standards. The application should also state that teachers of students who participate in the AA-AAS are specifically included in all training and rollout of the common core standards, and in every other facet of Wisconsin’s proposal that applies to other all other students, including teacher evaluation. When the application refers to students who participate in AA-AAS, it should consistently refer to this group as “students with the most significant disabilities” (pages 16 and 23). It is also important to be clear that in Wisconsin, 1% of students do not take the AA-AAS currently, in fact the number is lower and a 1% should not become a new target. Current USDOE WI data assessment data (2009-2010) shows the percent of SWDs on AA-AAS: 8.8% in Reading; 8.9% in Math. Wisconsin’s should be congratulated for participating in consortiums to develop high quality assessments for all students. For students with disabilities, this discussion must include reference to how accommodations will be addressed. Wisconsin’s waiver proposal should include a plan for reviewing and matching current accommodations policy with new accommodations which will be implemented. It is not practicable to rank order the above strategies in isolation. Strategies should be aligned to the schools needs and not provided in isolation but with multiple other supports to ensure success. For example replacing least effective teachers will not in itself turn around a school. The terminology is subjective in that a least effective teacher at one school may be a very effective teacher at another. It is suggested replacing ineffective teachers. Either way terminology would need to be defined.

1) We support the draft waiver’s guiding principle that “Every Student has the Right to Learn” which references the Common Core Standards as the “foundation of instruction and assessment for students with cognitive disabilities.”
2) We support proposed participation in the SMARTER Balanced Assessment Consortium.
3) We are concerned that the optional comprehensive and content-cluster measures are optional and question whether they will be designed for students with disabilities. We are concerned that subgroups will not be factored into overall accountability. We are concerned that the Stars award program does not account for post HS employment. We are concerned that high schools are being left out of the growth gap despite current 10th grade testing. We believe that all grades should be tested in the future. We are concerned that the “On-Track Indicator” only looks at attendance, without mentioning behavior and discipline and the impact those practices have on attendance. We are very concerned that the focus for students with disabilities appears to only be to reduce identification rates and fails to focus on increasing learning. We are concerned that there are no exit criteria proposed for priority or focus schools. We believe Wisconsin should adopt Common Core Standards based IEPs.

The current corrective action requirements that will continue through this waiver lack the flexibility to target supports and interventions for the students that need it the most. Instead it is a one-size fits all approach to reform.

1) We are concerned that the proposed waiver’s listing of stakeholders involved in developing the framework shows that there were no parents, disability groups, or special educators involved. So, future development must include all 3 of these groups. 2) We are concerned that the draft waiver, in discussing student achievement and principal evaluation, fails to mention SWDs and how principals attain achievement for them. 3) We support that the draft waiver states that an educator will not be allowed to remain at the developing level “indefinitely” but we are concerned that no time frame is identified for exiting inadequate educators out of the profession.
All of the above should be a number one to have a successful learning environment. These 10 interventions are a must.

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The regular classroom is disrupted when outburst are going on during learning and teaching. Behavioral disabled children should not be allowed in the regular classroom. There should be a holding school for them until they can be assessed and then provide for their needs.

Clarification on the measures used for special education teachers.
<table>
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<tr>
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<th>Finalizing the move toward a state-wide SIS</th>
<th>Eliminate grade levels</th>
<th>Move toward e-text/blended learning</th>
<th>Move toward year-round schedules</th>
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<td>Include students with the most significant disabilities, including intellectual disabilities, in participation in the Common Core Standards.</td>
<td>Factor subgroups into overall accountability even in small districts/schools</td>
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<td>A stronger safety net is needed for at-risk students outside of school.</td>
<td>1. Infuse reading and writing into all subjects</td>
<td>2. Set/maintain high standards of writing for teacher education candidates</td>
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--- Noticeable lack of involvement by stakeholders, including families, disability groups, special educators. --- Draft waiver does not mention students with disabilities when discussing student achievement and principal evaluation. --- Good step that
Hold parents accountable for student absence and misbehavior.

Low-income schools are failing, and it's a tragedy. We need more equality in education.

[Answer too lengthy for this space but is provided as an Appendix.]
All of the preceding suggestions are solid but require knowledge that we don’t yet have. If you replace a poorly performing administration with a different, yet equally poor administration, then that intervention will have no effect. No intervention will work in each and every case. Interventions must fit the school and student population specifically, not be applied uniformly to all schools.

Give teachers resources to learn and implement data driven instruction and then give them the flexibility to run their own classroom and make their own decisions. Reward entire schools for improving student achievement.
The above 1-10 scoring system is not working on my computer, so I’ll comment instead. I think ineffective teachers should be replaced, but their effectiveness shouldn’t be based on test scores. The best teachers are often given the most challenging students. More learning time is definitely a good thing. Top-down approaches that emphasize administrative interventions and mandated professional development are not a good strategy. Safe schools are key.

I agree with having core standards that encourage high achievement. In Madison, there is a push towards standardizing the curriculum, which I think is going to lower standards. I also think we need to get away from rewarding and punishing students based on standardized test scores, as this inadvertently lowers rigor. Teachers are far more focused on bringing low performers up to minimal standards than helping other students excel. In districts and schools where there are huge ranges in achievements, offering specialized classes for different learning levels (especially in middle and high school) is probably necessary. Honors students get what they need, but kids who are smart but not honors students need challenging classes where they are not held back by kids who are more challenged at school, or who don’t care or want to be there.

This will demand a great deal of new personnel at all levels and new responsibilities to implement, monitor and take corrective actions. Where will the burden fall, besides on all of us? It will cripple our independent school, already struggling with a budget of $6442 per MPCP students.

Teachers can’t do it alone and it all begins at home. So anything that helps parents help their kids is good.

