Section 4: Accountability, Support, and Improvement for Schools

Instructions: Each SEA must describe its accountability, support, and improvement system consistent with 34 C.F.R. §§ 200.12-200.24 and section 1111(c) and (d) of the ESEA. Each SEA may include documentation (e.g., technical reports or supporting evidence) that demonstrates compliance with applicable statutory and regulatory requirements.

4.1 Accountability System.

A. Indicators. Describe the measure(s) included in each of the Academic Achievement, Academic Progress, Graduation Rate, Progress in Achieving English Language Proficiency, and School Quality or Student Success indicators and how those measures meet the requirements described in 34 C.F.R. § 200.14(a)-(b) and section 1111(c)(4)(B) of the ESEA.

i. The description for each indicator should include how it is valid, reliable, and comparable across all LEAs in the State, as described in 34 C.F.R. § 200.14(c).

ii. To meet the requirements described in 34 C.F.R.§ 200.14(d), for the measures included within the indicators of Academic Progress and School Quality or Student Success measures, the description must also address how each measure within the indicators is supported by research that high performance or improvement on such measure is likely to increase student learning (e.g., grade point average, credit accumulation, performance in advanced coursework).

iii. For measures within indicators of School Quality or Student Success that are unique to high school, the description must address how research shows that high performance or improvement on the indicator is likely to increase graduation rates, postsecondary enrollment, persistence, completion, or career readiness.

iv. To meet the requirement in 34 C.F.R. § 200.14(e), the descriptions for the Academic Progress and School Quality or Student Success indicators must include a demonstration of how each measure aids in the meaningful differentiation of schools under 34 C.F.R. § 200.18 by demonstrating varied results across schools in the State.

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A.4.iv.a. Academic Achievement Indicator. Describe the Academic Achievement indicator, including a description of how the indicator (i) is based on the long-term goals; (ii) is measured by proficiency on the annual Statewide reading/language arts and mathematics assessments; (iii) annually measures academic achievement for all students and separately for each subgroup of students; and (iv) at the State's discretion, for each public high school in the State, includes a measure of student growth, as measured by the annual Statewide reading/language arts and mathematics assessments.

A.4.iv.b. Indicator for Public Elementary and Secondary Schools that are Not High Schools (Other Academic Indicator). Describe the Other Academic indicator, including how it annually measures the performance for all students and separately for each subgroup of students. If the Other Academic indicator is not a measure of student growth, the description must include a demonstration that the indicator is a valid and reliable statewide academic indicator that allows for meaningful differentiation in school performance.

A.4.iv.c. Describe the Graduation Rate indicator, including a description of (i) how the indicator is based on the long-term goals; (ii) how the indicator annually measures graduation rate for all students and separately for each subgroup of students; (iii) how the indicator is based on the four-year adjusted cohort graduation rate; (iv) if the State, at its discretion, also includes one or more extended-year adjusted cohort graduation rates, how the four-year adjusted cohort graduation rate is combined with that rate or rates within the

indicator; and (v) if applicable, how the State includes in its four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rates students with the most significant cognitive disabilities assessed using an alternate assessment aligned to alternate academic achievement standards under ESEA section 1111(b)(2)(D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25).

A.4.iv.d. Progress in Achieving English Language Proficiency (ELP) Indicator. Describe the Progress in Achieving ELP indicator, including the State's definition of ELP, as measured by the State ELP assessment.

A.4.iv.e. School Quality or Student Success Indicator(s). Describe each School Quality or Student Success Indicator, including, for each such indicator: (i) how it allows for meaningful differentiation in school performance; (ii) that it is valid, reliable, comparable, and statewide (for the grade span(s) to which it applies); and (iii) of how each such indicator annually measures performance for all students and separately for each subgroup of students. For any School Quality or Student Success indicator that does not apply to all grade spans, the description must include the grade spans to which it does apply.

The DDOE is well positioned to meet the requirements described in 34 C.F.R. § 200.14(a)-(b) and section 1111(c)(4)(B) of ESSA because our existing accountability system incorporates many of the multiple measures required under the new law. Given the new opportunity under ESSA to revisit and refine the existing measures, DDOE elicited feedback from a wide variety of stakeholders over the past several months.

The DDOE has included multiple measures in our accountability system since 2014-2015. The ESEA Flexibility Waiver catalyzed the creation of an accountability system framework anchored around academic achievement, growth, on track to graduation, and college and career preparation. Through early implementation, DDOE learned that a multiple measures accountability system provides a more comprehensive picture of school quality and performance. Stakeholder feedback for the ESSA state plan indicated that while many of the existing metrics are appropriate and meet ESSA statutory requirements, the DDOE should consider additional metrics based on DDOE and the broader education community priorities and values. Stakeholders expressed interest in adding a range of indicators to have a more complete and robust picture of schools.

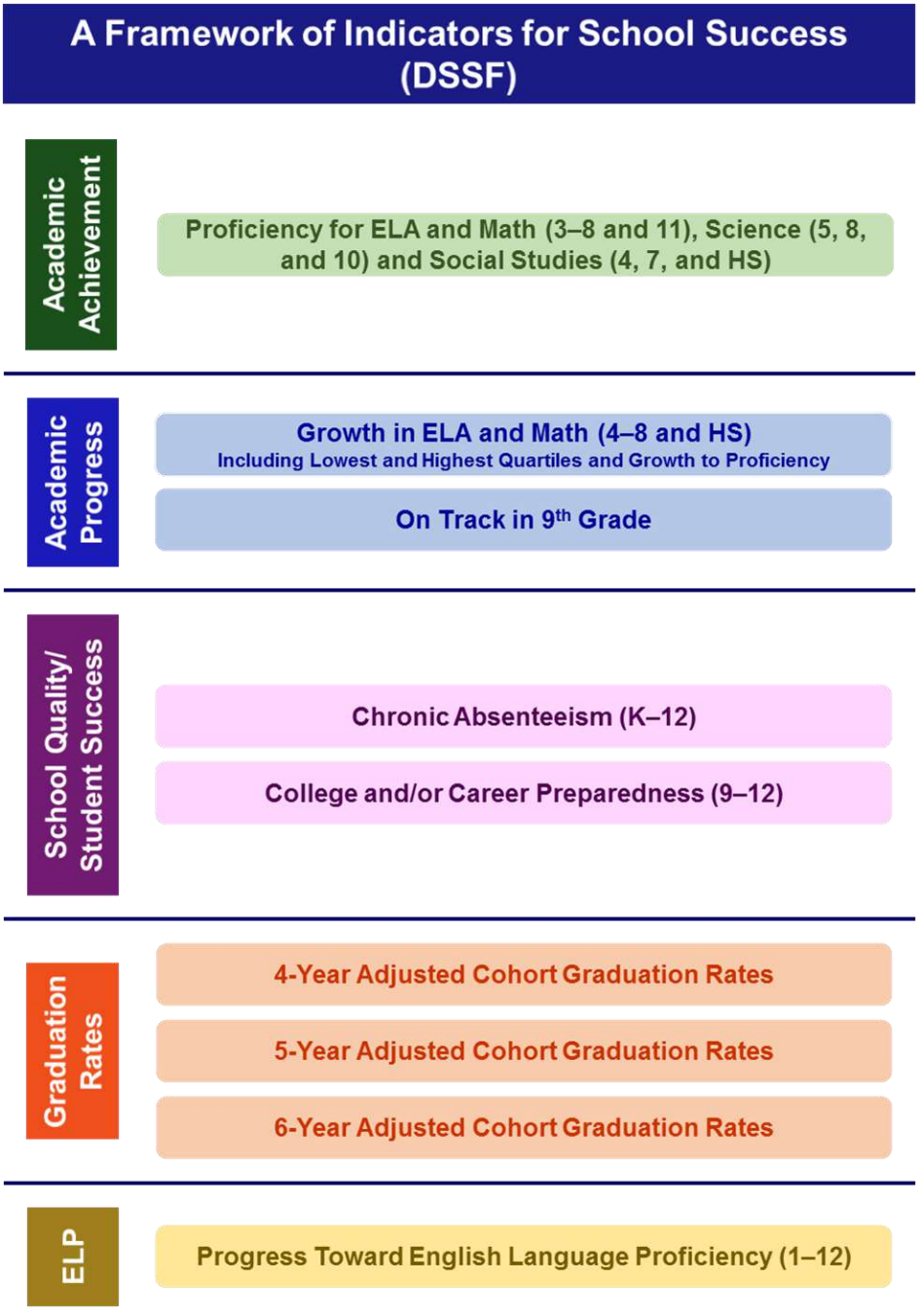
The metrics illustrated in the graphic below will be included in the accountability system beginning with the 2017-2018 school year. Decisions on which metrics to include in the accountability system were based on LEA and DDOE data experts' review of each metric's validity and reliability as a measure of student learning and/or school quality.

Please note that growth from the PSAT 10 to the SAT will not be included in 2017-2018. A thorough review of resources and a review of technical quality are needed before the PSAT can be included in a statewide accountability system.

Other metrics will be reported (but not included in accountability ratings) to provide parents and community members a more complete picture of school performance. These metrics are included in the last table after the graphic.

The following graphic shows the proposed indicators and metrics for the Delaware School Success Framework (DSSF) beginning in school year 2017-2018 based on feedback, and it builds on the DSSF as developed in 2014-2015.

The following measures are included in the DSSF calculation.



