Wisconsin ESEA Flexibility

Request

July 3, 2012

Amended May 20, 2013

ESEA Flexibility Extension Request July 1, 2014

U.S. Department of Education
Washington, DC 20202

OMB Number: 1810-0708

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.

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

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

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

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

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

3. Party or parties responsible: Identification of the SEA staff (*e.g.*, position, title, or office) and, as appropriate, others who will be responsible for ensuring that each key activity is accomplished.

4. Evidence: Where required, documentation to support the plan and demonstrate the SEA's progress in implementing the plan. This *ESEA Flexibility Request* indicates the specific evidence that the SEA must either include in its request or provide at a future reporting date.

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

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

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

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

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

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

Each request must include:

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

Requests should not include personally identifiable information.

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

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

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

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

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

REQUEST SUBMISSION DEADLINE

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

TECHNICAL ASSISTANCE MEETING FOR SEAS

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

FOR FURTHER INFORMATION

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

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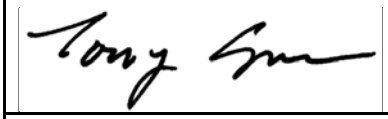
COVER SHEET FOR ESEA FLEXIBILITY REQUEST

Legal Name of Requester: Wisconsin Department of Public Instruction	Requester's Mailing Address: 125 South Webster Street P.O. Box 7841 Madison, WI 53707-7841
State Contact for the ESEA Flexibility Request Name: Lynette Russell Position and Office: Assistant State Superintendent, Division for Student and School Success Contact's Mailing Address: 125 South Webster Street P.O. Box 7841 Madison, WI 53707-7841 Telephone: 608-266-5450 Fax: 608-267-9142 Email address: lynette.russell@dpi.wi.gov.	
Chief State School Officer (Printed Name): Tony Evers	Telephone: 608-266-8687
Signature of the Chief State School Officer: 	Date: July 3, 2012
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 that meet the definitions of "priority schools" and "focus schools," respectively, set forth in the document titled *ESEA Flexibility*, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.

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

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

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

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

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

Optional Flexibilities:

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

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

☒ 12. The requirements in ESEA sections 1116(a)(1)(A)-(B) and 1116(c)(1)(A) that require LEAs and SEAs to make determinations of adequate yearly progress (AYP) for schools and LEAs, respectively. The SEA requests this waiver because continuing to determine whether an LEA and its schools make AYP is inconsistent with the SEA's State-developed differentiated

recognition, accountability, and support system included in its ESEA flexibility request. The SEA and its LEAs must report on their report cards performance against the AMOs for all subgroups identified in ESEA section 1111(b)(2)(C)(v), and use performance against the AMOs to support continuous improvement in Title I schools that are not reward schools, priority schools, or focus schools.

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

ASSURANCES

By submitting this application, the SEA assures that:

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

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

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

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

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

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

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

☒ 8. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, all teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later than the deadline required under the State Fiscal Stabilization Fund. (Principle 3)

☒ 9. It will evaluate and, based on that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)

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

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

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

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

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

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

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

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:

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

The Department of Public Instruction (DPI), Wisconsin's state education agency, actively seeks input on the contents of this request in a variety of ways, engaging key educational stakeholders including but not limited to: district administrators; principals; teaching staff targeting specific student populations including English learners and students with disabilities; parents; school board association/members; Title I staff, including Committee of Practitioners; and cooperative educational service agencies (CESAs) (regional partners). A number of presentations, meetings, conversations, and written communications with a variety of stakeholders have taken place (See Attachment 1 and Attachment 2, A-H). Wisconsin's waiver was posted for a two-week window accompanied by a comprehensive survey. DPI received over 700 responses (many from teachers) to the survey which were considered in the design of Wisconsin's new Accountability Index and Statewide System of Support. Below is a summary of the education stakeholders that were consulted in the development of this waiver request and plans to continue outreach and consultation.

