

AMENDMENTS TO THE CONSOLIDATED STATE APPLICATION FOR TITLE III ESEA:
ENGLISH LANGUAGE PROFICIENCY ANNUAL MEASURABLE ACHIEVEMENT OBJECTIVES

This document amends the English Language Proficiency Annual Measurable Objectives in the Title III portion of Wisconsin's Consolidated State Application. Wisconsin's plan is amended to comply with the Notice of Final Interpretations published in the *Federal Register* on October 17, 2008. The amended plan takes effect with the 2011-12 school year.

The document is divided into five sections:

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NOTICE OF FINAL INTERPRETATIONS CHECKLIST
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BACKGROUND

Previous Amendments to Wisconsin Annual Measurable Achievement Objectives (AMAOs)

Wisconsin first submitted a plan to determine AMAOs in its 2003 Consolidated State Application. Since that time the state has adopted a single English language proficiency (ELP) assessment and implemented a data warehouse with a statewide student identification number. These developments led to an amended plan in 2007 based on empirical research. The current amendment is in response to the U.S. Department of Education's Notice of Final Interpretations of Title III. Below is a summary of AMAO milestones.

Date	Milestone
Sept. 2003	First AMAO plan included in Consolidated State Application.
2005-06	ACCESS for ELLs® adopted as Wisconsin's sole ELP test. Statewide student identification numbers implemented.
Aug. 2007	Amended AMAOs. Key features: <ul style="list-style-type: none">• AMAO 1 – Cohorts based on initial ELP level and grade level.• AMAO 2 – Exit rate based on students eligible to exit.

Date	Milestone
May 2010	Amended AMAOs. Key features: <ul style="list-style-type: none"> • AMAO 1 – No cohorts. • AMAO 2 – All ELLs included and proficiency defined solely by score on ELP assessment. • AMAO 1 & 2 – Improvement timeline established.
April 2011	Amended AMAO 1 to the percent of ELLs making progress rather than the average gains of ELLs.
Jan. 2012	Amended plan to ensure that all Title III funded districts receive an AMAO determination, regardless of cell size.

Demographics

In the 2008-09 school year 344 of Wisconsin’s 426 districts enrolled about 45,000 English language learners (ELLs) in grades K-12. Just over one-half of these districts (193) enrolled 20 or fewer English language learners. The nearly one-half of districts (151) which enrolled more than 20 ELLs enrolled the majority (96%) of English language learners.

ELLs Enrolled	Number of Districts	Percent of ELLs Enrolled
0	82	0.0%
1-20	193	3.6%
21-40	47	3.2%
More than 40	104	93.2%
	426	100.0%

The most common native languages for English language learners in Wisconsin are Spanish (62%) and Hmong (24%). English language learners are distributed among all grades and all ELP levels, with most in the elementary grades and at English language proficiency level 3 (see *ELP Levels* below for details regarding English language proficiency levels).

Assessment

Wisconsin school districts have annually assessed all enrolled English language learners with the sole state-approved English language proficiency test, ACCESS for ELLs®, since the 2005-06 school year. ACCESS is a product of the WIDA Consortium, of which Wisconsin is a founding member. It provides valid and reliable information about students’ English language proficiency in the domains of reading, writing, listening, and speaking. Results are reported in terms of raw scores, scale scores, and English Language Proficiency (ELP) levels. The ELP levels are interpretations of student performance in terms of the English language proficiency standards. Composite scores are reported for oral language, literacy, and comprehension. An overall composite score reflects students’ weighted scores in all four domains.

ELP Levels

Wisconsin uses seven ELP levels. These levels correspond to the ACCESS ELP level scores up to level 6.0. For example, a student with an ACCESS overall composite score of 3.7 is classified as an ELP level 3 English language learner. ELP level 6 facilitates monitoring performance of former English language learners, and is distinct from ELP level 7, which designates native English speakers.

ELP Level	Wisconsin	WIDA
1	Beginning/Preproduction	Entering
2	Beginning/Production	Beginning
3	Intermediate	Developing
4	Advanced Intermediate	Expanding
5	Advanced	Bridging
6	Formerly ELL	Reaching
7	Never ELL	--

Progress

Statewide mean ELP level growth from 2008-09 to 2009-10 was 0.41 ELP level, but varied by initial ELP level from 0.69 at ELP level 1 to 0.05 at ELP level 5. This is consistent with the principle that in terms of language acquisition *lower is faster; higher is slower*.¹

Initial ELP Level	N	Mean ELP Level Gain
1	1,095	0.69
2	3,739	0.63
3	11,669	0.49
4	11,620	0.39
5	5,272	0.05
Overall	33,395	0.41

The mean ELP level growth varies from .35 to .41 over the most recent three years of data. Half of ELLs made 0.3 to 0.4 or less ELP level gain over this time period.

Year	N	Mean	SD	Minimum	First Quartile	Median	Third Quartile	Maximum
2008	31,468	.35	.67	-4.7	0.0	0.3	0.8	4.9
2009	32,580	.35	.65	-4.5	0.0	0.3	0.7	4.8
2010	33,395	.41	.65	-4.8	0.0	0.4	0.8	4.6

¹ Cook, H. G., Boals, T., Wilmes, C., & Santos, M. (2008) Issues in the development of annual measurable achievement objectives for WIDA consortium states (WCER Working Paper No. 2008-2). Madison: University of Wisconsin-Madison, Wisconsin Center for Education Research.

