
ESEA Flexibility Request



Revised September 28, 2011

This document replaces the previous version, issued September 23, 2011.
(The document was formatted to ease usability on October 14, 2011)

U.S. Department of Education
Washington, DC 20202

OMB Number: 1810-0708
Expiration Date: March 31, 2012

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1810-0708. The time required to complete this information collection is estimated to average 336 hours per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate or suggestions for improving this form, please write to: U.S. Department of Education, Washington, D.C. 20202-4537.

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INTRODUCTION

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

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

REVIEW AND EVALUATION OF REQUESTS

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

GENERAL INSTRUCTIONS

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

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

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

1. Key milestones and activities: Significant milestones to be achieved in order to meet a given principle, and essential activities to be accomplished in order to reach the key milestones. The SEA should also include any essential activities that have already been completed or key milestones that have already been reached so that reviewers can understand the context for and fully evaluate the SEA’s plan to meet a given principle.
2. Detailed timeline: A specific schedule setting forth the dates on which key activities will begin and be completed and milestones will be achieved so that the SEA can meet the principle by the required date.
3. Party or parties responsible: Identification of the SEA staff (*e.g.*, position, title, or office) and, as appropriate, others who will be responsible for ensuring that each key activity is accomplished.
4. Evidence: Where required, documentation to support the plan and demonstrate the SEA’s progress in implementing the plan. This *ESEA Flexibility Request* indicates the specific evidence that the SEA must either include in its request or provide at a future reporting date.
5. Resources: Resources necessary to complete the key activities, including staff time and additional funding.

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

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

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

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

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

Each request must include:

- A table of contents and a list of attachments, using the forms on pages 1 and 2.
- The cover sheet (p. 3), waivers requested (p. 4-5), and assurances (p. 5-6).
- A description of how the SEA has met the consultation requirements (p. 8).
- An overview of the SEA's request for the ESEA flexibility (p. 8). This overview is a synopsis of the SEA's vision of a comprehensive and coherent system to improve student achievement and the quality of instruction and will orient the peer reviewers to the SEA's request. The overview should be about 500 words.
- Evidence and plans to meet the principles (p. 9-18). An SEA will enter narrative text in the text boxes provided, complete the required tables, and provide other required evidence. An SEA may supplement the narrative text in a text box with attachments, which will be included in an appendix. Any supplemental attachments that are included in an appendix must be referenced in the related narrative text.

Requests should not include personally identifiable information.

Process for Submitting the Request: An SEA must submit a request to the Department to receive the flexibility. This request form and other pertinent documents are available on the Department's Web site at: <http://www.ed.gov/esea/flexibility>.

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

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

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

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

REQUEST SUBMISSION DEADLINE

SEAs will be provided multiple opportunities to submit requests for the flexibility. The submission dates are November 14, 2011, a date to be announced in mid-February 2012, and an additional opportunity following the conclusion of the 2011–2012 school year.

TECHNICAL ASSISTANCE MEETING FOR SEAS

To assist SEAs in preparing a request and to respond to questions, the Department will host a series of Technical Assistance Meetings via webinars in September and October 2011.

FOR FURTHER INFORMATION

If you have any questions, please contact the Department by e-mail at ESEAflexibility@ed.gov.

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Insert page numbers prior to submitting the request, and place the table of contents in front of the SEA’s flexibility request.

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1.C Develop and administer annual, statewide, aligned, high-quality assessments that measure student growth	
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2.B Set ambitious but achievable annual measurable objectives	
2.C Reward schools	
2.D Priority schools	
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2.F Provide incentives and supports for other Title I schools	
2.G Build SEA, LEA, and school capacity to improve student learning	
Principle 3: Supporting Effective Instruction and Leadership	
3.A Develop and adopt guidelines for local teacher and principal evaluation and support systems	
3.B Ensure LEAs implement teacher and principal evaluation and support systems	

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For each attachment included in the *ESEA Flexibility Request*, label the attachment with the corresponding number from the list of attachments below and indicate the page number where the attachment is located. If an attachment is not applicable to the SEA's request, indicate "N/A" instead of a page number. Reference relevant attachments in the narrative portions of the request.

LABEL	LIST OF ATTACHMENTS	PAGE
1	Notice to LEAs	
2	Comments on request received from LEAs (if applicable)	
3	Notice and information provided to the public regarding the request	
4	Evidence that the State has formally adopted college- and career-ready content standards consistent with the State's standards adoption process	
5	Memorandum of understanding or letter from a State network of institutions of higher education (IHEs) certifying that meeting the State's standards corresponds to being college- and career-ready without the need for remedial coursework at the postsecondary level (if applicable)	
6	State's Race to the Top Assessment Memorandum of Understanding (MOU) (if applicable)	
7	Evidence that the SEA has submitted high-quality assessments and academic achievement standards to the Department for peer review, or a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review (if applicable)	
8	A copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups (if applicable).	
9	Table 2: Reward, Priority, and Focus Schools	
10	A copy of any guidelines that the SEA has already developed and adopted for local teacher and principal evaluation and support systems (if applicable).	
11	Evidence that the SEA has adopted one or more guidelines of local teacher and principal evaluation and support systems	
12	NOTE: ATTACHMENTS AND APPENDICES WILL BE INCLUDED WITH THE FEBRUARY 21, 2011 SUBMISSION, BUT HAVE NOT BEEN INCLUDED WITH THIS POSTING.	

COVER SHEET FOR ESEA FLEXIBILITY REQUEST

Legal Name of Requester:	Requester's Mailing Address:
State Contact for the ESEA Flexibility Request	
Name:	
Position and Office:	
Contact's Mailing Address:	
Telephone:	
Fax:	
Email address:	
Chief State School Officer (Printed Name):	Telephone:
Signature of the Chief State School Officer: X_____	Date:
The State, through its authorized representative, agrees to meet all principles of the ESEA Flexibility.	

WAIVERS

By submitting this flexibility request, the SEA requests flexibility through waivers of the ten ESEA requirements listed below and their associated regulatory, administrative, and reporting requirements by checking each of the boxes below. The provisions below represent the general areas of flexibility requested; a chart appended to the document titled *ESEA Flexibility Frequently Asked Questions* enumerates each specific provision of which the SEA requests a waiver, which the SEA incorporates into its request by reference.

- ☒ 1. The requirements in ESEA section 1111(b)(2)(E)-(H) that prescribe how an SEA must establish annual measurable objectives (AMOs) for determining adequate yearly progress (AYP) to ensure that all students meet or exceed the State's proficient level of academic achievement on the State's assessments in reading/language arts and mathematics no later than the end of the 2013–2014 school year. The SEA requests this waiver to develop new ambitious but achievable AMOs in reading/language arts and mathematics in order to provide meaningful goals that are used to guide support and improvement efforts for the State, LEAs, schools, and student subgroups.
- ☒ 2. The requirements in ESEA section 1116(b) for an LEA to identify for improvement, corrective action, or restructuring, as appropriate, a Title I school that fails, for two consecutive years or more, to make AYP, and for a school so identified and its LEA to take certain improvement actions. The SEA requests this waiver so that an LEA and its Title I schools need not comply with these requirements.
- ☒ 3. The requirements in ESEA section 1116(c) for an SEA to identify for improvement or corrective action, as appropriate, an LEA that, for two consecutive years or more, fails to make AYP, and for an LEA so identified and its SEA to take certain improvement actions. The SEA requests this waiver so that it need not comply with these requirements with respect to its LEAs.
- ☒ 4. The requirements in ESEA sections 6213(b) and 6224(e) that limit participation in, and use of funds under the Small, Rural School Achievement (SRSA) and Rural and Low-Income School (RLIS) programs based on whether an LEA has made AYP and is complying with the requirements in ESEA section 1116. The SEA requests this waiver so that an LEA that receives SRSA or RLIS funds may use those funds for any authorized purpose regardless of whether the LEA makes AYP.
- ☒ 5. The requirement in ESEA section 1114(a)(1) that a school have a poverty percentage of 40 percent or more in order to operate a schoolwide program. The SEA requests this waiver so that an LEA may implement interventions consistent with the turnaround principles or interventions that are based on the needs of the students in the school and designed to enhance the entire educational program in a school in any of its priority and focus schools, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.
- ☒ 6. The requirement in ESEA section 1003(a) for an SEA to distribute funds reserved under that section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its LEAs in order to serve any of the State's priority and focus schools.

- ☒ 7. The provision in ESEA section 1117(c)(2)(A) that authorizes an SEA to reserve Title I, Part A funds to reward a Title I school that (1) significantly closed the achievement gap between subgroups in the school; or (2) has exceeded AYP for two or more consecutive years. The SEA requests this waiver so that it may use funds reserved under ESEA section 1117(c)(2)(A) for any of the State's reward schools.
- ☒ 8. The requirements in ESEA section 2141(a), (b), and (c) for an LEA and SEA to comply with certain requirements for improvement plans regarding highly qualified teachers. The SEA requests this waiver to allow the SEA and its LEAs to focus on developing and implementing more meaningful evaluation and support systems.
- ☒ 9. The limitations in ESEA section 6123 that limit the amount of funds an SEA or LEA may transfer from certain ESEA programs to other ESEA programs. The SEA requests this waiver so that it and its LEAs may transfer up to 100 percent of the funds it receives under the authorized programs among those programs and into Title I, Part A.
- ☒ 10. The requirements in ESEA section 1003(g)(4) and the definition of a Tier I school in Section I.A.3 of the School Improvement Grants (SIG) final requirements. The SEA requests this waiver so that it may award SIG funds to an LEA to implement one of the four SIG models in any of the State's priority schools.

Optional Flexibility:

An SEA should check the box below only if it chooses to request a waiver of the following requirements:

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

ASSURANCES

By submitting this application, the SEA assures that:

- ☒ 1. It requests waivers of the above-referenced requirements based on its agreement to meet Principles 1 through 4 of the flexibility, as described throughout the remainder of this request.
- ☒ 2. It will adopt English language proficiency (ELP) standards that correspond to the State's college- and career-ready standards, consistent with the requirement in ESEA section 3113(b)(2), and that reflect the academic language skills necessary to access and meet the new college- and career-ready standards, no later than the 2013–2014 school year. (Principle 1)
- ☒ 3. It will develop and administer no later than the 2014–2015 school year alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities that are consistent with 34 C.F.R. § 200.6(a)(2) and are aligned with the State's college- and career-ready standards. (Principle 1)
- ☒ 4. It will develop and administer ELP assessments aligned with the State's ELP standards, consistent with the requirements in ESEA sections 1111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii). (Principle 1)
- ☒ 5. It will report annually to the public on college-going and college credit-accumulation rates for all students and subgroups of students in each LEA and each public high school in the State. (Principle 1)
- ☒ 6. If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and uses achievement on those assessments to identify priority and focus schools, it has technical documentation, which can be made available to the Department upon request, demonstrating that the assessments are administered statewide; include all students, including by providing appropriate accommodations for English Learners and students with disabilities, as well as alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2); and are valid and reliable for use in the SEA's differentiated recognition, accountability, and support system. (Principle 2)
- ☒ 7. It will report to the public its lists of reward schools, priority schools, and focus schools at the time the SEA is approved to implement the flexibility, and annually thereafter, it will publicly recognize its reward schools. (Principle 2)
- ☒ 8. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later the deadline required under the State Fiscal Stabilization Fund. (Principle 3)
- ☒ 9. It will evaluate and, based on that evaluation, revise its own administrative requirements to

reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)

- ☒ 10. It has consulted with its Committee of Practitioners regarding the information set forth in its request.
- ☒ 11. Prior to submitting this request, it provided all LEAs with notice and a reasonable opportunity to comment on the request and has attached a copy of that notice (Attachment 1) as well as copies of any comments it received from LEAs (Attachment 2).
- ☒ 12. Prior to submitting this request, it provided notice and information regarding the request to the public in the manner in which the State customarily provides such notice and information to the public (*e.g.*, by publishing a notice in the newspaper; by posting information on its website) and has attached a copy of, or link to, that notice (Attachment 3).
- ☒ 13. It will provide to the Department, in a timely manner, all required reports, data, and evidence regarding its progress in implementing the plans contained throughout this request.

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

- ☒ 14. It will submit to the Department for peer review and approval a copy of the guidelines that it will adopt by the end of the 2011–2012 school year. (Principle 3)

CONSULTATION

An SEA must meaningfully engage and solicit input from diverse stakeholders and communities in the development of its request. To demonstrate that an SEA has done so, the SEA must provide an assurance that it has consulted with the State’s Committee of Practitioners regarding the information set forth in the request and provide the following:

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

This section will carefully delineate the full scope of DPI’s consultation and outreach, specifically with teachers and their representatives, related to this waiver request. Details are not provided at this time, as the consultation effort is still underway.

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

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

School and District Accountability Design Team

DPI solicited specific feedback on a number of issues with the School and District Accountability Design Team, including:

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

system.

The remainder of this section will carefully delineate the full scope of DPI's consultation and outreach related to this waiver application. Details are not provided at this time as the consultation effort is still underway.

EVALUATION

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

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

OVERVIEW OF SEA'S REQUEST FOR THE ESEA FLEXIBILITY

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

1. explains the SEA's comprehensive approach to implement the waivers and principles and describes the SEA's strategy to ensure this approach is coherent within and across the principles; and
2. describes how the implementation of the waivers and principles will enhance the SEA's and its LEAs' ability to increase the quality of instruction for students and improve student achievement.

THEORY OF ACTION

An education system will only impact every student's future when it guarantees equal, yet individualized opportunities for all students. Driven by this knowledge, the Department of Public Instruction (DPI) will differentiate and personalize Wisconsin's education system to transform teaching and learning across the state. Differentiation and personalization—for both student and teacher—mark the difference between successfully educating *some* and successfully educating *all* students.

Accordingly, DPI has committed to a robust, sensitive, and impactful statewide accountability system, as demonstrated in the State's plans across the four Principles of this request.

- Principle 1, Transition to College- and Career-Ready Expectations for All Students
 - A detailed, high-quality plan for implementation of the Common Core State Standards (CCSS) that includes

- Foundational Guiding Principles for Teaching and Learning;
 - Partnerships with educational leaders, regional service agencies, and institutions of higher education;
 - Formation of an innovative Center for Standards, Instruction, and Assessment to develop rigorous, online instructional resources for the CCSS and assessment systems;
 - Universal Design for Learning Principles;
 - Lessons learned from a productive partnership with the Wisconsin Response to Intervention Center, which provides excellent methods for differentiation and personalization.
- Wisconsin is transitioning to next generation assessment systems through three assessment consortia.
 - SMARTER Balanced – developing an accessible, balanced assessment system with precision and adaptive differentiation at the heart of the assessment; implementation in Spring 2015
 - Dynamic Learning Maps – developing essential elements of the CCSS and an alternate assessment system; implementation in Spring 2015
 - ASSETS Consortium – developing new English Language Proficiency standards rooted in CCSS expectations and an English language proficiency assessment; implementation in 2015-16.
- Additional changes in college- and career-ready expectations
 - DPI will request funding for EXPLORE, PLAN, ACT, and WorkKeys to provide statewide implementation, in recognition that these assessments provide important information regarding a student’s trajectory toward college and career readiness, and allows flexibility in the trajectory by honoring different pathways to college or career.
 - DPI proposes changes to state graduation requirements to reflect an increased focus in STEM fields, in recognition of their importance for 21st century learning.
- Principle 2, State-Developed Differentiated Recognition, Accountability, and Support
 - Wisconsin will differentiate how schools are characterized by accountability measures, expectations, and interventions that result from accountability determinations; an approach that is an extension of the belief in the power of differentiation and personalization.
 - Wisconsin built an accountability index system using priority areas that factor in multiple measures—including attainment and growth—to place schools on a differentiated performance continuum while emphasizing the importance of continuous improvement for all students.
 - Rewards, interventions, and supports will begin with diagnostic reviews to personalize appropriate next steps using the most effective and efficient school improvement actions.
- Principle 3 – Supporting Effective Instruction and Leadership

Wisconsin’s Educator Effectiveness Framework includes formative and summative elements

and is intended to link each educator’s professional development to their individual strengths and weaknesses identified in the evaluation system.

The work outlined here is shaping DPI’s strategic plan to make Every Child a Graduate, and ensure every student in Wisconsin graduates ready for college and career.

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

1.A ADOPT COLLEGE- AND CAREER-READY STANDARDS

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

Option A

- ☒ The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that are common to a significant number of States, consistent with part (1) of the definition of college- and career-ready standards.
- i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)

Option B

- ☐ The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that have been approved and certified by a State network of institutions of higher education (IHEs), consistent with part (2) of the definition of college- and career-ready standards.
- i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)
- ii. Attach a copy of the memorandum of understanding or letter from a State network of IHEs certifying that students who meet these standards will not need remedial coursework at the postsecondary level. (Attachment 5)

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

Provide the SEA’s plan to transition to and implement no later than the 2013–2014 school year college- and career-ready standards statewide in at least reading/language arts and mathematics for all students and schools and include an explanation of how this transition plan is likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards. The Department encourages an SEA to include in its plan activities related to each of the italicized questions in the corresponding section of

the document titled *ESEA Flexibility Review Guidance*, or to explain why one or more of those activities is not necessary to its plan.

Wisconsin's approach to Principle 1: *Transition to College- and Career-Ready Standards*, builds upon Wisconsin's strong foundation of Common Core State Standards (CCSS) implementation plans, processes, infrastructures, and partnerships, while also building up from the foundation in innovative ways that will produce and make available high-quality instructional resources for teachers and other instructional leaders. Work in the College- and Career-Ready Standards arena is both far-reaching and long-term. It includes new standards, new assessments, and looks to the higher expectations (college- and career-ready) inherent in these standards and assessments to develop a rigorous transition plan that reaches beyond CCSS implementation.

Proactive Steps Taken Prior to CCSS Adoption

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

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

Investigation Year (2010-2011)

After adopting the standards, DPI worked closely with several groups, including the CESAs,

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

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

During one meeting, the group realized that many of the state’s core beliefs about teaching and learning transcend English or mathematics; they are simply good practices for all classrooms. As a result, the teams continued to meet across disciplines to create the beginnings of a new resource called “Wisconsin’s Guiding Principles for Teaching and Learning,” six statements that help make clear the core beliefs intrinsic to high quality teaching and learning.

These guiding principles drive the work of DPI—particularly Principle #1: Every Student has the Right to Learn—and specifically guides the work on the Essential Elements of the Common Core State Standards, part of DPI’s participation in the Dynamic Learning Maps Consortium. (It also includes DPI’s work to align the CCSS with English language proficiency standards, discussed in detail below.) The Essential Elements will be the foundation of instruction and assessment for students with significant cognitive disabilities, comprising

approximately one percent of the total student population, and Wisconsin is playing a key role in the development of those elements. Throughout this school year, DPI will partner with Wisconsin's regional service agencies, special education leaders, institutions of higher education, and general education leaders to develop an implementation timeline and plan for the Essential Elements. A cadre of these representatives will guide development of this plan between February and June of 2011. This implementation timeline will align with that for the alternate assessment, which is slated for initial implementation in the 2014-15 school year.

Framing CCSS and Essential Elements of the CCSS implementation within a full vision for improving education, and linking the effort to other key initiatives as part of a system of high-quality educational practices is a major focus for DPI. As such, the department has continued to work with a large internal CCSS implementation workgroup to further develop and connect major initiatives, and to create consistent language, materials, and presentations detailing the connections between standards, assessment, instruction and other key initiatives, including Response to Intervention. Notably, DPI has worked to ensure alignment of CCSS resources with early childhood standards, extended grade-band standards, and college- and career-readiness expectations defined by Institutions for Higher Education. As a result of this work, Wisconsin was selected to participate as one of the State Leadership Teams for the College Readiness Partnership with CCSSO, the American Association of State Colleges and Universities, and State Higher Education Executive Officers to promote broad implementation of CCSS in mathematics and English language arts, with a focus on those issues at the intersection of K-12 and higher education systems.

Furthering Wisconsin's focus in making the CCSS accessible for all students, Wisconsin's role as the lead state for the World-Class Instructional Design and Assessment (WIDA) Consortium, recently funded to build the next generation of English language proficiency (ELP) assessments, includes development of ELP standards that directly correspond to the Common Core. Development of these new standards will be a wide-reaching process that engages member states, the WIDA Consortium housed at the University of Wisconsin-Madison, regional educational labs, and other institutions of higher education.

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

One additional decision made by Wisconsin's CCSS Implementation Team that appears to set Wisconsin apart from other states is DPI's approach to the CCSS for Literacy in Science, Social Studies, History, and the Technical Subjects. Quite simply, Wisconsin's CCSS Implementation workgroup determined that all educators must see themselves as part of the CCSS literacy

work. This decision compelled DPI to convene a new statewide leadership team for Literacy in All Subjects, or Disciplinary Literacy, in January of 2011. The Disciplinary Literacy team, made up of educators from career and technical education, the arts, health studies, and the four core content areas, was charged with broadening the scope of the grades 6-12 CCSS literacy standards to include all content areas and all grade levels. The resulting materials parallel DPI's English language arts and mathematics guidance documents and send a strong message about the need for every content area educator to identify the meaningful expressive and receptive skills students must learn in order to access deeper and richer content knowledge in that discipline (<http://www.dpi.wi.gov/cal/pdf/las.pdf>).

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

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

Moving Forward

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

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

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

Design and plans for the SIA center reflect these priorities:

- Standardization of materials and fidelity of implementation
- Low to no cost resources
- Increased access to content expertise across the state
- Centralized leadership connected to DPI
- Agility, speed, and responsiveness to needs across the state and DPI direction
- Partnerships with IHEs

DPI's planning for the SIA Center is underway, in conversation with institutions of higher education and Wisconsin's CESA Statewide Network. The goal in building plans for the SIA Center is to focus on identifying the best organizational structure—one that brings together institutions of higher education, CESAs, and other content and instructional experts—that results in a fantastic source for CCSS and assessment-related resources, a structure that, with sufficient DPI oversight, is empowered to address needs related to high quality instructional practices by quickly developing excellent online resources, training plans, and virtual modules.