Indicator	Measure(s)	Description
i. Academic Achievement	Proficiency in ELA (3-8, HS) Proficiency in Mathematics (3-8, HS) Proficiency in Science (5, 8, and 10) Proficiency in Social Studies (4, 7, and HS)	The Academic Achievement metric area measures student performance in relation to grade-level expectations. This area currently includes student performance data on statewide assessments (Smarter Assessments, SAT, and DCAS) in four content areas: ELA, mathematics, science, and social studies.
		This indicator measures student performance in relation to grade-level expectations as assessed annually by our statewide annual, summative assessments (Smarter Assessments in grades 3-8, SAT at grade 11, and DCAS for grades assessed for science and social studies). The state's long-term goals include proficiency goals for ELA and mathematics. Results will be calculated and reported annually for the All Students subgroup as well as disaggregated for each major subgroup, including SWD, EL, low-SES, and each racial subgroup of students. See Academic Progress description for information on high school growth.
		Feedback from stakeholder groups such as Teachers of the Year Advisory Council, Teaching and Learning Cadre, PTA, Delaware State Education Association (DSEA), and community members indicated that these metrics should continue to be included.
		DDOE will include these metrics in the accountability system.
ii. Academic Progress	Growth in ELA (4-8 and HS) Growth in Mathematics (4-8 and HS) Growth to Proficiency (4-8) Growth of Lowest Quartile (4-8 and HS) Growth of Highest Quartile (4-8 and HS)	Growth metrics measure how well schools are improving student learning over time and are measured by statewide assessments (Smarter Assessments and SAT). Growth metrics assist with meaningful differentiation by distinguishing between schools with similar proficiency rates.
		This indicator measures student-level growth in relation to grade-level expectations as assessed annually by our statewide annual, summative assessments (Smarter Assessments in grades 3-8, SAT at grade 11). Results will be calculated and reported annually for the All Students subgroup as well as disaggregated for each major subgroup, including SWD, EL, low-SES, and each racial subgroup of students in the state.
		Feedback from surveys, community discussions, and various stakeholder groups indicated that growth should be a significant factor in the accountability system. Moreover, stakeholder

Indicator	Measure(s)	Description
		feedback indicated that DDOE should include a Growth-to-Proficiency metric as well as growth of both lowest and highest quartiles to better identify achievement gaps as well as include growth of our highest performing students.
		Stakeholders also strongly supported requiring statewide administration of the PSAT to provide a more valid, reliable, and comparable growth measure.
		Feedback from a wide variety of stakeholder groups also indicated a strong desire to have a more transparent method for measuring growth at the student level.
		In response to stakeholder feedback, the DDOE will continue to measure student growth for elementary, middle, and high schools, and we are investigating costs and effective processes needed to include the PSAT in its growth calculations at the high school level.
		The DDOE will revisit its current school-level aggregate growth methodology, which currently cannot be replicated by LEA staff, and is exploring a growth-to-target approach that provides transparency, reports student-level data, and can be replicated by educators at the school level.
	On Track for Graduation in 9th Grade (HS only)	This high school metric is the percentage of 9th grade students earning a total of four or more combined credits in at least four of the following subjects: ELA, mathematics, science, social studies, and/or world languages.
iii. School Quality or Student Success	Chronic Absenteeism (K-12)	The U.S. Department of Education's definition of chronic absenteeism is the unduplicated number of students absent 10% or more school days during the school year.
		Feedback from stakeholders, such as DSEA, discussion groups, and the Governor's Advisory Committee, strongly recommended that the attendance measure be replaced with chronic absenteeism.

Indicator	Measure(s)	Description
		Research shows that chronic absenteeism is strongly correlated with low performance and low persistence. Whereas most schools show very similar attendance rates, a measure of the percentage of students who are chronically absent, and therefore not present to learn, provides for meaningful differentiation among all schools. Results will be calculated and reported annually for the All Students subgroup as well as disaggregated for each major subgroup, including SWD, EL, low-SES, and each racial subgroup of students in the state. School performance in this metric area of the School Quality or Student Success Indicator will contribute to the school's rating for this indicator as well as to the school's overall rating.
		Based on stakeholder feedback and supporting research, the DDOE will include the chronic absenteeism metric.
	College and Career Preparedness (9-12)	Students who demonstrate early success in college and career preparation opportunities have an increased likelihood of entry and success in education and career training after high school. College and career preparation is determined by calculating the percent of students who have demonstrated successful preparation for education and career training after high school through advanced coursework and technical skills attainment. Results will be calculated and reported annually for the All Students subgroup as well as disaggregated for each major subgroup, including SWD, EL, low-SES, and each racial subgroup of students in the state. School performance in this metric area of the School Quality or Student Success Indicator will contribute to the school's rating for this indicator as well as to the school's overall rating.
		Feedback from the Governor's Advisory Committee, community conversations, the Delaware School Boards Association, and surveys indicate a desire to include additional college and career preparation options within this metric.
		Based on the feedback received, the DDOE will include the following options in this metric:
		College and Career Preparedness Option:
		One college and one career preparedness option (listed above)

Indicator	Measure(s)	Description
		College Preparedness Options:
		AP (3 or better)
		IB (4 or better)
		Postsecondary credit attainment with a B or higher outside of a state-approved program of study
		SAT College- and Career-Readiness Benchmarks (ELA, mathematics, and writing)
		Career Preparedness Options:
		DDOE-approved industry credential
		Certificate of Multiliteracy
		Postsecondary credit attainment with a B or higher within a state-approved program of study
		Successful completion of an approved co-operative education and/or work-based learning extension
		Armed Forces Vocational Aptitude Battery (ASVAB) General Technical (GT) score of 70+
iv. Graduation Rate (HS only)	Four-Year Adjusted Cohort Graduation Rate Five-Year Adjusted Cohort Graduation Rate Six-Year Adjusted Cohort Graduation Rate	Delaware's long-term goals for the four-year adjusted cohort graduation rate, as well as the extended year cohort graduation rates, represent statewide expectations to increase the number of students graduating from high school. School-level and subgroup results will be compared against state-level long-term goals on an annual basis to determine progress. Adjusted cohort graduation rates are calculated based on the number of students who earned a regular high school diploma divided by the total number of students in the cohort, accounting for students who are considered dropouts and transfers. Extended graduation rates of five and six years are included in the current DSSF to recognize that some students, including those with extended graduation rate individualized education plans (IEPs), need additional time to graduate.
		Feedback from multiple stakeholders, such as the Measures of School Success and Reporting discussion group, the Delaware State PTA, community surveys, and the Teachers of the Year Advisory Council, indicated that the four-, five-, and six-year adjusted cohort graduation rates should continue to be used.
		The DDOE will continue this approach.

Indicator	Measure(s)	Description
v. Progress in Achieving English Language Proficiency	WIDA ACCESS 2.0 for ELs (1-12)	The DDOE has developed a growth-to-target model—please refer to Section 1 for details. The measure will be based on the annual WIDA ACCESS 2.0 Assessment for EL Composite Scale Score. Through assistance with WIDA researchers, technical assistance from CCSSO, and an analysis of Delaware EL success on the state ELA content assessments, the DDOE has determined that a student's exit target, or AT, will be defined as a 5.0 composite PL on the ACCESS for ELs 2.0 assessment. Starting with the 2016-2017 assessment cycle, the DDOE will define increases in the percentage of all current ELs making progress in ELP as ELs that meet the ELP cut SS within the established timeframe consistent with a student's baseline PL. Thus, the state will consider a student's PL on the first annual ACCESS for ELs 2.0 assessment to determine the number of years that a student has to reach proficiency, then set targets for interim progress based on entering grade-level SS accordingly. Under this model, students achieving a PL of 5.0 or higher on their initial ACCESS assessment (Year 1) have met their growth target. The maximum number of years that students have to attain proficiency is six years. This decision is a result of significant stakeholder input, including ESL coordinators, the Governor's Advisory Committee, and on empirical research in language acquisition.

The following measures will be reported only and will not be included in the DSSF calculation.

Measure(s)	Description
Suspensions/Expulsions (K-12)	The DDOE currently defines this metric as the number of suspensions and expulsions in each school with comparisons to district rates and state rates.
	Feedback from a variety of stakeholders indicates that reporting on the percentage of suspensions and expulsions in a school helps to provide a picture of the school's climate and level of student engagement. Stakeholders also expressed concerns that inclusion of this metric in a school's rating could incentivize schools to underreport infractions. This measure will be reported only.
Student/Teacher/Parent Survey (K-12)	Feedback from a wide variety of stakeholders, such as discussion groups, DSEA, and community surveys, indicates that student, teacher, and parent engagement surveys provide a comprehensive picture of school climate and should be included in the accountability

Measure(s)	Description
	system. Conversely, stakeholder feedback also voiced that surveys could be "gamed." This measure will be reported only.
Educator/School Administrator Retention (K-12)	Feedback from community conversations recommended including teacher and school administrator retention as a measure of school climate.
	There is research to support the relationship between teacher and school administrator retention and student learning. These data will be available through the Excellent Educator Dashboard (EED).
Class Size (K-12)	In grades K-5, class size equals the number of students per homeroom as identified in the state's pupil accounting system, eSchoolPLUS, while the total number of classes offered throughout the day are used to calculate class-size distribution for grades 6-12.
	Stakeholders did not provide a strong recommendation regarding inclusion of this metric; however, survey results and community conversations indicated that it is important to report class size. This measure will be reported only.
Specialist-to-Student Ratio (K-12)	Feedback from community conversations and the Measures of School Success and Public Reporting discussion group indicates that student access to counselors, librarians, nurses, school psychologists, and other school-based specialists is an important measure to report. This measure will be reported only.
Equitable Access to Effective Teachers (K-12)	Data relating to educator effectiveness, experience, and teaching out of field will be available through the EED.
	Significant stakeholder feedback indicates a strong desire to include this metric in order to capture which teachers are teaching which students. This measure will be reported only.
	Inclusion of this metric also reinforces ESSA's requirement that low SES and students of color in Title I schools not be taught at higher rates by ineffective, out-of-field, or inexperienced teachers.
Postsecondary Outcomes	Performance for this metric does not currently receive a rating in the accountability system. Rather, the current DSSF reports data associated with this metric, defined as the percent of students who enroll in a postsecondary institution within one year after high school graduation.
	Feedback from the Governor's Advisory Committee recommends that this metric continue to be included in the accountability system. As a result of this feedback, this measure will be reported only and will include college, postsecondary education, apprenticeship, military service, and entrance into the workforce at one-year post graduation.
Rate of ELP Attainment	Percentage of EL students who meet their target (PL 5.0 exit criteria) annually.