All students at ELP levels 1-5 are counted as ELLs for both Title I (Adequate Yearly Progress) and Title III (Annual Measurable Achievement Objectives) accountability. Students reach ELP level 6 either by attaining an ACCESS overall composite ELP level score of 6.0 (the highest obtainable level) or through a manual reclassification process. To be eligible for reclassification students must be in 4th grade or higher, attain an ACCESS overall composite ELP level score of 5.0 or higher, and show other evidence of having attained English language proficiency (for details on reclassification, see ESEA Information Update Bulletin 07.2, "Criteria for Reclassification of ELL Students as Fully English Proficient"). ELP level 6 students exit services and are not eligible for Title III funds.

Students who attain an ACCESS overall composite ELP level score of 5.0 or higher are considered proficient for Title III accountability. Until these students reach ELP level 6 as described above, however, they are still considered English language learners and are eligible for Title III services, required to participate in annual ACCESS testing, included in Title III accountability determinations, and included in the LEP subgroup for Title I accountability.

AMAO REVISION PROCESS

The current amended plan is the result of a research-based, deliberative process. Longitudinal data and alternative AMAO determinations were considered by a key stakeholder group on March 20, 2009. Office of Educational Accountability staff consulted Dr. Gary Cook (the WIDA consortium research director) and WIDA consortium member states, refined the stakeholder recommendations, and analyzed impacts using real student data. A final draft plan was reviewed by the state Technical Advisory Committee² on December 1, 2009, and their recommendations were incorporated.

Seven key principals guided development of this amended plan:

- Based on data and research
- Consistent with Title I Adequate Yearly Progress
- Meets the requirements of the Notice of Final Interpretations
- Sets challenging yet reasonable goals for improvement
- Statistically reliable and valid
- Transparent
- Useful for program improvement

² Brian Gong, Robert Linn, and Andrew Porter.

Wisconsin followed the Linqanti and George five-step process, as described by Cook,³ to revise its AMAOs:

AMAO 1: Progress

1. Determine the scoring metric to be used to determine growth:
ACCESS overall composite proficiency level decimal score.
2. Determine the annual growth criterion:
An overall composite proficiency level decimal score gain of 0.4 or greater.
3. Set the starting point for AMAO 1 targets:
Twentieth percentile of percent meeting growth criterion: 35%.
4. Set the ending point for AMAO 1 targets:
Sixtieth percentile of percent meeting growth criterion: 55%.
5. Determine the annual rate of growth:
Annual percent progressing target increase: 2%.

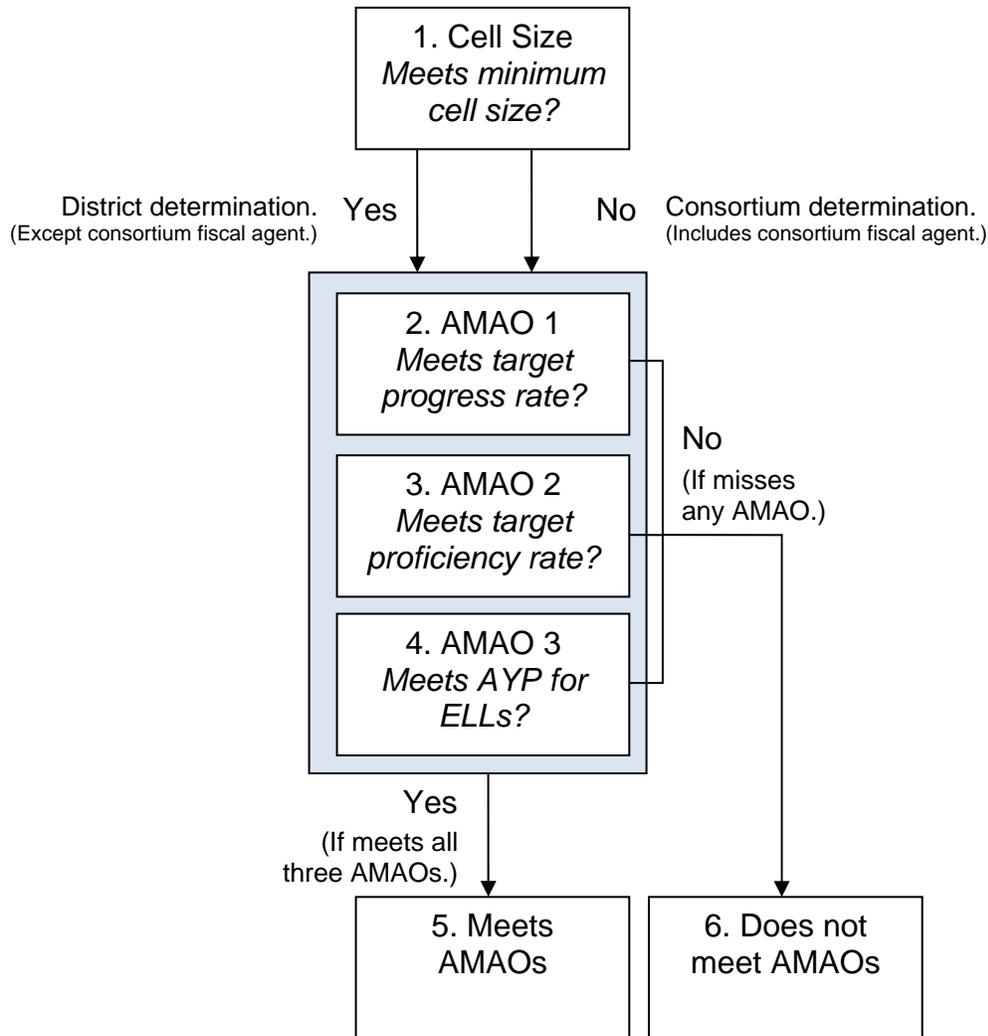
AMAO 2: Proficiency

1. Define the English proficiency level:
Overall composite ELP level score 5.0 on ACCESS.
2. Determine the cohort of ELLs for analysis:
All ELLs are included in the analysis.
3. Set the starting point for AMAO 2 targets:
District percent proficient near the 20th percentile: 5%.
4. Set the ending point for AMAO 2 targets:
District percent proficient near the 60th percentile: 20%.
5. Determine the rate of annual growth:
Annual proficiency rate target increase: 1.5%.