It all starts with getting all children learning as early as possible. When they are kindergarten ready the learning is easier and they can learn more advanced topics earlier. So start mandatory education earlier especially in the impoverished low s.e.s. areas.
Provide professional development on differentiation. Develop and implement digital personal learning supports/plans. Implement assessments and provide professional development for teachers that emphasize depth of knowledge and rigor in instructional practices and assessment design. Directly align state assessments with college placement systems.

The utilization of value-added is a good step. Also emphasize learning goals for all students in SLO's. SLO's for special education teachers must be focused on student learning and not on functional/behavioral objectives.

System reform should maintain the autonomy and independence of schools, allowing them to offer innovative options in education. There also needs to be well-developed systems of support commensurate to any heightened accountability requirements.

1) By offering a variety of high quality educational opportunities that are sensitive to the needs of students, including permitting students to attend charter or choice voucher schools. 2) Develop a system of assessment that is value-added and measures student growth and attainment.

Regardless of what strategies/supports/resources are developed, all should be made available to educators, administrators, and schools statewide, in both rural and urban areas, and the public and private sector.
All with schools being accountable for student achievement, parents and students must be held accountable as well. Achievement is a three legged stool and only one leg is being addressed in all of this.

I just hope we don't fall into the practice of rating schools by their population. It may be that a good school is starting with less prepared kids and will be labelled a bad school despite having quality education. It is true, however, that all schools should continue to improve and this might be a good system to help identify strengths and weaknesses of schools.
Please be aware that schools need to make decisions that effect their kids and community. Laws that are federal that do not match state or vice versa are not helpful. For example highly qualified teacher where the state gives an emergency but the federal government says no you have to report a teacher who is not highly qualified. All kids must test, but Wis has opt out at 4th, 8th and 10th. Now Wis says higher standards for teachers in college, that is fine but federal govt saying individuals with other degrees can teach. Really? They don't need specific courses? Extra training? Because I am an engineer I can teach? Very frustrating to all in education.

We need to get better at teaching and measuring 21st skills that are embedded in the CCSS, e.g., creativity, teamwork, problem-solving, etc.

Wisconsin should have a high school fine arts requirement of 1 credit. If we want well-rounded students then there needs to be a balance to the additional math and science credits being proposed otherwise we will continue to see a narrowing of the curriculum and the non-mandated areas will continue to be seen as less valuable and more expendable.
Thank you for taking the time to create this application for waiver. We need to be able to demonstrate our growth, efforts and work.

The language seems like it has a lot of gray areas in it for schools. What funding is the state going to give for these new mandates? I am concerned about the funding for all of these new programs. I am also concerned that the new requirements are not going to accurately assess student learning. I am also don’t see any student or parent accountability for low performing students. It seems like it is high stakes for teachers and administration, but no stakes for parents and students. Since there are so many factors that are out of the schools control (i.e. families that live in the district and their unique needs), the accountability system doesn’t seem to do enough to consider it. Also, there seem to be a lot of new requirements, and recently a lot of reduced funding from the state.
PI 34 has been an improvement to ongoing teacher development. The required involvement of a post-secondary educator continues to be a challenge. Many of our teacher preparation college programs are not using “best-practice” in the use of data to drive instruction and development of common formative and summative assessments. We focus on lesson design and delivery, but not measurement of student learning.

Two main areas of frustration: meaningless state assessment for improving instruction—please look at EPAS rather than development of another assessment AND lagging behind other states in the flexibility of funding and use of special ed staff to implement RTI.

You will need to define courses for all graduation requirements, otherwise it will not work well. Also, I love that you are looking to the ACT set of examinations.
| Fund our Public Schools: Eliminate School Vouchers, why do you need to make two classes in our education system | Don’t take any advice from our Governor. He is a college dropout. He doesn’t value education |
| Has there been consideration for rural schools with small class sizes? In a class of 20, two or three students who choose not to test or are unable to test well can throw off the whole results. | Why aren’t all school administrators included in the evaluation process? Principals can shape a district, but so do the superintendents. They are public employees and should be rated and ranked too. Wouldn’t it be important for a district to be able to critically examine a person’s abilities before they are hired? |

| The survey jumped from page 10 to 12. Did it skip page 11 or is it numbered incorrectly? |
| Why is the math standard lower than the reading standard (I know it follows NAEP, but why does it have to be lower)? |
| “Labels for schools” indicates there must be a minimum of 10% of schools with a “not meeting or significantly below” label and 5% with a “persistently significantly below” label. Does that mean that even if all schools are showing growth and improving there will ALWAYS be schools in those categories? That doesn’t seem right if that’s the case. |
| Why aren’t central office administrators, superintendents, and board of education members being included in the EE System? If communities had information about board members, in particular, who cannot show specific evidence of helping to improve their schools, it might influence community ownership of the improvement of the education for its students. |
I applaud this effort. I would suggest implementation in a way that exempts districts that are already achieving at a certain level or of a certain size. Smaller districts that are successful with their students may be overwhelmed with all of the logistical aspects of implementation. If they could be phased on at a later point in time, the higher priority districts could be focused on. NCLB seems to be designed for larger systems. There is a real lack of understanding of the burden all these layers and reports places on small systems with limited person power to implement. The personal relationships and stability in these districts often creates success. If so, leave them alone and concentrate where needs are greatest.
| I think that the state needs to come up with an efficient and effective teacher evaluation tool. If it is too lengthy and involved it loses its effectiveness. |
| I like the focus on college and career readiness, I believe that is on the right track. I think for this to be effective and implemented appropriately, the state needs to provide training in teacher evaluation (how teachers are evaluated in Superior should be the same as in Milton). The cost of this can't be another item tacked onto school district's budgets, it needs to come from the state for it to be effective. |
Please have working plans in place before implementing. Make sure they are in place at the start of a school year...do not interrupt a learning year with new items. New testing should be tested and developed. WKCE's are not enough to measure by. We have been hearing about new tests being developed and still no test is available. Testing should be done twice a year, a one time test is not fair or equitable. Not all students test well and their future is at stake by one test.