B. Subgroups.

i. List the subgroups of students from each major and racial ethnic group in the State, consistent with 34 C.F.R. § 200.16(a)(2), and, as applicable, describe any additional subgroups of students used in the accountability system.

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A.4.i.a. List each major racial and ethnic group the State includes as a subgroup of students, consistent with ESEA section 1111(c)(2)(B).

A.4.i.b. If applicable, describe any additional subgroups of students other than the statutorily required subgroups (*i.e.*, economically disadvantaged students, students from major racial and ethnic groups, children with disabilities, and English learners) used in the Statewide accountability system.

Subgroups included in the DDOE accountability system include

- All students
- American Indian
- African American
- White, Hawaiian/Pacific Islander
- Asian, Hispanic
- Multiracial
- SWD
- EL
- Low SES

Although not required in the accountability determination, consistent with 200.16(a)(2), the DDOE will be also reporting, but not including in DSSF calculations, performance data for the following subgroups: homeless, foster care, and military dependent.

ii. If applicable, describe the statewide uniform procedure for including former children with disabilities in the children with disabilities subgroup for purposes of calculating any indicator that uses data based on State assessment results under section 1111(b)(2)(B)(v)(I) of the ESEA and as described in 34 C.F.R. § 200.16(b), including the number of years the State includes the results of former children with disabilities.

Not applicable.

iii. If applicable, describe the statewide uniform procedure for including former English learners in the English learner subgroup for purposes of calculating any indicator that uses data based on State assessment results under section 1111(b)(2)(B)(v)(I) of the ESEA and as described in 34 C.F.R. § 200.16(c)(1), including the number of years the State includes the results of former English learners.

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A.4.i.c. Does the State intend to include in the English learner subgroup the results of students previously identified as English learners on the State assessments required under ESEA section 1111(b)(2)(B)(v)(I) for purposes of State accountability (ESEA section 1111(b)(3)(B))? Note that a student's results may be included in the English learner subgroup for not more than four years after the student ceases to be identified as an English learner.

☒ Yes

☐ No

The DDOE will include former ELs in academic achievement and academic progress indicators for four years. This decision is the result of public feedback reported from the Measures of School Success and Public Reporting discussion group and from the LEA ESL Coordinators. The longitudinal data analysis of former ELs will allow the DDOE to determine if exited students need additional supports in order to meet academic achievement targets. The continued tracking and inclusion of this subgroup will also equip LEAs with data to provide continued intensive support to former ELs with low literacy levels and who are at risk of failure or dropout within the four years following their exit from EL services.

iv. If applicable, choose one of the following options for recently arrived English learners in the State:

☐ Exception under 34 C.F.R. § 200.16(c)(3)(i) or

☐Exception under 34 C.F.R. § 200.16(c)(3)(ii) or

☐ Exception under section 1111(b)(3) of the ESEA and 34 C.F.R. § 200.16(c)(4)(i)(B). If selected, provide a description of the uniform procedure in the box below.

☒ Other – **DDOE State-Proposed Option 4:** The state would like to propose to the U.S. Department of Education a fourth option for recently arrived EL students.

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A.4.i.d.If applicable, choose one of the following options for recently arrived English learners in the State:

☐ Applying the exception under ESEA section 1111(b)(3)(A)(i); or

☐ Applying the exception under ESEA section 1111(b)(3)(A)(ii); or

☐ Applying the exception under ESEA section 1111(b)(3)(A)(i) or under ESEA section 1111(b)(3)(A)(ii). If this option is selected, describe how the State will choose which exception applies to a recently arrived English learner.

☒ Other – **DDOE State-Proposed Option 4:** The state would like to propose to the U.S. Department of Education a fourth option for recently arrived EL students.

The DDOE defines recently arrived ELs as an EL whose enrollment in any public school in the United States has been less than 12 cumulative months (not consecutive). Recently arrived status only applies to content area testing in grades 3-8 and 11.

It is the DDOE's intention to create an accountability system that is responsive to newly arrived ELs. Historically, newly arrived ELs represent a wide variety of ELP levels as well as diverse prior formal educational experiences. Stakeholders, including the Governor's Advisory Council, the ESL Coordinators, and ESSA community conversation participants, recognize that a high level of ELP is a necessary precursor to academic proficiency. Current research demonstrates that it will take anywhere from five to seven years to meet this high level of proficiency.

Therefore, the DDOE proposes the following option that complements the state's ELP accountability measures and goals. In this option, newly arrived ELs are afforded the time to acclimate to a new educational environment and to develop the academic language needed for success on statewide assessments. This option also highlights the importance of student growth over time toward content proficiency.

Year 1: Provide an exception to the ELA participation requirement and exclude mathematics results from accountability (reported only).

Year 2: ELA and mathematics must be assessed, but results are excluded from accountability (reported only).

Year 3: ELA and mathematics results are only included in the growth indicator.

Year 4: ELA and mathematics results are fully included in accountability.

Inclusion of English Learners' Performance in Accountability

Time in Delaware Schools	Subject	Will Students Participate?	How Will Results be Included?
Year 1	English Language Arts	No	N/A
	Mathematics	Yes	Reported only
Year 2	English Language Arts	Yes	Reported only
	Mathematics	Yes	Reported only
Year 3	English Language Arts	Yes	Included in growth indicator only, but not in the academic achievement indicator
	Mathematics	Yes	Included in growth indicator only, but not in the academic achievement indicator
Year 4	English Language Arts	Yes	Fully included in both growth and academic achievement indicators
	Mathematics	Yes	Fully included in both growth and academic achievement indicators

C. Minimum Number of Students.

i. Provide the minimum number of students for purposes of accountability that the State determines are necessary to be included in each of the subgroups of students consistent with 34 C.F.R. § 200.17(a).

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A.4.ii.a. Provide the minimum number of students for purposes of accountability that the State determines are necessary to be included in each of the subgroups of students

A.4.ii.c. Describe how the minimum number of students was determined by the State, including how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number.

Accountability systems use a minimum number of students (n-size) for determining whether to include a specific metric in a school's accountability rating. The rationale is that, when the number of students is very small, the metric is not likely to be a reliable measure of school performance. Therefore, if the number of students for a metric meets or exceeds the

minimum n-size, the measure is considered reliable and is included in the school's rating. The measure is excluded if the minimum n-size is not met.

The majority of feedback received from multiple stakeholder groups, including the National Downs Syndrome Congress and The Advocacy Institute, indicated a strong desire to decrease the current n-size of 30 in order to address the academic needs of all subgroups of students. The DDOE has decided to lower its n-size to 15, which is consistent with current reporting rules and eliminates the disparity between the current n-size for accountability (30) and reporting (15).

ii. If the State's minimum number of students for purposes of reporting is lower than the minimum number of students for purposes of accountability, provide that number consistent with 34 C.F.R. § 200.17(a)(2)(iv).

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A.4.ii.e. If the State's minimum number of students for purposes of reporting is lower than the minimum number of students for purposes of accountability, provide that number.

The DDOE's minimum number of students for purposes of reporting is not lower than the minimum number of students for purposes of accountability.

iii. Describe how the State's minimum number of students meets the requirements in 34 C.F.R. § 200.17(a)(1)-(2);

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A.4.ii.b. Describe how the minimum number of students is statistically sound.

ESSA Section 200.17(a)(1) prohibits a state from using disaggregated data for reporting purposes or accountability determinations if the number of students in the subgroup is insufficient to yield statistically reliable information. Using a minimum n of 15 for accountability provides both statistical reliability across accountability metric calculations and privacy protection for those subgroups too small to report without disclosing personally identifiable information.

iv. Describe how other components of the statewide accountability system, such as the State's uniform procedure for averaging data under 34 C.F.R. § 200.20(a), interact with the minimum number of students to affect the statistical reliability and soundness of accountability data and to ensure the maximum inclusion of all students and each subgroup of students under 34 C.F.R. § 200.16(a)(2);

The DDOE's accountability system does not average data across years or subgroups. The DSSF uses multiple measures for each required subgroup under Section 200.16(a)(2). To ensure the statistical reliability and soundness of the accountability data, the DDOE will use an n-size of 15.

v. Describe the strategies the State uses to protect the privacy of individual students for each purpose for which disaggregated data is required, including reporting under section 1111(h) of the ESEA and the statewide accountability system under section 1111(c) of the ESEA;

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A.4.ii.d. Describe how the State ensures that the minimum number is sufficient to not reveal any personally identifiable information.

The DDOE uses a two-tiered approach to disclosure avoidance. When reporting aggregate counts for mutually exclusive subgroups (e.g., race/ethnicity subgroups or subgroups by grade) where the total for all subgroups is also reported, the DDOE suppresses aggregate data reporting for subgroups smaller than the minimum n-size. When reporting percentages, true percentages will be capped if those percentages and the counts that underlie them compromise student privacy. The DDOE will use an n-size of 15.

vi. Provide information regarding the number and percentage of all students and students in each subgroup described in 4.B.i above for whose results schools would not be held accountable under the State's system for annual meaningful differentiation of schools required by 34 C.F.R. § 200.18;

The table below shows the number of students excluded from accountability calculations based on changes in n-size. The current n-size is n=30. The proposed n-size is n=15.

For example, using an n-size of 30, 366 African American students are excluded from accountability statewide. By decreasing the n-size to 20, 138 African American students are excluded. If the n-size is reduced to 15, 60 African American students are excluded, and with an n-size of 10, 14 are excluded.

Demographic	Total n	n=30	n=20	n=15	n=10
African American	**38,765**	366	138	60	14
American Indian	**512**	512	512	512	424
Hispanic/Latino	**19,243**	760	352	158	70
Asian	**4,629**	1,556	1,023	750	401
Hawaiian	**151**	151	151	151	140
White	**59,626**	437	224	140	91
Multiracial	**3,507**	2,079	1,132	679	316
EL	**8,329**	1,291	877	491	248
Low SES	**42,867**	366	171	77	26
SWD	**19,157**	377	74	41	41

Feedback from the Governor's Advisory Committee indicated an interest in seeing how many *schools* would be excluded at each n-size. The table below illustrates how many schools, out of 215 total statewide, would meet the various minimum n thresholds for each demographic area. As n-size decreases, the number of schools held accountable for each subgroup increases.