With the goal of raising the bar and resulting outcomes for all students, the SIA Center will create resources for classroom educators, principals, and other educational stakeholders with a focus on improving instructional practices. For example, resources for classroom educators will focus on how they can improve their practices; resources for principals will focus on how they can best support their classroom educators' improvement. The SIA Center's focus on improving instruction situates it well to provide resources that are focused on how they can serve as strong, instructional leaders in their schools to principals and other administrators.

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

- A deep understanding of the CCSS
- Consistent, appropriate attention to data to inform decisions
- Assessment practices that improve learning and inform instruction

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

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

The Guiding Principles for Teaching and Learning also drive the intention for the SIA Center work, which will include Universal Design for Learning (UDL) principles – to ensure that resources are not just made accessible for all populations, but designed to be accessible.

Beginning with DPI’s vision of Every Child a Graduate Ready for College or Career and continuing with the beliefs in the Guiding Principles for Teaching and Learning, the proverbial rubber hits the road through focused support and resources available from DPI – resources related to CCSS implementation and guidance – the RtI Center for resources related to RtI implementation and practices – and the SIA Center for resources directly related to improving instruction and assessment of college- and career-ready standards. One component of the Every Child a Graduate vision involves two questions directly related to DPI’s planning. The first, “What and how should students learn?” relates directly to the CCSS and development of higher standards for Wisconsin’s students as well as providing guidance for educators in what great instruction of the CCSS looks like (the SIA Center). The second question points to transitions in the world of assessment, which is, after all, a key component of high quality instructional practices. That question, “How do we know if they’ve learned it?” along with specific recommendations from a Next Generation Assessment Task Force, convened in 2009, guide Wisconsin’s participation in three next generation assessment consortia: the SMARTER Balanced Assessment Consortium, Dynamic Learning Maps (DLM) Consortium, and ASSETS Consortium. These consortia, while developing assessments for different populations of students, share a common goal of developing innovative, informative, rigorous assessments to replace the current statewide assessment system, assessments that provide students varying opportunities to demonstrate what they know and can do through a combination of assessment types (formative strategies, benchmark,

and summative) as well as item types (including performance tasks and technology enhanced items)

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

Table 1.1. Implementation of Statewide Assessments

Current Assessment	Population	New Assessment	Population	Implementation
Wisconsin Knowledge and Concepts Exam	General education students; all but the 1% population	SMARTER Balanced Assessment System	All but the 1% population	2014-15
Wisconsin Alternate Assessment for Students with Disabilities	Special education students with severe cognitive disabilities	Dynamic Learning Maps	Severely cognitively disabled students	2014-15
ACCESS for English language learners	English language learners	ASSETS for ELs	English language learners	2015-16

These transitions represent a new day for assessment in Wisconsin, one by which assessments that are used for accountability purposes are also designed in such a way as to provide useful, actionable, and timely data directly to educators to help inform classroom practices in an on-going manner. Further, these assessment consortia, which are designing assessments using Universal Design for Learning principles, are dedicated to considering accessibility issues before, during, and after assessment development to ensure the assessments provide all students opportunities to demonstrate what they know and can do.

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

- Change high school graduation requirements to reflect the changing demands of

college and career;

- Make the EXPLORE, PLAN, ACT, and WorkKeys assessments available to schools and districts so that students, families, and educators can better understand a student's progress toward college and career readiness;
- Make changes to the current statewide assessment system to prepare for upcoming transitions to the CCSS-based SMARTER Balanced Assessment System

Changing Expectations in High School

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

Table 1.2. Changes to Wisconsin's High School Graduation Requirements.

Subject Area	Requirement	Proposed Change
Mathematics	2 credits	3 credits
Science	2 credits	3 credits (2 of which would remain traditional science or science equivalency credits)

These changes have not yet taken place, but are a priority for the agency and are being reflected in the agency strategic planning process currently underway.

Providing Measures of College and Career Readiness

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

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

Following evaluation of the field tested index with new cut scores, official reports will be

provided for the 2012-13 school year, in the spring of 2013. The index calculations in the 2013 reports will factor in a new baseline that accounts for cut score changes and back-maps this change such that growth calculations are possible. The 2013 results will also be used for accountability determinations that will result in the categorization of schools along a continuum and identification of schools requiring specific interventions and support as well as rewards. This reporting timeline incorporates a year-long implementation that involves intensive communication and professional learning for schools, districts, and the public.

Additional Efforts to Raise Rigor and Improve Student Outcomes

DPI continues to invest significant effort not only to connect the dots between various initiatives at the department—from CCSS implementation to current and future assessments, from Response to Intervention to College and Career Pathways and 21st Century Skills—but in fact to braid those initiatives together and, where appropriate, change or re-focus staff time, resources, and organizational structures to create better efficiencies and improve the unity of Wisconsin’s approach to standards- and instruction-related initiatives, projects, and activities.

Reducing Duplication and Unnecessary Burden

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

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

Key to provision of these reports are the two major technology and data reporting initiatives mentioned above: a Statewide Student Information System (SSIS) and WISEdash. These initiatives will significantly impact districts. WISEdash will provide districts with direct access to aggregate and student-level data in a secure format. Reports and dashboards will be available on a variety of topics. Initial implementation of WISEdash will be with secure access

only – for school- and district-level staff authorized to see non-redacted or suppressed data and possibly authorized to view student-level information. Eventually, WISEdash will not only replace DPI’s current, myriad public reporting systems, updating and locating those reports in a single portal, but will add to the types and topics of available public reports. Accountability reporting will be completed through WISEdash, but so will other public reporting including information about postsecondary transitions, literacy, and other important statewide initiatives.

While the Statewide Student Information System will result in better data and better reporting from DPI, it will also save districts time and money by reducing duplicative and burdensome reporting requirements. Ultimately, the availability of data management and data reporting systems from a single location will allow any interested data consumer to have easier access to important data that can play a part in many decisions.

1.C DEVELOP AND ADMINISTER ANNUAL, STATEWIDE, ALIGNED, HIGH-QUALITY ASSESSMENTS THAT MEASURE STUDENT GROWTH

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

Option A ☒ The SEA is participating in one of the two State consortia that received a grant under the Race to the Top Assessment competition. i. Attach the State’s Memorandum of Understanding (MOU) under that competition. (Attachment 6)	Option B ☐ The SEA is not participating in either one of the two State consortia that received a grant under the Race to the Top Assessment competition, and has not yet developed or administered statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs. i. Provide the SEA’s plan to develop and administer annually, beginning no later than the 2014–2015 school year, statewide aligned,	Option C ☐ The SEA has developed and begun annually administering statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs. i. Attach evidence that the SEA has submitted these assessments and academic achievement standards to the Department for peer review or attach a timeline of when the SEA will submit the assessments and academic achievement
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	high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs, as well as set academic achievement standards for those assessments.	standards to the Department for peer review. (Attachment 7)
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Assessments Informing the Path to College and Career Readiness

As mentioned above, DPI is actively engaged in the process of replacing all three of its current statewide standardized assessments: the Wisconsin Knowledge and Concepts Examination (WKCE), the Wisconsin Alternate Assessment for Students with Disabilities (WAA-SwD), and ACCESS for ELLs. Wisconsin is a governing state in the SMARTER Balanced Assessment Consortium, a member of the Dynamic Learning Maps Consortium, and the lead state for the WIDA Consortium, building ASSETS (Assessment Services Supporting ELs through Technology Systems). Transitioning to the next generation of assessments will strengthen instruction by providing classroom resources that support educators in planning instruction and interventions, students and families in setting and assessing progress on goals for learning, and administrators identifying strengths and weaknesses in curriculum and other programs. Results will be timelier and, in the case of the SMARTER Balanced assessment, the computer adaptive nature of the assessment will allow for greater precision at all levels of the proficiency scale.

SMARTER Balanced Assessment Consortium

The SMARTER Balanced Assessment Consortium (SBAC) is one of two multi-state consortia awarded funding from the U.S. Department of Education to develop an assessment system based on the new Common Core State Standards (CCSS). To achieve the goal that all students leave high school ready for college and career, SBAC is committed to ensuring that assessment and instruction embody the CCSS and that all students, regardless of disability, language, or subgroup status, have the opportunity to learn this valued content and show what they know and can do. The assessment system will be field tested in the 2013-2014 school year and administered live for the first time during the 2014-2015 school year.

With strong support from member states, institutions of higher education, and industry, SBAC will develop a balanced set of measures and tools, each designed to serve specific purposes. Together, these components will provide student data throughout the academic year that will inform instruction, guide interventions, help target professional development, and ensure an accurate measure of each student's progress toward career and college readiness.

Wisconsin is a Governing State in the SMARTER Balanced Assessment Consortium. As defined in the Governance Document, each state is required to take an active role in supporting the

work of the Consortium, and Wisconsin has indeed been an active member in SBAC. The department's participation includes:

- A member of the Executive Committee
- A co-chair of two work groups
- A member of one additional work group

A SUMMARY OF CORE COMPONENTS

Summative Assessments

- Mandatory comprehensive accountability measures that include computer adaptive assessments and performance tasks, administered in the last 12 weeks of the school year in grades 3–8 and high school for English Language Arts (ELA) and mathematics;
- Designed to provide valid, reliable, and fair measures of students' progress toward and attainment of the knowledge and skills required to be college and career ready;
- Capitalize on the strengths of computer adaptive testing, i.e., efficient and precise measurement across the full range of achievement and quick turnaround of results; and
- Produce composite content area scores, based on the computer-adaptive items and performance tasks.

Interim Assessments

- Optional comprehensive and content-cluster measures that include computer adaptive assessments and performance tasks, administered at locally determined intervals;
- Designed as item sets that can provide actionable information about student progress;
- Serve as the source for interpretive guides that use publicly released items and tasks;
- Grounded in cognitive development theory about how learning progresses across grades and how college- and career-readiness emerge over time;
- Involve a large teacher role in developing and scoring constructed response items and performance tasks;
- Afford teachers and administrators the flexibility to:
 - select item sets that provide deep, focused measurement of specific content clusters embedded in the CCSS;
 - administer these assessments at strategic points in the instructional year;
 - use results to better understand students' strengths and limitations in relation to the standards; and
 - support state-level accountability systems using end-of-course assessments.

Formative Tools and Processes

- Provides resources for teachers on how to collect and use information about student success in acquisition of the CCSS;
- Will be used by teachers and students to diagnose a student's learning needs, check for misconceptions, and/or to provide evidence of progress toward learning goals.

Accountability

- Fully committed to providing each member state reliable, valid, and comparable achievement and growth information for each student;
- Enables each state to implement its own approved state accountability system;
- Establishes achievement standards in 2014 following the administration of the field test in the 2013-2014 school year.

System Features

- Ensures coverage of the full range of ELA and mathematics standards and breadth of achievement levels by combining a variety of item types (i.e., selected-response, constructed response, and technology-enhanced) and performance tasks, which require application of knowledge and skills;
- Provides comprehensive, research-based support, technical assistance, and professional development so that teachers can use assessment data to improve teaching and learning in line with the standards;
- Provides online, tailored reports that link to instructional and professional development resources.

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

- 2.A.i Provide a description of the SEA’s differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA’s plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA’s differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

THEORY OF ACTION

As noted in the Overview, Wisconsin’s development of a strategic plan centers on college and career readiness. The department is driven by the belief that increasing rigor across the standards (see Principle 1), assessments (see Principle 1), and the new, statewide accountability system (detailed in the following sections of Principle 2), will result in improved instruction and student outcomes. Specifically, the strategic plan contains three state goals:

- Raise graduation rates
- Close graduation gaps
- Graduate students ready for college and career

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

Reprioritization and Systemic Changes at the State Level

This flexibility request has provided DPI an opportunity to increase communication and collaboration with key stakeholders regarding the enhancement of existing educational initiatives, and the development of new education initiatives designed to improve student outcomes, increase rates of college and career ready graduates, and close achievement gaps. The Wisconsin Department of Public Instruction (DPI) worked in collaboration with the School

and District Accountability Design Team to design the framework for a new statewide system of accountability and support. The Design Team developed thirteen principles to guide this work, which directly align to the department’s strategic plan to raise graduation rates, close graduation gaps and graduate all students ready for college and career. As such, the DPI is advancing the following systemic changes.

Raising Expectations, Increasing Rigor

As noted in Principle 1, DPI has significantly raised expectations for schools and the proportion of students who graduate ready for college and career, as indicated by the adoption of rigorous academic standards, higher cut scores based on NAEP as the state transitions to SBAC, increasingly rigorous and adaptive assessment systems, and increased graduation requirements. The new accountability report card and the new system of support, rewards, and recognition will reflect these new expectations. While the state has previously emphasized graduation rates (and boasted one of the highest in the nation), DPI also recognizes the state has significant achievement and graduation gaps. The accountability index prioritizes achievement and attainment using measures which emphasize not only graduation, but also the proportion of students graduating college and career ready. Additionally, the system examines achievement gaps within and across schools as a means to address the state’s existing gaps. Using a multifaceted index will help pinpoint areas of need within a school, as well as areas of strength, and help schools track their progress at meeting the needs of all student subgroups. Within the system of support, identified schools will participate in diagnostic reviews and needs assessments (Priority and Focus Schools, respectively) to identify their instructional policies, practices, and programming that have impacted student outcomes and to differentiate, and individualize reforms and interventions. While planning and implementing reforms, schools and districts will have access to increasingly expansive and timely data systems to monitor progress. Additionally, the state will require Priority and Focus Schools to implement RtI (with the support of the Wisconsin RtI Center and its resources) to ensure that all students are receiving customized, differentiated services within a least restrictive environment, including additional supports and interventions for SwDs and ELLs as needed, or extension activities and additional challenge for students exceeding benchmarks.

Developing a Statewide System

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

To address these issues, the Wisconsin School and District Accountability Design Team developed a statewide accountability framework which specifically includes *all* state schools, including traditional public schools and charter schools regardless of Title funding, as well as private schools participating in the Parental Choice Program (PCP). All schools receiving state

funds will be part of the state accountability and support system. The state will use this opportunity to not only include all schools, but also to increase accountability through the implementation of aggressive policies designed to address persistently low-achieving schools in the state.

Traditional Public Schools and Districts

Schools. If a traditional public school is identified as a Priority School, it must: 1) participate in a state-contracted school improvement diagnostic review (SIDR) and partner with a state approved turnaround expert to develop a targeted school reform plan aligned to findings from the review, as well as targeted, prescriptive directives from DPI, *or* 2) close. If the school elects to implement a reform plan aligned to the turnaround principles, as prescribed by the state, but does not make adequate improvement and is identified as a Priority School again after the three year cohort, the State Superintendent will utilize his or her intervention authority to appoint a special master to direct the activities of the school outside the limitations and boundaries created by policies and practices of the school's local education authority (LEA).

Districts. DPI has historically utilized districts as the entry point for reform in order to address local capacity and build sustainability. Recent experiences implementing school reforms and interventions within the state suggest that school administrators often face barriers to rapid reform as a result of district practices, as opposed to their own. DPI believes that changing structures at the district level will more likely result in long-term reform than changing structures within a school without consideration of the impact the district has on the school. This flexibility request provides DPI the opportunity to affect systemic reform, and differentiate based on identified needs.

The state will prioritize improvement efforts at the district level if the school's diagnostic review demonstrates that systemic challenges at the LEA level contributed to identification as a Priority School. DPI will appoint a state-contracted expert with proven expertise in supporting reform at the LEA level to conduct a diagnostic review of central administration's critical systems and structures, including human resources, curriculum and instruction, finance, and leadership. Based on district improvement diagnostic review (DIDR), the State Superintendent will direct reform at the LEA level and require schools to continue implementing successful school reforms, including DPI Corrective Action Requirements (CAR). The state-contracted LEA expert will act as a liaison between DPI and the district, supporting the implementation of the State Superintendent's directives, while also providing objective monitoring results to DPI regarding implementation status and outcomes.

Charter Schools

When a charter school is initially identified as being among the persistently lowest performing schools in the state, the charter school authorizer will implement one of three options:

- The charter school (or its authorizer) will enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years. If annual performance targets

are not met, the charter is revoked.

- DPI will require an on-site diagnostic review conducted by a state-approved school turnaround expert to identify the factors contributing to poor performance at the school. After participation in the state-conducted review, the charter school authorizer must implement one of two options with respect to the school consistent with the findings and recommendations of the diagnostic review:
 - Contract with a state-approved independent expert/vendor to implement reform plan aligned to turnaround principles and based on the recommendations of the diagnostic review.
 - Revoke the charter.
- In lieu of implementing either of these two options, the charter authorizer may instead elect to immediately revoke the charter.

If the persistently low-performing charter school has not demonstrated adequate improvement after three years of participating in a performance contract or implementing a reform plan, the authorizer must revoke the charter. No authorizer may renew a charter if the school is persistently low performing. Relevant state law and new or, to the extent permissible, existing charter school contracts will need to reflect these requirements.

Private Schools in the Parental Choice Program

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

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

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

- The choice school must enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years. If annual performance targets are not met, the school shall no longer participate in the Choice program; or
- DPI will conduct a mandatory on-site diagnostic review to identify the factors contributing to poor performance at the school, funded by the private school. After

participation in the state-conducted review, the Choice school must implement one of two options with respect to the school consistent with the findings and recommendations of the diagnostic review:

- Contract with a state-approved independent expert/vendor to implement a turnaround model based on the recommendations of the diagnostic review.
 - Discontinue participation in the choice program; or
- In lieu of implementing either of these options, the choice school may elect to immediately discontinue participation in the program.

Aligning Relevant State Initiatives

DPI also committed to aligning existing and developing state education initiatives to inform each process and avoid duplication of efforts. Accordingly, DPI has aligned relevant initiatives, in existence and in development, across the agency to support the recommendations made by task forces regarding three current statewide educational reforms: 1) Early literacy, 2) Educator Effectiveness, and 3) School and District Accountability. Working in collaboration and cooperation with key stakeholders, including the Governor and the Chairs of the Education Committees. Each of these task forces has concluded their meetings. DPI has begun development of appropriate cross-agency workgroups to support the implementation phase for each set of recommendations. The work of each of these workgroups, and their members, will inform the Statewide System of Support (SSOS).

Addressing Capacity

The Design Team also indicated the state system should be developed based on *reasonable and realistic implementation goals* that address capacity at the state, district, and school levels. Informed by this recommendation, DPI's request for flexibility identifies the most efficient yet effective means to affect change. For example, the proposal to focus reforms at the district level if an LEA exhibits systemic barriers was informed by findings from School Improvement Grant (SIG) monitoring visits. One district, with 12 SIG schools, was struggling to implement meaningful reforms and, under this new system of accountability, the same district would be expected to implement similar turnaround plans in approximately five times the number of schools. Therefore, DPI deemed district level intervention more effective and efficient, and also more likely to create change.

Making Improvements as Necessary

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

NEWLY DEVELOPED STATEWIDE SYSTEM OF ACCOUNTABILITY

The School and District Accountability Design Team provided helpful guidance and recommendations concerning the accountability system presented in this Request for ESEA Flexibility. For example, the group not only specified generally that growth and attainment should be factors in school accountability, but proposed four priority areas of the accountability system: Student Attainment, Student Growth, Closing Gaps, and On-track (for elementary and middle schools) or Postsecondary Readiness (for high schools). These priority areas form the foundation of an accountability index system that incorporates multiple measures in calculating a school-level score (on a scale from 0-100) that is used to place schools on a six-level continuum. The index system is also used to identify the highest need schools based on overall performance and gaps between subgroups, and to identify schools that demonstrate high performance overall.

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

New School and District Report Cards will be developed over the coming year, in consultation with Wisconsin's TAC, school and district staff, and other stakeholders. Report cards based on the accountability index will be publicly reported beginning in summer 2013. DPI will set differentiated expectations (Annual Measurable Objectives) based on each school's and district's overall performance on the index. Schools further behind will have more aggressive AMO's, requiring all schools to be at an acceptable level within four years, regardless of their starting point.

CUSTOMIZED AND DIFFERENTIATED SYSTEM OF REWARDS, RECOGNITION, AND SUPPORT

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

Differentiated Systems of Support

In collaboration with the Design Team, DPI committed to provide differentiated systems of support to the lowest performing schools and districts, including professional development targeted to their individual needs. The following sections briefly describe the transition to and implementation of the new SSOS.

Transition Year: 2012-13

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

Waiving Supplemental Education Services

DPI will be using the ESEA flexibility as an opportunity to waive choice and supplemental education services (SES) from its current accountability system due to the limited impact on student achievement observed locally. DPI contracted with the Wisconsin Center for Educational Research (WCER) to conduct studies at the state and district level addressing the effect of SES. These studies conclude that SES has resulted in minimal impact on student outcomes. Due to the limited evidence regarding the effect of these programs, Wisconsin is requesting to reprioritize use of these funds towards other, more effective programs serving persistently low-achieving schools. After consulting with stakeholders, including Milwaukee Public Schools (MPS)--the largest LEA with an extensive history implementing SES--DPI determined districts would benefit from flexibility to develop and implement extended learning opportunities which more closely align with district and school curricula, programs, and philosophies.

Alternative Requirements. In collaboration with key stakeholders, DPI developed an alternative for districts interested in waiving SES (if applicable). For the 2012-13 school year, interested districts may submit a plan to DPI which identifies the requirements detailed in the following sections for approval. Upon approval from the state, the district can discontinue contracts with their current state-approved SES providers.

The state would require districts interested in waiving SES, as it is currently defined within NCLB, to submit a district-wide plan detailing the specific extended learning opportunities that will be provided in place of those currently required in identified schools. The plans must include:

Parent involvement. Significant consultation with parents must be the cornerstone of flexibility requests. Districts must first consult with parents to determine if a majority wish to waive SES as it is currently implemented. If parents express interest, the district must engage parents in shaping the newly defined extended learning opportunities in ways which would best meet the needs of their child, including the selection of instructional supports and interventions. Districts must provide evidence of these consultation processes, including representation of parents of all student subgroups served within the school (i.e., students with disabilities, English language learners, low-income students, and students of various races and ethnicities).