This is effort is risky from a PR standpoint. With Milwaukee performing at the bottom nationally, with African American students and Latino students performing well below Anglo students, any effort to move away from NCLB will be perceived as the education establishment trying to hide from its failures. This better be sold as even more demanding than the national effort. Even in this hyper partisan political climate, NCLD received maybe the most bipartisan support of any federal legislation. Wisconsin better raise not lower the bar for the performance of its schools and sell cynical members of the public of this fact.
Thank you for addressing this.
Along with creating low morale in the school environment by removing collective bargaining, decreased funding across the board for education by our governor is not focused on what is best for students. It is not practical to expect educators to do more with less, especially after the politics of the last year.

Being able to hang an award in the school gymnasium based on the 0-100 point system sounds nice. But it is not really that motivating when the rest of the world operates on cash incentives for work production. At what point do teachers get recognized and compensated accordingly for doing all the great things that are continually being expected of them? Especially, when data supports their efforts!
Send a message to WEAC to stop telling teachers that they are not appreciated. Teachers are appreciated. Some of them are underpaid but their efforts are still appreciated. WEAC is largely to blame for low teacher morale.
See above suggestions. Enough surveys and studies. You know what is needed - DO SOMETHING!

Overall, I don’t see how you can call it accountability if there are no consequences. What if DPI doesn’t provide appropriate interventions? What if they don’t make improvements? What if they don’t or can’t develop the assessments, evaluation frameworks, and teacher eval systems? What if they can’t get buy in from the unions? Seems like another generation of underprivileged students will rot away in low performing schools and face a bleak future as unskilled, non-literate adults, as DPI tries yet again to reinvent itself.
Needs to be a stronger standards-based focus on teacher development, both in terms of induction program standards and standards for on-going professional development for veteran educators.

I believe 99% of the teachers and administrators are giving as much energy as they can to help their students be successful. All students start at a different place and have different needs. I hope schools that are low performing will be given help to improve, not just negative consequences.

Most of the requirements are unnecessary. Students need to be interested and taking education seriously, no matter what level they are on. Teachers and parents can make it work if they support each other to make sure that their child is learning and knows what he/she needs to succeed in life.
Again, teacher effectiveness has to be data-driven but the social economics of all students must be applied to any equation in school improvement.

Educators are professionals who should be consulted and placed on all think tanks and committees that develop any type of school improvement strategies, who better to improve the schools than the teachers themselves. They are the most informed on the topic as they are living in the environments that are supposedly not producing effective students. Also, as I've pointed out many times, considering a person's environmental and social economics must play a role when determining any form of school reform.

The evaluation measures for teachers & principals should take into account the family environment. Does the parent help or hinder student success? Many parents are very supportive, but others do not value education for anyone. It is not fair, valid, or reliable to ignore this factor.

For years, teachers could get lifetime certifications...and those educators, with or without pay or push for it obtained master's degrees and professional development. A good teacher will get professional development on his/her own—let them do it. Good teachers= effective educational goals. Sometimes the profession is overregulated by people who know it only from the outside.
Everything as previously stated! I can't believe you actually hired a bunch of people that earn 6 digit to look and evaluate this survey. PUT THE MONEY where it helps the most - in the classroom. What are students without desks, books or pencils. It's like robbing a handicapped person the wheelchair!

STOP BUREAUCRATIZATION OF SCHOOLS AND DISTRICTS!

Let schools try some different ways of working with students and let teachers use what works for students.
Get rid of the dead wood sooner rather than later. Protecting lesser performing individuals through years of mentoring/relearning/etc. is just keeping the problem in place. There are plenty of competent people looking for jobs that would love to replace the slackers and underachievers. We as teachers have problems when it comes to protecting our own. It's bad for the entire group.

WEAC has some stake in this, but we wouldn't be in the position we are now if it wasn't for foot-dragging by WEAC (and certain bureaucrats) when it comes to reforms. Keep pushing with or without the union backing.
Please look at different ways to assess students. Doing normed test seems like the easy way out and is not a fair and equitable way of measuring student success. I have been advocating for this since 1979 when I graduated. My children and I, all of which are college graduates should never have been successful based on those tests. A huge sales job on each of our parts had to be done just so colleges and universities would give us a chance.
Thank you for changing the system, even in a highly-politicized environment. Dr. Ever’s actions are applauded and thank you DPI for your work around this issue. It’s the right thing to do for our WI students.
Classroom make up needs to be considered when evaluating teachers. For example, some classes are set up as ELL cluster classrooms. Teachers in these rooms may be outstanding teachers whose students have simply not had enough time working in English to be proficient. Also, many administrators place the most challenging students in their best teachers’ classrooms. This can affect the performance of students in these classrooms. Teachers should not be penalized if their classroom is not meeting performance expectations if there are factors like these that affect the class’ performance. Also, by using test scores to evaluate teacher effectiveness, everything that has been gained in terms of collaboration in the past few years may be lost. Teachers may decide to focus on only their own students rather than investing time in the students of another classroom. Also, if test scores are used to evaluate teacher effectiveness, what will prevent some teachers from helping their students cheat? What impartial person will be administering and protecting the tests?
Do not encourage or support the use of AIMSWEB or DIBELS as literacy assessments in the state. They do not yield meaningful information and are using up valuable instructional time in schools. They also send the wrong message to children that reading words fast and reading nonsense words are what the teacher is looking for. Kids can turn their brains off and just say words fast. Don't we want to teach our students to think more analytically and deeply? The 21st century goals for our students are to 1. Investigate the world 2. Recognize perspectives 3. Communicate ideas and 4. Take action. While we want our students to be able to do those things, AIMSWEB and DIBELS are doing just the opposite.