Wisconsin's Unions

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

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

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

To follow-up and follow-through on the findings of these listening sessions, DPI continued to reach out to WEAC and AFT-Wisconsin through meetings and other communications to gather their perspectives on the plans found in this request. Their feedback confirmed that this waiver request is necessary, and that teachers support Wisconsin's direction and the plans found in this request. In addition, WEAC's president testified at a joint legislative hearing in support of DPI's proposal on February 2, 2012 (Attachment 2F). As a result of these meetings, DPI proposes to change state statute to reflect more rigorous graduation requirements that also honor the importance of electives. Additionally, as part of the ongoing evaluation of

the proposed Accountability Index, DPI intends to complete impact analyses that look carefully for potential negative unintended consequences such as narrowing of curriculum. Advances in data and reporting systems will also enable DPI to produce report cards that provide a fuller representation of the rich and varied educational programs offered in schools. DPI will continue to meet and consult with staff from WEAC and AFT-Wisconsin regarding ongoing work to refine the design and begin implementation of the new statewide system of accountability of support, as well as to continue to evolve the system as advances in data systems contribute to greater capacity for the accountability index proposed in Principle 2.

School Administrator's Alliance

Consultations with the School Administrator's Alliance—which includes the state organizations representing principals, superintendents, administrators of special services, and school business officials—resulted in refinement to the accountability labels resulting from the accountability index (discussed in Principle 2). Offering the ACT Suite statewide is a key priority for the Association of Wisconsin School Administrators, and DPI is requesting funds in the 2013-15 biennial budget to make EXPLORE, PLAN, ACT, and WorkKeys available across the state. DPI continues to consult with this group on issues related to implementation of new standards and assessments, new data systems, and the design and dissemination of new school report cards. Members representing these organizations will be included in consultation efforts and focus groups related to school and district report cards.

Wisconsin's Educators

Workgroups comprised of classroom teachers, principals, superintendents, representatives from regional service agencies, higher education faculty, and DPI staff have been formed to develop components of the Educator Effectiveness system. A summary of their work follows:

Development of the rubric to evaluate teacher practice
Teacher practice evaluation will be aligned with the Interstate Teachers Assessment and Support Consortium (InTASC) standards. This teacher practice workgroup is drafting a rubric using Charlotte Danielson's Framework for Teaching as a foundation to guide and assess practice and is identifying evidence sources relevant to the rubric. Like the principal practice workgroup (below), the teacher workgroup will create a Process Manual that details the timing of the evaluation cycle, data collection procedures, and how practice measures will be combined to rate teacher practice.

Development of the rubric to evaluate principal practice
Principal practice evaluation will be aligned with the Interstate School Leaders Licensure Consortium (ISLLC) Educational Leadership Policy Standards. This workgroup is drafting a rubric to guide and assess practice and is identifying evidence sources relevant to the rubric. They are creating a Process Manual that details the timing of the evaluation cycle, data collection procedures, and how practice measures will be combined to rate principal practice.

Student Learning Objectives
This workgroup has reviewed existing selection and approval rubrics from other states and districts using student learning objectives (SLOs), and is producing a draft version for use in Wisconsin. Selection and approval of SLOs will follow a rubric designed to ensure alignment to state standards and 21st Century skills. The workgroup also reviewed SLO process guides and are nearing completion of a guiding document for Wisconsin. Other outcome measures (e.g., value-added measures) will be developed during 2012-13.

Future workgroups will address issues related to

Data Management: Addressing the data capacity issues and resources needed for quality data systems to support educator effectiveness decisions.

Equivalency Process: Developing an equivalence review process for districts seeking to use their own teacher or principal practice evaluation approach aligned to the state model evaluation systems.

Further, the state superintendent has appointed a statewide Coordinating Committee to oversee the implementation of the *Wisconsin Framework for Educator Effectiveness* that has been working with national experts to ensure that DPI develops evaluation systems that can be used with reliability and generate valid results for all educators.