Logistics. District plans must describe in detail the following components for intervention

strategies outside the regular school day:

- Instructional frequency, duration, and schedule of interventions supporting literacy and mathematics;
- Student-to-teacher ratios, with a maximum of six students to one teacher (or less if necessary when serving specific subgroups, such as SwDs and ELLs);
- Staffing. This flexibility will allow districts to contract with high quality, certified teachers (including local staff) to enhance these opportunities and more closely align to district and school improvement goals;
- Duration. Per evidence provided by the What Works Clearinghouse, districts must provide a minimum of 45 hours of extended learning per student, to maximize the likelihood of increased student outcomes.

Supplemental instruction. The plan must still describe services which supplement instruction provided during the regular instructional day. Specifically, districts must provide the services:

- Before or after school;
- During Saturday school;
- During summer school; or
- Continue with SES in its current form with state-approved providers.

Curriculum and instruction. The plans must detail how the districts will evaluate the impact of the newly defined extended programs, as measured by specific, differentiated student learning outcomes. The plan must also describe how the services provide individualized instruction and align with individual student needs identified through balanced assessments, including the needs of SwDs and ELLs. Additionally, the plan must demonstrate that the new program aligns with current school and district curricula and instructional programming as a means to support student outcomes.

Assurances. As part of the plan, the district must make the following assurances:

- The district assures that the identification of students being served through additional and extended learning opportunities are low-income students (those qualifying for free or reduced lunch), *and* low-achieving as determined by school or district assessments.
- The district must align the services to identified student need(s).
- The district will identify a school-level parent contact to promote services.
- The services will be provided by certified teaching staff.
- The district will require parental signatures of consent on the student's instructional learning plan that outlines learning goals, as well as the progress, frequency, and method of on-going parental communication.

Budget. The district must submit a budget detailing funding sources and allocations to support the district's plan. Districts may use the Title I 20% set aside, if they provide evidence of consultation with private schools, as these services will now be subject to equitable participation.

As each of these components align with the turnaround principles and are also requirements of Priority School reform plans, this flexibility will support districts' and schools' transition to the new statewide system of accountability and support, which the state will fully implement in 2013-14.

Priority Schools

In 2012-13, SIG Cohort I and Cohort II schools will continue implementation of their reform plans, aligned to the turnaround principles, as planned.

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

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

Priority Schools¹

For persistently low performing schools, a DPI-contracted turnaround expert will complete a School Improvement Diagnostic Review (SIDR) to evaluate processes and practices, with specific emphasis on reading and mathematics instruction, to identify components of the instructional programming which will benefit from support and interventions (including identification of the processes and practices used to identify and serve SwDs and ELLs). Following the SIDR, the school must partner with a state-approved vendor with proven success in addressing the school's specific areas of weakness within their instructional programming, as identified during the SIDR. In partnership with the vendor, the school must submit a detailed reform plan, aligned to the SIDR findings and the turnaround principles, via Indistar®. The vendors will serve as liaisons between DPI and the school, provide monitoring results to the State Superintendent, and relay directives from DPI while supporting implementation of reform plans.

The state will identify persistently low performing districts if systemic challenges at the LEA level contribute to a large proportion of district schools identified as Priority Schools (see rationale provided above). If identified, a DPI-contracted turnaround expert will complete a District Improvement Diagnostic Review (DIDR) at the LEA level to evaluate critical systems and structures within the district's central office. The State Superintendent will work with the contracted turnaround expert to direct reform at the LEA level, including staffing,

¹ The following sections summarize interventions in traditional public schools and districts if identified within the new statewide system of accountability. For information regarding the interventions required of charter schools and private schools participating in the Parent Choice Program, refer to the previous section: *Reprioritization and Systemic Changes at the State Level*.

programming, and finances. The turnaround expert will also work closely with the district to support implementation of the required reforms. Additionally, identified schools within the district will continue to implement Corrective Action Requirements and SIG to drive reform at the school level (if applicable).

The SEA will provide targeted support to Priority Schools and Districts to improve implementation quality and student outcomes. Systems of support will include a list of turnaround experts identified through a state approval process (see Section 2.G), the use of Indistar® (the online system which allows schools and districts to develop and monitor a reform plan aligned to their individual needs) a DPI district liaison, and SEA monitoring (see Section 2.D for more detail).

Focus Schools

Focus schools will be identified using a subgroup gap measure. Specifically, schools with large subgroup gaps in reading attainment, mathematics attainment, or graduation rates will be identified as Focus Schools.

DPI will require all LEAs with schools identified as Focus Schools to ensure that those schools do the following:

- Assess core instruction and interventions in reading and mathematics, with specific emphasis on the processes and practices to identify and serve SwDs and ELLs;
- Develop and implement a school reform plan to ensure RtI is implemented with fidelity in reading and mathematics; and
- Report RtI implementation progress and student achievement data.

DPI will provide comprehensive and targeted systems of support to Focus Schools in order to improve the quality of implementation and student outcomes, including training, resources, and guidance from the Wisconsin RtI Center, as well as Indistar®.

After Three Years of Implementation

If, after three years of implementation a Priority School is identified as Priority status again, the State Superintendent will utilize his/her authority to intervene, as defined by legislation, to remove the school from its local LEA and place the school under the authority of a state identified turnaround expert. In exchange for the flexibility and autonomy associated with removal from the local LEA or jurisdiction of its school board, the state will hold the expert accountable for the improvement of school and student outcomes.

If, after three years of reform and Focus School status, a Focus School is identified again, DPI will increase the level of prescription and schools and their LEAs will lose flexibility and autonomy until evidence of on-going improvement. (For more detail regarding Priority and Focus School Interventions and Supports, see Sections 2.D and 2.E, respectively.)

Recognize High Performing Schools

While the School and District Accountability Design Team prioritized state efforts and resources in low-performing schools and districts, there was agreement that the state should not only recognize Wisconsin’s high performing schools, but should also disseminate their practices statewide as a means to drive change in schools struggling to increase achievement.

DPI has long understood the importance and benefit of publicly recognizing and rewarding high performing Title I schools, as evidenced by the introduction of *Schools of Recognition* (SOR) in 2003. Across recent years, DPI has expanded and enhanced these opportunities to create a comprehensive program of public recognition and rewards designed to positively incentivize schools to improve student achievement or maintain high levels of performance. DPI designed the system of rewards and recognition to represent the goals in the state strategic plan:

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

The methodology used to identify Title I schools rewards schools “beating the odds” and increasing student achievement in schools with high poverty. This methodology allows the state to reward schools that specifically target *closing the statewide achievement gap*. Collectively, the state’s initiatives have heightened the awareness of best practices and quality instructional programs throughout Wisconsin Title I districts and schools.

This application for flexibility of implementation within ESEA legislation provides DPI the opportunity to enhance and expand the existing rewards and recognition program in order to implement more rigorous identification requirements of participants using the new statewide index system (see Section 2.B), expand the current Title I accountability and support system to a Statewide System of Support (SSOS) with the inclusion of all Wisconsin schools, and add recognition for schools making significant progress in closing their in-school achievement gap as a means to help address the achievement gaps across schools and across the state.

Additionally, the state will recognize schools identified as Significantly Exceeding Expectations (the highest level of determination within the new state system), as this determination represents an impressive and rigorous level of accomplishment also shown by high scores within all four priority areas (*Achievement, Growth, College Readiness, and Gaps*). This recognition incentivizes schools to emphasize improving scores for both high and low performing students, closing existing gaps (such as with ELLs and non-ELLs or SwDs and non-SwDs), and preparing students college or career.

TIMELINE FOR IMPLEMENTATION

DPI will begin implementation of its new accountability system with a Transition Year in 2012-13. During this year, the state will begin distribution of the new Report Cards aligned to the accountability index system, to inform schools and districts of the new system (including reporting of assessment scores aligned to NAEP) and their own strengths and weaknesses

within the new system in order to prepare for full implementation of the system in 2013-14. Priority Schools currently implementing SIG will continue implementation of the turnaround models. Thus, these schools will meet the requirement for implementation of Priority School reforms in 2012-13. This transition year will represent the final year of SIG implementation for most of these schools, allowing the state to transition to its new accountability system, including plans targeted to the district and school level as appropriate. Additionally, schools currently required to implement supplemental educational services (SES) and school choice as a consequence of NCLB will be allowed to use this transition year to opt out of these programs, pending support from appropriate key stakeholders and submission of a detailed plan for transition that is approved by DPI. DPI will continue to implement its current system of recognition and rewards for the 2012-13 school year.

As presented in Table 2.1, the state will continue with full implementation of the proposed plan pending approval by USDE beginning in 2013-14.

TABLE 2.1. Timeline for Transition to Newly Developed State System of Differentiated Recognition, Accountability, and Support.

	Responsible Party	2011-12 School Year	2012-13 School Year	2013-14 School Year	2014-15 School Year	2015-16 School Year
clarify expectations, timelines and grant opportunities.						
SEA provides training to all Priority and Focus Schools and their LEA representatives on Indistar®	Title I and School Support Team			June-July	n/a?	
Priority and Focus Schools participate in reviews of instructional practices (diagnostic review), respectively)	External Partner (TBD)			August-November	N/A?	
SES and CHOICE is waived. LEAs must submit plan for supplemental tutoring w/parent input as part of the plan.	LEAs with level II - SIF	Fall	Fall	Fall	Fall	Fall
20% set aside redirected to fund LEA LTP in Priority Schools						
Consult with key stakeholders and parents when developing plans	LEAs, Priority and Focus Schools with SEA district liaison			August-November		
Priority and Focus Schools develop school reform plans aligned to findings from reviews of instructional practices	LEAs, Priority and Focus Schools with SEA district liaison			August-November	August-November (modify plan)	August-November (modify plan)
Priority and Focus Schools submit school reform plans to SEA via Indistar® (annually)	LEAs with Priority and Focus Schools CII			November 1	November 1	November 1
SEA develops competitive grant application and review criteria for Priority Schools	Title I and School Support Team			August-November		
SEA releases regional grants workshops for 1003(a) competitive grant program and application materials for Priority Schools	Title I and School Support Team			August-November		
SEA approves Indistar® plans (year #1)	Title I and School Support Team			January		
SEA monitors LEAs' school reform plans (quarterly)	SEA			Quarterly beginning January		

	Responsible Party	2011-12 School Year	2012-13 School Year	2013-14 School Year	2014-15 School Year	2015-16 School Year
<i>Communicating the New Accountability System</i>						
ESEA waiver posted for public comment	LEA	January 21				
ESEA waiver submitted to DOE	LEA	February 21				
Disseminate state goals to LEAs increase graduation rate to 92% by 2018		State goal 86%	State goal 87%	State goal 88%	State goal 89%	State goal 90%
<i>Reporting</i>						
New report cards	OEA	Pilot	Required	Required	Required	Required
<i>Supporting School Improvement</i>						
Release of SIG continuation applications for existing Cohort I and II schools (pending USED launches)	Title I and School Support Team	March	Spring	Spring	Spring	Spring
Release of RFP for Diagnostic Review vendor	Title I and School Support Team			January	N/A	N/A
Recruitment/training of SEA-district liaisons (assigned to Priority Schools)	Title I?			November-January		
Final determination of Priority and Focus Schools, as well as Schools of Recognition (3 year cohort)	Office of Educational Accountability			May	3 year cohort	3 year cohort
LEAs notified of determinations and requirements of Priority and Focus Schools	State Superintendent's Office			May	3-year cohort	3-year cohort
SEA-district liaison assigned to LEAs with priority school(s)	Title I			May		
SEA selects diagnostic review vendor	Title I and School Support Team Title I Committee of Practitioners Rd Center Title I Network			June-July	Continue contract w/selected vendor	Continue contract
SEA conducts school meetings and webinars with Priority and Focus Schools, as well as their LEAs, to	Title I and School Support Team			Ongoing beginning June-July		

	Responsible Party	2011-12 School Year	2012-13 School Year	2013-14 School Year	2014-15 School Year	2015-16 School Year
<i>Intervening to Correct Deficiencies</i>						
approval)						
Implement SEA directed CAR		Ongoing if applicable				
Assist LEA in restructuring schools that fail meet performance objectives		N/A	N/A	N/A	N/A	July 2017
Rewards						
Continue recognition program: Schools of Recognition recognized publicly in State Ceremony	Title I and School Support Team	October	October	October	October	October
Continue recognition program: LEAs notified of SOR grant approval		January	January	January		
Continue recognition program: Teacher Fellowship applications due	LEAs with Schools of Recognition	January				
Continue recognition program: Teacher Fellowship grantees announced	Title I and School Support Team LEAs with Schools of Recognition	March				
Spotlight Schools applications due	Spotlight Schools and their LEAs	March				
Notification of Spotlight School awards	Title I and School Support Team	May				
SEA conducts onsite visits to Spotlight schools		September-October				
Spotlight Schools open visits to LEAs and schools statewide	Spotlight Schools and their LEAs	November-April				
Ongoing network sessions with principals of spotlight schools		September-May				

	Responsible Party	2011-12 School Year	2012-13 School Year	2013-14 School Year	2014-15 School Year	2015-16 School Year
LEA and SEA district liaison monitor school reform plans (weekly)	LEA and SEA-district liaison			Weekly beginning February		
Priority Schools' competitive grant application due	LEA's with Priority Schools			January 31		
External review and internal review of Priority Schools' competitive grant application	Title I School Support Team Title I Committee of Practitioners			February		
Recommendations for Priority School funding made to State Superintendent	Title I and School Support Team			February		
Priority School grantees notified of funding	State Superintendent's Office			March		
LEAs begin implementation of approved school reform plans for Priority (non-SIG) and Focus Schools	LEA's with Priority and Focus Schools			March		
Priority Schools and Focus Schools participate in ongoing state-directed PD aligned to school reform plans	LEA's with Priority and Focus Schools CESAs/Title I network Rd Center SEA SEA Center Turnaround Vendors			Ongoing beginning March		
Focus Schools participate in online progress monitoring (SIMS)	LEAs with Focus Schools Rd Center SEA			Ongoing Beginning March		
Indistar® opens for Priority and Focus reform plans	Title I and School Support Team			April	April	April
Priority and Focus School Indistar® plans due (annually)	Title I and School Support Team			June	June-modified plan	June-modified plan
SEA approves Priority and Focus School Indistar® plans (annual)	Title I and School Support Team			July	July	July

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A ☒ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	Option B ☐ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools, it must: a. provide the percentage of students in the “all students” group that performed at the proficient level on the State’s most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.
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Wisconsin’s School and District Accountability Design Team indicated interest in including content areas other than English language arts and mathematics as part of a statewide accountability system. This topic will be revisited as new, common standards and assessments are developed for other content areas.

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

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

Option A ☐ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the “all students” group and in each subgroup who are not proficient within six	Option B ☐ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must	Option C ☒ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups.
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years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State’s report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups. (Attachment 8)
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State Superintendent Tony Evers convened the School and District Accountability Design Team with other educational leaders because of a shared commitment to improving upon existing accountability structures and ultimately improving outcomes for all students in Wisconsin. The Department of Public Instruction (DPI) is deep in the work of re-focusing its efforts in a way that braids together agency initiatives to build college- and career-readiness for all students.

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

In an effort to design a system that reflects this vision and holds schools accountable for high-leverage, measurable, fair indicators of student engagement, progress, and performance, Wisconsin has developed an index system that incorporates multiple measures—including student growth—that the Department of Public Instruction, in consultation with key stakeholders. This index system reflects the goals of high attainment and growth as well as other key priorities. In all, the Wisconsin Accountability Index incorporates four priority areas: Student Attainment; Student Growth; Closing Gaps; and On-

Track (for elementary and middle schools) or Postsecondary Readiness (for high schools).

Factoring in Subgroups

Under No Child Left Behind, large, diverse schools could miss AYP on up to 64 different indicators. In order to develop a system that appropriately focuses on subgroups—i.e., one that does not “hide” subgroup performance—but that also acknowledges the importance of overall performance and growth, the Wisconsin Accountability Index will factor in student subgroups in certain, but not all areas. Individual subgroup performance will be reported for all priority areas, but for accountability calculations, the “all students” group will be used to calculate index scores in the Student Attainment and Student Growth Areas. Individual subgroups will inform calculations for the remaining priority areas: Closing Gaps and On-Track/Postsecondary Readiness. These subgroups include each of the subgroups currently defined in NCLB. How specific subgroups are factored into these priority areas is dependent upon the measure within each area, which is delineated below. The purpose of this approach is to ensure a fair system that appropriately prioritizes progress toward college and career ready expectations for all students and every single subgroup.

The School and District Accountability Design Team specifically recommended use of an additional subgroup, one that groups the lowest 25% of performers together. The goal for including such a subgroup is to prioritize moving all low performers up, regardless of demographic characteristics. After attempts to create such a supplemental subgroup, DPI has determined that it is not possible at this time given that the WKCE’s scale is not vertically aligned. Creation of a developmental scale to be used in place of a vertical scale was considered, but requires costly changes to WKCE tests. Instead, inclusion of the lowest 25% as an additional subgroup will be considered for inclusion in the accountability system upon implementation of the SMARTER Balanced Assessment System in the 2014-15 School Year.

Priority Area and Overall Scores

Within this multiple measures index, scores earned for each priority area will be based on the measures used. Priority area scores will be combined into an overall score, which will contribute to a school’s placement in one of six categories along a continuum. The exact methodology for how each category is weighted and combined into the overall score will be determined through a standard setting process overseen by DPI’s Technical Advisory Committee, Dr. Brian Gong of the National Center for the Improvement of Educational Assessment, Dr. Andrew Porter from the University of Pennsylvania, and Dr. Robert Linn from the University of Colorado.

Flags

When constructing simulations of the index and its components, it became clear that certain proposed components of the index were not functioning in ways that were intended. For example, DPI attempted to incorporate a school’s test participation rate into its attainment index, with the goal being to acknowledge the importance of high test participation and not allow schools to inappropriately skew their measure by not

testing all students. However, simulations indicated that incorporating participation into the calculation of the Attainment Index resulted in every school's score in this area receiving a boost, even schools with low participation.

The concept of “unacceptable-performance flags” is Wisconsin’s solution to incorporating test participation and dropout rates into the new accountability system, as well as to highlight the importance placed on every child reading at grade level by 3rd grade. These flags exist outside of the mathematical calculation of the index, and instead carry overarching weight in determining where on the accountability scale a school falls.

Test Participation. Schools may receive unacceptable-performance flags if their “All Students” group or any single subgroup misses the target in either mathematics or reading test participation. The target test participation rate is 95%.

Dropout Rate. Schools will receive a flag if their dropout rate is above 2% for Elementary and Middle schools, and 10% for High Schools. These thresholds were calculated based on recent statewide data.

3rd Grade Reading. Reading proficiency in third grade was identified as a key indicator by the Read to Lead Task Force, a group convened by Governor Scott Walker, and vice-chaired by State Superintendent Tony Evers, to identify needs and establish recommendations that will result in improved reading skills for all students across the state, but with particular focus on early grades. To reflect the priority on 3rd grade reading, this accountability system will apply a flag to schools whose 3rd grade reading proficiency rates are more than two standard deviations below the statewide average.

Stars

An accountability system should not only identify performance below expectations; it should also highlight positive progress or work being done in schools and districts. In addition to flags, report cards will include stars for certain indicators for which DPI will not hold schools accountable, but that are important enough to highlight as a significant positive for that school or district. Specifically, stars may be awarded for

- Rate of college credits earned in high school;
- Postsecondary enrollment rates within 16 months of college graduation; and
- Advanced Placement participation and performance.

The final submission of this waiver request will include sample report cards that demonstrate the index system with flags and stars included.

Final overall index scores will be an aggregation of scores in the four priority areas. Overall scores place schools and districts within one of six categories:

- Significantly Exceeding Expectations
- Exceeding Expectations
- Meeting Expectations
- Not Meeting Expectations
- Significantly Below Expectations
- Persistently Failing to Meet Expectations

Expectations for Wisconsin Schools

Wisconsin's goal is to couple these accountability determinations with differentiated interventions and supports for certain schools and development of a statewide system of school improvement tools and resources available for all. The goal is for all schools in the state to be at the *Meet Expectations* level within four years. To meet this goal, annual expectations must be made clear.

Expectations for Schools

As mentioned above, flags serve as one overall goal in three areas: test participation, dropout rates, and 3rd grade reading performance. Schools that receive flags in any area cannot be to *Meet*, *Exceed*, or *Significantly Exceed Expectations* in the accountability system. In order to set targets on-track with meeting the goal of all schools at least *Meeting Expectations*, Wisconsin will set differentiated Annual Measurable Objectives (AMOs) that ensure all schools are on track to meet, continue to meet, or exceed expectations within four years of system implementation. Specifically, school-level AMOs will require an increase in overall index scores at a rate that each school's score—as long as it does not earn any flags—places it in the Meeting Expectations category.

Expectations for Districts

While school-based accountability expectations are based on a trajectory toward Meeting Expectations, district-level accountability calculations are intended to focus annually on how a district performs at each of three levels: grades K-5, 6-8, and 9-12. Index calculations will be run for data aggregated to each of the levels (including possible flags for test participation, dropout rates, and 3rd grade reading performance). District-level report cards will include information about which of the six categories each school level performed, and at what category the district performed overall. Districts in which all three levels do not at least Meet Expectations—either based on index scores or flags—are identified as needing improvement.

District Flags. In addition to the three possible school-level flags mentioned previously, a district will receive a flag—and may require interventions discussed in later sections—if one or more schools in the district fall into the *Persistently Failing to Meet Expectations* category.

Important Index Miscellany

Cell Size

All accountability calculations will apply a cell size of 20, a change from Wisconsin's current use of a cell size of 40. This change represents a dedication to “shining the light in the

corners” and ensuring that accountability calculations are fair for all populations.

Establishing Baselines

In anticipation of the use of new, higher cut scores for the WKCE, overall index scores will be set using the new WKCE cut scores. Baselines for all AMOs will be established using the new cut scores.

Reporting

Given many significant changes to the accountability system, and a keen desire to ensure an ample implementation period so that educators, the public, and other important stakeholders are well-informed about this new Wisconsin accountability system, DPI intends to phase in accountability report cards. District partners and other stakeholders have been and will continue to be consulted on the design of school report cards, particularly as the Wisconsin Accountability Index is field tested following the 2011-12 school year.