Schools Excluded	n=30	n=20	n=15	n=10	Total # of Schools
African American	14	6	3	0	215
American Indian	215	215	213	205	215
Hispanic/Latino	34	22	14	7	215
Asian	168	140	129	108	215
Hawaiian	215	215	215	214	215
White	25	18	13	8	215
Multiracial	161	120	91	61	215
EL	105	83	72	47	215
Low SES	8	7	2	0	215
SWD	12	4	3	3	215

vii. If an SEA proposes a minimum number of students that exceeds 30, provide a justification that explains how a minimum number of students provided in 4.C above promotes sound, reliable accountability determinations, including data on the number and percentage of schools in the State that would not be held accountable in the system of annual meaningful differentiation under 34 C.F.R. § 200.18 for the results of students in each subgroup in 4.B.i above using the minimum number proposed by the State compared to the data on the number and percentage of schools in the State that would not be held accountable for the results of students in each subgroup if the minimum number of students is 30.

The DDOE is not considering using an n-size that exceeds 30.

D. Annual Meaningful Differentiation. Describe the State's system for annual meaningful differentiation of all public schools in the State, including public charter schools, consistent with the requirements of section 1111(c)(4)(C) of the ESEA and 34 C.F.R. §§ 200.12 and 200.18.

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A.4.v.a. Describe the State's system of annual meaningful differentiation of all public schools in the State, consistent with the requirements of section 1111(c)(4)(C) of the ESEA, including a description of (i) how the system is based on all indicators in the State's accountability system, (ii) for all students and for each subgroup of students. Note that each state must comply with the requirements in 1111(c)(5) of the ESEA with respect to accountability for charter schools.

Starting in the summer of 2014, the DDOE engaged with stakeholders across the state to devise a comprehensive and authentic structure for measuring school and LEA performance. As a result of these consultations, the DSSF was designed to incorporate multiple academic and nonacademic measures related to college and career readiness for all students.

The DDOE will continue to implement the DSSF to categorize performance of all public schools. To aid in meaningful differentiation between schools and between LEAs, ratings are based on performance in each indicator (Academic Achievement, Academic Progress, School Quality/Student Success, Graduation Rate, and Progress Toward English Language Proficiency).

Student data for each indicator will be reported and disaggregated at the school and LEA levels. Data will be aggregated to generate a numeric score for each indicator. Weighted indicator scores will then be combined to create a summative index score for the school. The summative index score will then be translated into an overall text-based identification (i.e. exceeds, meets or meets few expectations) based on a summative index score. Terminology to be used for text-based identifications will be developed through stakeholder consultation.

Summative index scores will also be used to identify schools for Comprehensive Support and Improvement (CSI), while subgroup summative index scores will be used to identify schools for Targeted Support and Improvement (TSI). Schools that do not fall in one of these two categories will be identified as "Other". DDOE will develop final school support designation titles for CSI, TSI, and "other" schools through stakeholder consultation. Schools identified as CSI will receive the highest level of supports, and TSI schools will receive supports targeted to supporting specific populations in order to foster continuous improvement.

While the DSSF applies to all schools, Delaware charter schools are also held to additional standards of accountability and transparency. Adherence to state Charter School Performance Frameworks (http://www.doe.k12.de.us/Page/2267) is required at the point of application as well as during annual reporting of charter school performance, formal review, and renewal processes as mandated by Delaware's charter school law. Charter school performance is reported for each charter school and collectively for all charter schools annually.

Describe the following information with respect to the State's system of annual meaningful differentiation:

i. The distinct and discrete levels of school performance, and how they are calculated, under 34 C.F.R. § 200.18(a)(2) on each indicator in the statewide accountability system;

Under the current multiple measures accountability system, schools and districts receive ratings based on performance in each indicator (e.g., Academic Achievement, Growth, On Track to Graduation, and College and Career Preparation). With the proposed refinements to the DSSF, there are five indicators (Academic Achievement, Academic Progress, School Quality/Student Success, Graduation Rate, and Progress Toward English Language Proficiency). Student data for each indicator will be reported and disaggregated at the school and LEA levels. Data will be aggregated to generate a numeric score for each indicator. Weighted indicator scores will then be combined to create a summative index score for the school. The summative index score will then be translated into an overall text-based identification (i.e., exceeds, meets, or meets few expectations) based on the summative index score. Terminology used for text-based identifications will be developed through stakeholder consultation.

Summative index scores will also be used to identify schools for CSI, while subgroup summative index scores will be used to identify schools for TSI. Schools that do not fall in one of these two categories will be identified as "Other". DDOE will develop final school support designation titles for CSI, TSI, and "other" schools through stakeholder consultation. Schools identified as CSI will receive the highest level of supports, and TSI schools will receive supports targeted to supporting specific populations in order to foster continuous improvement.

Under ESSA, schools will be identified for CSI and TSI during the 2018-2019 school year using 2017-2018 data. DDOE will have the ability to calculate the new DSSF by the end of November 2018, which will afford identified schools time to conduct their comprehensive needs assessments and develop plans during the remainder of the 2018-2019 school year. Implementation of those plans must begin no later than the beginning of the 2019-2020 school year.

ii. The weighting of each indicator, including how certain indicators receive substantial weight individually and much greater weight in the aggregate, consistent with 34 C.F.R. § 200.18(b) and (c)(1)-(2).

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A.4.v.b. Describe the weighting of each indicator in the State's system of annual meaningful differentiation, including how the Academic Achievement, Other Academic, Graduation Rate, and Progress in ELP indicators each receive substantial weight individually and, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate.

Feedback from community conversations, surveys, DSEA, the Governor's Advisory Committee, and the Measures of School Success and Public Reporting Discussion Group highlighted the importance of weighting student growth more than absolute proficiency in order to capture progress at the school level. Feedback also highlighted the importance of providing considerable weight to learning conditions such as school quality and student learning opportunities.

Based on this feedback, combined with the ESSA requirement that academic factors, in the aggregate, be given more "substantial weight" than nonacademic indicators, the DDOE seeks to utilize the following weights at the indicator level:

- Academic Achievement – 25%
- Academic Progress – 30% (growth metrics to include overall growth, growth to proficiency, and growth of the lowest and highest quartiles)
- School Quality/Student Success – 25%
- Graduation Rate – 10%
- Progress Toward ELP – 10%

With the proposed weighted measures outlined above, the DDOE's accountability system will contain an aggregate of 75% academic metrics. A group of data stewards and experts representative of all LEAs in Delaware and data experts at the DDOE will model and vet the final weighting of the metrics within the DSSF.

iii. The summative determinations, including how they are calculated, that are provided to schools under 34 C.F.R. § 200.18(a)(4).

DDOE will calculate summative index scores and provide both summative text-based identifications and summative school support designations. The summative index score will be translated into an overall text-based identification (i.e., exceeds, meets, or meets few expectations) based on the summative index score. Terminology used for text-based identifications will be developed through stakeholder consultation.

Identification of public schools for CSI will be calculated by rank ordering Title I schools as measured by the overall score on the DSSF and identifying the 5% lowest-performing Title I schools.

Feedback from the School Support and Improvement Survey, the Governor's Advisory Committee, and the community conversations indicates that DDOE stakeholders believe that "all schools" should be considered when identifying CSI status rather than just Title I only or Title I eligible schools. More than twice as many participants in the community conversations felt that all schools should be considered for identification, a vast majority of the advisory committee agreed, and 55% of those surveyed indicated the same. Based on this stakeholder feedback, the DDOE will consider all schools when identifying schools for CSI. The DDOE will allocate state school improvement funds to support non-Title I schools that perform as low or lower than the 5% lowest-performing Title I schools.

TSI-1 schools will be identified based on an index across all indicators of the DSSF for each student subgroup. This subgroup summative index score will then be compared to the performance of all students in CSI schools. The DDOE will then rank the performance of each subgroup in this set of schools. The 5% of accountability schools with the lowest-performing subgroup summative index scores will be identified as TSI-1 schools.

Feedback from chiefs and charter school directors indicate that, in addition to summative index scores and summative text-based identifications, summative school determinations as CSI, TSI, and a third "Other" determination should be reported on school report cards. DDOE will include both the summative text-based identification and the summative school support designation for each school on the school report cards.

DDOE will develop final school support designation titles for CSI, TSI, and "other" schools through stakeholder consultation.

iv. How the system for meaningful differentiation and the methodology for identifying schools under 34 C.F.R. § 200.19 will ensure that schools with low performance on substantially weighted indicators are more likely to be identified for comprehensive support and improvement or targeted support and improvement, consistent with 34 C.F.R. § 200.18(c)(3) and (d)(1)(ii).

The DSSF is comprised of indicators, or metric areas, that have varying weights. The academic achievement, academic progress, graduation rate, and progress toward ELP indicators, in aggregate, weigh substantially more than the school quality/student success indicator.

All indicators, with their varying weights, will be aggregated into an overall score. The range of possible overall scores is from 0 to 500. Actual overall scores for schools based on current data for all students range from about 80 to 450. Based on current data, the schools in the lowest-performing 5% of Title I schools (potential CSI schools) for their overall DSSF score are also consistently among the lowest-performing schools on the substantially weighted indictors.

Weighted DSSF calculations will also be performed for each subgroup in each school to identify TSI schools. Data modeling shows that that the schools with the lowest-performing subgroups will be the ones most likely identified for TSI.

E. Participation Rate. Describe how the State is factoring the requirement for 95 percent student participation in assessments into its system of annual meaningful differentiation of schools consistent with the requirements of 34 C.F.R. § 200.15.