Educators of Special Populations

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

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

Meetings with representatives from the organizations above included conversations on the waiver in which specific input was invited regarding issues related to cell size, transitions to new assessments, incorporation of subgroups in the accountability index, and the importance of Universal Design for Learning principles, among other issues. The change in minimum group size used for accountability calculations from 40 to 20 is a direct result of input from the organizations listed above. Further, DPI paid particular attention to Universal Design for Learning and the importance of addressing specific needs of students with disabilities in developing transition plans for new standards and new assessments in the narrative of this application. Since initial submission of Wisconsin's Request for ESEA Flexibility, DPI has met with several of the groups listed above to discuss ongoing work to refine DPI's work on the major initiatives presented in this request. In one meeting with the Board for People with Developmental Disabilities, DPI staff spoke with Board members and learned about concerns related to the importance of providing assessment systems that give students different ways and multiple opportunities to demonstrate what they know and can do. DPI staff also presented at the statewide Wisconsin Council of Administrators of Special Services (WCASS) conference in the winter, sharing information and answering questions about the proposed changes to the accountability system, as well as gathering important input and feedback. Continued outreach and conversations with these key stakeholders are critical to the successful implementation of the accountability system, and the improvement of that system over time. DPI maintains its commitment to ongoing consultation with these stakeholder groups and outreach in the form of presentations and dialogue with educators in the field.

Educators of English Language Learners

English language learners (ELLs) represent 5.7 percent of Wisconsin's student population. DPI staff specifically notified a number of stakeholders including district Title III coordinators, bilingual-bicultural coordinators, a regional ELL network, and a variety of district and school-based educators of the public comment period and requested their input via the waiver survey that accompanied the draft. Additionally,

the survey accompanying the waiver draft for public review included multiple specific questions about how DPI can ensure the plans proposed in this application better meet the needs of English language learners and educators of English language learners.

Since initial submission of DPI's waiver request, DPI has engaged in specific outreach to stakeholders in the English learner community, providing presentations and conducting feedback sessions with school, district, and higher education staff on issues related to standards implementation, assessment, and accountability systems. School and district staff are particularly interested in the connection between the transition away from adequate yearly progress (AYP) and how new annual measurable objectives will relate to Title III annual measurable achievement objectives. They also had input on the design of school report cards, specifically requesting that the report cards address program type, given that Wisconsin requires bilingual, bicultural programs in schools with a minimum number of English learners. As a result, DPI has put a statement on the report card as follows: "This report shows student performance in mathematics and reading in English; it does not include academic performance in languages other than English." DPI staff are building a network of English language learner advocates and educators to serve as a regular point of contact for issues related to instruction, assessment, accountability, and policies affecting the English learner population.

Educators at Milwaukee Public Schools

DPI staff has and continues to engage a number of administrators in Milwaukee Public Schools (MPS), Wisconsin's largest district. DPI staff held teleconferences, briefings and ongoing informational meetings with a number of MPS staff, including administrators, researchers, business managers, and the director of school improvement on the contents of this proposal. Additionally, the Title I coordinator from MPS participated in the webinar that DPI held for the Committee of Practitioners. Lastly, regular MPS staff meetings take place in which the ESEA waiver is discussed with DPI staff, including the close alignment with the current Corrective Action Requirements (CAR).

DPI received a letter from MPS that highlights multiple components of the draft waiver that the district supports, including increasing proficiency expectations; considering both achievement and growth; emphasizing the importance of closing achievement gaps and basing achievement gap analysis on the highest performing subgroup rather than defaulting to the performance of white students; provision of opportunities for extended learning days for students in low-performing schools; and establishment of statewide student information and reporting systems. The letter also requested clarity on a few points that DPI has since addressed: that plans for an early warning data system are underway but have a long-term timeline; providing clarity within the application narrative about when and which subgroups are factored into the accountability index; and clarifying for MPS the role of DPI in directing reform at a district level. The letter may be found in Attachment 2G.

DPI staff specifically consulted with Milwaukee educators on the issue of supplemental educational services (SES) because MPS has been required to offer SES since 2003. MPS was very supportive of the state's proposal to waive the SES requirement (as outlined in Principle 2). MPS continues to be part of conversations about shaping extended learning opportunities in conjunction with parents as well as the involvement of community organizations. For instance, DPI has consulted a large community-based organization in working collaboratively with MPS in developing and/or enhancing extended learning opportunities.