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

More detailed descriptions of the methodology for each priority area are provided below.

Student Attainment

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

Test participation was initially going to be included in a school’s attainment score as an indicator of student engagement. However, as previously mentioned, this indicator was not functioning as intended during initial simulations of the measure. Test participation will instead be included within the new accountability system as a flag that will be received if the

school fails to test 95% of its students in the “all students” group or any subgroup with more than 20 students.

Student Growth

On Target to Move Up

The growth measure proposed, On Target to Move Up, is an adaptation of the principles behind Colorado’s “Catch Up, Keep Up, Move Up” measures across multiple levels of achievement. It is a 1-100 index score that combines subject scores for reading/ELA and mathematics. On Target to Move Up is self-differentiating, accounting for schools with high achievement while allowing lower-achieving schools to gain credit for high growth, a priority for this accountability system. Wisconsin is not yet adopting a high school growth measure because students are not tested in the 9th, 11th, or 12th grades; however, DPI intends to request funds for EXPLORE, PLAN, ACT, and WorkKeys which would enable an appropriate growth measure to be calculated for high school students (in addition to providing important college-pathway information to students, parents, and educators).

Background

Student Growth Percentiles (SGP) were originally developed for the Colorado Department of Education.² An SGP is a number derived from a statistical comparison of a student’s growth on an assessment to students with similar performance histories, assigning the amount of growth a percentile rank. An advantage of SGPs is that they characterize growth without regard to student demographics; every student (with enough data) receives a growth percentile.

Colorado developed a set of aggregate measures based on SGPs known as “Catch Up, Keep Up, Move Up.” In this method, the statistical program that calculates each student’s SGP also projects the SGP they need to achieve the next year in order to grow to a higher proficiency level within a number of years. The next year, their actual SGP is compared to the projection.³ Using SGPs in this manner is a growth-to-standard measure with the advantage that it evaluates growth relative to how a student is achieving and where they need to go to meet proficiency standards, rather than by a fixed number of scale score points as with a value table.

On Target to Move Up avoids the drawback of aggregating SGPs by school median, which is that a median SGP is still normative and is affected by the achievement of other students at other schools. A related, school-level statistical method, Value Added Modeling, is also normative and dependent on other schools’ performance. *On Target to Move Up* addresses these concerns at the school level.

² Betebenner, Damian. *Estimation of Student Growth Percentiles for the Colorado Student Assessment Program*. Dover, N.H.: National Center for the Improvement of Educational Assessment, 2007. Accessed Jan. 5, 2012 from <http://www.cde.state.co.us/research/Documents.htm>.

³ Colorado Department of Education. *Catch Up, Keep Up, and Move Up Definitions*. Denver, Co.: 2009. Accessed Jan. 5, 2012 from <http://www.cde.state.co.us/research/Documents.htm>.

Methodology

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

- A student is included for calculation of a growth factor for a subject if DPI is able to calculate the student’s SGP in two consecutive years and the student does not score at the Advanced level in the previous year.
- In the first year, a student’s SGPs needed to reach the Basic, Proficient, and Advanced achievement levels over 1, 2, or 3 years, are projected for each subject. At each level, the lower of the 1-, 2-, or 3-year projections is their target for that level.⁴
- As an informational note, the WKCE proficiency categories, in order from lowest to highest performance are: Minimal Performance, Basic, Proficient, and Advanced.
- In the second year, the student’s SGPs, describing their growth from the first year to the second, are compared to their targets for each subject. The student receives one point for each higher level’s target they meet or exceed (e.g. a student starting at the Minimum Performance level could receive 1 point for reaching the Basic target, 2 points for reaching the Proficient target, or 3 points for reaching the Advanced target). If the student starts at the Proficient level in the first year and does not meet or exceed the Advanced target, but they meet or exceed the Proficient target, they receive ½ point as credit for maintaining proficiency.
- Because Wisconsin tests its students in the fall, the school accountable for a student’s growth is the school at which they were enrolled in the first year.
- A school’s growth factor for each subject, *GF*, is the sum of its students’ points divided by the number of students included in the growth factor, multiplied by 0.5⁵.
- The school’s percentage of students with SGPs calculated in two consecutive years reaching the Advanced level in the subject in the first year, *PA*, is determined.
- The school’s subject score is $(GF + PA - [GF \times PA]) \times 50$ ⁶, rounded to the nearest whole number.
- The school’s *On Target to Move Up* score is the sum of its reading/ELA and mathematics subject scores.

In the preliminary simulations we found that 68 percent of students who took the WKCE in 2008-09 (287,539 of 425,839), and 67 percent in 2009-10 (286,418 of 425,494), had two consecutive years of SGP data. As in other aspects of Wisconsin’s proposed accountability

⁴ Usually, the 3-year projection will be lowest and thus the target, but since our cut score progression is not linear there will be times where a student is near an achievement level cut and the 1- or 2-year projections are lower.

⁵ The multiplier of 0.5 is used to scale the growth factor to a value between 0 and 1, as with a percentage.

⁶ Adding the growth factor and percentage advanced and then subtracting the product of those two values has the effect of scaling growth with achievement at the advanced level. The floor of the subject score, where a school starts with 0% advanced students ($PA=0$), is simply the growth factor times 50; the ceiling, where 100% of students are advanced ($PA=1$), is 50.

system, we use 20 as the minimum cell size required for a school to have a score calculated; in the simulations this omitted 11 percent of schools (167 of 1,488) tested in 2008-09 and 10 percent (151 of 1,476) tested in 2009-10. Given the large number of small schools in Wisconsin, we consider this rate acceptable.

On Target to Move Up contributes to a system that differentiates accountability determinations. It has the particular advantage of being a self-differentiating measure, for two reasons: First, lower-achieving schools can earn higher scores by showing more growth, since the one-point-per-level scoring system allows lower-achieving students to gain more points. Second, the measure essentially gives automatic credit for students at the advanced level. This rewards schools for high achievement, rather than punishing them because there is no higher level to which we can compare their advanced students.

Closing Achievement Gaps

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

Closing achievement gaps is a priority area for Wisconsin. Wisconsin has one of the largest black-white achievement gaps in the nation. The design of this accountability system, while it aims to eradicate existing gaps across current subgroups. Wisconsin's accountability system reflects this priority by including a specific priority area for closing gaps in the index calculation for accountability determinations, and by including several measures of existing gaps within this index.

The overall Gap Closure Index will be a combination of gap measures of Attainment, Rates of Growth, and Graduation rates. Current measures within the system strike a balance of characterizing existing gaps and acknowledging progress in closing those gaps.

The Attainment Gap

Annual *within school* achievement gaps will be determined for each demographic subgroup using weighted proficiency rates calculated for each subgroup using the same methodology that is employed in the creation of the Attainment priority area mentioned above. The weighted proficiency rate of each subgroup is then compared to its comparison group. Specifically, the system will compare each of the five race/ethnicity subgroups to the highest performing racial/ethnic subgroup in the school; English language learners to English proficient students; students with disabilities to students without disabilities, and; economically disadvantaged students with non-economically disadvantaged students.

Each group must meet the minimum cell size of 20 students in order to be given a gap

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

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

The Growth Gap

Another component of the Closing the Achievement Gap index is a growth measure, *On Target to Proficient*. Like the index for the Student Growth priority area, it is an application of Colorado's "Catch Up, Keep Up, Move Up" principles. Because Wisconsin students are not tested in the 9th, 11th, or 12th grades, it will not be used for high schools at this time, although high school growth measures could be included in a future version of the system with statewide availability of the EXPLORE, PLAN, and ACT tests.

On Target to Proficient looks at growth of each subgroup to the Proficient level. The process to determine a school's score, similar to that for the growth index, is:

- A student is included for calculation if we are able to calculate their SGPs in two consecutive years in reading/ELA and mathematics.
- In the first year, a student's SGPs needed to reach the Proficient achievement level over 1, 2, or 3 years are projected for each subject. The lower of the 1-, 2-, or 3-year projections is their target.
- In the second year, the student's SGPs, describing their growth from the first year to the second, are compared to their targets in each subject area. The student is flagged as On Target to Proficient in a subject if they meet or exceed their target.
- Because Wisconsin tests its students in the fall, the school accountable for a student's growth is the school at which they were enrolled in the first year.
- For each racial/ethnic group in a school, and for the ESEA binary and comparison groups (e.g. students with disabilities vs. students without disabilities), in that school, a subgroup score is determined in each subject. The subgroup score is calculated from the percentage of students included in the subgroup On Target to Proficient, *OTP*, and the percentage of its included students in the subgroup reaching the Proficient level in the first year, *PP*, as follows: $OTP + PP - (OTP \times PP)$.
- The gap for a subgroup in a subject is the difference between the subgroup's score and its comparison group's score, if the subgroup's score is lower. For racial/ethnic subgroups, the comparison group is the highest-scoring racial/ethnic subgroup.
- The school's gap score in each subject is 1 minus the average of all the gaps present in

that school, multiplied by 50 and rounded to the nearest whole number.

- The school's overall gap score is the sum of the reading/ELA and mathematics gap scores.

At this time, DPI plans to weight each gap measure equally to establish a priority area index score. Because growth is only measured in elementary and middle school, and graduation only measured for high schools, 50% of the Closing Gaps priority area will be determined by attainment gap measures and the other 50% will be determined based on either growth or graduation gap measures.

The Graduation Gap

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

Within school gaps in graduation rates between demographic subgroups will be evaluated annually. Specifically, the system will compare graduation rates for each race/ethnicity subgroup to the race/ethnicity subgroup that has the highest graduation rate; economically disadvantaged students to non-economically disadvantaged students; students with disabilities to students without disabilities, and; English language learners to English proficient students. These comparisons will be made using four-year adjusted cohort graduation rates and six-year adjusted cohort graduation rates. Schools will receive a numerical score for this priority area on a scale of 0-100, based on the average gap in graduation rates when placing equal weight on each subgroup gap.

On-Track Status/Postsecondary Readiness

The On-Track/Postsecondary Readiness measures proposed consist of a number of variables designed to identify whether schools are meeting benchmarks in preparing students for postsecondary success. The On-Track indicator, for schools with grades pre-Kindergarten through grade 8, includes attendance, with reading performance for 3rd grade and the 7th and 8th grade dropout rates serving as flags for schools that fall below certain thresholds. The Postsecondary Readiness indicator includes attendance, ACT participation and performance, and graduation rates, with the 9th through 12th grade dropout rates serving as a penalty flag for schools that fall below certain thresholds.

On-Track Indicator

The On-Track priority area calculation is applied to schools with grades pre-Kindergarten through grade 8. At this time the priority area includes a measure of attendance only. Dropout rates and performance on the 3rd grade reading assessment were also deemed important indicators, but were removed from this priority area to serve as overall flags for the Index system.

Dropout Rate (Flag). The number of dropouts for each school with students from grade 7-8 is calculated by identifying the number of dropouts and dividing that total by the overall school population to establish a school dropout rate. A subgroup dropout rate percentage is calculated for subgroups with at least 20 students for each racial/ethnic subgroup, for students with disabilities, students who are economically disadvantaged, and English Language learners. If the overall dropout rate or the dropout rate of any subgroup exceeds 2% for elementary and middle schools, or 10% for high schools, the school will receive a flag.

3rd Grade Reading Performance (Flag). Wisconsin Student Assessment System (WSAS) reading proficiency rates for the all students (full academic year) group are calculated to determine whether a school receives a flag for the 3rd grade reading performance. Third grade reading performance is calculated for subgroups with at least 20 students for each race/ethnicity subgroup, for students with disabilities, economically disadvantaged students, and English Language learners. If the overall proficiency rate for the school falls two or more standard deviations below the state wide average the school will be flagged.

Attendance (100% of On-Track priority area index score). To determine an attendance score, the number of days attended out of the total possible days for each student is calculated. These numbers are summed together to provide both an overall school attendance rate and a subgroup attendance rate (for each subgroup with at least 20 students). Subgroup attendance scores are calculated for the following demographic groups: race/ethnicity, disability status, economic status, and English language learner status.

Each school's Attendance score will be calculated based on an average of the school's overall attendance rate and the lowest attendance rate of all subgroups present in the school. For example, if a school's overall attendance rate is 95%, but its attendance rate for American Indian students is only 75%, the school's Attendance score will be 85 out of 100 (i.e., $(95 + 75)/2 = 85$). Attendance is highly correlated with rates of high school graduation. As such, DPI is leveraging this high-impact measure by tying a school's score to its lowest-attending subgroup.

Postsecondary Readiness Indicator

The postsecondary readiness priority area is applied to schools with a grade 12. This priority area includes measures of attendance, participation and performance on the ACT, and graduation rates.

Attendance (20% of priority area index score)

The attendance calculation is based on the number of days attended out of the total possible days for each student. These rates are summed together to provide both an overall school attendance rate and a subgroup attendance rate (for each subgroup with at least 20 students). Subgroup attendance scores are calculated for the following demographic groups: race/ethnicity, disability status, economic status, and English language learner status.

As mentioned above, each school's Attendance score will be calculated based on an average of the school's overall attendance rate, and the lowest attendance rate of all subgroups present in the school.

ACT performance and participation (20% of priority area index score)

Participation. This measure is calculated by first identifying 12th grade students with a composite ACT score. The number of students with a score is divided by the total number of 12th grade students in the school to arrive at the ACT participation score.

Performance. ACT performance is calculated by identifying the number of students classified as meeting the College Readiness Benchmark established by ACT for each test area (English, Reading, Mathematics and Science) and dividing by the total number of tested students.

The ACT participation score and the ACT performance score for each test area are combined and the total is divided by five to arrive at the ACT performance and participation score.

Graduation (60% of priority area index score)

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

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

The graduation index score is calculated by adding the four-year adjusted cohort rate for the "all students" group to the six-year adjusted cohort rate for the lowest performing subgroup and dividing by two. While the goal of graduating from high school within four years of 9th grade is appropriate for most students, DPI acknowledges that graduating from high school in five or six years may also be appropriate—and in fact part of a detailed Individualized learning plan established by a student, his or her family, and educators—for some students. It is important that the accountability calculation recognize graduation beyond a fourth year in high school as an appropriate goal and a potential success for some students.

The School and District Accountability Design Team discussed the idea of short, long, and longer-term accountability systems that incorporate additional meaningful measures when the data are available in a reliable, high-quality manner. DPI does intend to include other postsecondary data, including (but not necessarily limited to) college enrollment, industry certification, and military enlistment, when these data are widely available.

Dropout Rate (Flag). The dropout rate for schools with students from grades 9-12 is calculated by identifying the number of dropouts and dividing that by the overall school

population. A subgroup dropout rate percentage is calculated for subgroups with at least 20 students for each of the following subgroups: race/ethnicity, disability status, economic disadvantaged status, and English proficiency status. If the school dropout rate or any subgroup dropout rate exceeds 10% the school will be flagged.

Advanced Placement – Star Consideration

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

For Performance – to identify the number of Advanced Placement exams taken in a given year and dividing that by the number of exams passed with a score of 3 or above.

WORK TO BE DONE

This index system is a work in progress. As mentioned earlier in this document, DPI is excited by the momentum offered to the state’s accountability reform efforts through this waiver process, and the Department looks forward to gaining valuable feedback early in the development of Wisconsin’s statewide accountability system to ensure not only that the system meets federal requirements but ultimately that it will result in the best outcomes for all students.

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

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

In addition, while some changes will be informed by the review process, DPI believes there are measures not included in the current Index that may result in a more sensitive, accurate system. Namely, more robust measures of student postsecondary readiness (like

postsecondary enrollment, credit-earning, and remediation rates), information about performance on assessments in additional subject areas like science and social studies, and school characteristics that point to the importance of rich, varied curricula that include course offerings such as art, music, physical education, world language, career and technical education, and other non-tested subjects as well as varied co-curricular activities. Advances in DPI's technology and data system will allow for some of these indicators to be factored into the Index in the future and such additions will be evaluated as soon as the data are available.

Expected Outcomes

By identifying four key priority areas, and high-leverage measures within those priority areas, DPI is creating an index-based accountability system that places schools on a continuum that informs differentiated interventions and supports. Ambitious but achievable AMOs that value all of the four priority areas and honor their representation of college- and career-ready expectations will inform improvement for all schools on the continuum and result in a significant number of students being on track for college and career.

Summary and Timeline

Wisconsin is making dramatic changes in how we think about accountability across the state. While work remains, this waiver request represents a significant commitment from DPI and a public statement that building and implementing a meaningful, transparent, statewide accountability system, while complicated and time-consuming, must continue to move quickly and must reflect the priorities of the state to move toward college and career readiness for every Wisconsin student.

As mentioned above, work on the Accountability Index continues.

2.C REWARD SCHOOLS

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

The draft release does not include the reward school lists. Because the Index standards setting process is not yet complete, only redacted school lists for reward, priority, and focus schools will be included in DPI's final waiver submission. Final lists will be available in Spring 2013.

Reward

Reward schools are identified annually and fall into one of three categories: Exemplary Schools, Gap Closing Schools, and schools that are Beating the Odds.

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

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

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

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

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

OVERVIEW

Wisconsin has long understood the importance and benefit of publicly recognizing and rewarding high performing Title I schools, as evidenced by the introduction of *Schools of Recognition* (SOR) in 2003. In recent years, the Department of Public Instruction (DPI) has expanded and enhanced these opportunities to create a comprehensive program of public recognition and rewards to positively incentivize schools to improve student achievement or maintain high levels of performance. DPI designed the system of rewards and recognition to represent the three academic components within the five strategies of the state strategic plan in order to help meet the three strategic goals:

- Providing rewards and recognition based on student achievement represents a strategy designed to *increase reading and mathematics performance* using incentives.
- DPI specifically developed the SOR grants to emphasize and develop *innovative instruction*.
- The programs rely on various *statewide infrastructures* to inform and support the dissemination of best practices.

Collectively, the state's initiatives have heightened the awareness of best practices and quality instructional programs throughout Wisconsin Title I districts and schools.

This application for flexibility of implementation within ESEA legislation provides DPI the opportunity to enhance and expand the existing rewards and recognition program in order to implement more rigorous identification requirements of participants, expand the current Title I accountability and support system to a Statewide System of Support (SSOS) with the inclusion of all Wisconsin schools, and add recognition for schools making significant progress in closing their in-school achievement gap as a means to support the state strategic goal and address the achievement gaps across schools and across the state. However, DPI will not seek flexibility for Reward Schools as it is currently defined in section 2.C and related

definitions within the Flexibility Guidance. Specifically, the definition of Reward Schools as identified within the guidance would require the state to modify its existing methodology for identification in a way which would skew outcomes and result in over-identification of low-poverty Title I schools in the state. As it currently exists, the methodology rewards Title I schools “beating the odds” and increasing student achievement in schools with high poverty, high minority student populations. This methodology allows the state to reward schools that help address the state’s achievement gap, which more closely aligns with the three strategic goals outlined in the state’s strategic plan, as previously noted.

The following sections describe Wisconsin’s plan to utilize this opportunity for flexibility to enhance its existing opportunities for recognition and rewards for Title I schools, as well as expand its recognition program to all schools statewide.

EXISTING OPPORTUNITIES FOR TITLE I SCHOOLS OF RECOGNITION

The following sections describe the four components that currently comprise Wisconsin’s Title I rewards and recognition program, which the state will continue to implement.

Schools of Recognition—Beating the Odds

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

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

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

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

Spotlight Schools. Any school identified as a SOR for three or more consecutive years can

apply to become a Spotlight Schools. Potential Spotlight Schools must complete a self assessment with documented evidence that demonstrates success in at least Teaching and Learning, as well as one of the following: 1) Vision, Leadership, and Governance; 2) Decision Making and Accountability, 3) Professional Development and Teacher Quality, or 4) Family, School, and Community Partnerships. Spotlight Schools may request grant funds.

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

Spotlight Schools may use grant funds to continue reforms and improve school practices.

The SEA also hosts two annual networking meetings for all Spotlight Schools. These meetings include opportunities for professional development, sharing of spotlighted practices, and the dissemination of SEA-developed materials to support dissemination of spotlighted practices. Finally, Spotlight Schools are featured on the SEA's Spotlight Schools website as well as in a statewide searchable database featuring Spotlight Practices.

Teacher Fellowships. Teachers in SORs can apply for a competitive fellowship grant program to fund personalized professional development opportunities designed to impact their practice, students, and school communities. Successful applications describe opportunities that will result in fresh perspectives, expertise, and broad world knowledge which will enhance instruction in their classrooms. The SEA selects approximately 20 teachers as Wisconsin SOR Fellows.

Basic eligibility requirements include the following:

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

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

ENHANCEMENTS TO WISCONSIN'S EXISTING RECOGNITION AND REWARDS PROGRAM

This application provides the state an opportunity to enhance its existing recognition and

rewards program to include more rigorous identification criteria using the new accountability index (as described in Section 2.B), introduce two new categories which recognize schools closing their in-school gaps (as measured by the Gaps Index of the new accountability index described in Section 2.B), as well as Exemplary Schools, or schools earning the highest scores across multiple measures of achievement (as measured by the overall index score within the new Statewide Index System described in Section 2.B).

Additionally, this flexibility provides the state the opportunity to expand its existing system of public recognition to include non-Title I schools in an effort to develop a Statewide School and District Accountability System aligned to recommendations provided by the School and District Accountability Design Team, as opposed to Wisconsin's existing accountability system which only affects Title I schools due to its funding source.

Non-Title I schools identified within these new categories will receive public recognition and become eligible to participate in state-conducted Spotlight Schools Diagnostic Reviews (SPDR). The state will conduct SPDRs to generate reports for statewide dissemination on high-quality practices utilized in *Gap Closing* and *Exemplary* schools. SPDRs will be based upon the criteria developed to identify Spotlight Schools and their spotlight practices. The state will prioritize diagnostic reviews within a small, representative sample of *Gap Closing Schools* in order to provide more applicable information to Wisconsin schools. *Gap Closing Schools* can inform statewide practice by providing strategies proven to rapidly improve achievement within each school's unique existing conditions and improve the quality and implementation of instructional programs and practices designed to supplement the instruction of SwDs, ELLs, and other student populations facing achievement gaps.