I applaud your efforts in making this shift in the state during this challenging time. If you have questions about comments I have included, please contact me at kblaker@comcast.net. Thank you and good luck!

Please look at ways to hold not just teachers and administrators accountable, but students as well. Right now a middle school student in my district can fail all of his/her classes and still get to high school. These students aren't held back and aren't given consequences for their choices. Instead, the school is penalized for trying everything they can do to help them.
Make sure the final bill makes it possible to more easily get rid of ineffective educators.
WI DPI has not created much statewide PD via technology. I understand the "local control" issue, but having the resources create, and available may increase the likelihood that schools/districts would take advantage of this. WIDA could develop these for you.

Be sure to support teachers instead of blaming them.

Focus on student accountability is of more value than focus on teacher accountability. Most teachers are highly effective, but are limited by student apathy and lack of consequences for students who choose not to learn.

Include student and family accountability in the system.
I am EXTREMELY concerned about the impact of what will be an even more focused approach to teaching science, math and reading/language arts will have on Social Studies education which is already extremely marginalized in many of the elementary schools around the state. How can we expect to have educated and engaged citizens if we take away the learning in this area.
already answered in previous similar questions.

It appears we still have the unrealistic expectation that all students will be at grade level in reading by 3rd grade. There are so many variables that are involved in a student's achievement beyond the curriculum and instruction they are provided and schools cannot impact many of those factors. And being able to read is not the same thing as doing well on a test.

How are we going to be able to afford the computers for MAPs and the WKCE?
Promise you will go visit a couple schools in some places where you know education is struggling before you move forward with anything on this...you owe it to the students and teachers in the trenches everyday to do so before attempting to implement some sort of system by which to measure and evaluate them. How are you evaluated in your job? Is it right? Is it fair? Is it making you better? Is it common sense? For your sake, I hope it is.
Any system of evaluating teachers on principals is ridiculous, when teachers have zero control over who comes into their class. I have 5 sections of the lower students, and the teacher next door teaches 3 second of average students and 2 sections of advanced students. So his scores will say that he is 50% better at his job than me. I don't think so.
this plan was not written with the parents of students in mind. Parents and students are the client and it's clear that this plan is not parent friendly. Giving a two week turnaround for the public to reply, doesn't even afford parents the chance at learning how to interpret this plan, yet alone to ask questions and receive answers. DPI says they support parent engagement in schools, yet you roll out this plan with no way to make it parent friendly. My biggest question is who is going to fund all these mandates that are placed on low performing schools? My child's school is already broke, looking at class sizes of 31 for 4 year olds (with no aides or paras). I can't imagine having to take out more money from my child's class to fund these mandates you created, without any parent participation in here. DPI should have had a panel of parents they consulted with throughout the state, to have representatives from urban, rural, and suburban areas.
To truly make students college ready in grade school the change needs to happen asap and needs to be in every classroom starting at kindergarten. Only providing college knowledge and education to high school students would be the least effective way to make college ready students.

Teachers will leave low economic areas and struggling school districts to avoid being penalized for poor student performance. Educator effectiveness is a vague term... what will be criteria? Student opinion? This is an overall vague document with little specifics. It offers very little facts and leaves the door open for the state to really do anything they like.

We need time to discuss and review this before taking this survey! There has been no communication about this previously.
Many students do well in standard classroom settings where all students are expected to move at about the same rate of speed. However, there are students who would do better if they were on some sort of individualized track where they could have the flexibility of moving forward or backwards as needed for learning information. This secondary track would offer more remedial assistance when the student needs time to review before moving ahead to new information. I truly don’t know how this could work, but there just has to be a way for us to stop assuming that “one size fits all learning” will work for everybody.

I'm not sure.

If we are going to use the new test replacing the WKCE to be an evaluation of teachers/students then there needs to be something attached to the test that makes it “important” to the students. It needs to be a graduation requirement, or something so that they see it as important and try their best. The kids get tested to death and when the state tests roll around for high school kids, a lot of kids just don't care as it doesn't impact them (or at least that is how they see it).

I am not sure. I thought some of this was very vague for me to make some solid suggestions for you. Sorry.
Wow...This is for real, very exciting for Wisconsin!!

Parent effectiveness should also be rated with appropriate interventions/consequences for parents who do "not meet standard expectations". Schools can not be expected to educate students who are not physically, mentally and emotionally prepared to learn.
Who is going to do the work of rolling this out if the waiver is approved?
Flexibility in operations allow us to look at teacher effectiveness via student achievement, surveys, performance reviews as well as seniority. It will be important to maintain this flexibility as opposed to past structures in which we were bound only by a review of seniority.
Educator effectiveness measures need to consider an entire school community's impact on the student, as many "special" teachers and aides may make a positive or negative impact on the student's achievement and growth as well. These measures also need to consider the environment in which the learning takes place (students' personal / home / societal challenges; composition of the classrooms the student learns within, etc.)

My only concern is the issue of time needed to implement and maintain the evaluation program. A true evaluation takes time – pre-mtg; observation; post-mtg; follow-up. Most administrators and teachers are so fully scheduled that trying to find the time to do all will be an issue. This may mean the implementation (with pay) of an extended day, which should also be used for increased collaboration and professional development.
This plan must be equally applied to all taxpayer funded, charter and voucher schools in the state. No exceptions.

I made my comments as I went along in the survey, and as they applied to the topic surveyed.