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

Committee of Practitioners

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

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

DPI Title I staff met with the COP in May 2012. This meeting focused primarily on Wisconsin's new Accountability System as it relates to the ESEA waiver. As a result, many local educational agencies (LEAs) at the meeting provided input and recommendations specifically around communication resources. These recommendations, and DPI action to-date to address the recommendations, included:

- Provision of parent-friendly communication resources: fact sheets, web-based resources
  - DPI staff are currently building a series of fact sheets for different components of the new accountability system. All resources will be available online.
- Identification of a point of contact (at the state education level [SEA] level) based on specific topic areas (identification, required interventions, supports/resources)
  - DPI releases a topic-based contact sheet annually. This will be updated to reflect new topics stemming from the accountability reform. In the meantime, released documentation includes relevant contact information.
- Requests for resources targeted to local school boards—including presentation materials that may be utilized by district and school administrators.
  - All resources will be available online and should be reusable for different audiences. Stakeholder-specific resources, such as communication materials for school boards, will be developed following release of initial materials intended for use with various audiences.
- Increasing the accessibility and number of resources available on DPI's accountability reform website.
  - DPI will re-design the accountability reform website: (http://dpi.wi.gov/oea/acct/accountability.html). Initial plans are underway; final re-design will follow completion of the accountability-related resources mentioned above.

Title I Network

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

The Title I and School Support Team has provided bi-monthly updates to the Network to ensure all CESAs are receiving a clear and consistent message. In addition, in June 2012, all CESAs will appoint a central contact (including the Title I coordinator) for the new accountability system. Over the coming year, these representatives will be trained by DPI staff to communicate key aspects of the new accountability system. The four identified trainings will focus on 1) understanding and collecting input on preliminary school report cards (June 2012); 2) building public understanding of the new accountability system (Fall 2012); 3) helping parents understand the change in WKCE cut scores for reading and mathematics (January 2013); and 4) understanding district report cards (Fall 2013). This will raise the SEA's capacity around communication and will allow for more strategic and ongoing communication to take place when rolling out the new accountability system statewide.

Public Review

Prior to submission of this request, DPI posted the flexibility draft for a two-week public comment period and directly invited a plethora of organizations to provide input. DPI issued a press release http://dpi.wi.gov/eis/pdf/dpinr2012_15.pdf (Attachment 3) and conducted a broad outreach effort to notify stakeholders of the posting and opportunity to provide feedback via the survey.

There were more than 700 respondents to the survey that accompanied the waiver draft. Respondents included Wisconsin teachers; principals; superintendents; practitioners serving high need students, English learners, and students with disabilities; as well as educators and administrators in charter and private schools. Of those responding to the waiver survey, 80 percent were educators:

- 50 percent teachers
- 16 percent administrators
- 14 percent other school/district personnel

The results of the survey showed 75 percent of respondents were in favor of DPI submitting a waiver request. In a number of areas, DPI received very favorable feedback on the contents of the request and the new direction of accountability for the state, demonstrating that the request is in sync with Wisconsin's educators.

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

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

Another recurring theme in survey results was a call for smaller class sizes and small group instruction to target student needs more effectively, personalizing instruction as much as possible. In addition, it was clear the process of personalizing learning and planning for student learning goals must include more than the classroom teacher. Parents and students must be primarily involved, along with teachers and library media specialists, and to whatever extent possible, business, industry, and community leaders who also have an investment in the successful education of students. Involvement should focus on personalizing learning and creating dynamic, engaging school experiences directly tied to career and college expectations. This important input is being taken into consideration as ongoing planning occurs for refinement of the Accountability System; supports, interventions, and rewards; and development of resources and training for educators and educational leaders related to implementation of new, college- and career-ready standards and assessments.

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

During the public comment period, DPI publicized the Request for ESEA Flexibility and the opportunity for public input via the DPI homepage. In addition, the state superintendent issued an editorial (http://dpi.wi.gov/eis/pdf/dpinr2012_22.pdf [Attachment 2]), and led his weekly electronic briefing, ConnectEd, (Attachment 3D) with this story. Outreach also included distribution of a Waiver Overview document which continues to serve as a user-friendly summary of some of the key proposals in DPI's draft application (http://dpi.wi.gov/oea/acct/accountability.html and Attachment 3A). A list of organizations contacted, while not exhaustive, is included in Attachment 3G, and collectively represents thousands of stakeholders.