The SPDR process and dissemination of best practices in non-Title I schools will require additional state resources, including staffing and funding. Without additional state funding, DPI will continue to implement the rewards and recognition efforts in Title I schools.

TIMELINE FOR IMPLEMENTATION OF PROPOSED ENHANCEMENTS

Table 2.2 presents Wisconsin's timeline for implementing enhancements to the current system of recognition and rewards. As previously noted, expansion of recognition opportunities to include all Wisconsin public schools, charter schools, and private schools participating in the Parental Choice Program as recommended by the Design Team, will require the state to allocate funding towards these initiatives.

Table 2.2.

Timeline for Implementation of Wisconsin's System of Recognition and Rewards: Title I and Statewide.

	Activity	Person(s) Responsible	Budget
2012-13	Continue Current Title I Rewards and	Title I and School Support Team	TBD

	Recognition Programs (<i>Schools of Recognition</i>)		
2013-14	Modify Identification Formula for Existing Title I Rewards and Recognition Programs Using New Achievement Index (<i>Schools of Recognition</i>)	Office of Educational Accountability	TBD
	Continue to Implement Current Title I Rewards and Recognition Programs in Title I Schools Identified with Modified Formula (<i>Schools of Recognition</i>)	Title I and School Support Team	TBD
2013-14	Identify <i>Gap Closing Title I Schools</i> Using Gaps Index From New Statewide Accountability Index System (<i>Schools of Recognition and Title I Gap Closing Schools</i>)	Office of Educational Accountability	TBD
	Identify <i>Gap Closing Schools</i> Statewide Using Achievement-Growth Index From New Statewide Accountability Index System (<i>Includes non-Title Schools</i>)	Office of Educational Accountability	TBD
	Identify <i>Exemplary Schools</i> Statewide using Statewide Accountability Index System Overall Scores (<i>Includes non-Title Schools</i>)	Office of Educational Accountability	TBD
	Recognize all <i>Title I Rewards Schools</i> at	Title I and School Support Team; State	TBD

	Schools of Recognition Ceremony (<i>SOR Schools, Gap Schools, and Exemplary Schools if applicable</i>)	Superintendent	
	Publicly recognize all of Wisconsin's Statewide Reward Schools	Governor; State Superintendent	TBD
	Identify Representative Sample of 2013-14 Gap Closing Schools Statewide to Participate in Diagnostic Reviews (Includes Non-Title Public, Charter, and Private Schools Participating in Choice Program)	Office of Educational Accountability	TBD
	Conduct Diagnostic Reviews in Gap Closing Schools and Disseminate Findings	TBD	TBD

RATIONALE FOR SCHOOL REWARDS AND RECOGNITION

In the development of Wisconsin Title I rewards and recognition programs, DPI consulted a number of collaborative partners, including the State Superintendent's Collaborative Council, State Superintendent's Parent Advisory Committee, Title I Committee of Practitioners (CoP), the 12 regional Cooperative Educational Service Agencies (CESAs), Title I Network, teachers, administrators, and parents. The input from the collaborative partners collected during various meetings and networking sessions, as well as a statewide Title I needs assessment conducted by DPI, helped to shape each program in order to best meet the needs of the field. Additionally, the collaborative partners continually participate in annual grant application reviews and provide funding recommendations to the State Superintendent for each of the Title I rewards and recognition programs.

These programs remain popular with stakeholders across the state. While participating in informational sessions and presenting at key conferences across the state to inform stakeholders of the NCLB waiver opportunity, multiple representatives from Schools of Recognition expressed concerns regarding the potential discontinuation of SOR programming.

Additionally, stakeholders have directly informed the inclusion of future recognition initiatives through the School and District Accountability Design Team process. Design Team members, representing stakeholders across the state, supported the recognition of high performing schools identified using indices under the New Statewide Accountability System implemented in 2014-15 and the dissemination of their proven practices across the state.

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA’s methodology for identifying a number of lowest-performing schools equal to at least five percent of the State’s Title I schools as priority schools.

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

Wisconsin has been working to build a statewide accountability system, one that includes all traditional public schools as well as charter schools and private schools participating in the Parental Choice Program. However, until State funding is made available, only Title I funds are currently available to provide the interventions mentioned in section 2.D.iii (below), and as such those interventions will only be available for Title I schools.

2.D.ii Provide the SEA’s list of priority schools in Table 2.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

OVERVIEW

DPI is working to reprioritize its efforts to support persistently low-achieving schools at the state, district, and school level. Similar to Wisconsin’s vision for Rtl in schools, DPI recognizes that challenges must be identified as early as possible in order to align districts and schools to available resources and interventions, and to ensure that these systems of support affect change. The state will continue reforms already in place under NCLB, as well as implement new reforms aligned with the priorities of the state accountability system, as opposed to waiting until a school or district is identified as “failing.” DPI envisions a statewide accountability system which supports its schools and, this requires early and aggressive intervention.

Transition Year: 2012-13

The 2012-13 school year will serve as a transition year as DPI pilots the major components of its new statewide accountability system. While the identification of Schools Identified for

Improvement (SIFIs) under current adequate yearly progress (AYP) formula will continue for 2012-13. Title I SIFI schools will no longer be required to provide SES as currently defined in NCLB. Instead, districts may use their 20 percent Title I set aside to provide a broader range of supports to students.

Waiving Supplemental Education Services

DPI will be using the ESEA flexibility as an opportunity to waive choice and supplemental education services (SES) from its current accountability system due to the limited impact on student achievement observed locally. DPI contracted with the Wisconsin Center for Educational Research (WCER) to conduct studies at the state and district level addressing the effect of SES. These studies conclude that SES has resulted in minimal impact on student outcomes. Due to the limited evidence regarding the effect of these programs, Wisconsin is requesting to reprioritize use of these funds towards other, more effective programs serving persistently low-achieving schools. After consulting with stakeholders, including Milwaukee Public Schools (MPS)--the largest LEA with an extensive history implementing SES--DPI determined districts would benefit from flexibility to develop and implement extended learning opportunities which more closely align with district and school curricula, programs, and philosophies.

Alternative Requirements. In collaboration with key stakeholders, DPI developed an alternative for districts interested in waiving SES (if applicable). For the 2012-13 school year, interested districts may submit a plan to DPI which identifies the requirements detailed in the following sections for approval. Upon approval from the state, the district can discontinue contracts with their current state-approved SES providers.

The state would require districts interested in waiving SES, as it is currently defined within NCLB, to submit a district-wide plan detailing the specific extended learning opportunities that will be provided in place of those currently required in identified schools. The plans must include:

Parent involvement. Significant consultation with parents must be the cornerstone of flexibility requests. Districts must first consult with parents to determine if a majority wish to waive SES as it is currently implemented. If parents express interest, the district must engage parents in shaping the newly defined extended learning opportunities in ways which would best meet the needs of their child, including the selection of instructional supports and interventions. Districts must provide evidence of these consultation processes, including representation of parents of all student subgroups served within the school (i.e., students with disabilities, English language learners, low-income students, and students of various races and ethnicities).

Logistics. District plans must describe in detail the following components for intervention strategies outside the regular school day:

- Instructional frequency, duration, and schedule of interventions supporting literacy and mathematics;

- Student-to-teacher ratios, with a maximum of six students to one teacher (or less if necessary when serving specific subgroups, such as SwDs and ELLs);
- Staffing. This flexibility will allow districts to contract with high quality, certified teachers (including local staff) to enhance these opportunities and more closely align to district and school improvement goals;
- Duration. Per evidence provided by the What Works Clearinghouse, districts must provide a minimum of 45 hours of extended learning per student, to maximize the likelihood of increased student outcomes.

Supplemental instruction. The plan must still describe services which supplement instruction provided during the regular instructional day. Specifically, districts must provide the services:

- Before or after school;
- During Saturday school;
- During summer school; or
- Continue with SES in its current form with state-approved providers.

Curriculum and instruction. The plans must detail how the districts will evaluate the impact of the newly defined extended programs, as measured by specific, differentiated student learning outcomes. The plan must also describe how the services provide individualized instruction and align with individual student needs identified through balanced assessments, including the needs of SwDs and ELLs. Additionally, the plan must demonstrate that the new program aligns with current school and district curricula and instructional programming as a means to support student outcomes.

Assurances. As part of the plan, the district must make the following assurances:

- The district assures that the identification of students being served through additional and extended learning opportunities are low-income students (those qualifying for free or reduced lunch), *and* low-achieving as determined by school or district assessments.
- The district must align the services to identified student need(s).
- The district will identify a school-level parent contact to promote services.
- The services will be provided by certified teaching staff.
- The district will require parental signatures of consent on the student's instructional learning plan that outlines learning goals, as well as the progress, frequency, and method of on-going parental communication.

Budget. The district must submit a budget detailing funding sources and allocations to support the district's plan. Districts may use the Title I 20% set aside, if they provide evidence of consultation with private schools, as these services will now be subject to equitable participation.

As each of these components align with the turnaround principles and are also requirements of Priority School reform plans, this flexibility will support districts' and schools' transition to the

new statewide system of accountability and support, which the state will fully implement in 2013-14.

Priority Schools

In 2012-13, SIG Cohort I and Cohort II schools will continue implementation of their reform plans, aligned to the turnaround principles, as planned.

Implementation of New Statewide Accountability System: 2013-On-going⁷

DPI will provide targeted support to newly identified Priority Schools and Districts to improve implementation quality and student outcomes. The following sections describe the targeted systems of support and interventions provided to the state's persistently lowest-achieving schools and districts.

School Improvement Diagnostic Reviews

DPI will contract with an external partner to conduct a school improvement diagnostic review (SIDR) of each Priority School's core instructional program (specifically reading and mathematics) resulting in recommendations supporting effective implementation of RtI for academics, as well as behavior. DPI envisions RtI as a means to systematize high quality instruction, balanced assessment systems, collaboration and supports for struggling learners. It is this multi-level system of support that will ensure that all students have equal access to resources and support their long-term success. RtI will create collaborative systems among educators; assist in using data to make informed decisions about students, staff, and resources; and provide a framework for seeking success for all students. RtI will offer a process to examine gaps in opportunity and learning and assist in building systems so that every child is a graduate. (For greater detail regarding RtI in Wisconsin, refer to Section 2.E). The SIDR will evaluate the fidelity of implementation and efficacy of each school's RtI program, including core instruction (such as curricular alignment with the Common Core State Standards), universal screening methods and processes to identify students in need of interventions, the selected interventions, and progress monitoring. Additionally, the review will evaluate staff capacity to implement a system of early intervening services aligned to the turnaround principles schoolwide including, but not limited to, systems and structures that provide meaningful data about student performance and collaborative planning time for staff.

Turnaround Experts

Upon identification, the state will require a Priority School to partner with a state-approved turnaround expert exhibiting proven expertise in reforming persistently low-achieving schools, as well as proven expertise in addressing the specific deficits of the Priority School, as identified by the SIDR (for state approval processes, refer to Section 2.G). Identification as a Priority School results in loss of autonomy, due to exhibited lack of capacity to improve student

⁷ The following sections summarize interventions in traditional public schools and districts if identified within the new statewide system of accountability. For information regarding the interventions required of charter schools and private schools participating in the Parent Choice Program, refer to the previous section: *Reprioritization and Systemic Changes at the State Level*.

outcomes. Therefore, the turnaround expert will work, in cooperation with DPI, to direct reform at the school level.

The state will prioritize improvement efforts at the district level if the school identification processes, as well as the resulting SIDRs demonstrate systemic challenges at the LEA level that contribute to the Priority identification of a large proportion of the district's schools or represent potential barriers to successful implementation of school reforms. DPI will appoint a state-contracted turnaround expert with proven expertise in supporting reform at the LEA level to conduct an additional diagnostic review of central administration's critical systems and structures, including human resources, curriculum and instruction, finance, and leadership. Based on district improvement diagnostic review (DIDR), the State Superintendent will direct reform at the LEA level and require schools to continue implementing successful school reforms, including DPI Corrective Action Requirements (CAR) and School Improvement Grants (SIG), if applicable. The LEA expert will act as a liaison between DPI and the district, supporting the implementation of the State Superintendent's directives, while also providing objective monitoring results to DPI regarding implementation status and outcomes.

Plans for School Reform in Priority Schools and Districts

Priority Schools must submit a reform plan, informed by recommendations from the diagnostic review and aligned to the turnaround principles, for state approval via submission in Indistar®. Indistar® is a web-based system implemented by a SEA for use with district or school improvement teams to inform, coach, sustain, track, and report improvement activities. Indistar® requires activities within plans to align with indicators of evidence-based practices at the district, school, and classroom levels designed to improve student achievement, including RtI implementation and strategies to successfully serve students with disabilities (SwDs) and English language learners (ELLs). The tool's pre-populated indicators draw upon the vast turnaround literature and, once embedded in the aligned school reform plan, will ensure that Priority Schools progress through a continuous cycle of assessment, planning, implementation, and progress monitoring. In addition, to Indistar® allows for customization, and Wisconsin intends to enhance the system with additional indicators aligned to the state's vast understanding of effective practices and interventions drawn from Wisconsin Title I schools. Significant consultation with parents must be the cornerstone of districts' reform plans. Districts must first consult with parents to communicate the Priority status. Schools must then engage parents in shaping the reform plan in ways which would best meet the needs of their child, including the selection of instructional supports and interventions. Districts must provide evidence of these consultation processes, including equal representation of parents of all student subgroups served within the school (i.e., students with disabilities, English language learners, low-income students, and students of various races and ethnicities). All LEAs with Priority Schools must commit to a single reform plan within each Priority School which will incorporate and expand upon all aspects of other state and local required plans (such as a Title I schoolwide plan, LEA required school improvement plan, or persistently dangerous school plan).

Reform plans, whether targeted at the school or district level, must include the following components:

Response to Intervention (RtI). Identified as a strategy to effectively implement differentiated and customized instruction in order to improve individual and student subgroup outcomes, Priority Schools and Districts must commit to a detailed plan for implementation of RtI within their reform plan in coordination with the Wisconsin RtI Center (for more information regarding RtI or the Wisconsin RtI Center, see Section 2.E). These plans must describe in detail how the school will utilize RtI as a strategy to meet the individualized needs of all students, as well as student subgroups, including SwDs and ELLs.

Extended learning time. Due to the extensive research suggesting that schools providing high quality, extended learning time experience greater student outcomes, Priority Schools must articulate how staff will redistribute resources and time in order to increase the hours in the instructional day.

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

Implementation in Priority Districts. DPI will require the district turnaround expert to demonstrate expertise recruiting, inducting, training, and retaining highly qualified, as well as highly effective staff. Additionally, the expert must demonstrate expertise in identifying educator needs, developing aligned professional development in an appropriate learning environment, and providing consistent and on-going support to ensure implementation of new strategies or practices.

Highly skilled leaders. If an LEA wishes to retain the current principal in a Priority School, the LEA must produce data which demonstrates the principal has improved student learning in the school. Additionally, the LEA must create opportunities for continuous learning through job-embedded professional development to increase the principal's capacity to implement the reform plan, as well as lead change with his/her staff. Additionally, the LEA must communicate its plan to implement a leadership evaluation as part of its newly developed Educator Evaluation system.

Implementation in Priority Districts. Prior to contracting with DPI, a turnaround expert must demonstrate expertise identifying, recruiting, training, and retaining highly effective leaders and administrators to ensure effective and sustainable implementation of newly developed reforms. The district vendor will use this expertise to staff and develop leadership positions within the district. The expert must staff administrative positions in turnaround schools with

leaders willing and able to create change, provide leaders adequate professional development aligned to needs, and create the flexibility within the LEA necessary for the school and its leaders to succeed.

Positive and safe learning environments. The reform plans must include methods to provide a safe and disciplined learning environment. LEAs must prioritize the distribution of pupil services staff (e.g., School Social Workers, Nurses, Psychologists, and Guidance Counselors) to each Priority School, and staff schedules must allow for adequate time to serve students. LEAs must also ensure Priority Schools implement Positive Behavior Intervention Systems (PBIS) to support students across multiple domains (e.g., social, emotional, behavioral) in order to increase positive academic outcomes. This requirement will also ensure that Priority Schools do not prioritize implementation of mathematics and ELA at the expense of other practices designed to help a student develop the habits and skills necessary to succeed in college and career (for more information regarding PBIS, see Section 2.E).

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

For approval, a school and its LEA must provide a detailed plan which includes each of the previously mentioned components in a customized manner which meets the individual and unique circumstances of that school, as identified within the Diagnostic Review and Needs Assessment processes. DPI will utilize an extensive rubric to ensure schools and districts understand and communicate what is expected of them within their plans.

After Three Years of Implementation

If, after three years of implementation a Priority School is identified as Priority status again, the State Superintendent will utilize the authority to intervene, as defined by modifications to legislation, to remove the school from its local LEA and under the authority of a state identified turnaround expert. In exchange for the flexibility and autonomy associated with removal from the local LEA or jurisdiction of its school board, the state will hold the expert accountable for the improvement of school and student outcomes.

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

Table 2.3. Timeline for Implementation of Priority School Activities

Timeline	Activity	Person(s) Responsible	Budget
<i>2011-12</i>			
Spring	Develop application criteria for diagnostic review partner	DPI	TBD
Spring	Develop application criteria for external turnaround partners	DPI	TBD
Summer	Begin communication of identification processes and reform plan requirements associated with Priority Schools	Title I and School Support Team	TBD
<i>2012-13</i>			
Fall	Release diagnostic review partner application	DPI	TBD
	Release external turnaround partner application	DPI	TBD
	Continue development and finalization of agency and statewide RtI initiatives to support future Priority Schools	DPI	TBD
	Continue communication of	Title I and School Support Team	TBD

	identification processes and reform plan requirements associated with Priority Schools		
	Run “Mock” reports with Priority School identifications using 2011-12 data to prepare schools at risk of identification	Office of Educational Accountability	TBD
Winter	Select diagnostic review partner	DPI	TBD
	Release state approved list of turnaround partners	DPI	TBD
Spring	Final determination of Priority Schools using 2012-13 data	Office of Educational Accountability	TBD
	Focus School staff and representatives from their LEAs attend informational meetings and webinars conducted by the DPI regarding Focus School reform requirements	Title I and School Support Team	TBD
	Diagnostic review are conducted at Priority schools and MPS	Title I and School Support Team	TBD
Summer	Training of Priority Schools and LEA representatives on Indistar®	Title I and School Support Team Center on Innovation and Instruction	TBD
2013-14			
Fall	Priority Schools’ reform plans due to DPI via Indistar®	Focus Schools and LEA Representatives	TBD
	Indistar® reform	Title I and School	TBD

	plans approved by DPI	Support Team	
Winter	DPI begins monitoring implementation via site visits, Indistar® plans, data reviews, and fiscal reviews	Title I and School Support Team	TBD
Spring	DPI continues monitoring implementation via site visits, Indistar® plans, data reviews, and fiscal reviews	Title I and School Support Team	TBD
	Indistar® opens for 2014-15 reform plans	Title I and School Support Team	TBD
Summer	Indistar® reforms plans for 2014-15 due	Focus Schools and LEA Representatives	TBD
	DPI approves Indistar® reform plans	Title I and School Support Team	TBD
2014-16			
Annually	Continue implementation of reform plans aligned to annual schedule as detailed above	Focus Schools and LEA Representatives	TBD

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA’s choice of timeline.

Table 2.4. Timeline for Implementation of Priority School Activities.

Timeline	Activity	Person(s) Responsible	Budget
2011-12			

Spring	Develop application criteria for diagnostic review partner	DPI	TBD
Spring	Develop application criteria for external turnaround partners	DPI	TBD
Summer	Begin communication of identification processes and reform plan requirements associated with Priority Schools	Title I and School Support Team	TBD
2012-13			
Fall	Release diagnostic review partner application	DPI	TBD
	Release external turnaround partner application	DPI	TBD
	Continue development and finalization of agency and statewide RtI initiatives to support future Priority Schools	DPI	TBD
	Continue communication of identification processes and reform plan requirements associated with Priority Schools	Title I and School Support Team	TBD
	Run “Mock” reports with Priority School identifications using 2011-12 data to prepare schools at	Office of Educational Accountability	TBD

	risk of identification		
Winter	Select diagnostic review partner	DPI	TBD
	Release state approved list of turnaround partners	DPI	TBD
Spring	Final determination of Priority Schools using 2012-13 data	Office of Educational Accountability	TBD
	Focus School staff and representatives from their LEAs attend informational meetings and webinars conducted by the DPI regarding Focus School reform requirements	Title I and School Support Team	TBD
	Diagnostic review are conducted at Priority schools and MPS	Title I and School Support Team	TBD
Summer	Training of Priority Schools and LEA representatives on Indistar®	Title I and School Support Team Center on Innovation and Instruction	TBD
2013-14			
Fall	Priority Schools' reform plans due to DPI via Indistar®	Focus Schools and LEA Representatives	TBD
	Indistar® reform plans approved by DPI	Title I and School Support Team	TBD
Winter	DPI begins monitoring implementation via site visits, Indistar® plans, data reviews, and fiscal reviews	Title I and School Support Team	TBD
Spring	DPI continues monitoring implementation via	Title I and School Support Team	TBD

	site visits, Indistar® plans, data reviews, and fiscal reviews		
	Indistar® opens for 2014-15 reform plans	Title I and School Support Team	TBD
Summer	Indistar® reforms plans for 2014-15 due	Focus Schools and LEA Representatives	TBD
	DPI approves Indistar® reform plans	Title I and School Support Team	TBD
2014-16			
Annually	Continue implementation of reform plans aligned to annual schedule as detailed above	Focus Schools and LEA Representatives	TBD

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

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

2.E FOCUS SCHOOLS

2.E.i Describe the SEA’s methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as “focus schools.”