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A.4.vii. Annual Measurement of Achievement *(ESEA section 1111(c)(4)(E)(iii))*: Describe how the State factors the requirement for 95 percent student participation in statewide mathematics and reading/language arts assessments into the statewide accountability system.

Took out reference to regulations

As required by federal law, the DDOE is committed to all schools meeting the 95% student participation for all students and for all subgroups. DDOE will report the participation rates for schools. For schools that do not meet the 95% participation rate, DDOE will require each school to submit a plan that includes strategies for meeting participation requirements. For schools that do not meet the participation rate for multiple years or that does not show sustained improvement in meeting the 95% participation rate, DDOE will implement additional actions and interventions as appropriate.

F. Data Procedures. Describe the State's uniform procedure for averaging data, including combining data across school years, combining data across grades, or both, in a school as defined in 34 C.F.R. § 200.20(a), if applicable.

The DDOE does not currently average data across school years. However, DDOE is considering data averaging as this procedure helps to mitigate statistical anomalies. These anomalies tend to be seen in small schools where one student's data could dramatically sway overall school performance.

G. Including All Public Schools in a State's Accountability System. If the States uses a different methodology for annual meaningful differentiation than the one described in D above for any of the following specific types of schools, describe how they are included, consistent with 34 C.F.R. § 200.18(d)(1)(iii):

i. Schools in which no grade level is assessed under the State's academic assessment system (e.g., P-2 schools), although the State is not required to administer a standardized assessment to meet this requirement;

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A.4.v.c. If the States uses a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a. above for schools for which an accountability determination cannot be made (*e.g.*, P-2 schools), describe the different methodology or methodologies, indicating the type(s) of schools to which it applies.

For those schools whose grade configuration does not require the administration of a statewide academic assessment (e.g., K-2 schools), the DDOE's current accountability system attributes a portion of each applicable third grader's academic performance on a prorated basis to the schools in which they attended grades K-2. That performance is then aggregated to attribute an accountability score to those schools with non-assessed grades. The school that provided kindergarten services would be accountable for 10% of the score; the school that provided first grade services gets 20% of the score; the school that provided

second grade services gets 30% of the score; the school that provided third grade services gets 40% of the score. DDOE will continue to use this methodology.

ii. Schools with variant grade configurations (e.g., P-12 schools);

For those schools with grade configurations that span both elementary and secondary grades, (e.g., P-12 schools), the DDOE's current accountability system treats these schools as secondary schools to generate an accountability rating.

iii. Small schools in which the total number of students who can be included in any indicator under 34 C.F.R. § 200.14 is less than the minimum number of students established by the State under 34 C.F.R. § 200.17(a)(1), consistent with a State's uniform procedures for averaging data under 34 C.F.R. § 200.20(a), if applicable;

Any metric with an n-size smaller than the accountability threshold will not be included when calculating accountability ratings. The points associated with those metrics will either be redistributed to other metrics within that indicator, or they will be subtracted from the total number of points possible. For example, if a school has no tested grades in science, either the points associated with the science metric will be redistributed to ELA, mathematics, and social studies, or the total number of points for the academic achievement indicator will be reduced according to the business rules.

iv. Schools that are designed to serve special populations (e.g., students receiving alternative programming in alternative educational settings; students living in local institutions for neglected or delinquent children, including juvenile justice facilities; students enrolled in State public schools for the deaf or blind; and recently arrived English learners enrolled in public schools for newcomer students); and

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A.4.v.c. If the States uses a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a. above for schools for which an accountability determination cannot be made (*e.g.*, P-2 schools), describe the different methodology or methodologies, indicating the type(s) of schools to which it applies.

There are two categories used to identify the accountability status of a school, including schools that serve special populations:

- Category 1 – Schools that are Title I schools for the given year.
- Category 2 – Schools that are not Title I schools for the given year but have enrolled students generated through the unit count process.

If a school falls within either of these two categories, the school receives an accountability rating. However, some schools serving special populations are not considered accountability schools. In this case, students are reassigned back to an appropriate accountability school. As such, the DDOE accountability system captures all students regardless of the school they attend. Charter schools that are identified as serving "at-risk" students are governed under state charter school law and may have alternate measures above and beyond the measures included in the statewide accountability system.

v. Newly opened schools that do not have multiple years of data, consistent with a State's uniform procedure for averaging data under 34 C.F.R. § 200.20(a), if applicable, for at

least one indicator (e.g., a newly opened high school that has not yet graduated its first cohort for students).

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A.4.v.c. If the States uses a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a. above for schools for which an accountability determination cannot be made (*e.g.*, P-2 schools), describe the different methodology or methodologies, indicating the type(s) of schools to which it applies.

Newly opened schools with at least one state assessment-eligible grade currently receive an accountability determination per the DDOE's accountability business rules. If the newly opened school has a grade configuration that does not require a statewide assessment, current business rules stipulate they do not receive an accountability score until such time as their grade configuration expands to state assessment-eligible grades or their students matriculate into state assessment-eligible grades, whichever comes first.

4.2 Identification of Schools.

A. Comprehensive Support and Improvement Schools. Describe:

i. The methodologies, including the timeline, by which the State identifies schools for comprehensive support and improvement under section 1111(c)(4)(D)(i) of the ESEA and 34 C.F.R. § 200.19(a) and (d), including: 1) lowest-performing schools; 2) schools with low high school graduation rates; and 3) schools with chronically low-performing subgroups.

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A.4.vi.a. Comprehensive Support and Improvement Schools. Describe the State's methodology for identifying not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement, including the year in which the State will first identify such schools.

A.4.vi.b. Comprehensive Support and Improvement Schools. Describe the State's methodology for identifying all public high schools in the State failing to graduate one third or more of their students for comprehensive support and improvement, including the year in which the State will first identify such schools.

A.4.vi.c. Comprehensive Support and Improvement Schools. Describe the methodology by which the State identifies public schools in the State receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d)(2)(C) (based on identification as a school in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D)) and that have not satisfied the statewide exit criteria for such schools within a State-determined number of years, including the year in which the State will first identify such schools.

A.4.vi.d. Frequency of Identification. Provide, for each type of school identified for comprehensive support and improvement, the frequency with which the State will, thereafter, identify such schools. Note that these schools must be identified at least once every three years.

A.4.vi.g. Additional Statewide Categories of Schools. If the State chooses, at its discretion, to include additional statewide categories of schools, describe those categories.

CSI School Identification: ESSA specifies that SEAs "establish a state-determined methodology to identify beginning with school year 2017-2018, and at least once every three

school years thereafter one statewide category of schools for comprehensive support and improvement". Schools meeting the following criteria are required to be identified:

- *Lowest-Performing 5% of Title I Schools (CSI-1)*: The lowest-performing 5% of all Title I schools in the state (based on performance on accountability framework over no more than 3 years).
- *Low Graduation Rate High Schools (CSI-2)*: All public schools (Title I or non-Title I) that graduate less than 67% of their students. States can set a higher graduation rate requirement.
- *Schools with Chronically Low-Performing Subgroups (CSI-3)*: Any Title I school with at least one chronically low-performing subgroup of students. Chronically low-performing subgroup of students is defined as a subgroup that is performing as poorly as all students in any of the lowest performing 5% of Title I schools and that has not sufficiently improved (as defined by the state) after implementation of a TSI plan over no more than three years.
- *CSI-Re-identified (CSI-R):*
  - Schools identified as Priority Schools under ESEA Flex and have not yet met exit targets will automatically be elevated to CSI-R status if they are re-identified under ESSA accountability measures.
  - Schools initially identified under ESSA that do not meet CSI targets within the identification cycle will be "re-identified" as CSI-R.

The identification of CSI schools will be determined based on an index across all indicators of the DSSF. DDOE will use summative index scores to identify the lowest-performing schools in the state. Using this methodology, the state will identify CSI schools every three years.

Feedback from the School Support and Improvement Survey, the Governor's Advisory Committee, and the community conversations indicates that DDOE stakeholders believe that "all schools" should be considered when identifying CSI status rather than just Title I only or Title I-eligible schools. More than twice as many participants in the community conversations felt that all schools should be considered for identification, a vast majority of the Governor's Advisory Committee agreed, and 55% of those surveyed indicated the same. Based on this stakeholder feedback, the DDOE will consider all schools when identifying CSI schools. With regard to the consideration of all schools for CSI identification, the DDOE will allocate state school improvement funds to support non-Title I schools that perform as low or lower than the 5% lowest-performing Title I schools.

When asked to consider whether the state should use the lowest 5% of all schools or the lowest 5% of schools by each grade span (elementary, middle, and high), two stakeholder groups (surveys and community conversations) clearly indicated that the state should identify schools by grade span. Conversely, the majority of the Governor's Advisory Committee conveyed that the schools should be determined by rank order.

Took out reference to regulations & previous template versions

Subsequent data modeling suggests that rank order will identify schools across all grade spans. Therefore, the DDOE decided to identify the lowest 5% of schools in rank order.

In addition, all public high schools (Title I or non-Title I) that graduate less than 67% of their students will be identified for CSI beginning in the 2018-2019 school year using 2017-2018 four-year cohort graduation rate data.

Per ESSA Section 1111(d)(3)(A)(i)(II), TSI-1 schools that do not meet exit targets within three years will be identified for CSI beginning November 2022.

The DDOE will identify CSI schools by the end of November 2018 using 2017-2018 school year data. LEAs and schools will then conduct needs assessment and planning prior to implementation by the beginning of the 2019-2020 school year. LEAs will assist schools in conducting a needs assessment, analyzing the data, and developing school improvement plans. The DDOE will provide support and assistance to LEAs in the form of:

- Planning tools and templates;
- Sample needs assessment tools;
- Root cause analysis;
- Fiscal and plan monitoring;
- Evidence-based resources/strategies;
- Assistance in plan development and grant application; and
- Deploying DDOE experts for ongoing support.

LEAs will not be required to use the DDOE identified tools and resources; however, if an LEA elects to use a locally developed template, it must meet DDOE approval and ESSA needs assessment, planning, and budgeting requirements.