Do not increase math and science credits. There is not enough money in the schools budgets to take this extra burden. More teachers would need to be hired, more rooms would be needed to teach in, and more resources needed. It is hard enough to get some students thru the basic requirements of 2 years. The willing and motivated take the 3 years already. So you would be mandating it to the students who do not want it.
The best way to improve education is to help teachers get further education and support to use the data. Teachers must have reasonable class sizes or they won’t be able to accomplish the many other tasks involved in individualized instruction. Teachers need time. Education needs support, support, and support.

Using real life hands on demonstrations, assignments and fewer moments of memorizing spelling words—more instruction on grammar and requiring a second language for all students K-12.
I think Wisconsin is a great state to raise children and that is why my husband and I chose to live here. The recent cuts to education from the governor make me sad and frustrated. Why when we need education the most to continue making our economy and citizens strong would he cut education? In my eyes all he is doing is making more people dependent on government programs not less. There has to be a happy medium. If students can't learn the skills they need to be successful in the workplace they are more likely to be in need of government assistance. If we don't figure out what the future needs for jobs we will have failed. Technical, charter technical, etc high school might be the answer but with educational cuts that seems like a pipe dream. And if lower and middle income families continue to struggle financially the need for a stronger education becomes even more urgent and also ways to help transient families increase their children's odds for a stable education.
Again, change the academic calendar, the days of instruction, and the academic requirements.

We all have students, perhaps 25% or more, that will not be able to meet the CCSS no matter how much time they are given and how many strategies are used. We need to develop a system of different pathways for different students. All students should not be college bound, all students should not be intellectually inclined, because we are not all born with the same capacity for intellect. Why can’t a system be designed that meets the capacity of all of our learners........2 or 3 different pathways that all have merit and employment as the final outcome.
The requirement of having to be recommended by a University in order to obtain a teaching license is obsolete. It is also meaningless; since all the University programs vary so much. Rather than abdicating the process of determining whether an individual is qualified to be an effective educator to the various colleges and universities (who typically just base it on seat time in a particular series of courses) the Department should retain this critically important responsibility. The Department hasn’t had the resources to perform the audits that are required by state statute so it really has no idea whether mandates regarding teacher preparation are being followed.

It has been said, what get's measured is what get's done. Moving to SMARTER Balanced Assessment Consortium and EXPLORE-PLAN-ACT suite of tests means the state will have even less control over the content of the assessment tools it is using to measure student achievement. It appears environmental literacy, financial literacy, civic literacy, music appreciation, etc. will not longer be factors in the equations used to determine whether students and schools are successful. We need to be developing well-rounded critical thinkers—not just students who can meet basic math, reading, and writing thresholds.
Much work and thought has obviously been involved with this waiver development on the part of the WI DPI - which is most appreciated. It is obvious from my survey comments that I believe additional attention needs to be placed on SWD.

Include requirements for anyone observing teachers for evaluative purposes to have ongoing training, rigorous certification and proof of being highly capable of identifying teacher performance.

Really important to promote and reward effective collaboration by all teachers to meet the needs of students with disabilities and ELLs. Graduation and accountability process is not mentioning how needs of students with significant cognitive disabilities will be addressed. And what about students who are guaranteed FAPE until 21 years of age and who may legally and appropriately take more than 6 years to graduate high school?
Establishing the SLOs (Student Learning Outcomes) will be critical work. Folks in the field are extremely anxious about the equity of the proposed Educator Effectiveness model. Special educators, non-core educators, secondary educators, etc., are particularly vocal about their concerns.

We have reviewed the information from the Wisconsin Department of Public Instruction and the U.S. Department of Education NCLB Flexibility Waiver as well as the Accountability Reform Overview from the Wisconsin Department of Public Instruction. We are very pleased that someone had taken the time to prepare this information however, there are several areas of concern, questions, and suggestions which we have included in this document for you to review. We would ask that you please review these prior to making any decisions. Concerns

ΓÇô Using NAEP assessments to create new cut scores for next year will likely result in lower proficiency rates as the NAEP. This is providing districts less than one year to align benchmarks in accordance with NAEP before being held accountable. ΓÇô If the above is truly important to do right away, and change the cut scores immediately, then we should also change the testing window to the spring immediately in order to truly identify the studentΓÇÖs achievement at grade level.

ΓÇô There needs to be greater weight and focus on annual learning and achievement through emphasis on the growth model rather than on point in time tests. ΓÇô Regarding the four-year adjusted graduation cohort: District credit requirements already exceed the new expectations but concern
The Wisconsin ESEA Flexibility Request provides a rigorous and ambitious framework to increase college and career readiness expectations for all students while supporting high levels of accountability and support for schools and districts founded upon increased teacher and administrator effectiveness expectations. The plans documented within this request raise the following questions and concerns pertaining to the identified principles:

- **College and career ready expectations for all students**: SMARTER Balanced Assessment System: Will computer access and bandwidth pose issues for schools and districts as the grades 3-8 and 11 assessments are administered? EXPLORE-PLAN-ACT + WorkKeys package (ACT Suite): What is appropriate for all students to participate in the ACT Suite knowing that a large percentage of students do not go onto or complete their education at a 4 year institute of higher education, but enroll at a technical college for a certificated program of study or an associate degree? What does the research suggest pertaining to the appropriateness of all students taking the ACT Suite? What strategies do we have to provide relevance to all students participating in the ACT Suite which will provide the intrinsic motivation to fully engage the students in the assessment system?
Thank you for pursuing this waiver and for asking for public input. In principle, the document reflects what you already know the Department of Education is looking for. I am hopeful there continues to be recognition of the importance of a well-rounded education, rather than too much focus on English, math and science. (Refer to core subjects & skills as identified by Partnership for 21st Century Skills). I am fearful there is not enough attention being paid to the importance of the arts and creativity, something China and other Eastern economies are currently ramping up their own efforts on within their own school systems. Let's not take a step backwards. Music and the arts are good for the body, spirit and mind. They help get our brains wired for learning and teach students how to think outside the box, not to mention relieve stresses that can affect our physical health. In our ever more wired & data-rich world, employers continue to say not only are the soft skills becoming that much more important, they seek creative people who show the ability to find/ask the right question rather than simply find the "right" answer. Good luck!
The urban school situation especially in Milwaukee needs much help. I am a former teacher of central city students for 35 years and now a volunteer tutor. School discipline needs an across the board agreement and follow through with consequences. No excuses. Believe the children can excel. I think wearing uniforms could change a lot of behavior. Pants should be up and belted around the hips or waist. This a small way to prepare for the employment world. Clothes change behavior.