Since posting the draft request, the state superintendent received a number of emails from parents, educators, and concerned citizens. The great majority of these letters (near 90 percent) registered support for Wisconsin's plan to include all schools—public, charter, and schools in parental choice programs (vouchers)—in the state accountability system. DPI-continues to stay engaged with educators and key stakeholder groups beyond the public comment period as the single statewide accountability system evolves. DPI has established a communications plan that includes a variety of outreach and mediums, and is scheduled to present at a number of educator conferences in the coming months to review the contents of this request and gather input for ways to improve. DPI is confident that the contents of this waiver request align to the priorities of Wisconsin's educators. However, continued engagement with these practitioners is critical to the successful implementation of the system and will, therefore, remain a priority for the state.

Next Steps

The Department of Public Instruction (DPI) acknowledges that the accountability index is complex, and that helping people with a vital interest in effective schools, but little familiarity with educational performance measurement—such as most parents—understand the index is critical. The success of that process will largely depend on the quality and focus of DPI's communications materials. Below, approaches are first discussed to targeting accountability related communications materials to different audiences. Next, examples of outreach events and activities that are planned are given. After that, plans are described for helping districts and schools use the accountability index information.

Levels of information for different audiences

There are four levels of specificity that are germane to DPI's communications about Wisconsin's new accountability system. The audience narrows for each successively more specific level.

The first level is the most general and does not delve into the specifics of the accountability system. This level is especially suitable for the media, policy makers, community leaders, and the interested public, including individuals who do not have a day-to-day interest in school affairs. At this level, DPI will be conveying the significance of the different educational reform initiatives in Wisconsin and how these different initiatives add up to comprehensive change. The accountability system is one of these initiatives, and others include the related statewide system of school support, the CCSS, next-generation assessments, educator effectiveness, and new data tools for school improvement. A series of one-page fact sheets address this level.

At the second level, a description of specific features of the accountability system begins. This level is key for educators and stakeholders, including parents. While the methods behind Wisconsin's accountability system are complex, the purpose and overall structure of Wisconsin's balanced system are not. It is important for all stakeholders to have a conceptual understanding at this level. Many will support Wisconsin's system based on this level of understanding and will not feel a need to or want to examine the methods used to produce index scores.

Parents and educators can easily understand that DPI is measuring school performance according to these perspectives:

- Student Achievement—the level of academic attainment of a school's students
- Student Growth—the pace at which students in a school are learning and improving

- Closing Gaps—the extent to which a school is helping lower performing, traditionally underserved students catch up
- On-Track—the extent to which students in a school are reaching educational milestones that predict success.

DPI's second level materials will provide a little more information about the priority areas than the above capsule descriptions—e.g., it may be appropriate to mention that Student Achievement scores are based on WKCE performance levels and are smoothed out over three years—but will make no attempt to explain the calculations behind the scores. It is important not to mask the basic construction of the accountability index with detail that is unnecessary for many consumers of the accountability system.

DPI's third level will address educators and other stakeholders who want to have a grasp of the method behind the measures to develop confidence in the system and think about how to use the data. This level will explain the logic of the calculations so it is apparent what kinds of source data contribute to the priority area scores. These explanations should be accessible to all who care to take the time to understand the methods, not just those who have quantitative backgrounds, so these will be written in plain English and will avoid mathematical specifics, unless they can be intuitively grasped.

DPI's fourth level is for educators and stakeholders who want to understand these methods in full. This level will consist of technical documentation that explains the calculation methods in detail.

DPI will be designing the communications materials and organizing them (e.g., on the DPI website) so that consumers can easily access the level of information they need without wading through unnecessary detail that may hinder their understanding.

It is worth acknowledging that the report card itself is the primary communications tool for explaining the accountability system. The DPI is paying, and will continue to pay, close attention to feedback received from stakeholders as work to design a report card that balances being informative with transparency and clarity is made.