³ See Footnote 1.

MAKING AMAO DETERMINATIONS

AMAO determinations are made as follows. The numbered steps correspond to the boxes in the diagram.



1. Cell size. *Does the district meet the minimum cell size?*

Districts with at least 20 ELLs enrolled each year for the current and prior years meet the cell size requirement. A district that meets the cell size requirement receives a district AMAO determination, unless the district is the fiscal agent for a consortium. A district that is a fiscal agent for a consortium is included in the AMAO determination for that consortium.

A district that does not meet the cell size requirement and is a member of a consortium receives a consortium AMAO determination. This determination includes

the district that is the fiscal agent for the consortium and all districts in the consortium that do not meet the cell size requirement.

A district that does not meet cell size and is not a member of a consortium does not receive Title III funds. All districts, including districts that do not receive Title III funds, receive district AMAO reports for informational purposes.

A minimum cell size is used to control for variability within a single year and volatility over time. In small samples a small number of individuals can have a disproportionate impact on the sample proportion, leading to incorrect inferences about overall program effectiveness. See the technical information below for data related to cell size.

2. AMAO 1. *Does the district meet the target progress rate?*

Districts meet AMAO 1 if the percent of ELLs making 0.4 or greater ELP level progress in the current year, or the pooled percent for the current and prior years, meets the current year progress rate target. All students with two composite test scores are included in calculating the percent making progress.

Districts that do not meet the target progress rate do not meet AMAO 1.

The progress rate is the count of all students with two scores who gained 0.4 or greater ELP level divided by the count of all students with two scores. A 95% confidence interval is applied to control for variability and sample size. See the technical information section for details related to the confidence interval.

The district improvement timeline has been developed to be challenging yet reasonable. In ten year's time, the lowest-performing district must be more effective than 60% of today's districts.

Year	Target Progress Rate (Percent At or Above 0.4 Gain Criterion)
2010	--
2011	35
2012	37
2013	39
2014	41
2015	43
2016	45
2017	47
2018	49
2019	51
2020	53
2021	55

3. AMAO 2. *Does the district meet the target proficiency rate?*

Districts meet AMAO 2 if the percent proficient in the current year, or the pooled percent proficient for the current and prior years, meets the current year target proficiency rate. All ELLs enrolled in the district are included in calculating the proficiency rate, regardless of their ELP level or whether they have test scores. Districts that do not meet the target proficiency rate do not meet AMAO 2. The proficiency rate is the number of English language learners who have attained a composite ELP level score of 5.0 or higher, divided by the number of English language learners enrolled. A 95% confidence interval is applied to control for variability and sample size.

The district improvement timeline has been developed to be challenging yet reasonable. In ten year's time, the lowest-performing district must be more effective than 60% of today's districts.

Year	Target Proficiency Rate (Percent At or Above 5.0)
2010	5.0
2011	6.5
2012	8.0
2013	9.5
2014	11.0
2015	12.5
2016	14.0
2017	15.5
2018	17.0
2019	18.5
2020	20.0

AYP will be revised under Wisconsin's accountability waiver. See more at http://acct.dpi.wi.gov/acct_home.

4. AMAO 3. *Does the district meet AYP for ELLs?*

Districts that meet Adequate Yearly Progress (AYP) in reading and mathematics for the ELL subgroup meet AMAO 3. The same students are included in both AYP and AMAO determinations. Minimum cell size for AYP is 40.

Districts that do not meet AYP in reading or mathematics for ELLs do not meet AMAO 3.

5. District meets AMAOs.

Districts that meet all three AMAOs meet the AMAO requirements. No further action is required from these districts.

6. District does not meet AMAOs.

Districts that miss any AMAO do not meet the AMAO requirements. Districts will be notified and Title III districts must notify parents. DPI provides sample parent letters in English, Spanish, and Hmong for district use. DPI also provides technical assistance as required.

If a district does not meet AMAO requirements for two consecutive years, additional measures will be taken in accordance with the requirements of Title III. If a district does not meet AMAO requirements for four consecutive years, further measures will be taken in accordance with the requirements of Title III.

Districts that do not receive Title III funds do not receive an AMAO determination. However, the Department of Public Instruction (DPI) will provide an AMAO report to these districts for their own use in monitoring and improving services to English language learners.

NOTICE OF FINAL INTERPRETATIONS CHECKLIST

Wisconsin's amended plan meets the requirements articulated in the Notice of Final Interpretations. Amendments to the plan are denoted "New" in the "How Met by Wisconsin" column.