It is imperative that all students with disabilities and English Language Learners be assessed utilizing a growth model rather than attainment only. It is also imperative that accommodations be outlined for appropriate participation on statewide assessments for SWDs and ELLs and that the decision making process involving statewide assessment participation and accommodations determination remains with the IEP team. The IEP team must also maintain authority to determine graduation requirements as appropriate for the student.
Overall, improved/more information/strategies/accountability on:  
- Universal Design for Learning  
- Positive behavior supports/intervention  
- Connecting ALL SWD to common core standards  
- Connection of assessment to IEP process  
- Accountability, targeted intervention for SWD, including those with the most significant disabilities and those with behavioral challenge.

There’s mention of support for the non-core areas, but I’m not sure how clearly that’s reflected in the plan. I also wonder about the extent to which interdisciplinary education is encouraged, such as the state’s plan for K-12 environmental literacy. Interdisciplinary approaches reflect the “real world” and have been shown to be effective in improving student performance across the disciplines.
To whom it may concern, Thank you for this opportunity to provide feedback on DPI’s draft Waiver from NCLB request. I am concerned about the way that students and ultimately teachers, administrators and schools will be evaluated. I am troubled that the test used will be high stakes for teachers, administrators, and schools, but for those taking the tests, students, it has little individual relevance or consequence. As a result, students may not be adequately motivated to do their best on these tests. Moreover, and equally troubling, the replacement of WKCE norms with the NAEP norms. Historically, students taking the NAEP assessment have scored significantly lower in areas tested than they do on the WKCE test. Do the NAEP tests measure what is being done within Wisconsin’s classrooms based on our state standards? Are we prepared to explain the likely significant drop in the number of students deemed as proficient on the new assessment? Research suggests that SES and cultural background and language proficiency are highly correlated with academic success on tests. And while I am aware that some plan is in place to ‘compensate’ for these factors, I am deeply concerned about the details and the potential disadvantages faced by schools with high proportions of students from diverse backgrounds. I feel that we need to expect more from students. Learning requirements have softened over the last 30-40 years. [Answer too lengthy for this space but is provided as an Appendix.]
This waiver destroys the charter school program in Wisconsin. Charter schools must be held accountable by their authorizer, not by a third party. If DPI is concerned with the quality of charter schools, hold authorizers accountable for closing poorly performing schools and opening only those with promise. The proposal negates current charter school law, and in some places replicates part of what the charter school movement is already doing, sending a mixed message to educators about their place in WI education. National charter school groups have advocated for initial 5 year contracts to allow for school culture and practices to be able to take hold before performance follows. This proposal, with its three year window, will de-incentivize innovation, by empowering a non-stakeholding group (DPI) to override their contract without compromise. DPI's suggestion to force turnaround plans on schools defeats the purpose of a charter in the first place. Their second suggestion of a performance contract with DPI SHOULD ALREADY EXIST WITH THE AUTHORIZER. In my opinion, this waiver is reactionary. It looks at the system we have and punishes it into being better (which we know won't work). I propose being proactive. Implement a system that first tries to empower and reward people, schools, authorizers, districts and communities before trying to force them into change.
I realize you have to work with the US Department of Education, but this document is far too focused on data, testing, and scores. Children are far more complex than their test scores will ever reveal. The best teachers nurture and care for every child, and no test can ever capture this. Teachers need to lead the way to finding solutions. They know what is going on in their classrooms better than any administrator. I am extremely wary of the interventions suggested for failing schools. I'm not sure who will be brought on as a "turnaround agent," but as a voter and taxpayer, I'm not enthusiastic about the state being able to take over my locally elected school board. Combined with the wrong legislation, this could open the door for districts to be taken over by national charter school corporations and privatization of our public schools.

I can appreciate that this Waiver provides flexibility. We are one of the MPCP schools, not connected with a religion, on Brady St. in Milwaukee. We are recognized by the other high performing MPCP school leaders as doing an outstanding job, but achieving results with very different means than traditional accountability measures. We are doing an outstanding job preparing students for life. Mayor Norquist's son attend for 8 years before they moved to Chicago. Come and visit us and you will understand just how much these new measures would do a severe disservice to our students and the parents who have chosen Waldorf education, a world-wide movement, for their children.

Public education is under attack. "School Choice" already exists within the public system through the wonderful Magnet School program. You need to counter the radical right's privatization schemes by asserting the fact that school choice already exists and its called the magnet schools and they are great!
Set the goals high. Aligning our proficiency scale to NAEP is an excellent first step. Further, participate in international alignment studies that will provide us with an accurate assessment of where we stand as a state with high achieving national education systems. Supporting professional development and a longer school year (similar to Canadian provinces) will help achieve the objectives of this accountability waiver.