Communications events and activities
Looking ahead, the Department of Public Instruction (DPI) has planned a number of outreach sessions, training, collaborative meetings, and other communications to ensure that stakeholders across the state have access to accurate, timely information regarding the plans provided here as well as a direct line to provide input and suggestions. Some examples of these plans include:

- A series of four train-the-trainer sessions over the coming year with Wisconsin's regional educational service agencies. The first session was held on June 12, 2012, and received both useful suggestions for the design of the report card and a show of support for the accountability index.
- Presenting webinars fashioned after the future CESA trainings so that more CESA staff and interested school district staff can participate in this kind of detailed exposure to the system.
- For the initial, preliminary release of report cards for school review and data-checking to include at least one survey to collect input, suggestions, and questions regarding the new report cards.
- Gathering focus groups of school and district staff, including classroom educators, to discuss the accountability index and report cards.
- Specific outreach for schools identified as Focus or Priority that includes phone conversations, written communication, and in-person meetings for discussion and planning.
- Acknowledgment that understanding is a critical prerequisite to constructive participation in the design or implementation of a new system. As a result, DPI staff are producing a series of one-page fact sheets on various components of the larger education reform initiative, from new data systems, to what it means to be identified as a Focus School. These user-friendly documents are meant as tools for school and district staff as well as the public. Additionally, specific online guides will accompany the report cards to build understanding.
- Ongoing outreach and opportunities for legislative and gubernatorial staff to review and comment on the work of the waiver, as well as outreach with education organizations.

- Meetings and phone conversations with staff from school districts, education organizations, and student advocates to discuss plans following from this waiver proposal. Such meetings inform ongoing conversations at the DPI and ultimately inform and improve upon the design, communications, and implementation of the new system.
- All of the materials produced for the various outreach activities described above will be made available on the DPI website in a way that makes it easy for stakeholders to find the specific content and level of coverage that they need. In the fall, the DPI's website will be converted to a content management platform (Drupal) that will provide DPI with much improved capabilities for providing flexible, easy access to materials according to users' needs, gathering user input on the effectiveness of those materials, and pushing news and updated information to DPI's audiences. DPI will exploit this website change specifically to make learning about Wisconsin's accountability system as easy as possible.

The DPI is fully committed to ensuring that all stakeholders understand and have a voice in the various components of this Request for ESEA Flexibility, from the design of parent-friendly materials related to the implementation of the Common Core Essential Elements, to adjustments to accountability report cards, to the design of training related to student learning objectives as part of the new educator evaluation system. This collaboration makes each part of this education reform plan stronger.

Helping educators use accountability system data
Wisconsin's new accountability system is designed to provide guidance for and be a part of the process of school improvement and not just be a reporting tool that stands at a distance from school operations. However, examining accountability data is only a first step in a data-informed improvement planning process. DPI's training and communications materials will help educators understand what accountability data can and cannot accomplish and how they can be used in conjunction with other performance data and school improvement planning resources to drive improvement.

DPI's message to educators will point out that the priority areas and accountability expectations can serve as school-wide metrics for continuous school improvement. The report card data can call attention to problematic areas that merit further investigation; they can be the stimulus for targeted root cause analysis. However, actual diagnoses of issues within the school that need attention can only be made on the basis of analyzing disaggregated performance data and the input of school administrators, teachers, and staff.

To assist with the analytical process, DPI will place school report cards within WISEdash, DPI's new business intelligence solution being launched this fall. This will place accountability information in the same vicinity as other school data—on attendance and enrollment, testing results, and Student Growth Percentiles—that can be used to identify problem areas and areas of accomplishment. Eventually, the WISEdash school report cards will be interactive, enabling schools to drill deeper into priority areas data simply by clicking on parts of the report card. WISEdash itself will expand to include much more student level data (e.g., related to course enrollments), and the report card will reside in a very rich data environment that will be a single locale for data to inform root cause analysis.