Section of Notice	Final Interpretation	How Met by Wisconsin
1. Annual ELP Assessments	ELLs must be assessed annually in reading, writing, speaking, and listening.	Wisconsin requires ACCESS for ELLs® to be annually administered to all ELLs. All four domains are assessed.
2. Use of Annual ELP Assessment Scores for AMAOs 1 and 2	States may use a single composite score based on all four domains.	The ACCESS overall composite ELP score, used in AMAOs 1 and 2, is based on all four domains.
3. Students included in Title III Accountability	All Title III-served students must be included.	[New] All ELLs are included in all three AMAOs.
4. Exclusion of students Without Two Data Points from AMAO 1	States must include, at a minimum, students with two scores on the state ELP test.	All students with two ACCESS scores in the current or prior year are included in AMAO 1.
5. Attainment of English Proficiency	States are permitted to use a definition of "attaining proficiency" for AMAO 2 that differs from the definition used to exit students from the LEP subgroup.	Wisconsin uses the composite ELP level score on ACCESS as the sole determiner of "proficiency" for AMAO 2. Students who are "proficient" for AMAO 2 but who are not yet exited from LEP status are eligible for Title III services, required to participate in annual ACCESS testing, included in Title III accountability determinations, and included in the LEP subgroup for Title I accountability.
6. Use of Minimum Group Size	States may apply a minimum group size consistent with the minimum group size they apply for Title I accountability.	Wisconsin's minimum group size of 20 in a year (40 over two years) is consistent with the minimum group size of 40 for Title I accountability.

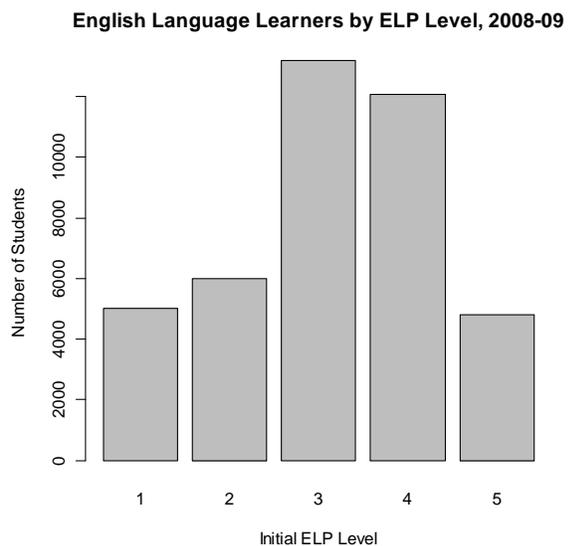
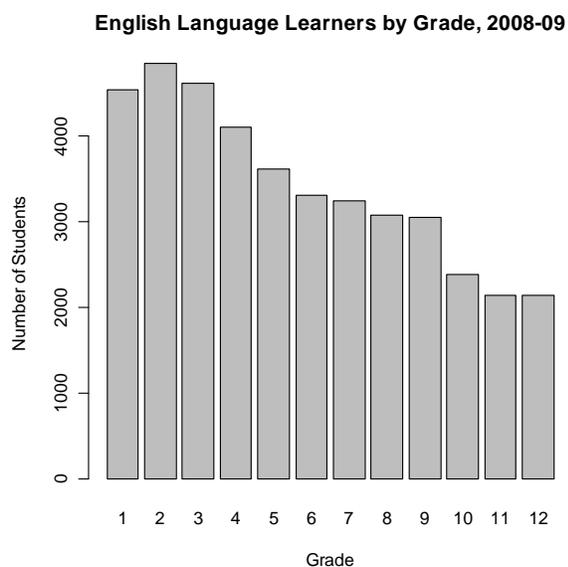
Section of Notice	Final Interpretation	How Met by Wisconsin
7. Adequate Yearly Progress and AMAOs	States and subgrantees are permitted to meet AMAO 3 if the ELL subgroup meets AYP for reading and mathematics.	Wisconsin uses the district AYP determination for ELLs in reading and mathematics.
8. AMAOs and the Use of Cohorts	States may establish cohorts only if based solely on the amount of time ELLs have had access to language instruction programs. States are not required to establish cohorts.	[New] Wisconsin AMAO determinations are not based on cohorts.
9. Determining AMAOs for Consortia	States may treat subgrantees that consist of more than one LEA as a single entity or as separate entities for calculating AMAOs.	[New] Wisconsin evaluates each district that meets cell size separately. Districts within a consortium are evaluated together when they don't meet cell size separately.
10. Implementation of Corrective Actions under Title III	<p>States must annually determine all three AMAOs for every Title III subgrantee. States must maintain evidence that</p> <ol style="list-style-type: none"> 1. State has informed subgrantees that missed AMAOs. 2. Subgrantees that missed AMAOs have notified parents. 3. State has provided technical assistance to subgrantees. 4. State has implemented required measures to address subgrantee's failure to meet AMAOs. 	Wisconsin annually determines AMAOs for every district. Districts that miss AMAOs are notified and are required to communicate with parents within 30 days of notification. The state provides technical assistance to districts through consultation, professional development, and other means.
Title III: Sections 3122(a)(3)(A)(i) and (ii)	Annual increases in the number or percentage of children making progress. Annual increases in the number or percentage of students attaining English proficiency by the end of each school year.	<p>[New] The AMAO 1 target is based on the percent of students in a district meeting the growth criterion.</p> <p>[New] AMAO 1 and 2 targets increase annually for ten years.</p>

TECHNICAL INFORMATION

The following figures summarize information related to demographic characteristics of English language learners in Wisconsin, statistical controls for sample size and variability, and progress in English language acquisition.