CSI schools will be identified in November every three years beginning in November 2018. Identification will be based on the prior school year's data (DSSF indicator index, four-year graduation cohort rate), and whether prior-cycle TSI exit targets are or are not met.

ii. The uniform statewide exit criteria for schools identified for comprehensive support and improvement established by the State, including the number of years over which schools are expected to meet such criteria, under section 1111(d)(3)(A)(i) of the ESEA and consistent with the requirements in 34 C.F.R. § 200.21(f)(1).

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A.4.viii.a. Exit Criteria for Comprehensive Support and Improvement Schools. Describe the statewide exit criteria, established by the State, for schools identified for comprehensive support and improvement, including the number of years (not to exceed four) over which schools are expected to meet such criteria.

Took out reference to regulations

Exit criteria for CSI schools:

ESSA requires the state to establish uniform statewide exit criteria for schools implementing a CSI plan. At a minimum, exit criteria must require that within a state-determined number of years (not to exceed four years), the school: 1) improves student outcomes; and 2) no longer meets the criteria for identification as a CSI school (suggesting that exit criteria need to be aligned to the state's accountability framework).

The majority of individuals across all the stakeholder groups agreed that the exit criteria for schools identified for CSI status should be the same as the criteria for which the school was identified. Similarly, the stakeholder groups agreed that schools should have up to four years to exit CSI status. When asked, "If a school meets its exit criteria early (less than four years),

what should be the next step?" once again most stakeholders (surveys, community conversations, Governor's Advisory Committee) conveyed that the state should require schools to meet targets for a second year in order to validate and sustain outcomes for students. In that regard, the stakeholders also indicated that schools should develop a "sustainability plan" while receiving additional funding as well as ongoing monitoring and technical assistance from the DDOE.

Schools identified for CSI status will be identified every three years. LEAs will have up to one year for improvement planning and up to three years to exit CSI status (not exceeding four years in total). The DDOE will identify the first cohort of CSI schools by the end of November 2018, using 2017-2018 data. The subsequent cohorts of CSI schools will be identified in November for each identification cycle.

The circumstances and factors contributing to the status of each school vary. This will require the DDOE to provide individualized support to schools and LEAs. During the "Needs Analysis" phase, the DDOE will work with the LEA and school to examine previous school improvement efforts. This will include examining evidence of effectiveness and implementation of programs, systems, strategies, initiatives, assessments, staffing, and other factors that were intended to drive improvement.

ESSA Title I, Part A, § 1111(d)(3) requires states to establish exit targets for identified schools. Once schools are identified, the DDOE will negotiate CSI exit targets with LEAs based on the data from 2017-2018 school year. The DDOE will collaborate with LEAs to establish ambitious but achievable targets that will improve outcomes for students as indicated by the DSSF. The intent is to set targets that are relevant and appropriate to the needs of the individual school communities and that are reasonable to the extent that the school will not be immediately re-identified in the next identification cycle. When determining the exit targets, the DDOE will examine performance on each DSSF indicator for the identified school and work with the LEA to customize the individual indicator targets to reflect appropriate growth needed for the individual school.

Note: Any charter school identified for CSI will be placed on the formal review process as outlined in 14 Del Code § 515 and follow the formal review process in lieu of the CSI process.

If a school does not exit CSI status within four years, what should be the next step?

The participants from the community conversations most commonly identified the need to conduct a comprehensive analysis to diagnose the reasons why the school did not exit and develop a new plan to address the specific issues based on root causes. The survey feedback echoed similar sentiments with 60% of respondents indicating, "Enhanced on-site technical assistance and professional learning," provided by the DDOE with an additional 40% requesting, "More intensive support and oversight to schools," and a "Leadership capacity review."

Schools identified as Priority Schools under ESEA Flex and have not yet met exit targets will automatically be elevated to CSI-R status if they are re-identified under ESSA accountability measures. In addition, schools that do not exit CSI status within four years will enter CSI-R status. DDOE will work collaboratively with the LEA and CSI-R school to identify an

external partner to conduct qualitative needs assessments at both the school and district levels.

The qualitative needs assessments will examine the efficacy of previous school improvement efforts/plans and current school conditions. This will also include an assessment of the leadership capacity/competency at the school and district level. By using an external partner to conduct the qualitative needs assessment, the LEA/school will get an unbiased, objective assessment of the school from a fresh perspective.

The results of these qualitative needs assessments will be one component of the required comprehensive needs assessment, which also includes quantitative data analysis related to DSSF measures, school profile data, educator equity data, financial risk assessments, program analyses, community input, and additional LEA data. Funding for the external needs assessment may come from the CSI-R grant or other funding sources. The DDOE will work with IHEs and other external partners to develop local, effective, and cost-efficient external evaluators and evaluation systems.

The DDOE will work collaboratively with the LEA/school to examine the findings of the needs assessment and provide support in the development of an appropriate and actionable improvement plan. Additional data analyses (quantitative data described above) will be used to identify which of the previous interventions should or should not be continued and to determine if other evidence-based strategies are needed.

B. Targeted Support and Improvement Schools. Describe:

i. The State's methodology for identifying any school with a "consistently underperforming" subgroup of students, including the definition and time period used by the State to determine consistent underperformance, under 34 C.F.R. § 200.19(b)(1) and (c).

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A.4.vi.e. Targeted Support and Improvement. Describe the State's methodology for annually identifying any school with one or more "consistently underperforming" subgroups of students, based on all indicators in the statewide system of annual meaningful differentiation, including the definition used by the State to determine consistent underperformance. *(ESEA section 1111(c)(4)(C)(iii))*

TSI School Identification: ESSA calls for schools to be identified as in need of "targeted support and improvement" if they have at least one subgroup of students underperforming. ESSA calls for two types of TSI schools:

- *Low-Performing Subgroup at Level of Lowest 5% of Schools (TSI-1)*: Schools (Title I or non-Title I) with at least one low-performing subgroup of students, defined as a subgroup of students that is performing as poorly as all students in any of the lowest-performing 5% of Title I schools (CSI schools).
- *Consistently Underperforming Subgroups (TSI-2)*: Schools (Title I or non-Title I) that have at least one "consistently underperforming" subgroup as identified through a DDOE-established methodology (to be determined) based on the state's accountability system.

TSI-2 schools will be identified using similar methodology as used for the identification of TSI-1 schools as outlined in section 4.2.B.ii; however, TSI-2 schools will be identified based on all accountability schools not already identified under CSI or TSI-1. TSI-2 will be identified annually beginning in November 2019. The DDOE will consider TSI-2 schools as "watch list" schools and will provide technical assistance to support LEAs, similar to the supports provided to TSI-1 schools. The LEA will help schools develop and monitor a plan for targeted support and improvement. If TSI-2 schools do not make sufficient progress prior to the next identification cycle for CSI and TSI-1, they may be identified for TSI-1.

ii. The DDOE's methodology, including the timeline, for identifying schools with low-performing subgroups of students under 34 C.F.R. § 200.19(b)(2) and (d) that must receive additional targeted support in accordance with section 1111(d)(2)(C) of the ESEA.

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A.4.vi.f. Additional Targeted Support. Describe the State's methodology, for identifying schools in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D), including the year in which the State will first identify such schools and the frequency with which the State will, thereafter, identify such schools. *(ESEA section 1111(d)(2)(C)-(D))*

The DDOE will first identify schools for CSI as outlined in section 4.2.A. TSI-1 schools will be identified based on an index across all indicators of the DSSF for each student subgroup. This subgroup summative index score will then be compared to the performance of all students in CSI schools. The DDOE will then rank the performance of each subgroup in this set of schools. The 5% of accountability schools with the lowest-performing subgroups will be identified as TSI-1 schools. The DDOE will identify TSI-1 schools every three years based on the prior school year's data (DSSF indicator index for each subgroup of students). The first identification will be in November 2018 using 2017-2018 data.

Please see above section 4.2.A for stakeholder feedback regarding school improvement identification.

SY 17-18	• ***Continuation of school support and improvement cycle under Ed Flex Waiver*** • Year 2 implementation for Focus • Year 3 for Focus Plus, and Priority Schools • DDOE technical assistance and support to LEAs and schools ➢ ***Baseline data for first cohort identification, support and improvement cycle (under ESSA)***
SY 18-19	• Year 3 implementation for Focus • Sustainability for Focus Plus and Priority Schools until ESSA identification in November 2018 • DDOE technical assistance and support to LEAs and schools ➢ ***First cohort identification and improvement cycle begins (under ESSA)*** ➢ November (2018): CSI and TSI-1 schools identified ➢ November-May (2018-2019): CSI and TSI-1 target setting and needs assessment/planning support to LEAs and schools; may include planning grants, depending on funding ➢ May-July (2019): CSI plan and grant submission to DDOE; TSI-1 plan approval by LEA + TSI-1 grant submission to DDOE
SY 19-20	➢ July-August (2019): CSI plan approval and funding to LEAs ➢ Year 1 implementation for CSI and TSI-1 schools ➢ DDOE technical assistance and support to LEAs and schools ➢ November (2019): first annual TSI-2 schools identified ➢ November-May (2019-2020): TSI-2 target setting, needs assessment and planning support to LEAs and schools ➢ May-July (2020): CSI & TSI-1 year 2 plan review/reflect and grant submission to DDOE
SY 20-21	➢ July-August (2020): CSI plan approval and funding to LEAs ➢ Year 2 implementation for CSI and TSI-1 schools ➢ DDOE technical assistance and support to LEAs and schools ➢ Year 1 implementation for TSI-2 schools ➢ November (2020): annual TSI-2 schools identified ➢ November-May (2020-2021): TSI-2 target setting, needs assessment and planning support to LEAs and schools ➢ May-July (2021): CSI & TSI-1 year 3 plan review/reflect and grant submission to DDOE
SY 21-22	➢ July-August (2021): CSI funding to LEAs ➢ Year 3 implementation for CSI and TSI-1 schools ➢ Year 2 implementation for TSI-2 schools ➢ November (2021): annual TSI-2 schools identified ➢ November-May (2021-2022): TSI-2 target setting, needs assessment and planning support to LEAs and schools ➢ DDOE technical assistance and support to LEAs and schools
SY 22-23	➢ ***Second Cohort school identification and improvement cycle begins (under ESSA)*** ➢ November (2022): ***CSI-R***, TSI-1, and CSI schools identified ➢ November-May (2022-2023): ***CSI-R***, TSI-1, and CSI target setting and needs assessment/planning support to LEAs and schools ➢ May-July (2023): ***CSI-R***, TSI-1, and CSI plan and grant submission to DDOE; TSI-1 plan approval by LEA ➢ November (2022): annual TSI-2 schools identified ➢ November-May (2022-2023): TSI-2 target setting, needs assessment and planning support to LEAs and schools ➢ DDOE technical assistance and support to LEAs and schools