Although the Department of Public Instruction (DPI) is required to ΓÇ£meaningfully engage and solicit input from diverse stakeholders,ΓÇ¥ the waiver request as drafted does not adequately address the concerns for private schools that participate in the choice voucher programs. There is concern that the new accountability measures do not recognize the limited information that is currently available or collected by private schools as regards choice voucher students; the over-identification of choice students in the assessment process; the ability to accurately measure school performance based solely on choice student performance within a school; and the level of state agency intervention in choice voucher program participating schools under the new accountability system. The ability to reflect upon solutions and suggestions to address these concerns was significantly limited as the waiver draft itself was not made publicly available until January 23, 2012, providing less than two weeks to review and analyze the proposal. The draft also does not include appendices and is frequently missing detailed information, making it difficult to adequately assess whether certain objectives are achievable, or even fully comprehend the possible logistical or legal
I support the DPI waiver for all publicly funded schools, including charter and virtual.

I support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. As Wisconsin applies to the federal government for a waiver of NO CHILD LEFT BEHIND requirements, please do not cave to lobbyists who want voucher and charter schools excluded from accountability requirements such as AYP. I urge you to continue to keep the pressure on to hold charter schools accountable in the same way the public schools are accountable. All taxpayer funded schools should have the same requirements for testing and

I support the plan to hold all taxpayer-funded schools accountable, including voucher schools. As Wisconsin applies to the federal government for a waiver of “No Child Left Behind” requirements, the voucher school lobby is pressuring the State Superintendent to exclude voucher and charter schools from the accountability to which public schools will be subject. Charter and voucher schools cannot get a free ride, while public schools are held accountable. I am a public school teacher. I just spent $150 in January to provide materials for my special education needs students. It is wrong for taxpayer funds to support a "cherry-picked"

Dear Mr. Evers, As a parent of 3 students who love their Magnet school I applaud your new plan to be exempted from NCLB and I thank you for making the private voucher schools every bit as accountable as the publics. Keep protecting public education b/c it's under attack by the Radical Right and their privatization agenda. Thanks.

I support the DPI waiver, especially the plan to hold all taxpayer-funded schools accountable, including vouchers

I support the plan to hold all taxpayer-funded schools accountable, including voucher schools. As Wisconsin applies to the federal government for a waiver of “No Child Left Behind” requirements all Wisconsin schools must be held accountable to the same standards. Do not let the voucher school lobby pressure you to exclude voucher and charter schools from the accountability to which public schools will be subject. Charter and

Just letting you know that I believe that charter and voucher schools should not get a free ride, with “No Child Left Behind” while public schools are held accountable. I don't understand how you would allow some children to be "left behind" just because the type of school that they are enrolled in. It is just not right. Either it is for all

Please hold voucher and charter schools to the same standards, the same accountability, as all public schools are held. Any waiver of accountability to voucher and charter schools, especially in this time of extreme cuts, is another nail in the coffin of our public schools. Public schools are the foundation and the protection of

All schools need to be held accountable for test scores. Picking and choosing which schools do not need to meet the same standards as others is unfair and wrong. This change should not happen!

I strongly agree that all schools, including voucher and charter schools, should be held accountable as the public schools are during the federal waiver application process. Any school that receives state or federal funding must have the same requirements in order to have equity in education. There should be no exceptions. Please hold

I support the plan for Wisconsin to apply for a waiver for NCLB. I am especially concerned that ALL schools be held accountable. If they get taxpayer funding, they need to be accountable!

Dear Superintendent Evers: I support the DPI waiver, especially the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. Keep up the good work. You have my support.

I would like to voice the importance of this waiver and one of its key provisions. It is very important that all schools hold the same accountability standards.

Dear State Superintendent, I'm writing to let you know that I am completely in favor of ALL schools that are receiving tax payers monies to be accountable for their students’ educations and what they purchase in order to achieve that goal. Thank you for your time, effort and support in this matter.

I support the DPI's efforts to find a better way to measure how our school's are performing with your waiver application. I am very glad that included in the waiver are provisions that hold all schools that receive taxpayer funding to the same accountability standards. My hope is that in your final application you will include all subjects, such as art, music and physical education. Because these also help to create a well-rounded student.
Dear Dr. Evers, Please continue your outstanding leadership of Wisconsin Schools and make sure that all schools are held to Wisconsin’s high standards. Please do all you can to stop voucher school lobbyists to allow exemptions for voucher and charter schools from the accountability standards that will apply to our public schools in meeting “No Child Left Behind” requirements. The funding drain must stop and fairness must return to public schools.

Please consider my support of the NCLB waiver: I support the DPI waiver, because it plans to hold all taxpayer-funded schools accountable, including vouchers and charter schools. Thanks -

We support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools.

Please support public schools who value art, music and physical education. These subjects are what our students get excited about...what they need to be well rounded. All our students need and deserve a balanced education to become a balanced adult. Let the politicians know that Wisconsin values all our teachers.

I support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. Charter and voucher schools cannot get a free ride, while public schools are held accountable.

I support the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. As Wisconsin applies to the federal government for a waiver of “No Child Left Behind” requirements, please do NOT exclude voucher and charter schools from the accountability to which public schools will be subject. Please know that I do not want charter and voucher schools to be held to a lower standard than public schools.

I feel it is important to let you know that I support the plan to hold all taxpayer-funded schools accountable, including voucher and charter schools. Do NOT exclude voucher and charter schools from accountability that the public schools are subject too. These schools should NOT get a free ride and must be held accountable, even

Please hold all Wisconsin schools, public - voucher - charter, accountable since they are all supported with tax-payer fund. Voucher and charter schools should not be exempt from what is expected of the public schools in the same standards as regular public schools.

I support the plan to hold all taxpayer-funded schools accountable, including charter and voucher schools. Please do not exclude voucher and charter schools from the accountability to which public schools will be subject. Charter and voucher schools cannot get a free ride, while public schools are held accountable.