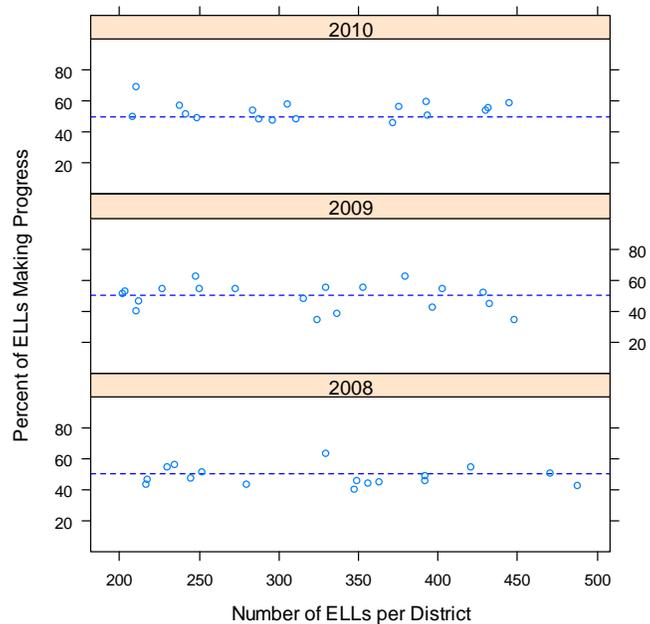
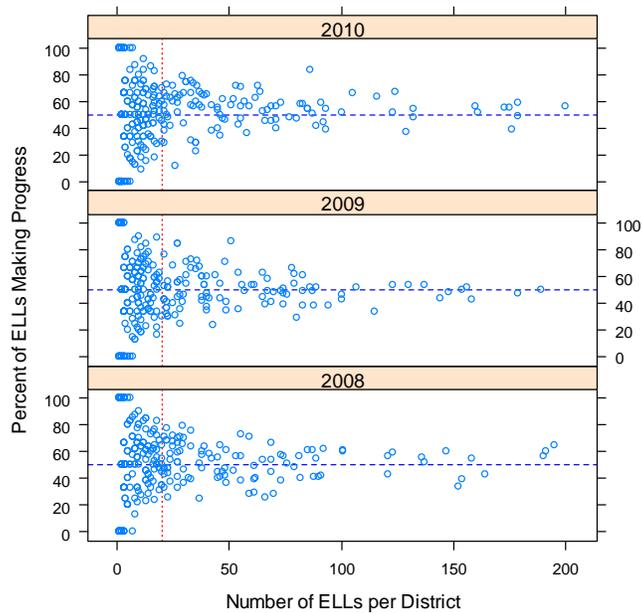
Demographics of ELLs in Wisconsin

The two figures below show the distribution of English language learners by grade and initial ELP level (at the beginning of the school year) for the 2008-09 school year.

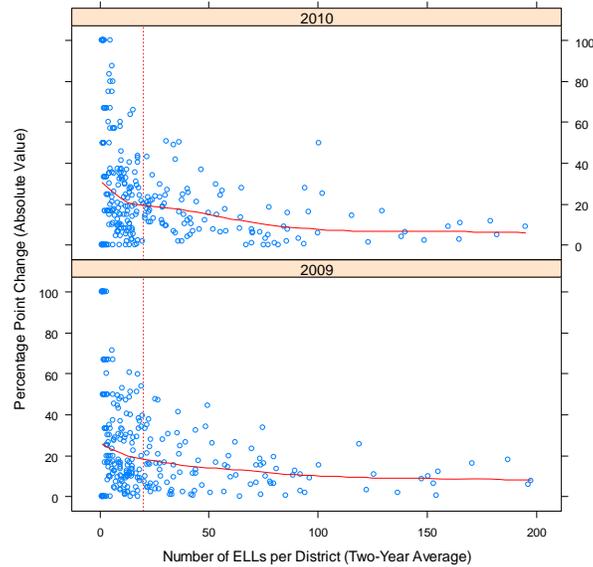


Controlling for Variability Related to Sample Size

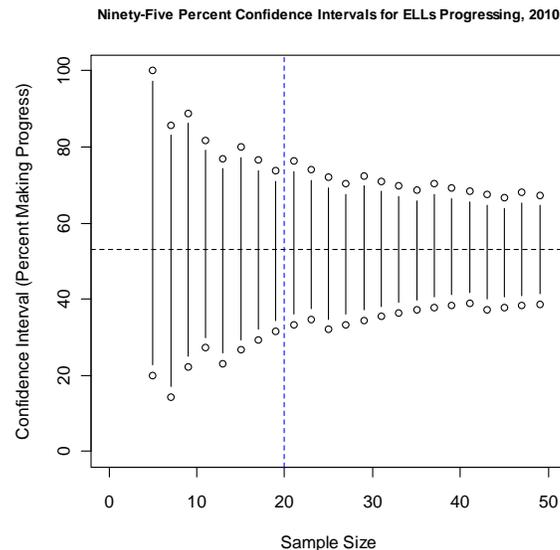
The two figures below show there is increased variability around the percent making progress in a single year for districts with fewer ELLs. The top figure shows districts with 1-200 ELLs with two test scores in 2008, 2009, and 2010. The bottom figure shows districts with 201-500 ELLs. This illustrates the need for the use of a minimum cell size and a confidence interval to control for statistical “noise” due to variability of small samples. The vertical red line marks 20 ELLs per district.



The figure below shows the increased volatility in percent making progress from one year to next for districts with smaller numbers of ELLs. The plot indicates the absolute value of the percentage point change in progress rates per district from 2007-08 to 2008-09 (2009) and 2008-09 to 2009-10 (2010). The figure illustrates the need for two-year averaging, especially for small districts.