DPI appreciates the US Department of Education’s efforts to clarify means by which Focus Schools may be identified in the most recent FAQ Addendum, dated January 5, 2012. At this time, given DPI’s strategic planning goals of closing gaps across the state, Focus Schools will be identified based on large within school gaps in achievement and graduation rates. Specifically, schools with large subgroup gaps in reading attainment, mathematics attainment, or graduation rates, may be identified as a Focus School.

This method will likely identify schools (final lists will be produced at a later date, upon completion of index field testing) that are high performing by traditional measures. By

focusing on attainment gaps and graduation gaps, DPI hopes to acknowledge that progress must be made in all educational settings, even those with large numbers of high-performing students, and that gaps can no longer be hidden in such situations.

To identify gaps, DPI will compare the proficiency rates of each demographic subgroup (five race/ethnic subgroups compared with the highest performing race/ethnic subgroup within the school; economically disadvantaged subgroup compared with the not economically disadvantaged subgroup; students with disabilities subgroup compared with the non disabled subgroup; English language learner subgroup compared with English proficient subgroup) for both reading and mathematics separately. Those schools with the largest within-school subgroup achievement gaps will be identified as Focus Schools. In addition, DPI will annually compare 4-year adjusted cohort and 6-year adjusted cohort subgroup graduation rates. Schools with the largest subgroup gaps in graduation rates will be identified as Focus Schools.

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

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA’s focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

OVERVIEW

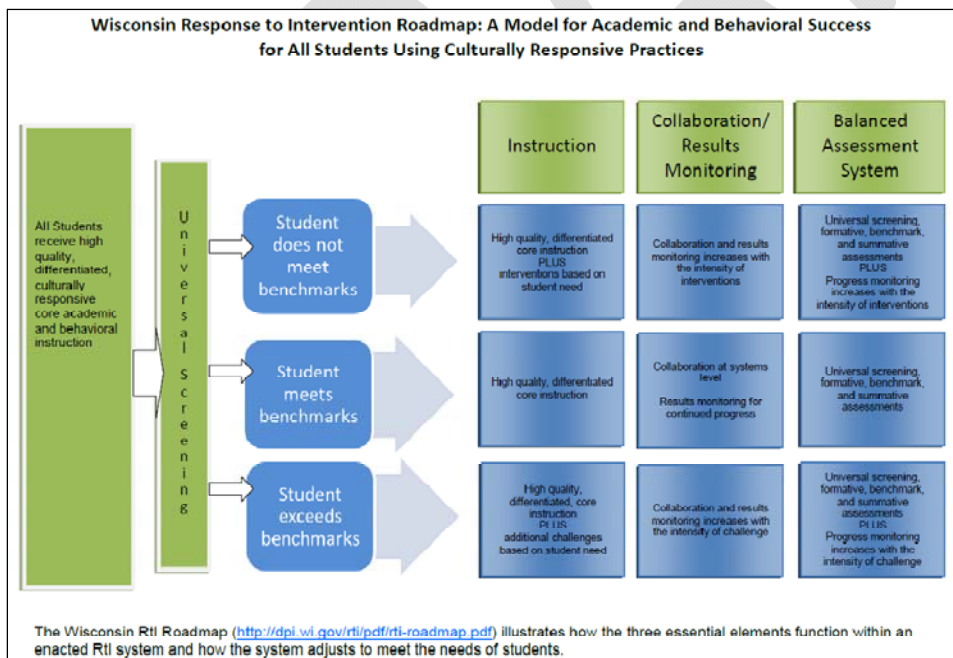
As previously noted, Wisconsin committed to three strategic goals, including *closing achievement gaps*. This flexibility application provides Wisconsin the opportunity to modify its existing accountability system to align to this strategic goal with the identification of Focus Schools, or those schools which most contribute to the state’s achievement gap. Identified schools must implement systematic reforms which *individualize and customize instruction* for all students, including prioritized student populations (such as students with disabilities and English language learners), as defined within the five strategies to meet the state’s strategic goals. The state will require Focus Schools to implement this strategy via Wisconsin’s model for Response to Intervention (RtI). Unlike most RtI models, Wisconsin’s innovative model systematically organizes the way schools operate in order to reach the vision of academic and behavioral success for *all* students through a fluid and flexible, multi-level system of support that includes high quality core, extension, and intervention instruction; balanced assessment systems to examine gaps in opportunity and learning, and professional collaboration to determine how best to meet the needs of identified students. Additionally, Wisconsin’s vision for RtI is centered on culturally responsive and appropriate practices (see Figure 2.1), imperative to modifying instructional practices to meet the needs of all students and close achievement gaps.

Figure 2.1. Wisconsin’s Vision for RtI



Unlike the ubiquitous tiered system, Wisconsin's system would more aptly be illustrated using a conical shape representing a fluid system with supports extending upwards (additional challenges) and downwards (interventions) from the core instruction to include all students within an individualized, differentiated educational plan that includes or is informed by high quality instruction, balanced assessments, collaboration, and culturally responsive practices. Figure 2.2 illustrates this vision in a different way, providing a Roadmap for Wisconsin educators to systematically implement Wisconsin's Model for Academic and Behavioral Success (RtI).

Figure 2.2.



When implemented with fidelity, RtI will increase Wisconsin schools' ability to make significant progress and achieve necessary outcomes within culturally responsive means for prioritized student populations in order to improve outcomes for all students and close achievement

gaps.

Statewide Commitment to RtI as a Means to Meeting Strategic Goals

In order to meet this vision and support implementation fidelity, DPI, in collaboration with the 12 regional Collaborative Education Service Agencies (CESAs), developed a statewide RtI Center. The Wisconsin RtI Center provides high quality professional development and technical assistance (TA) statewide. (The Wisconsin RtI Center is described in greater detail in following sections.) This Center will provide the foundation of support for Wisconsin's Focus Schools. Due to the state's commitment, the systems and structures necessary for Focus Schools to implement reform are already in place or currently in development and, therefore, immediately available to districts and schools at little to no charge. This prior work positions Wisconsin to easily implement RtI consistently in the state's Focus Schools and support change—specifically, decreasing achievement gaps.

SCHOOL REFORM PLANS

All LEAs with schools identified as Focus will be required to ensure that those schools do the following:

Assess Core Instruction in Reading and Mathematics

Focus Schools will participate in an online assessment of RtI implementation practices to further identify implementation components in need of support or training. This assessment will be conducted online using Indistar®, provided by the Center for Innovation and Instruction (CII). Indistar® is a web-based system used with school improvement teams to inform, coach, sustain, track, and report improvement activities. The tool's pre-populated indicators draw upon the vast turnaround literature, including RtI (65 specific RtI indicators), as well as indicators supporting success for individual student populations, such as ELLs (19 indicators), SwDs (10 indicators), and various age levels (e.g., high school). In addition, Indistar® allows for customization, and Wisconsin intends to enhance the system with additional indicators aligned to the state's vast understanding of effective RtI practices and interventions drawn from Wisconsin Title I schools. The development and continued growth of the Wisconsin RtI Center and DPI's promotion of RtI as a model schoolwide plan in Title I schoolwide programs has provided the opportunity to learn about, share, and begin replicating effective RtI practices statewide. DPI will continue to work in conjunction with the Wisconsin RtI Center to embed these effective practices in Indistar®. More information on the Wisconsin RtI Center and its initiatives to grow RtI expertise in Wisconsin is detailed below.

Develop and Implement a School Reform Plan

Following completion of the needs assessment (conducted annually), LEAs must ensure each Focus School develops and submits a reform plan aligned to identified needs necessary to improve RtI implementation and academic outcomes for identified student populations via Indistar®. The Indistar® application will ensure Focus Schools progress through a continuous cycle of assessment, planning, implementation, and progress monitoring across the three year implementation timeline.

In order to receive approval from DPI, the reform plans must thoughtfully address the following components:

Coordination of RtI initiatives. The reform plan must address how LEAs will coordinate the Focus School's RtI system including:

- Detailed description of how the school will utilize RtI as a strategy to meet the individualized needs of all students, as well as student subgroups, including SwDs and ELLs;
- Educating the school's leadership on the Wisconsin RtI Framework;
- Ensuring readiness and development of a RtI school team;
- On-going analysis of the school's RtI implementation on Indistar®; and
- Training and support around universal curriculum and instructional practices, universal screening, and processes or tools for progress monitoring.

Positive behavioral interventions and support. The reform plan must address implementation of a positive, school-wide, systematic approach to address behavior based on a proactive RtI model. LEAs will have access to consultation, training, and on-going TA with Wisconsin's PBIS Network, a component of the Wisconsin RtI Center.

Collaborative planning time. If necessary, the plan must articulate how the LEA will modify the current school schedule to allow grade level and/or reading and mathematics teachers and support staff to meet frequently in order to review student data and modify instruction and interventions.

Professional development. The reform plan must include a calendar of targeted professional development opportunities aligned to identified staff needs. The LEA must create opportunities for continuous learning through job-embedded professional development to increase all teachers' capacity to implement the reform plan. If necessary, the LEA may need to revise the teacher and principal evaluation systems and hiring processes to align to the state's Educator Effectiveness framework in order to ensure that staff in the Focus School(s) can effectively implement the reform efforts.

Report RtI Implementation and Outcomes Data

DPI will hold the LEAs accountable for adequate, on-going progress within Focus Schools through monitoring practices. On-going SEA and LEA monitoring of Focus School reform plans will take place through Indistar®. Indistar® allows DPI to collect and monitor student outcome data. In collaboration, the Wisconsin RtI Center and Wisconsin's Title I and School Support Team will monitor the reform plans and data reports on a quarterly basis, allowing DPI to assess the implementation of interventions and progress of outcomes at individual schools. If the state recognizes significant delays or areas of concern, agency staff will conduct monitoring visits and if necessary assist the LEA and school in developing plans for rapid compliance.

Flexibility in the Use of Title I Funds

The LEA will have the option to set aside up to 20% of its Title I dollars to fund the school reform plan. This option will ensure resources can be allocated to these schools' improvement efforts.

SUPPORT FOR IMPLEMENTATION OF REFORM PLANS

Given that success relies on implementation and each school will possess various levels of experience, skill, and expertise regarding RtI implementation, the state, in collaboration with the Wisconsin RtI Center, will provide extensive training, technical assistance and support to Focus Schools and their LEAs.

As previously noted, DPI established the Wisconsin RtI Center to support schools through the phases of RtI implementation to increase success, as well as sustainability. Wisconsin is one of a small number of states to establish, develop, and utilize a comprehensive, statewide RtI center. The Center exists to develop, coordinate, and provide high quality professional development and training opportunities, as well as to gather, analyze, and disseminate Wisconsin implementation data to enhance implementation statewide (see Figure 2.3).

Figure 2.3



As presented in Figure 2.4, the Wisconsin RtI Center developed a continuum of technical assistance and workshops aligned to the implementation process. Specifically, support begins in Year One (Purpose Building), as school staff receive training and guidance to become familiar with Wisconsin's unique RtI model and its variations from the more common tiered model in order to ensure consistent language, understanding, and implementation

(*Foundational Overview*), as well as workshops intended to support staff’s identification of their implementation needs within six key components of implementation, including high quality core instruction, collaboration, balanced assessment, high quality interventions and instruction, culturally responsive practices, and family engagement (*Framework Mapping*). During Years Two through Five (Implementation), schools and districts receive on-going assistance regarding any of the six key components as identified during annual needs assessments. As schools enter Full Implementation (Year Five and Beyond), the Center provides on-going training as needed, as well as “Success Stories,” a video series on implementation of RtI in Wisconsin schools, “Demonstration Schools,” which highlight current RtI implementation across the state, and “Recognized Schools,” which illustrate positive student outcomes after implementation of the Wisconsin RtI framework.

Figure 2.4



The RtI Center also employs regional technical assistance coordinators. Coordinator activities include:

- Basic consultation with the school leadership team on the school’s RtI framework or Wisconsin’s Vision of RtI;
- Basic consultation with the school leadership team on the technical assistance trainings of the Wisconsin RtI Center;
- Facilitation of the Wisconsin RtI School-wide Implementation Review to the schools’ leadership team;
- Facilitation in completing the Implementation Toolkit;

- Abbreviated Wisconsin RtI Foundational Overview or sections of the overview to all staff; and
- Follow-up to the RtI Mapping session.

The Center will align Coordinator activities to Focus School needs and assist LEAs and their Focus Schools with RtI implementation, as well as school and district improvement efforts.

Locally, Indistar® will provide Focus Schools and their LEAs practical documentation through built-in mechanisms for creating agendas, recording minutes, assigning responsibilities, setting timelines, allocating resources, coaching, and monitoring the fidelity of implementation of the school reform plan. Indistar® also allows schools to collect and monitor data aligned to the school's reform plan in order to estimate the impact of academic interventions and the resulting student outcomes. Additionally, the development of the statewide longitudinal data system will enable school and district staff to readily access data using multiple measures across a balanced system of assessments (as previously noted). With these systems in place, educators and state administrators will have the ability to collect and analyze important programmatic data over time. Schools will use these tools to promote dialogue amongst teams of educators addressing students' academic needs in order to remove barriers to learning and promote achievement early.

The Title I and School Support Team will also increase contract requirements for the Title I Network (see Section 2.F) to ensure that representatives from each CESA attend specific trainings and workshops provided by the Wisconsin RtI Center (as identified as mandatory by the Center) to support Focus Schools within their CESA in a manner consistent with the Wisconsin vision for RtI (as opposed to reinforcing conflicting visions through the use of other vendors) and likely to improve student outcomes.

MONITORING

In addition to providing support, DPI will hold the LEAs accountable for adequate, on-going progress within Focus Schools through monitoring practices. On-going SEA and LEA monitoring of Focus Schools will take place primarily through the main online framework, Indistar®. Indistar® also allows DPI to collect and monitor data aligned to the school's reform plan in order to estimate the impact of academic interventions and the resulting student outcomes. This resource ensures LEAs and schools monitor the progress of individual students in a consistent and timely manner. In collaboration, the Wisconsin RtI Center and Wisconsin's Title I and School Support Team will monitor these online plans and data reports on a quarterly basis, allowing DPI to assess the implementation of interventions and progress of outcomes at individual schools. If the state recognizes significant delays or areas of concern, agency staff will submit a report to the Focus School and its LEA identifying areas for improvement and plans for rapid compliance.

Increased Prescription and Directive Requirements

If, after three years of reform and Focus School status, the school is again identified as a Focus School, DPI will increase the level of prescription and schools. LEAs will lose flexibility and

autonomy until DPI receives sufficient evidence of on-going improvement. Specifically, the state will require these schools to participate in an onsite school improvement diagnostic review (SIDR) conducted by the Wisconsin RtI Center to thoroughly evaluate the level and quality of implementation as it aligns to the Wisconsin vision for RtI, instead of continuing with online self-assessments.⁸ Upon completion of the review, the state will provide prescriptive requirements for training, interventions, and supports which directly align to findings from the review and are consistent with needs identified in the data for specific student groups (e.g., DPI consultants with expertise in ELL educational programs provide workshops specific to best practices when serving ELL students if the school was identified due to low performance of their ELL students). Additionally, all practices identified in the reform plan will have to meet approval by the appropriate DPI expert (e.g., SwD, ELL, etc.).

This waiver application provides Wisconsin the opportunity to require implementation of systems and structures proven successful in serving all student populations (disaggregated, as well as aggregate). Specifically, DPI will require Focus Schools to implement with fidelity the state's vision for RtI as a means to ensure all students (individual and subgroup populations) receive high quality, differentiated, and customized instruction to close the state's achievement gaps. The requirements detailed in these sections will not only decrease gaps within identified Focus Schools, but across the state, as it is intended that this new requirement will increase awareness of the state's vision for RtI, as well as the resources available to support implementation statewide.

RATIONALE FOR FOCUS SCHOOL REQUIREMENTS

Because Wisconsin envisions RtI as a means to appropriately serve *all* students, the grade level and student population do not present a challenge to implementation. RtI is not only appropriate for all students, it is meant for all students. Specifically, the systems to address Focus School's achievement gaps (RtI) will be the same in each school, but the specific interventions, curricula, and strategies will differ based on unique need, and the RtI Center will work collaboratively with identified schools to support implementation within their various environments. While the research is still emerging, studies over the past ten years have indicated that RtI and school improvement are closely linked. The following sections provide a brief review of the national literature, as well as evidence collected locally by the Wisconsin RtI Center suggesting high quality RtI programs implemented with fidelity positively impact student outcomes.

English Language Learners

The National Center on Response to Intervention's research shows that implementation of the RtI framework with ELLs, particularly those who are Spanish-speaking, improves English literacy. Brown and Sanford (2011) explain that few intervention programs have included ELLs in their norming samples. Therefore, educators must use what we currently know regarding

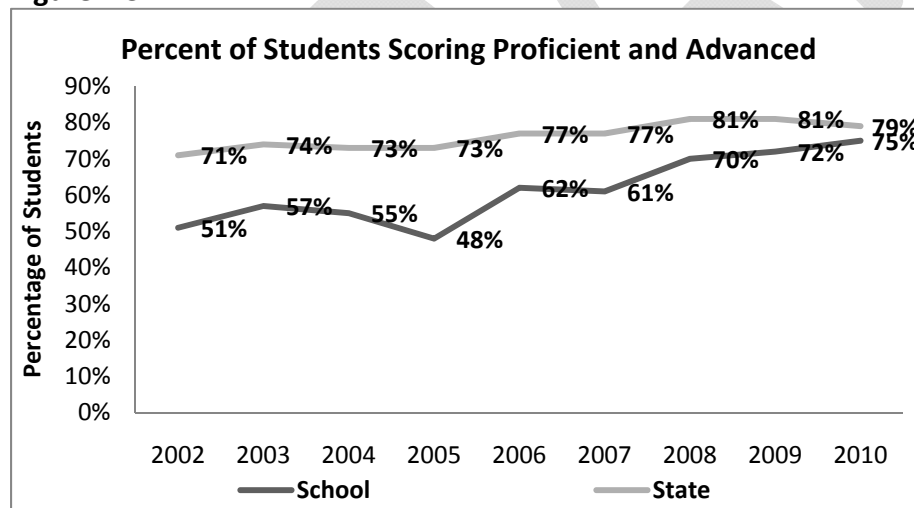
⁸ The WI RtI Center will utilize the three years of implementation to continue enhancing existing diagnostics and develop new assessments and data systems to effectively fulfill this requirement. Once these systems are in place, Focus Schools will transfer from Indistar®, to this system exclusively.

effective instruction in literacy and instruction for ELLs for instruction at all levels of the multi-level prevention system.

Within Wisconsin, evidence suggests RtI has positively impacted instruction for ELLs and assisted in closing in-school achievement gaps. For example, one Wisconsin Title I school serving high proportions of students from low income households (32 percent) as well as English language learners (21 percent) saw the percentage of students scoring proficient or advanced on the state standardized tests increase from 80 percent to 87 percent (representing an eight percent increase) across the past five years. Similarly, another Title I school implementing RtI to serve a high poverty (25 percent) and LEP (10 percent) population saw an 11 percent increase (from 84 percent to 94 percent) in the proportion of students scoring proficient or advanced across the past five years.

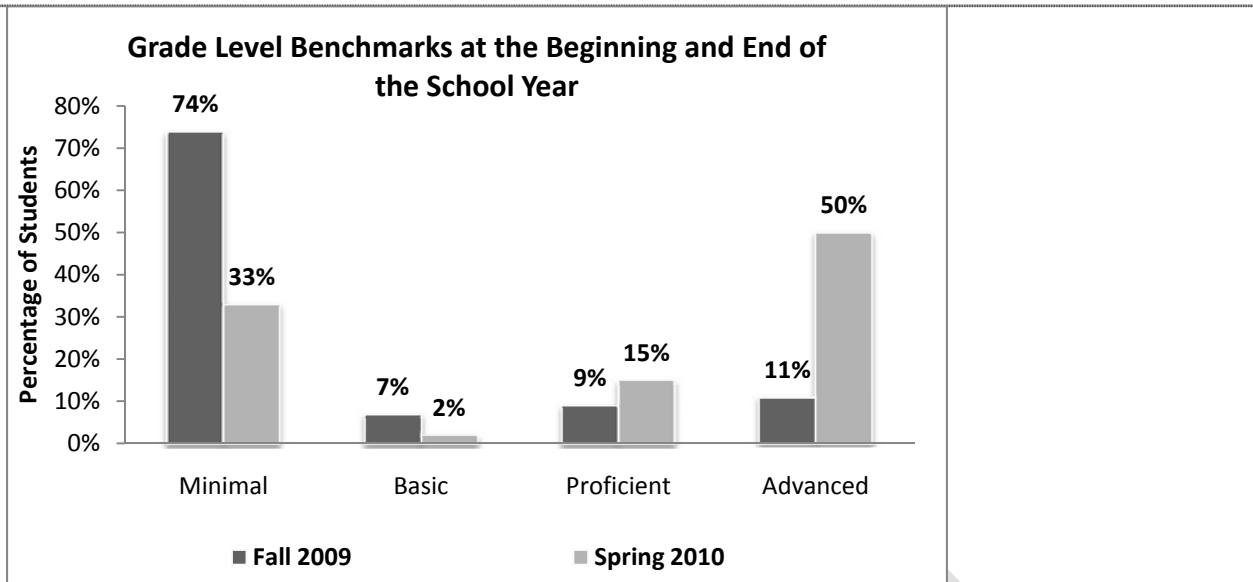
Additionally, data from a Wisconsin district located in a different region of the state serving a diverse student population (73 percent poverty, 53 percent minority with 24 percent black and 29 percent Hispanic, and 15 percent LEP) suggests RtI is an effective practice in closing achievement gaps. As illustrated in Figure 2.5, this district successfully *reduced the achievement gap* between its low income, high minority, and LEP students and the state average from 28 percent to five percent across eight years due, in part, to high quality RtI implementation.

Figure 2.5.



Similarly, an elementary school serving a high poverty (93 percent), high minority (71 percent) student population as well as a substantial (28 percent) LEP population not only reduced the proportion of students scoring minimal or basic on grade level benchmarks by 57 percent, but a substantial majority (78 percent) of students earned advanced scores after a year of high quality instruction implemented within a systematic vision of RtI (see Figure 2.6).

Figure 2.6.