The DPI will also build explicit linkages between the accountability system and specific resources available for supporting school improvement. Wisconsin's RtI (Response to Intervention) Center has a strong track record of assisting schools with improvement planning, emphasizing individualized instruction, collaboration, and smart use of data. The RtI Center will play a key role in supporting Focus Schools, and its services will also be available to other schools. DPI will leverage its partnership with the RtI Center from an accountability standpoint by training RtI Center staff on the accountability index and working with them to build accountability metrics into the RtI process of diagnosing and solving school performance issues.

The DPI also intends to incorporate accountability metrics into Wisconsin's implementation of Indistar, the web-based system for guiding and tracking school improvement efforts. Indistar will be required for Priority and Focus Schools, and it will be available to any school or district at no cost. Embedding

accountability indices into Indistar will help us ensure that school accountability and targeted improvement efforts are mutually reinforcing parts of an integrated cycle of school improvement.

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

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

School and District Accountability Design Team

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

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

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

Collaborative Council

Outreach continued with multiple presentations to the State Superintendent's Collaborative Council, which includes representatives from school boards, school administrators, district administrators, the Wisconsin Association for Supervision and Curriculum Development, regional cooperative educational service agencies (CESAs), the Commissioner of the CESA Statewide Network, institutions of higher education, and aforementioned educator unions, WEAC and AFT-Wisconsin. A recommendation resulting from this briefing was to develop a broad communication plan to educate stakeholders, parents, and the community at large. DPI is currently developing this plan that will involve multiple resources and talking points in order to provide ongoing awareness of the waiver. DPI consults this group of representatives strategically in a consistent manner. The Collaborative Council is consulted on all major state education policy issues. As a result, the ESEA waiver continues to be presented and feedback is weighed heavily.

Legislators

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

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

In addition, the legislature held an informational hearing on this waiver request on February 2, 2012. Testimony provided at this hearing is included in Attachment 2F.

Parents

The State Superintendent's Parent Advisory Council was specifically notified of the two-week public comment period. As part of a regularly scheduled meeting, the State Superintendent's Parent Advisory Committee received a briefing on the waiver, and committee members were highly encouraged to provide input via the waiver survey. The Parent Advisory Council meets on a quarterly basis and continues to be consulted both on DPI's submission and involved in ongoing conversations, particularly around efforts to increase parent involvement and building parent-friendly accountability reports. DPI's Parent Advisory Consultant has become an integral part of the statewide communication plan. This expertise in tailoring resources to ensure clear and consistent communication with parents has been a large asset to the communication team.

In addition, the Wisconsin Parent Teacher Association was represented on the Accountability Design Team, which provided much of the foundation of the state accountability system. DPI will continue to present to audiences targeted to parents, including statewide-PTA sponsored events as well as local events. For example, DPI will be presenting the main areas of the ESEA waiver for an MPS parent organization in June 2012.

Peer Review

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

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

Throughout the development of this request, DPI consulted with a number of internal teams and each of the Assistant State Superintendents overseeing the five divisions in the agency. The request benefitted

from this internal consultation in drawing connections across the reform areas and highlighting areas of success from which to build as DPI moves forward.

Ongoing work to refine DPI's request for ESEA Flexibility was informed by additional cross-state conversations hosted by CCSSO, as well as outreach to staff in other SEAs and research on other states' proposals.

Technical Advisory Committee

Department of Public Instruction staff met with Wisconsin's Technical Advisory Committee (TAC) in March and April 2012. The purpose of these meetings was to gather input and identify potential issues of validity or reliability in the design of the Accountability Index. These meetings identified strengths and weaknesses in the system, and directly informed decisions to make adjustments to index calculations. For instance, DPI adjusted its initial approach to high-need supergroups, which only created such a group in cases when all three binary subgroups (economically disadvantaged, English learner, and students with disabilities) did not meet cell size, to create a high-need supergroup in any case in which, when combined, two or three of the binary subgroups meet cell size. The TAC also advised on issues related to the change of WKCE cut scores (endorsing DPI's statistical approach) and the overall weighting of sub-scale areas of the Accountability Index. Agendas for these meetings are attached. (Appendix 16)