The figure below shows the 95-percent confidence interval for samples of various sizes from the 2009-10 state data. The confidence intervals were obtained by drawing 10,000 random samples with replacement at each sample size, calculating the percent making progress for each sample, and plotting the 2.5th and 97.5th percentiles for the resulting distributions. This illustrates the need for a confidence interval, as the test scores upon which AMAOs 1 and 2 are based are considered samples of program effectiveness.

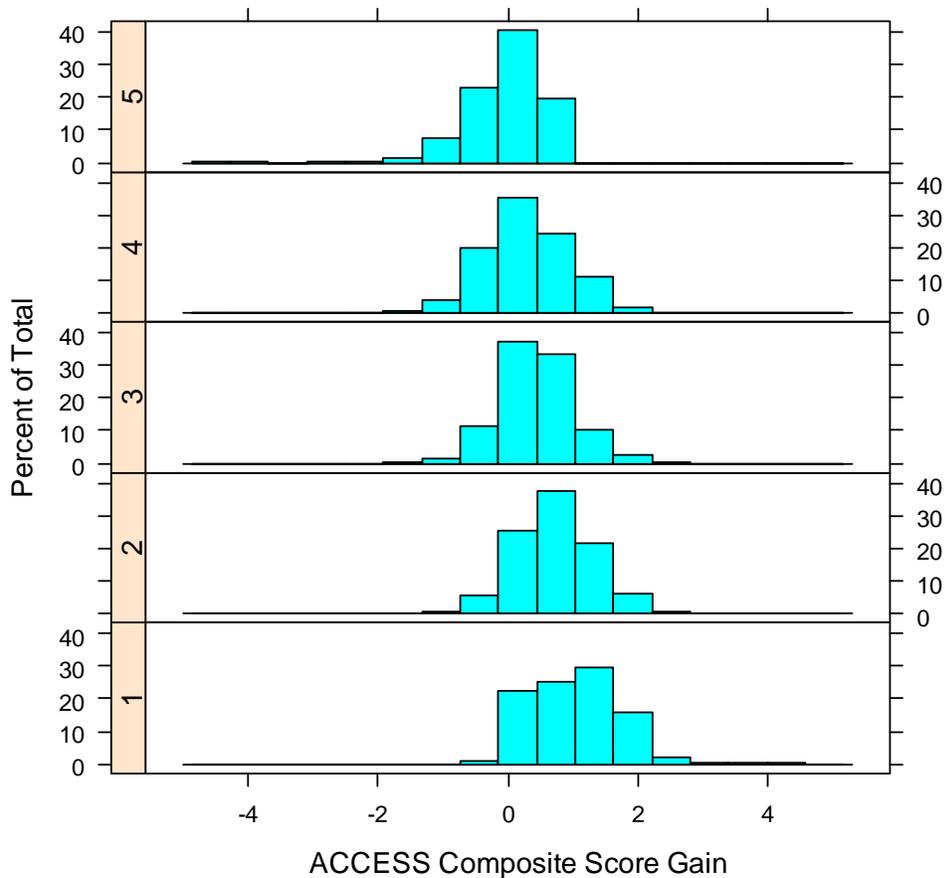


Progress

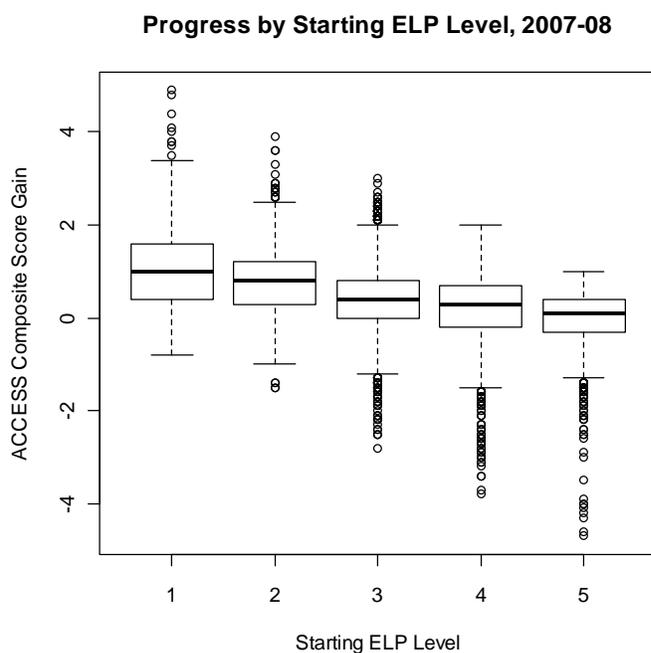
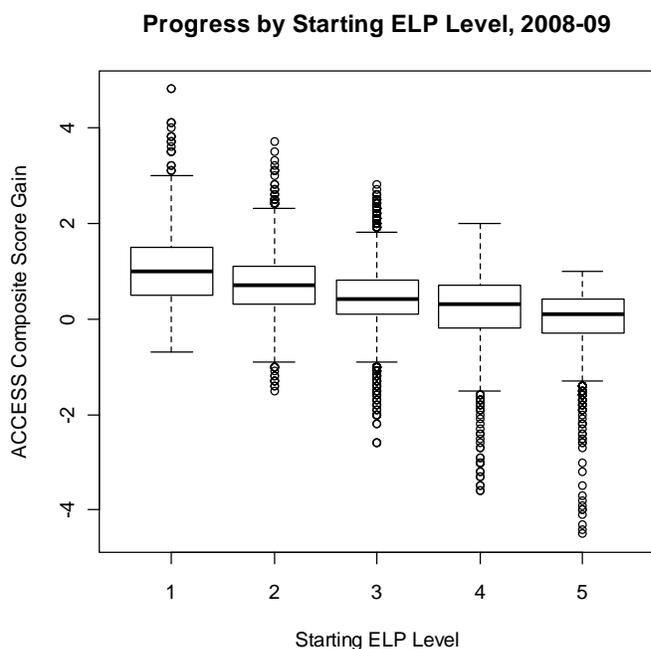
The rest of the figures below illustrate the observed progress of Wisconsin's English language learners in attaining English proficiency. They are presented here for informational purposes only. One interpretation of these data is that growth varies by ELP level and grade. An accountability model that doesn't take this into account risks communicating misleading information to educators and the public or worse, if sanctions are applied to programs that are in fact effective. Wisconsin will monitor the effectiveness of the amended AMAOs and is open to participating in research that may lead to more responsive accountability models.