TSI-1: Low-Performing Student Subgroup at level of lowest 5% of school (based on DSSF scoring index)

TSI-2: Consistently Underperforming Schools (based on DSSF scoring index)

CSI-R: Re-Identified CSI Schools; at each three-year school identification and improvement analysis

Exit Targets: Set at time of identification; specific DSSF score index is the determining factor for identification and exit

iii. The uniform exit criteria, established by the SEA, for schools participating under Title I, Part A with low-performing subgroups of students, including the number of years over which schools are expected to meet such criteria, consistent with the requirements in 34 C.F.R. § 200.22(f).

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A.4.viii.b. Exit Criteria for Schools Receiving Additional Targeted Support. Describe the statewide exit criteria, established by the State, for schools receiving additional targeted support under ESEA section 1111(d)(2)(C), including the number of years over which schools are expected to meet such criteria.

Schools identified for TSI-1 status will be identified every three years. LEAs will have up to one year for improvement planning and up to three years to exit TSI-1 status (not exceeding four years in total). The DDOE will identify the first cohort of TSI schools by November 2018. LEAs and schools will then conduct a comprehensive needs assessment and planning prior to implementation by the beginning of the 2019-2020 school year. Subsequent cohorts of TSI-1 schools will be identified by November each year. Schools and LEAs will conduct needs assessments between November and May, and begin implementation prior to the following school year.

ESSA Title I, Part A, § 1111(d)(3) requires states to establish exit targets for identified schools. Once identified, the DDOE will negotiate with LEAs to determine TSI-1 exit targets using baseline data from the 2017-2018 school year. The DDOE in collaboration with the LEAs will establish ambitious but achievable targets that will improve outcomes for students as indicated by the DSSF. The intent will be to set targets that are relevant and appropriate to the needs of the individual school communities and that are reasonable to the extent that the school will not be identified as CSI status in the next identification cycle. When determining the exit targets, the DDOE will examine performance on each DSSF indicator for the identified school in each subgroup that led to identification. The DDOE will work with the LEA to customize the individual indicator targets to reflect appropriate growth needed for the individual school.

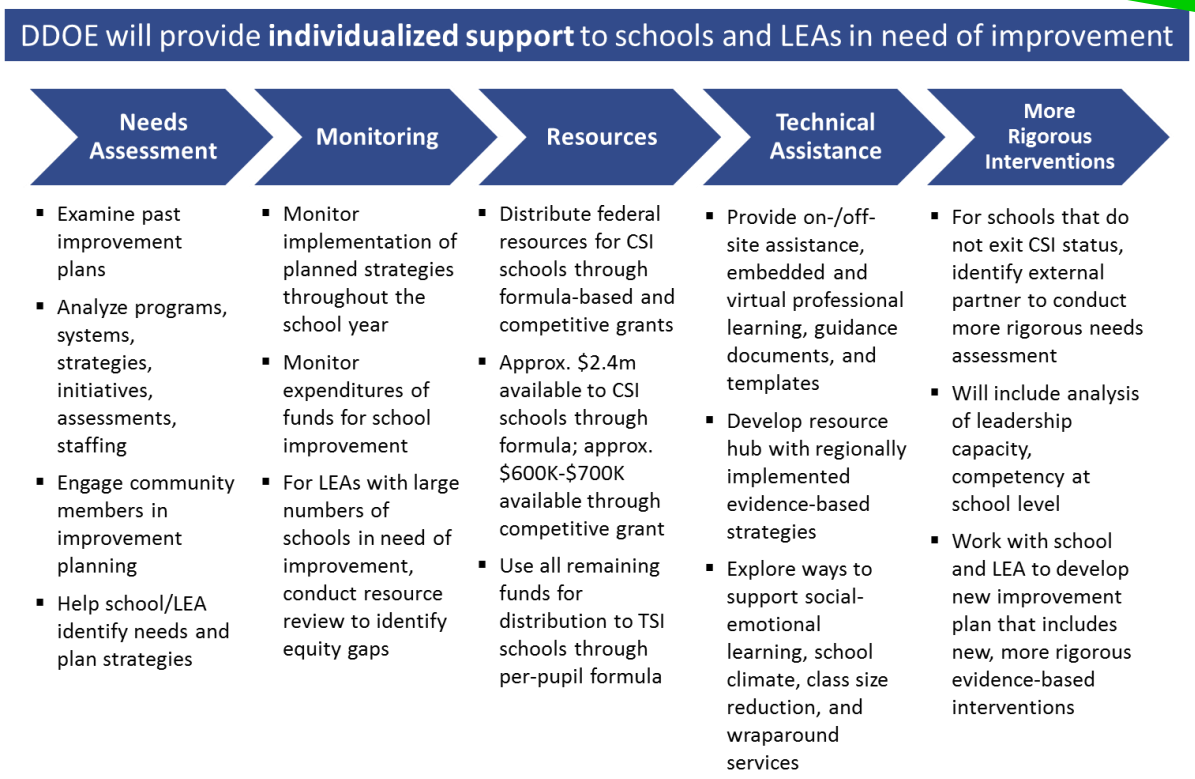
Per ESSA Section 1111(d)(3)(A)(i)(II), TSI-1 schools that do not meet exit targets within three years will be identified for CSI.

4.3 State Support and Improvement for Low-Performing Schools.

A. School Improvement Resources. Describe how the SEA will meet its responsibilities, consistent with 34 C.F.R. § 200.24(d) under section 1003 of the ESEA, including the process to award school improvement funds to LEAs and monitoring and evaluating the use of funds by LEAs.

The DDOE intends to build sustainable continuous improvement leadership at the LEA and school level by providing differentiated supports throughout the needs assessment, planning, and implementation process. DDOE supports will be provided based on the individual needs of each LEA and school and will be reduced as LEA and school expertise grow. The following graphic summarizes the range of individualized supports the DDOE will provide to schools and LEAs in need of improvement.

New graphic



Individualization will be key in the school improvement process. The circumstances and factors contributing to the status of each school vary from school to school. This will require the DDOE to provide individualized support to schools and LEAs. During the "Needs Analysis" phase, the DDOE will work with the LEA and school to examine previous school improvement efforts/ plans. This will include looking at programs, systems, strategies, initiatives, assessments, staffing, and all factors that were intended to bring about change in that school. It will be important for the school/LEA to understand the context and environment in which these prior efforts occurred and the fidelity of implementation. The intent is to conduct an honest and comprehensive needs assessment; develop an actionable, ambitious, and realistic plan with a clear focus; and implement that plan with fidelity and support.

Another element necessary for successful school improvement is community engagement. Schools under improvement must engage stakeholders in a meaningful way to conduct an honest needs assessment and develop an appropriate improvement plan to address identified needs.

The DDOE will work with LEAs/schools to engage the community in a much more open, comprehensive way. The DDOE will support LEA and school engagement efforts with families, the community, local businesses, and other agencies.

As mentioned in Section 2.2.C with regard to the continuous improvement cycle, the DDOE will provide technical assistance and guidance to LEAs to assist in completing a comprehensive needs assessment. The comprehensive needs assessment will be required as part of the consolidated grant application process. The DDOE will support and guide LEAs in identifying and prioritizing greatest needs and in planning long- and short-term implementation strategies. The DDOE intends to build continuous improvement leadership at the LEA and school level by providing supports throughout the needs assessment, planning, and implementation process.

The DDOE will monitor implementation of targeted strategies throughout the year and provide information on evidence-based best practices, supporting resources, on-demand guidance, and other technical assistance to support effective execution and implementation. In particular, the DDOE will monitor school improvement implementation and expenditures of related funds as part of the monthly check-ins. This will include the examination of progress implementing evidence-based strategies and whether the LEA is on track in spending funds aligned to the improvement plan strategies and by funding category.

When considering how the DDOE should distribute Title I funds for schools identified for CSI, the DDOE asked stakeholders to consider whether it should be a formula-based grant, a competitive grant, or a hybrid of the two. More than twice as many participants in the stakeholder community conversations supported the hybrid approach compared to the formula grant, while none supported the use of a competitive grant process. Similarly, stakeholders that responded to the School Support and Improvement Survey agreed that the DDOE should distribute funds through a hybrid funding mechanism versus a strict formula grant. None of those surveyed indicated that the distribution of funds should be through a competitive grant.

The DDOE will award school improvement funds through a hybrid grant process that combines a formula-based allocation with optional additional competitive funds also available. Each school will receive a formula-based amount of funds determined by student enrollment. The LEA may also apply for and receive additional funds allocated through a rubric-based competitive grant process.

The DDOE will have approximately $3.2 million in 1003(a) school supports and improvement funds, of which, approximately $160,000 are set aside for state administration purposes. The remaining amount of just over $3 million would be available as pass-through funds to support school improvement.