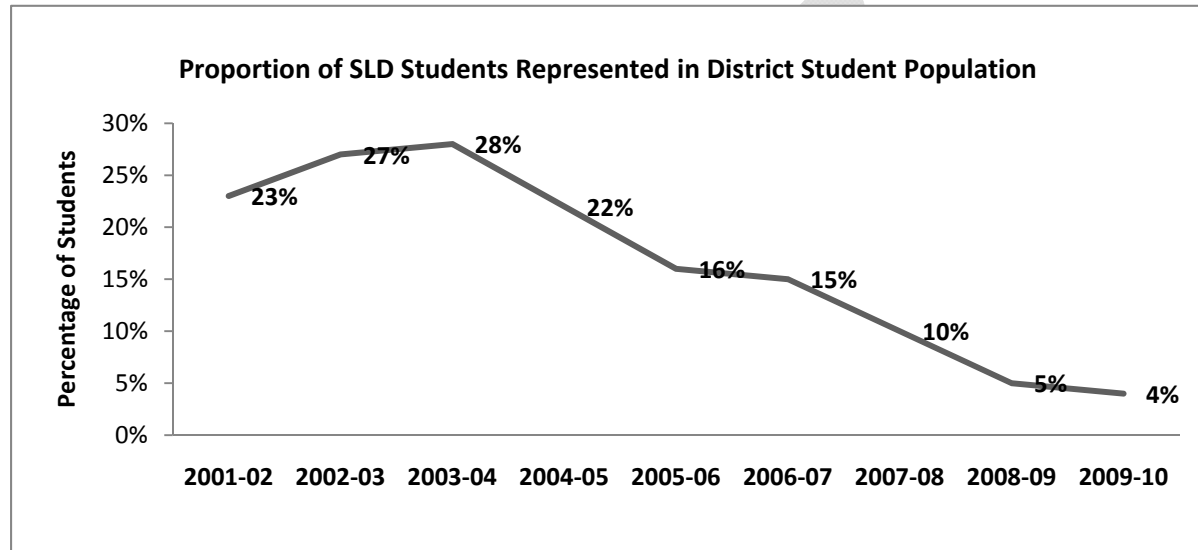
Students with Disabilities

Six of the 16 studies analyzed by Hughes and Dexter reported data on the effects of their programs on special education referral and/or placement rates. Bollman and colleagues (2007) examined the effect of the St. Croix River Education District (SCRED) model on the rate of identification for special education services and reported that placement rates dropped from 4.5% to 2.5% over a 10-year period. They indicate that the statewide prevalence rate over the same time period dropped from 4% to 3.3%. Calendar (2007) reported that placements decreased by 3% for "districts with at least one RBM school," whereas the state rate decreased by 1%. Marston and his co-authors (2003) indicated that special education placement rates stayed constant over time for Minneapolis problem-solving model schools, as did the district as a whole. Peterson, Prasse, Shinn, and Swerdlik (2007) reported similar information: Referrals and placements stayed relatively stable over time after RtI implementation. O'Connor et al. (2005) examined the effect of the tiers of reading intervention model on placement rates. They found that during the 4 years of implementation, rates fell to 8% compared to an historical contrast group (same schools, same teachers) for which the rate was 15%. Finally, VanDerHeyden and colleagues (2007) reported that for the four schools included in their study, there was a decrease in referrals and an increase in placements. The authors interpreted this pattern as an indication of more appropriate referrals.

Similarly, one Wisconsin elementary school reduced the number of students identified as SLD as a proportion of the total number of students in the district by 83 percent (23 percent as compared to 4 percent) across the past nine years since the implementation of RtI (see Figure 2.7). Specifically, the proportion of SLD students increased temporarily after the implementation of a universal screening process. Upon the implementation of high quality interventions and processes to monitor the progress of students identified using the screening assessment, the proportion of students identified as SLD reduced dramatically. These findings

illustrate the inability to properly identify struggling students without an adequate screening system (represented with the 15 to 18 percent growth in the proportion of students identified after implementation of the screener), as well as the over-identification of struggling students as SwD or SLD without implementation of a balanced assessment system aligned to appropriate resources and interventions as represented by the dramatic decrease (75 percent) in the proportion of identified students upon implementation of a balanced RtI system in 2005-06.

Figure 2.7.



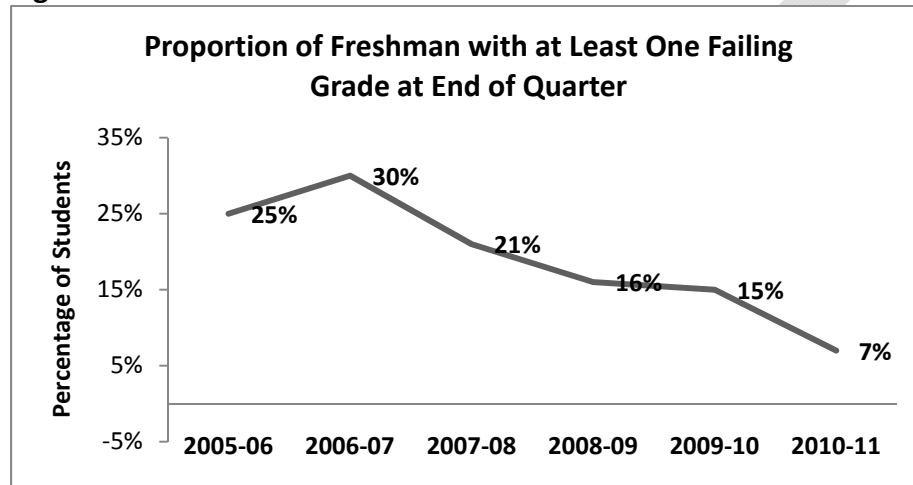
Secondary Schools

M. Burns, Ph.D., at the University of Minnesota, conducted a literature synthesis for the National Association of Secondary School Principals (NASSP) regarding the use of RtI in secondary school settings. Burns explained that the research has consistently found RtI initiatives lead to gains in student achievement and schoolwide improvements, such as reduced referrals to and placements in special education and a higher rate of students scoring proficiently on state tests (Burns, Appleton, and Stehouwer, 2005). Windram, Scierka, and Silbergliitt (2007) described two secondary programs and found a 66% proficiency rate on a group-administered accountability test among the 18 high school students who were considered at risk for failing the tests and who participated in the pilot RtI project. In addition, the average growth rate on a group-administered test for those students was more than three times the national average among students in grade 9 and more than five times their growth from the previous year. A similar program for mathematics in grade 8 led to growth rates that exceeded the national average by a factor of almost six (Windram, Scierka, and Silbergliitt, 2007). Finally, the Heartland Area (Iowa) Education Agency 11 (2004) published extensive data regarding its well-known RtI approach and found high rates of proficiency among middle level and high school students, but perhaps more important, it reported a drop-out rate of less than 2%, which is well below the national average.

Data from one Wisconsin high school supports the literature, suggesting that successful

implementation of RtI improved outcomes for students in ninth grade and reduced the proportion of students falling behind and becoming over-age or under-credited. Specifically, the high school reduced the proportion of students with at least one failing grade by 72 percent due in part to earlier screening in order to identify struggling students and align them to appropriate resources and interventions as necessary (see Figure 2.8). Recognizing that failure rates in ninth grade have been correlated to higher dropout rates, this figure demonstrates that this school has made a positive step towards one of the state’s strategic goals – *increasing graduation rates*- through the implementation of RtI.

Figure 2.8.



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

The Wisconsin PBIS Network (previously noted) will provide necessary support to high schools struggling to establish a positive school culture, increase academic performance, improve safety, and decrease negative behaviors. The Wisconsin PBIS Network, in collaboration with the Wisconsin RtI Center, will provide support to Focus Schools regarding PBIS implementation and methods for sustainability.

Implementation Training. While RtI is an appropriate and effective strategy to address the achievement gap within all Focus Schools serving any grade level, DPI recognizes it is often more difficult to implement RtI with fidelity at higher grade levels where teachers may teach four or more classes of 30 students, potentially in different sections or courses, as compared

to an elementary school teacher who works with the same 30 students all day, every day. Therefore, DPI and the Wisconsin RtI Center are developing workshops, trainings, and resources designed to increase the quality of implementation at the high school level, as well as increase the ease with which schools can achieve quality implementation. The RtI Center will draw upon findings from the National Centers for High Schools to identify evidence-based practices proven successful within high school implementation of RtI that the Center will modify to align to Wisconsin's vision of implementation. For example, the Wisconsin RtI Center provided a daylong RtI training event, *Implementing Essential Components of RtI in High Schools*, providing a national perspective of implementation at the high school level informed by information from the National High School Center and the National Center on Response to Intervention. Currently, more than half of the schools accessing training and resources from the Wisconsin RtI Center are middle schools and high schools and, as the figures presented in the previous sections indicate, RtI implementation has positively impacted Wisconsin schools of various levels, serving diverse populations.

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

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

Meeting State's Strategic Goals

While it is unclear if these data are representative of statewide implementation of RtI, or if the data can be entirely attributed to implementation of Wisconsin's vision for RtI, the previous figures do suggest that high quality RtI programming implemented with fidelity can positively impact the state's three strategic goals, including *closing the achievement gaps*. Therefore, prioritizing RtI as a means to address the strategic goals will serve as a reasonable and effective means to closing the achievement gaps in Focus Schools.

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

TIMELINE FOR IMPLEMENTATION OF FOCUS SCHOOL ACTIVITIES

Table 2.5 presents the Wisconsin's proposed timeline for the implementation of activities designed to support academic improvement at the school level, as well as for identified and prioritized student subgroups.

Table 2.5. Timeline for Implementation of Focus School Activities.

Timeline	Activity	Person(s) Responsible	Budget
2011-12			
Spring	Continue development and finalization of agency and statewide RtI initiatives to support future Focus Schools	WDPI	
Summer	Begin communication of identification processes and reform plan requirements associated with Focus Schools	Title I and School Support Team	
2012-13			
Fall	Continue development and finalization of agency and statewide RtI initiatives to support future Focus Schools	WDPI	
	Continue communication of identification processes and reform plan requirements associated with Focus Schools	Title I and School Support Team	
	Run "Mock" reports with Focus School identifications using 2011-12 data to prepare schools at risk of identification	Office of Educational Accountability	
	Final determination of Focus Schools using 2012-13 data	Office of Educational Accountability	
Spring	Focus School staff and representatives from their LEAs attend informational meetings and webinars conducted by the WDPI regarding Focus School reform requirements	Title I and School Support Team	
	Focus School staff and representatives from their LEAs attend <i>Foundational Overview and Framework Mapping</i> RtI training sessions	WI RtI Center	
	Training of Focus Schools and LEA representatives on Indistar®	Title I and School Support Team	
	Focus Schools begin developing reform plans aligned to identified areas of weakness during assessments of RtI implementation (i.e., <i>Framework Mapping and Indicator Needs Assessment</i>)	Focus School Staff and LEA Representatives	
Summer	Provide Focus Schools training regarding each of the six RtI components as necessary (i.e., identified as needing improvement during needs assessments)	WI RtI Center	

2013-14			
Fall	Focus Schools' reform plans due to W DPI via Indistar®	Focus Schools and LEA Representatives	
Winter	Indistar® reform plans approved by W DPI W DPI begins online monitoring of Rtl implementation via Indistar® plans	Title I and School Support Team Title I and School Support Team	
Spring	Indistar® opens for 2014-15 reform plans Indistar® reforms plans for 2014-15 due	Title I and School Support Team Focus Schools and LEA Representatives	
Summer	W DPI approves Indistar® reform plans	Title I and School Support Team	
2014-16			
Annually	Continue implementation of reform plans aligned to annual schedule as detailed above	Focus Schools and LEA Representatives	
2015-16			
Spring	Determination of second cohort of Focus Schools using 2015-16 data	Office of Educational Accountability	
Summer	Staff from newly identified Focus Schools and representatives from their LEAs attend informational meetings and webinars conducted by the W DPI regarding Focus School reform requirements	Title I and School Support Team	
	Newly identified Focus Schools and representatives from their LEAs attend <i>Foundational Overview</i> and <i>Framework Mapping</i> Rtl training sessions	Wl Rtl Center	
	Training of newly identified Focus Schools and LEA representatives on Indistar®	Title I and School Support Team Center on Innovation and Instruction	
	Newly identified Focus Schools begin developing reform plans aligned to identified areas of weakness during assessments of Rtl implementation (i.e., <i>Framework Mapping</i> and <i>Indistar Needs Assessment</i>)	Focus School Staff and LEA Representatives	

	Provide newly identified Focus Schools training regarding each of the six RfI components as necessary (i.e., identified as needing improvement during needs assessments)	WI RfI Center	
Focus Schools not Existing Focus Status After Three Years of Reform	Schools receive intensive onsite review of RfI implementation fidelity and quality	WI RfI Center	
	Provide schools targeted, prescriptive reform requirements aligned to needs identified during onsite reviews	WI RfI Center	
	Provide schools targeted training, technical assistance, and resources aligned to specific areas of need	WI RfI Center WDPPI	
	Modify existing reform plans to include the increasingly prescriptive requirements	Focus Schools and LEA Representatives	
2016-17			
Fall	Focus Schools' reform plans due to WDPPI via Indistar®	Focus Schools and LEA Representatives	
	Indistar® reform plans approved by WDPPI	Title I and School Support Team	
Winter	WDPPI begins online monitoring of RfI implementation via Indistar® plans	Title I and School Support Team	

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

Identification of Focus schools occurs every three years. Schools may be removed from the Focus schools list by no longer satisfying any of the identification criteria after three years.

DRAFT

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

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

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOL

LEA Name	School Name	School NCES ID #	REWARD SCHOOL	PRIORITY SCHOOL	FOCUS SCHOOL
TBD	TBD	TBD	TBD	TBD	TBD
TOTAL # of Schools:					

Total # of Title I schools in the State: _____

Total # of Title I-participating high schools in the State with graduation rates less than 60%: _____

Key	
Reward School Criteria: A. Highest-performing school B. High-progress school Priority School Criteria: C. Among the lowest five percent of Title I schools in the State based on the proficiency and lack of progress of the “all students” group D. Title I-participating or Title I-eligible high school with graduation rate less than 60% over a number of years E. Tier I or Tier II SIG school implementing a school intervention model	Focus School Criteria: F. Has the largest within-school gaps between the highest-achieving subgroup(s) and the lowest-achieving subgroup(s) or, at the high school level, has the largest within-school gaps in the graduation rate G. Has a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate H. A Title I-participating high school with graduation rate less than 60% over a number of years that is not identified as a priority school

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

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

OVERVIEW

In addition to recognizing and rewarding high performing or high progress Title I schools, as well as supporting immediate interventions and reforms in persistently low-achieving Title I schools (i.e., aggregate achievement or by subgroup), Wisconsin encourages continuous improvement in other Title I schools with supports designed deliberately to improve successful implementation of Title I programming in order to increase student achievement. The Department of Public Instruction (DPI) developed networks and collaborative partnerships in recent years with key stakeholders throughout the state to provide a *statewide infrastructure* of support while addressing staff capacity and resources at the state agency. These initiatives aim to provide consistent, yet differentiated resources to Title I districts and schools in order to continually improve student achievement and address the state’s strategic goals. Wisconsin will continue to utilize these initiatives in order to support *innovative instruction* and *improved student achievement and school performance*. The following sections describe these initiatives in greater detail.

Statewide Infrastructure

As a strategy to support the state’s progress towards the three strategic goals (as previously noted), DPI has worked in cooperation with key stakeholders and collaborative partners to develop a *statewide infrastructure* designed to provide information, guidance, resources, training, and support to districts and schools as necessary.

Title I Network

In collaboration with the 12 regional Collaborative Education Service Agencies (CESAs), the Title I Network provides increased access to technical assistance and professional development for Title I districts and schools. With financial support from DPI, each CESA provides free or reduced cost Title I services for all school districts in their CESA designed to increase student outcomes and close the achievement gap. The following sections describe the services currently provided by the Network to support Title I districts and schools, which will be continued in the future to support academic outcomes.

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

Title I Coordinator Leadership. District Title I coordinators can request information and resources through the Title I coordinator orientation, one-on-one technical assistance, and multiple regional meetings to support the management of Title I in their district and ensure

implementation of effective programming.

Professional Development. The Network provides multiple regional professional development opportunities based on specific Title I needs, as identified by districts in each CESA, including improving student achievement.

Rtl. Beginning next year (2012-13), Title I Network contracts with DPI will require the CESAs to provide more support to schools struggling to improve student achievement or narrow achievement gaps, such as professional development, consultation with LEAs, and targeted resource alignment. Network representatives will have to serve as “Trainer-of-Trainers” and provide Rtl training to districts in their CESA that is consistent with the training provided by the Wisconsin Rtl Center in vision and language. Therefore, Network contracts will also state that CESA staff must attend all applicable Rtl trainings and workshops provided by the Wisconsin Rtl Center.

Resources and Collaboration. The Network also aligns district staff to pertinent information and resources regarding local and statewide initiatives and agencies supporting Title I programming to improve student outcomes.

Wisconsin Rtl Center

As previously noted (see Section 2.E), the Wisconsin Rtl Center and the Wisconsin PBIS Network provide high quality professional development and TA across the state in collaboration with DPI and the 12 regional CESAs. Technical assistance includes advice, assistance, and training pertaining to the implementation, operation, evaluation, and sustainability of a district or school’s Rtl system. Although DPI identified the Rtl Center as the locus for professional development and support for Title I Focus Schools, other Title I schools will also have on-going access to the Center and its resources.

Standards, Instruction, and Assessment Center

Currently in development, the SIA Center, based on the successful model of the Wisconsin Rtl Center, will focus on implementation of the CCSS and other academic standards, as well as the instruction and assessment required for student success. The Center will work in collaboration with DPI and Rtl Center to communicate best practices relevant to implementation of Rtl in order to increase student outcomes and close the state’s achievement gap.

Increase Student Outcomes in Reading and Math

As a strategy to support the state’s progress towards the three strategic goals (as previously noted), DPI has developed internal, cross-agency workgroups and worked in cooperation with key stakeholders and collaborative partners to develop plans to *increase student outcomes in reading and mathematics* statewide.

Common Core Standards

In 2010, Wisconsin became the first state to adopt the Common Core State Standards (CCSS) in mathematics, language arts, and literacy across disciplines. Developed in collaboration with numerous stakeholders, the CCSS emphasize 21st Century Skills embedded within expectations for the understanding and application of rigorous core content knowledge. In collaboration

with two multi-state consortia, Wisconsin is currently developing new common standards for science and social studies (Refer to Principle 1.A for more detailed information regarding DPI’s transition plan for college- and career-ready standards.)

To ensure that districts and schools implement the CCSS with fidelity, DPI provides training, resources, and professional learning opportunities. DPI will also partner with the Title I Network, the Wisconsin Response to Intervention Center, and the Standards, Instruction, and Assessment Center to provide CCSS professional development to Title I districts and schools failing to make adequate progress as a means to improve instructional content and strategies, as well as support struggling learners (refer to Sections 1.A and 2.E for more details regarding these collaborations).

Parent Involvement

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

- DPI annually sponsors about 20 VISTA volunteers in schools statewide who work to engage families in children’s learning. Since 2002, VISTA members have generated over \$3.7 million in resources, volunteers, donations, and grants to Wisconsin schools, families, and communities.
- DPI family involvement staff offer comprehensive training in effective family involvement practices through an annual statewide parent leadership conference and regional workshops.
- State Superintendent of Public Instruction Tony Evers has appointed a Parent Advisory Council composed of 20 parent leaders statewide to provide a parent voice to DPI initiatives affecting children’s learning.
- DPI has a policy promoting family-school-community partnerships, available at <http://www.dpi.wi.gov/fscp/pdf/fscpol04.pdf>.
- The DPI Title I Community Learning and Partnerships website offers extensive family involvement publications, resources, strategies, and effective practices at <http://www.dpi.state.wi.us/fscp/index.html>.
- DPI funded creation of the Dual Language Learners website of the Wisconsin Collaborating Partners. This website gives programs and practitioners easy access to information and practical tips for working with young dual language learners, Birth-5 years, and their families: <http://www.dpi.state.wi.us/pld/slp.html>.
- The DPI-sponsored Wisconsin Summer Library Reading Program is designed to help families keep children reading and prevent the “summer slide” loss of learning: <http://www.dpi.state.wi.us/pld/slp.html>.
- The DPI Early Childhood webpage offers extensive Resources for Parents to help get children ready for Kindergarten: <http://www.dpi.state.wi.us/ec/begin-sch-yr.html>.

Innovative Instruction

As a key component of agency work, DPI has developed the previously noted internal, cross-agency workgroups, worked in cooperation with key stakeholders and collaborative partners, and created a system of recognition which incentivizes innovation.

Spotlight Schools

Spotlight Schools promote innovative instruction statewide in two ways. First, Spotlight Schools are required to host a minimum of three school teams per year to visit their school. During these visits, school teams have the opportunity to observe the Spotlight School's practices, participate in discussions with the school's principal and staff, and discuss possibilities for implementation at their own schools. Spotlight Schools also provide relevant materials and artifacts to support implementation for visiting schools. The second method for sharing spotlight practices is through statewide and regional sharing opportunities. Spotlight Schools have shared their practices in the following ways: presentations at statewide and local conferences, sharing information at CESA regional meetings, and creating videos of practices and posting them (along with relevant artifacts) on their websites.

Spotlight Practices Website

In the future, schools have access to a comprehensive database of effective practices implemented across the state, as well as opportunities to learn from other Wisconsin educators, design professional development, and organize school visits through electronic communication through the Spotlight Practices website (currently in development). Additionally, educators will have access to hyperlinks for specific spotlighted schools to view relevant videos and documents and gain increased knowledge of innovative practices and implementation strategies in order to improve student achievement in their own schools. DPI, in collaboration with the Title I Network, will encourage schools struggling with student achievement to visit Spotlight Schools excelling in the same practices the struggling schools have identified as in need of improvement (e.g., adolescent literacy, data driven decision-making, PBIS, etc.).