The figure below shows the distribution of composite score gains by students' ELP levels at the beginning of the school year. Note the center of the distributions shift left as the initial ELP level increases, indicating smaller annual gains as students become more English proficient.

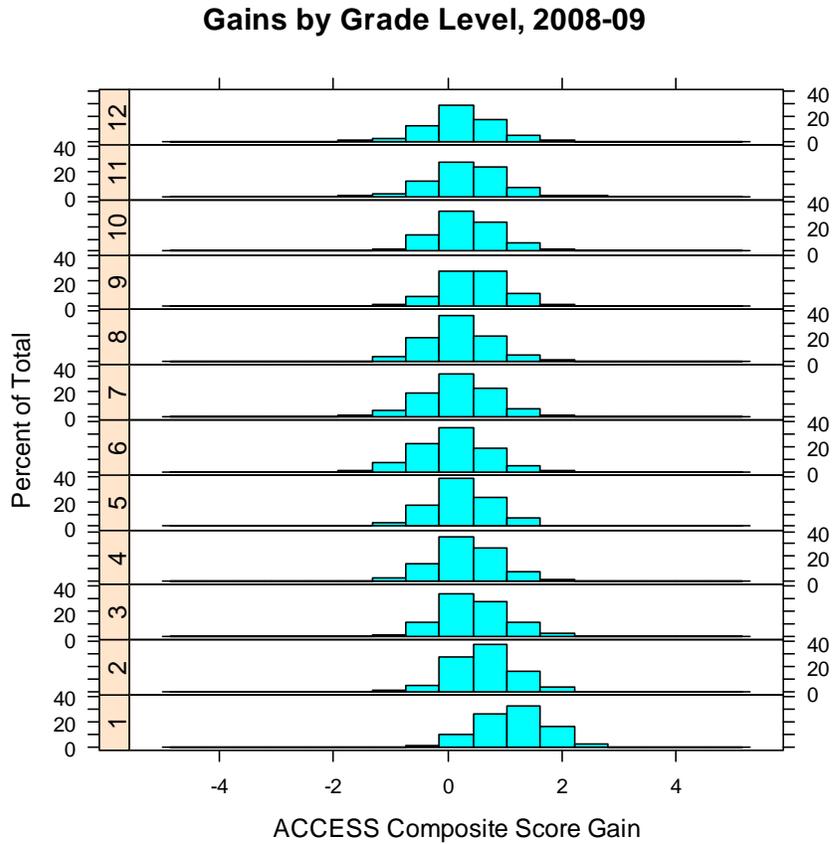
Gains by Initial ELP Level, 2008-09



The figures below show another way of visualizing these distributions. The box plots illustrate the decrease in median annual growth as initial ELP level increases. The solid line inside each box represents the median gain. Each box includes 50% of the students at an ELP level. The top and bottom of the boxes represent approximately the 75th and 25th percentiles, respectively. The dots represent extreme outliers. Data for 2008-09 (top) are consistent with data for 2007-08 (bottom).

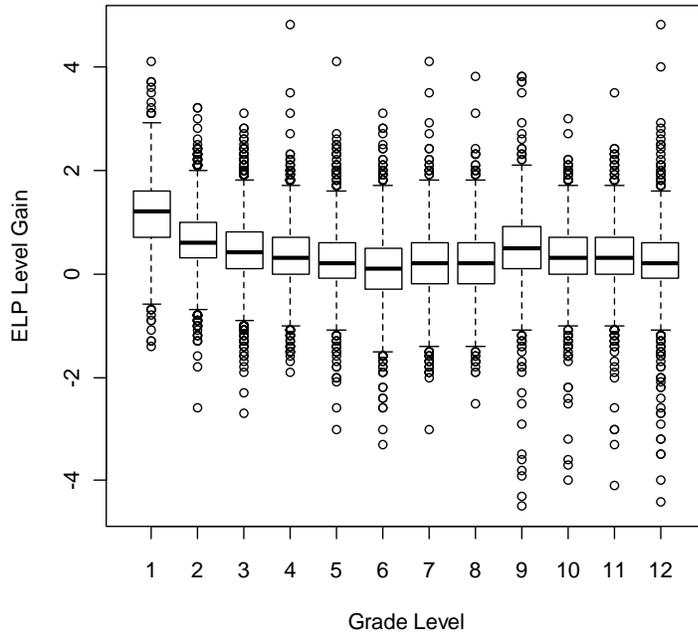


The figure below shows the distribution of composite score gains by grade level. The center of the distributions shift left as the grade level increases, showing smaller annual gains as students move into higher grade levels.