I support the DPI waiver application to the federal No Child Left Behind law. It is essential that all schools that receive taxpayer funding be held to the same accountability standards, including voucher and charter schools. It is also essential that accountability measures be crafted with educators at the table, not by politicians with their

I am a Wisconsin taxpayer and public school teacher who supports the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. Please do not exclude voucher and charter schools from the accountability to which public schools will be subject. Charter and voucher schools should not get a free ride, while public schools are held accountable. That makes absolutely no sense. I do not want my tax dollars

Good evening, I am writing to let you know that I believe that voucher and charter schools should be subject to the same requirements as public schools. How can you measure progress or compare them when you don't use the same form of accountability? As I see it, vouchers are draining our public school resources, so if they must

I am writing to let you know that I support the plan to hold all taxpayer-funded schools accountable, including voucher and charter schools. Those schools, voucher and charter, should not be excluded from the accountability to which public schools will be subject. Thank you for your consideration in this matter,

I believe all schools, public, charter, private, or voucher, should be held accountable to the same standards. The way things are taught in order to achieve those goals is up to the schools, but the standards should be the same.

I believe all schools that receive public funds should be held to the same level of accountability. While this is a good first step, there are some areas not measured in this waiver which we hope will be included in the final application, such as art, music, physical education and others designed to create well-rounded students.

Just writing to let you know that I support the plan to hold ALL taxpayer-funded schools accountable, including vouchers and charter schools. I just really don’t understand how they are taxpayer-funded and not held accountable. Mind boggling. PLEASE understand that charter and voucher school should not get a free ride while
I support the DPI’s waiver application, especially the plan to hold all schools receiving tax-payer money to the same accountability standards. It is especially necessary to hold voucher and charter schools accountable for meeting the standards applied to the public schools from which they siphon funds. While this is a good first step, there are some areas not measured in this waiver (ie: music, art, phy ed, family & consumer ed,) which I hope

I support the DPI waiver, and especially the plan to hold ALL TAXPAYER-FUNDED schools, including schools affiliated with vouchers, and charters, accountable. I also hope there is consideration for teachers who teach non-tested curricular areas such as: music, art, physical education, technical education and agriculture built into

Dear Mr. Evers, I wanted to take a moment to applaud you for applying for a waiver to the federal No Child Left Behind law. I think it is important to hold all schools accountable to the same standard, since they are all receiving taxpayer funding. I also think linking exams to common core standards is great. Finally, I think it is important to evaluate teachers, administrators, and schools on multiple factors. I worry about putting too much emphasis on one test on one particular day. I appreciate all the work you put in on this and your inclusion of

I support a waiver of No Child Left Behind legislation. If that occurs in Wisconsin, I believe all state-funded educational institutions need to be accountable for the students it educates and that the Department of Public Instruction would be the evaluator of those schools. We want students to be held to high standards and teachers

Just a short note to let you know that I support the DPI Waiver, especially the section that includes all taxpayer funded schools and schools that received vouchers and charter schools. It is really important that ALL schools in

Hello Dr. Evers, I just wanted to let you know that as a school social worker in Menomonie, I support the DPI waiver and am asking you to hold all vouchers and charter schools accountable along with taxpayer funded schools. Thank you and keep up the hard work to support the children of our state.

I support the DPI waiver.

I would like you to know that I support the DPI waiver, especially the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. As a 7th grade teacher and a parent of a six year old, I

I support the DPI waiver, especially the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools. My union and I also support your efforts to find a better way to measure how all of

I strongly support the DPI waiver application that is before the state legislature at this time. It is very important that the state of Wisconsin seeks to hold all tax-payer funded schools with the same accountability. In addition, it is imperative that our government find a better way to measure how well Wisconsin schools are performing

I am a school-based occupational therapist in Menomonie. I want you to know I support the DPI waiver, especially the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools.

I fully support the DPI waiver for the federal NCLB law, especially the provision that all schools that receive taxpayer money be held accountable. Taxpayers deserve to know how their dollars are spent and whether these expenditures are effectively helping the community. Charter and voucher schools should be held just as accountable as the rest of taxpayer-funded schools. Let them take the same "tests" and let the taxpayers view

Just wanted to give you a thumbs up on supporting the DPI waiver. We need to hold all taxpayer-funded schools accountable, including vouchers and charter schools.

It is important that Wisconsin submit a waiver application that is comprehensive and designed to improve the quality of our schools. I am requesting that you officially go on record about key provisions, such as holding all schools that receive taxpayer funding to the same accountability standards. I support support the DPI waiver,

I support the DPI waiver application to the federal No Child Left Behind law, especially the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools.

Thank you for all that you do to strengthen our state's public schools. I recently saw a story in the online version of the Wisconsin State Journal (http://tinyurl.com/6qcmhw) explaining that you are planning to include voucher and charter schools in the state’s accountability plan for ESEA Flexibility. I wholeheartedly support your efforts to do this as this is an issue of basic fairness and as a supporter of public education, I want the tax dollars that I invest in public education to be spent wisely. Charter and voucher schools should be held to the same standard
I am writing to let you know that I support the DPI waiver for the No Child Left Behind, especially the plan to hold all taxpayer-funded schools accountable, including vouchers and charter schools.

Voucher and charter school must be held accountable! Don't let this get by!

Dear Superintendent Evers, I am pleased to hear the state is revising the accountability process for our public school system. In reading through the DPI's Accountability Reform Overview I have two pressing comments. 1. In the suggested increase for high school credits, I noticed there are no credits required for fine arts. Yes, I understand these may be considered "electives" in the fine print. However, how will our students become cultured, creative thinkers if they are never taught to be so? Well-taught fine arts classes bring together multiple subject areas and make history and culture tangible. They also allow students to excel in areas other than traditional academics, giving more students opportunities for leadership. In order for students to fully develop their minds, I feel 1 fine arts credit should be added to the list. 2. It is difficult for us in the education