Since the DDOE would need to identify eight CSI schools to meet the 5% identification requirement, there would be less than $400,000 available per school. Therefore, the DDOE proposes to provide a formula grant for CSI schools based on a per-pupil amount for the first $2.4 million. Based on estimates of the total enrollment across identified schools of approximately 3,000 students, the per-pupil amount for formula awards will be approximately $800. If the formula amount does not sufficiently enable effective implementation of selected improvement strategies, then the LEA may also apply for a portion of the remaining $600,000 to $700,000 on a competitive basis. Competitive grant awards will be determined based on strategy alignment to identified needs, evidence base of selected strategies, and verified costs. This information will be included in the formula funds application, and will not require significant additional work for the LEA or school.

The DDOE will allocate state school improvement funds to provide CSI supports to non-Title I schools performing as low or lower than the 5% lowest-performing Title I schools.

DDOE funding available under ESSA section 1003(a) will very likely be insufficient to fund TSI-1 schools at a significant level. Once all CSI school improvement funds have been allocated, the DDOE will examine the remaining funds to determine available money to best support TSI schools.

Any remaining 1003(a) funds will be combined with any excess program state administration funds and/or available state funds in order to provide fiscal support for TSI school improvement efforts. Once this amount is determined, LEAs will be eligible to apply for TSI support based on a per-pupil amount. Regardless of funding amounts, the DDOE will still provide technical assistance to support LEAs and schools identified as TSI-1 and TSI-2 and recommend that the LEA set aside funds to provide additional support to each TSI school.

B. Technical Assistance Regarding Evidence-Based Interventions. Describe the technical assistance the SEA will provide to each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement, including how it will provide technical assistance to LEAs to ensure the effective implementation of evidence-based interventions, consistent with 34 C.F.R. § 200.23(b), and, if applicable, the list of State-approved, evidence-based interventions for use in schools implementing comprehensive or targeted support and improvement plans consistent with § 200.23(c)(2)-(3).

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A.4.viii.e. Technical Assistance. Describe the technical assistance the State will provide to each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement.

ESSA requires each SEA to describe its processes for approving, monitoring, and periodically reviewing LEA CSI plans. The DDOE will offer a variety of supports to schools and LEAs that could include on-site technical assistance; off-site networking sessions; embedded professional learning; virtual learning experiences; guidance documents; and templates to support needs assessment, improvement planning, and monitoring.

The DDOE will collaborate with LEAs and regional assistance centers to develop a resource hub with regionally implemented, evidenced-based strategies. In addition, the DDOE will assist LEAs in exploring and identifying appropriate resources in national clearinghouses, such as:

- What Works Clearinghouse
- Results First
- Regional Education Laboratories
- Best Evidence Encyclopedia

As mentioned previously throughout this plan, the DDOE conducted a variety of stakeholder engagement activities to elicit input. Community Meeting participants provided valuable feedback for the DDOE to consider when outlining options for technical assistance and identifying evidence-based strategies for ESSA. While opinions often varied by topic and question, a set of common themes did emerge:

- *Addressing social and emotional skills.* Participants discussing both measures of student readiness and early learning programs stressed the need to prioritize social and emotional learning as an area to provide instruction and measure student ability.
- *Developing a positive school climate.* Participants felt that it was important that school climate be included as an indicator of school quality and enhanced as a strategy for improving teacher recruitment and retention.

- *Ensuring smaller class sizes.* Ensuring smaller class sizes was emphasized as an important strategy during discussions about how to help ELs, special education students, and students experiencing poverty or trauma, and in conversations about recruiting and retaining teachers.
- *Providing access to wraparound services.* The availability of "wraparound" services, such as mental and physical health care, counseling, after school programs, tutoring, and other supports, were discussed in a variety of ways across all three topic areas.

The DDOE will explore and identify strategies, resources, and opportunities that can assist in addressing the themes outlined above. The DDOE will work with LEAs, the business community, and other state agencies to address common needs identified through the LEA-led needs assessments, root cause analyses, and school improvement plan processes.

C. More Rigorous Interventions. Describe the more rigorous interventions required for schools identified for comprehensive support and improvement that fail to meet the State's exit criteria within a State-determined number of years consistent with section 1111(d)(3)(A)(i) of the ESEA and 34 C.F.R. § 200.21(f)(3)(iii).

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A.4.viii.c. More Rigorous Interventions. Describe the more rigorous interventions required for schools identified for comprehensive support and improvement that fail to meet the State's exit criteria within a State-determined number of years consistent with section 1111(d)(3)(A)(i)(I) of the ESEA.

A.4.viii.f. Additional Optional Action. If applicable, describe the action the State will take to initiate additional improvement in any LEA with a significant number or percentage of schools that are consistently identified by the State for comprehensive support and improvement and are not meeting exit criteria established by the State or in any LEA with a significant number or percentage of schools implementing targeted support and improvement plans.

As mentioned previously in section 4.2.A.ii:

The participants from the community conversations most commonly identified the need to conduct a comprehensive analysis to diagnose the reasons why the school did not exit and develop a new plan to address the specific issues based on root causes. The survey feedback echoed similar sentiments with 60% of respondents indicating, "Enhanced on-site technical assistance and professional learning" provided by the DDOE, with an additional 40% requesting, "More intensive support and oversight to schools," and a "Leadership capacity review."

Schools identified for improvement under previous iterations of the law and re-identified under ESSA will automatically be elevated to CSI-R status. In addition, schools that do not exit CSI status within four years will enter CSI-R status. DDOE will work collaboratively with the LEA and CSI-R school to identify an external partner to conduct qualitative needs assessments at both the school and district levels.

The qualitative needs assessments will examine previous school improvement efforts/plans, programs, strategies, initiatives, instructional practices, assessments, staffing, systems development, and all factors that were intended to bring about change in that school. This will also include an assessment of the leadership capacity/competency at the school and district level. By using an external partner to conduct the qualitative needs assessment, the LEA/school will get an unbiased, objective assessment of the school from a fresh perspective.

The results of these qualitative needs assessments will be one component of the required comprehensive needs assessment, which also includes quantitative data analysis related to DSSF measures, school profile data, educator equity data, financial risk assessments, program analyses, community input and additional LEA data. Funding for the external needs assessment may come from the CSI-R grant or other funding sources. The DDOE will work with IHEs and other external partners to develop local, effective, and cost-efficient external evaluators and evaluation systems.

The DDOE will work collaboratively with the LEA/school to examine the findings of the needs assessment and provide support in the development of an appropriate and actionable improvement plan. Additional data analyses (quantitative data described above) will be used to identify which of the previous interventions should or should not be continued and to determine if other evidence-based strategies are needed.

Based on comprehensive needs analysis, including the qualitative needs analyses, an LEA will be required to amend its comprehensive support and improvement plan to:

1. Address the reasons the school did not meet the exit criteria, including whether the school implemented the interventions with fidelity and sufficient intensity, and the results of the new needs assessment.
2. Update how the LEA will continue to address previously identified resource inequities and identify any new resource inequities consistent with the requirements to review those inequities in its original plan.
3. Include the implementation of additional evidence-based interventions in the school *that are identified by an external LEA needs assessment* and that are more rigorous and based on strong or moderate levels of evidence.

The DDOE will provide support and guidance to the LEA for providing operational and financial flexibility for schools identified for improvement.

Note: Determining what constitutes a "more rigorous intervention" will depend in part on what interventions the school previously implemented, the effectiveness of implementation, and other factors that did not lead to improved outcomes. This will take a concerted effort between DDOE and the LEA to examine programs, systems, strategies, and financial alignments that were contributing factors to the lack of improved outcomes. The determination of a "more rigorous intervention" will be made on a school-by-school basis. Interventions will be aligned to the school's needs assessments and the indicator areas for which the schools were identified.

See previous section 4.2.A.ii in which the exit criteria for CSI is described. The process outlined in this section will be considered as part of the "more rigorous intervention" strategy.

D. Periodic Resource Review. Describe how the SEA will periodically review, identify, and, to the extent practicable, address any identified inequities in resources to ensure sufficient support for school improvement in each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement consistent with the requirements in section 1111(d)(3)(A)(ii) of the ESEA and 34 C.F.R. § 200.23(a).

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A.4.viii.d. Resource Allocation Review. Describe how the State will periodically review resource allocation to support school improvement in each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement.

ESSA requires states to review resource allocation between LEAs and between schools for those LEAs with a significant number of schools identified as TSI or CSI. A review of resource allocation must include a review of LEA- and school-level resources, among and within schools, including:

- Disproportionate rates of ineffective, out-of-field, or inexperienced teachers identified by the state and LEA consistent with sections 1111(g)(1)(B) and 1112(b)(2) of the Act; and
- Per-pupil expenditures of federal, state, and local funds required to be reported annually consistent with section 1111(h)(1)(C)(x) of the Act.

Also including, at the school's discretion, a review of LEA- and school-level budgeting and resource allocation with respect to resources described above and the availability and access to any other resource provided by the LEA or school, such as advanced coursework, preschool programs and instructional materials, and technology.

As mentioned earlier in section 4.2 regarding identification for CSI and TSI, LEAs will conduct a needs assessment to assist schools in developing appropriate improvement plans using evidence-based strategies. However, at the beginning of each four-year improvement cycle, those LEAs determined to have a significant number of schools identified for school improvement will work in collaboration with the DDOE to conduct a comprehensive needs assessment to identify any resource inequities. LEA size varies across the state of Delaware, and, therefore, a "significant number" of schools will depend on the total number of schools in the LEA. The DDOE will work in cooperation with the LEAs to determine what a significant number means on a case-by-case basis. For example, in a district with only four schools, a significant number may be one school, whereas in a district with ten or more schools, a significant number may be more than two.

Staff members across DDOE branches and workgroups will work in collaboration with the LEAs to assess resource inequities and provide support for improvement plan development and implementation. Internal collaboration and coordination across the various branches and workgroups will allow the DDOE to more efficiently and effectively support and monitor LEA school improvement planning and implementation. In that regard, ongoing assessment of potential resource inequities will be included as part of the regular monitoring that the DDOE already conducts for federal and state programs. By including this ongoing assessment and feedback as part of required monitoring, the DDOE will be efficient in supporting LEAs.