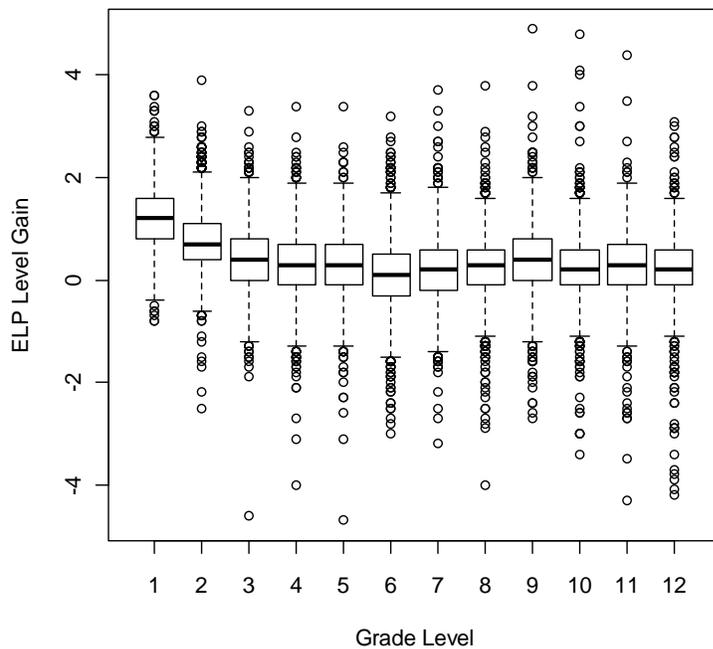


The figures below show another way of visualizing these distributions using box plots. Data for 2008-09 (top) are consistent with data for 2007-08 (bottom).

ELP Level Gain by Grade Level, 2008-09

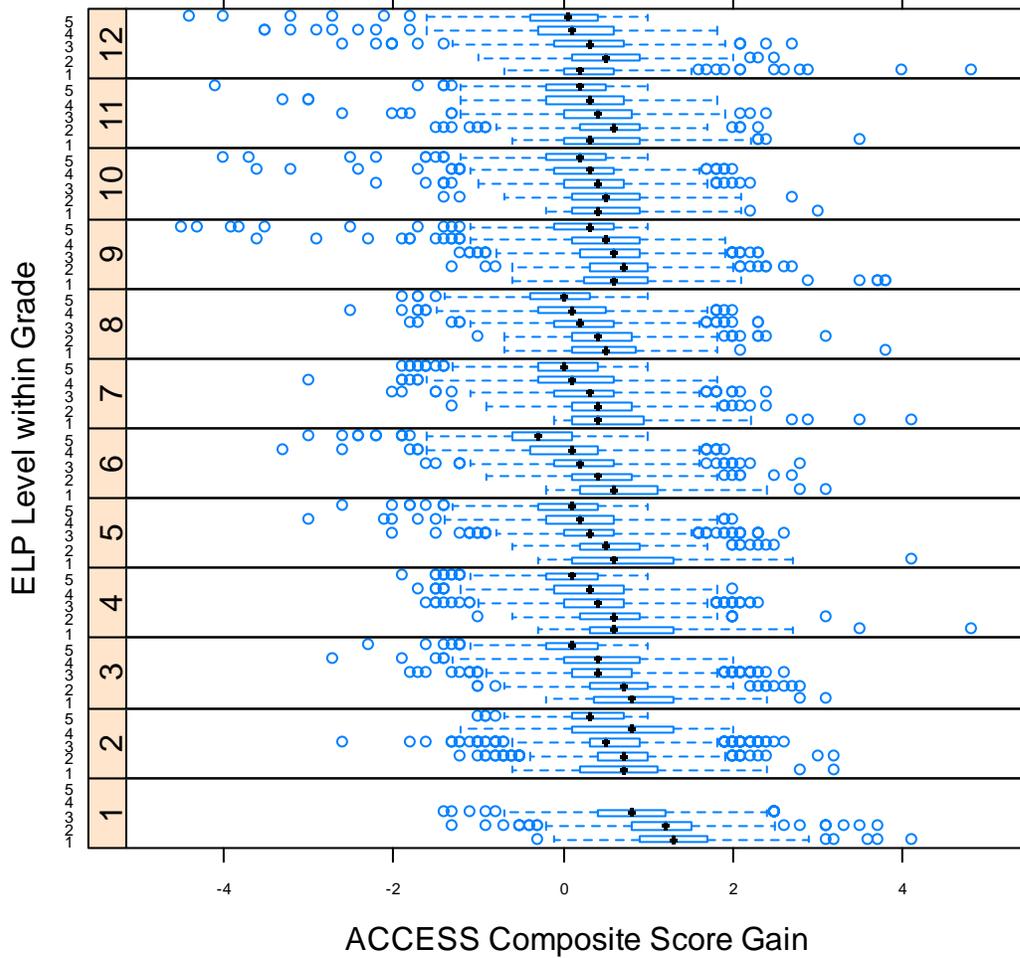


ELP Level Gain by Grade Level, 2007-08



Is the pattern of “students at higher ELP levels exhibit smaller gains” observed within each grade level? The figure below shows the distribution of gains for each starting ELP level within a grade. The pattern is generally observed in every grade.

Growth by Initial ELP Level within Grade, 2008-09



Is the pattern of “students at higher grade levels exhibit smaller gains” observed within each starting ELP level? The figure below shows the distribution of gains for grade within a starting ELP level. Although less clear, the pattern is generally observable within each ELP level.

Growth by Grade within Initial ELP Level, 2008-09