STATE CAPACITY

Implementation of the processes and practices described throughout Section 2.F in schools statewide (as opposed to Title I schools only) will require additional state resources, including staffing and funding. Without additional state funding, DPI will continue to implement these systems of support in Title I schools only.

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

- 2.G Describe the SEA’s process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:
- i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;
 - ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and
 - iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA’s differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).
- Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

OVERVIEW

The state’s existing framework, modified to align with the experience and expertise developed across recent years, provides targeted interventions and supports that ensure long-term improvement and sustainability by building SEA, LEA, and school capacity to serve all schools. As described in detail below, this process includes a balanced system of monitoring, accountability, and support. DPI will actively monitor LEAs and schools, particularly those with low performance and/or large achievement gaps to ensure that planned reforms are implemented effectively and with fidelity. Wisconsin’s system also includes strict accountability measures for LEAs and schools that are not successful in improving student learning. This combination of consistent monitoring, firm accountability, and additional resources and support, will lead to improved student outcomes, particularly in low-performing schools and schools with the largest achievement gaps.

SEA MONITORING AND TECHNICAL ASSISTANCE

Informed by prior experiences assisting LEAs and schools implementing reform plans, DPI will draw upon its recently enhanced system of monitoring and support, while also incorporating new components which vary based on each school’s determination, to ensure districts and schools build the capacity necessary to improve student outcomes. DPI will implement comprehensive monitoring systems tailored to Priority Schools and Districts, Focus Schools, and all other schools.

Priority Schools

The SEA will utilize *school improvement diagnostic reviews*, the *Indistar®* online system, *state approved vendors*, *fiscal monitoring*, *data reviews* and *site visits* to monitor the implementation of reforms required of Priority Schools. Together, these strategies will paint a holistic picture for a school and district about the effectiveness of the school reform plan. DPI, in collaboration with turnaround partners and technical assistance providers, will assist the districts and schools in modifying their implementation practices based on findings from the various monitoring strategies.

Diagnostic reviews. As noted in Principle 2.D, DPI will require all Priority Schools to participate in a SIDR, conducted by an external partner under contract with the state, to examine district and school policies and practices which impact student achievement. Objective findings from these reviews will inform LEAs of existing weaknesses within their school's instructional programming. In consultation with SEA staff and technical assistance providers, LEAs will construct and submit a school reform plan which aligns to findings from the review. This process will promote on-going analysis of LEA policies and practices which support or hinder positive student outcomes and require the LEA to identify strategies to address areas of concern in order to build district and school capacity and increase student achievement.

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

State-approved vendors. State-approved vendors will support Priority schools and districts under contract with DPI. The vendors will act as a liaison between the school and the state, providing support to those schools and districts they serve while also reporting objective monitoring findings to the State Superintendent. If necessary, the State Superintendent will use this information to provide additional directives to the specific school or district.

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

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

School visits. Wisconsin's School Improvement Grant (SIG) monitoring system includes school visits to in order to ensure LEAs and schools receiving SIG funds have implemented their

approved reform plans with fidelity, identified areas of concern within their implementation, and developed appropriate plans to resolve these issues accordingly. DPI staff will continue this process and conduct four school visits to each Priority School annually (with the exception of priority schools within a targeted priority district). Attendees will include the school's principal, improvement vendor (if applicable), reform coordinator, as well as the district reform coordinator.

Focus Schools

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

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

All Title I Schools

In 2012-13, the SEA will introduce a new online ESEA application which will allow SEA staff to monitor and manage Title I grants efficiently and effectively to ensure that LEAs and their schools use federal funds appropriately to support continued academic improvement and school performance.

Monitoring Activities of School and Student Performance

Table 2.5 presents Wisconsin's proposed monitoring activities designed to build school and district capacity to implement the reforms necessary to improve student outcomes and school performance in all Title I schools.

Table 2.5. Monitoring Activities of School and Student Performance

SCHOOLS	STRATEGIES	MONITORING BY SEA
Priority Schools	Diagnostic Review	Beginning of the year
	Indistar® Monitoring Tool	Monthly with more frequent communication as necessary
	School Visits	Quarterly
	Fiscal Monitoring	Quarterly
	ESEA Monitoring	Yearly with more frequent communication as necessary
Focus Schools	Indistar® Monitoring Tool	District monitors monthly SEA monitors as necessary
	ESEA Monitoring	Yearly with more frequent communication as necessary
	Title I Network	On-going
	Onsite Diagnostic Review	Annually after re-identification
Schools Missing Annual Measurable Objectives	ESEA Monitoring	Yearly

LEA AND SCHOOL ACCOUNTABILITY FOR IMPROVING PERFORMANCE

DPI will maintain and enhance its existing accountability structures including its authority to intervene in Districts Identified for Improvement. DPI understands that a complete system of support includes a strong accountability component. The accountability system described in detail below will ensure that LEAs are responsible for school improvement, particularly for Priority Schools. Additionally, the system addresses capacity at the state, district, and school level. The system is designed to ensure that reforms are implemented in the most efficient and effective manner, while developing the local capacity to sustain reforms after the three years of implementation. For example, a persistently low-achieving school has demonstrated the lack of capacity to produce improved student outcomes and will, therefore, be required to partner with an expert. Similarly, if a large proportion of schools are identified due to systemic issues at the LEA level, the district has demonstrated it does not have the capacity to support reforms in its schools and the state will target reforms at the district level.

Traditional Public Schools and Districts

Schools. If a traditional public school is identified as a Priority School, it must: 1) participate in a state-contracted school improvement diagnostic review (SIDR) and partner with a state approved turnaround expert to develop a targeted school reform plan aligned to findings from the review, as well as targeted, prescriptive directives from DPI, or 2) close. If the school elects to implement a reform plan aligned to the turnaround principles, as prescribed by the

state, but does not make adequate improvement and is identified as a Priority School again after the three year cohort, the State Superintendent will utilize his or her intervention authority to appoint a special master to direct the activities of the school outside the limitations and boundaries created by policies and practices of the school's local education authority (LEA).

Districts. DPI has historically utilized districts as the entry point for reform in order to address local capacity and build sustainability. Recent experiences implementing school reforms and interventions within the state suggest that school administrators often face barriers to rapid reform as a result of district practices, as opposed to their own. DPI believes that changing structures at the district level will more likely result in long-term reform than changing structures within a school without consideration of the impact the district has on the school. This flexibility request provides DPI the opportunity to affect systemic reform, and differentiate based on identified needs.

The state will prioritize improvement efforts at the district level if the school's diagnostic review demonstrates that systemic challenges at the LEA level contributed to identification as a Priority School. DPI will appoint a state-contracted expert with proven expertise in supporting reform at the LEA level to conduct a diagnostic review of central administration's critical systems and structures, including human resources, curriculum and instruction, finance, and leadership. Based on district improvement diagnostic review (DIDR), the State Superintendent will direct reform at the LEA level and require schools to continue implementing successful school reforms, including DPI Corrective Action Requirements (CAR). The state-contracted LEA expert will act as a liaison between DPI and the district, supporting the implementation of the State Superintendent's directives, while also providing objective monitoring results to DPI regarding implementation status and outcomes.

Charter Schools

When a charter school is initially identified as being among the persistently lowest performing schools in the state, the charter school authorizer will implement one of three options:

- The charter school (or its authorizer) will enter into a performance agreement with DPI in which it agrees to meet annual state-approved performance targets that demonstrate substantial academic improvement within three years. If annual performance targets are not met, the charter is revoked.
- DPI will require an on-site diagnostic review conducted by a state-approved school turnaround expert to identify the factors contributing to poor performance at the school. After participation in the state-conducted review, the charter school authorizer must implement one of two options with respect to the school consistent with the findings and recommendations of the diagnostic review:
 - Contract with a state-approved independent expert/vendor to implement reform plan aligned to turnaround principles and based on the recommendations of the diagnostic review.

- Revoke the charter.
- In lieu of implementing either of these two options, the charter authorizer may instead elect to immediately revoke the charter.

If the persistently low-performing charter school has not demonstrated adequate improvement after three years of participating in a performance contract or implementing a reform plan, the authorizer must revoke the charter. No authorizer may renew a charter if the school is persistently low performing. Relevant state law and new or, to the extent permissible, existing charter school contracts will need to reflect these requirements.

Private Schools in the Parental Choice Program

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

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

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

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

SUPPORT

In order to optimize local capacity, there needs to be enough support, including technical assistance and additional resources, for LEAs and schools to improve student learning, especially in low performing schools and schools with the largest achievement gaps. The SEA will build the capacity of LEAs and their identified schools to successfully implement reform initiatives with a comprehensive system of support, which will include: state-approved turnaround vendors, a SEA Liaison, the Wisconsin RtI Center, the Title I Network, and other networking opportunities (see Section 2.F). Additionally, the state will support districts' and schools' capacity to implement reforms with an intensive review of external technical assistance providers, as well as leverage funding to best support priority schools and districts and their efforts to improve student outcomes.

Review and Approval of External Technical Assistance Providers

DPI will approve a number of turnaround partners demonstrating evidence of experience and expertise in successful reform initiatives identified through an RFP process. During the RFP process, DPI staff, the CoP, and other external reviewers will evaluate applications based on rigorous criteria developed through a comprehensive review of best practices and key indicators of turnaround partner success. Specifically, the criteria will rely on research produced by groups such as *Mass Insight Education* and the *Center on Innovation and Improvement*. DPI will also research the experiences of other states that have approved external providers in order to develop rigorous and effective criteria. Examples of states that will be consulted include Virginia, Indiana, and Illinois.

As described above, the final criteria for review and approval will be developed based on current research, best practices, and experiences from other states. Criteria include:

- Successful and effective work with low performing schools (or districts, if applicable) or schools with comparable student populations;
- Instructional models that are comprehensive, yet aligned to the needs and contexts of individual schools and districts;
- A well-developed framework of leading success indicators; and
- A record of organizational and financial stability.

LEAs with Priority Schools, with the consultation of DPI, will select an approved vendor which best meets their individual needs; unless the LEA can provide evidence that it does not need the support of a vendor to successfully turnaround its low-performing schools. Vendors must implement comprehensive school reform efforts that integrate structural and programmatic interventions, including daily onsite support and leadership, while building the Priority School's and the LEA's ability to successfully implement and sustain reform efforts.

The state will hold state-approved vendors accountable for performance—their support and interventions must result in improved student outcomes. Specifically, a school is re-identified after the three year cohort and implementation of reforms, the state will remove the vendor

serving that school from its approved provider list.

Leverage of Funding

DPI will provide support for implementation of meaningful interventions in Priority Schools through all available funding sources, including Title I, Part A, 1003(a), 1003(g) SIG (for eligible Priority Schools), 1116(b)(10), and other Federal funds as permitted. DPI understands that the turnaround interventions required in Priority Schools will require significant funding in order to fully implement and will ensure that Priority Schools have sufficient funding.

In particular, DPI has already appointed a Federal Funds Trustee for MPS. This position is responsible for ensuring that the state and district utilize the various federal funds available to the district appropriately, effectively, and efficiently.

Implementation of a large proportion of the processes and practices described throughout Section 2.G in schools statewide (as opposed to Title I schools only) will require additional state resources, including staffing and funding. Without additional state funding, DPI will continue to implement these efforts in Title I schools only.

Principle 4: Reducing Duplication and Unnecessary Burden

DPI will reduce burden on LEAs based on this waiver through a number of means:

Districts Identified for Improvement will be required to submit a plan that addresses capacity at the district level which will focus on how the district functions overall (staffing, visioning, funding, etc.). Rather than working at the individual school level, a district-wide plan will ensure effective and efficient systems and structures are in place to impact student outcomes. These plans will be approved at the state level to hold the districts accountable for the reform plan.

This waiver is intended to more closely align the new accountability system with requirements stated within CAR, including district-wide reforms such as a single comprehensive literacy plan.

Requiring a consistent planning and monitoring tool (Indistar®) with low performing schools, will ensure the district is using a common plan and language with a universal vision, goals, and performance objectives.

Requiring RtI and continuing to build capacity the Wisconsin RtI Center will greatly enhance student achievement. Districts are requesting more direction/guidance on specific interventions and best practices in implementing an effective RtI system. The waiver would promote this and build Wisconsin's capacity around resources, professional development and implementation of RtI.

The roll-out of the statewide Standards, Instruction and Assessment (SIA) Center will ensure consistency around instruction and assessment. Districts and schools will have much greater

access to best practices that will inform instructional practice. Additional, the SIA Center will greatly enhance the collaboration with Wisconsin's Institutes of Higher Education, which in turn will positively impact the education/training of new teachers.

Providing alternatives to SES will greatly reduce the amount of staff time both at the SEA and LEA level in terms of approving providers, contracting with providers and tracking multiple provider programs. This flexibility would allow one program that would much more closely align with district/school improvement goals as well as individual student needs. This will also provide additional opportunities for parent involvement, which is a significant component of the improvement process.

Wisconsin's new accountability system will provide a single statewide system that will impact all schools. Currently, the system is primarily linked to Title I, as there is no funding/consequences at the state level for non-Title I schools. The new system will look at all schools, including charter schools and schools participating in the Parental Choice Program, and hold the same standard of accountability for all schools, statewide.

PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP

3.A DEVELOP AND ADOPT GUIDELINES FOR LOCAL TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

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

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

	adopted guidelines and the process to continue their involvement in developing any remaining guidelines; and v. an assurance that the SEA will submit to the Department a copy of the remaining guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance 14).	
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THE WISCONSIN FRAMEWORK FOR EDUCATOR EFFECTIVENESS

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

Theory of Action

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

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

Key Design Features of the Framework

The following design features are predicated on the understanding that the success of a

performance-based evaluation system hinges on the development of a high-quality system that is implemented with fidelity and fully aligned with professional development and support.

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

Guiding Principles

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

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

The Wisconsin Framework for Educator Effectiveness Design Team Report and Recommendations is included in this request.

3.A.ii Provide evidence of the adoption of the guidelines

(Press Release to be attached)

http://dpi.wi.gov/eis/pdf/dpinr2011_125.pdf

DEVELOPMENT OF THE FRAMEWORK

The Wisconsin Framework for Educator Effectiveness was designed in collaboration with leaders of state professional education organizations, educator preparation programs, Governor Walker’s office, and the Wisconsin Department of Public Instruction. Design Team members represented the following:

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

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

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

Decision feedback was supported through stakeholder communication. An Educator Effectiveness Symposium was held in June 2011 to inform stakeholders and elicit feedback on

the emerging framework design. Additionally, stakeholders sought feedback from their various constituent groups throughout the process.

Continuous Improvement of Instruction

This request for flexibility is driven by the belief that increasing rigor across academic standards and assessments while implementing a new statewide accountability system will result in improved instruction and improved student outcomes throughout Wisconsin. The Wisconsin Framework for Educator Effectiveness is designed to provide individualized support and professional development plans to every teacher and principal in the state. Regularly timed formative evaluations will inform educators' individualized professional development plans. As such, on-going improvement will be addressed through professional development.

MULTIPLE MEASURES

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

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

The following measures of educator practice will be used:

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

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

or for those who work with special populations.

- For principals, the 2008 ISLLC standards will be used. The ISLLC subordinate functions under the standards will form the components. Rubrics for observing principal practice will be developed, adapted, or identified at the component level. Models based on ISLLC will be used as a starting point for rubric development.
- Multiple observations of educator practice are required during summative evaluations. Observations must be supplemented by other measures of practice. Multiple sources of evidence must be collected to document the evaluation of practice.
- Districts will have the flexibility to create their own rubrics of educator practice. Districts that choose to do so must apply to the State Superintendent through an equivalency review process. The rubrics (and related training, tools, etc.) for teacher practice must be based on the InTASC standards, and Danielson's four domains of teaching responsibility, but may combine components into fewer categories.

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

All teachers' evaluations will be based in part on multiple measures of student outcomes. The measures used and their relative weights will vary based on availability of measures. For example, value-added data are available for a limited number of grades and subjects (currently, grades 3-7 reading and mathematics) ("covered grades and subjects"). Individual value-added data will be used as one of several measures of student outcomes for teachers of covered grades and subjects.

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

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

process.

- District choice of data based on improvement strategies and aligned to school and district goals within the state accountability system.

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

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

- District-adopted standardized assessment results where available as described above.
- Student learning objectives as described above.
- District choice of data based on improvement strategies and aligned to school and district goals within the state accountability system.

For principals, the following data when available will be used:

- School-wide value-added data from statewide standardized assessments taken by students in the school(s) to which the principal is assigned.
- District-adopted standardized assessment results where available. The selection of assessments will be informed by district and school goals, the Common Core State Standards, and 21st century skills and meet APA/AERA criteria for tests that are used for high-stakes decisions.
- School Performance Outcomes, agreed upon by principals and administrators, that move students toward mastery of applicable content or skills. The school performance objectives must be rigorous and meet the following criteria – specific, measurable, attainable, relevant, timely. The school performance objectives will be informed by district and school goals, the Common Core State Standards, and 21st Century skills. The district will establish a process for the development and oversight of the school performance objectives component. The state will provide guidelines and tools to support districts in this process.
- District choice of data based on improvement strategies.

School-wide student achievement on state assessments in reading would be considered for 5% of the student outcome component of PreK-8 principal's evaluation. In lieu of school-wide reading, for 9-12 grade teachers, 5% of student outcomes will be graduation rate until a statewide reading assessment is available.

The Evaluation Process

New educators (first three years in a district) will be evaluated annually. Struggling educators (those whose summative performance rating is "Developing") will be evaluated annually. Veteran, non-struggling educators will be evaluated once every three years, although these

educators could be evaluated on a subset of performance dimensions each year, with the entire set covered over a three year period. These specifications refer to summative evaluations. Formative evaluation shall be on-going for all educators.

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

Educators will receive feedback on their performance in educator practice and student outcomes, both of which will be combined into an overall performance rating. Three categories of performance ratings will apply to all educators across the state:

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

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

The evaluation process will include multiple forms of evidence, and will serve both formative and summative evaluation needs. A manual describing formative and summative evaluation, and detailing evidence sources, the frequency of data collection, timelines, and procedures for collection and analysis of evidence will be developed. Formative evaluation shall be on-going. Summative evaluations shall follow the timelines specified in the manual.

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

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

Design Process

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

DPI has convened an Educator Effectiveness Coordinating Committee representing diverse stakeholders that will provide guidance and feedback throughout the piloting and initial implementation phases of the system, at least through the 2014-2015 school year. Districts and CESAs are also collaborating with DPI on the development, pilot, and training phases. The state is encouraging districts to begin implementing the new system as soon as possible and will allow any district wishing to implement the new system early to do so.

Development Phase (2011-2012)

During the development phase many key tasks will be accomplished to prepare for the pilot phase. These key tasks include the development of rubrics for educator practice, defining evaluation sources (observations, surveys, portfolios, etc.), building the value-added data system which links to district student information systems, developing criteria for student learning objectives, training of evaluators and those being evaluated, and writing guidance documents.

The department will convene an internal cross-agency coordination team. This phase of work will be aligned with the other state initiatives, including development of the state accountability system, early childhood literacy, and new assessment and data systems initiatives.

Pilot Phase (2012-2013)

School District Pilots: During the Piloting Phase (2012-2013) the state model will be piloted in diverse school districts that will include urban, suburban and rural school districts. A sufficient number of school districts will pilot the state model to provide valid and reliable evaluation data. The pilot will be conducted for one full school year. Large districts will pilot test in a sample of schools for principal evaluation, teacher evaluation, or a mix of teachers

and principals. Smaller districts will pilot test in a substantial portion or perhaps all of the district's schools. Specific licensure areas for teachers will be included (e.g. early childhood, English Language Learners, special education, music, art, physical education, agriculture, etc.). Evaluators and those being evaluated will be trained before participating in the pilot test. The training program will describe the evaluation process including the use of formative feedback, value-added student outcomes, and performance rating categories.

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

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

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

Evaluation of the Training Program: Educators will have opportunities to provide on-going feedback on the pilot process (e.g., through the department's Educator Effectiveness website, department staff, external evaluator, trainers, etc.). This feedback will inform the state model and modifications will be made to the system.

Implementation Phase (2013-2014 and 2014-2015)

Roll-out (2013-2014): Districts will be supported through on-going evaluator/educator training, resource tools and communication. Resources will include rubrics, scoring protocols, technical assistance with analyzing student growth measures, protocols for combining multiple measures, department -supported training from evaluators, and professional development tailored to state system materials. The state model will address the following:

- On-going training for evaluators for teachers and principals.
- Evaluation results that are valid and reliable.
- Evaluation rubrics and tools that are fair, rigorous and transparent.
- Sufficient timing and frequency of evaluations to ensure sufficient data is collected.
- Collaborative professional development time for educators to respond to student outcome data.
- Student data that is correlated between student outcomes and educator

effectiveness ratings.

Statewide Implementation (2014-2015): All districts will be required to begin implementation of the state model in 2014-2015. School districts may apply to the State Superintendent to develop their own rubrics (and related training, tools, etc.) provided that they meet the Wisconsin Model Educator Effectiveness System standards (as defined in development phase). District principals and teachers will be trained in the Wisconsin Model Educator Effectiveness System before implementing the system.

Continuous Improvement (On-going): The state model will continue to be evaluated for fidelity of implementation and impact on practice and student outcomes. Data collection and monitoring will be focused on increased educator effectiveness and the improvement of student outcomes. The effectiveness ratings of teachers and principals will be consistent with overall student and school performance.

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

The state model will be adapted for the evaluation of other professional educators, including pupil services, paraprofessionals, and other district administrators. The teacher and principal evaluation system will inform the development and expansion of the state model.

SAMPLE FORMAT FOR PLAN

Below is one example of a format an SEA may use to provide a plan to meet a particular principle in the *ESEA Flexibility*.

Key Milestone or Activity	Detailed Timeline	Party or Parties Responsible	Evidence (Attachment)	Resources (e.g., staff time, additional funding)	Significant Obstacles

NOTE: ATTACHMENTS AND APPENDICES WILL BE INCLUDED WITH THE FEBRUARY 21, 2011 SUBMISSION, BUT HAVE NOT BEEN INCLUDED WITH THIS POSTING.