Results of Consultation

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

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

- In addition to raising the mathematics and science credit requirements needed for graduation, DPI is advocating for 6.5 elective credits as a graduation requirement across the state, so that art, music, world languages, and technical courses may be a part of every student's high school experience. This is critical to Wisconsin teachers and families, and was a key finding of WEAC's *Speak Out* series discussed above.
- In order that more students are recognized and included in this accountability system, and to avoid the masking of small subgroup performance, DPI will change the cell size used for accountability calculations from 40 to 20. This was a priority for the disability advocacy groups in Wisconsin.
- A combined subgroup will be used when at least two of the binary subgroups (ELL, SwD, economically disadvantaged) do not meet cell size, in recognition of the need to closely monitor the performance of these traditionally high-need student groups.
- DPI will continue to incorporate Universal Design for Learning principles into planning and development of resources for standards implementation, assessments, and instructional practices.
- DPI will raise cut scores on current assessments to reflect higher expectations for students during the two-year transition between current and next generation assessment systems.
- DPI confirmed support for the plans to waive SES in lieu of other extended learning opportunities as well as having significant parental input as part of these plans.

- In serving Focus Schools, DPI will be significantly increasing the capacity of Wisconsin's RtI Center to ensure a high quality, multi system of support, including additional interventions/supports for students with disabilities and English language learners.
- In serving Focus Schools, DPI has developed a specific professional development plan with clearly defined outcomes and priorities. This "pathway" for professional development was developed through ongoing consultation with experts/consultants that work specifically with English learners and students with disabilities.
- In serving Priority Schools, initiatives and requirements will be aligned with current Corrective Action Requirements (where applicable) to avoid duplication.
- In serving Priority Schools, the Turnaround Partner will provide the analysis of the diagnostic review which will in turn drive the reform plan. Priority Schools must sustain an ongoing partnership and consult with the Turnaround Partner over the four-year cohort timeframe.

DPI continues to engage educators and key stakeholder groups and will continue to do so as the statewide accountability system evolves. DPI has established a communications plan that includes a variety of outreach and mediums, and DPI is scheduled to present at a number of educator conferences in the coming months to review the contents of this request and discuss the accountability index and new report cards. Continued engagement with these practitioners is critical to the successful implementation of the system and, therefore, will remain a priority for the state. DPI staff meets weekly to continue to develop the statewide communication plan that will reach all stakeholders. The main areas of communication that will be targeted over the course of the next three months include:

- Clearly delineated goals of the new Accountability System
- Communication tools, including intended audiences and specific topics
- Resources required to ensure successful rollout of the new Accountability System

The cross-agency communications team maintains a work plan to ensure tasks are completed within specified timelines and stakeholder needs are addressed. Further, a cross-agency calendar has been established to monitor and respond to requests for meetings, presentations, and other consultation opportunities. (See the current version of the work plan below):

Communication Planning for Wisconsin's Education Reform Initiatives

MONTH	DATE	TASK	PRODUCT	TEAM(S) RESPONSIBLE
May		Brief DPI staff	**Overview PowerPoint**	Office of Educational Accountability
May	Late May	Notify Priority and Focus Schools	**Formatted List:** Priority and Focus Schools	Office of Educational Accountability
			FAQ: Focus	Title I
			FAQ: Priority	Title I
			Fact sheet: Every Child a Grad	Education Information Services
			Fact sheet: Priority and Focus Schools	Title I
June	Late June	Identify Accountability Trainers Host Accountability Training on new report cards	**Sample Report Cards, Interpretive Guide, Technical Guide**	Office of Educational Accountability
			Fact sheet: Higher Expectations	Office of Educational Accountability
			Fact sheet: New School Accountability System	Office of Educational Accountability
			Fact Sheet: Every Child a Grad	Education Information Services

June-July		Waiver approved	**News release**	Education Information Services
			Fact Sheets (12)	(various)
			Updated Executive Summary	Office of Educational Accountability; Title I
June - August		Brief district leaders, education leaders, and state leaders	**Accountability Handbook**	Title I
			Teacher Training Toolkit	Title I
			Media and Parent Communication Guides	Title I
June - October		Develop Budget and Legislative Proposals regarding all current initiatives	**Budget Proposal**	Policy Team
July-August		Publicly Announce Roll-out of Accountability System	**News release**: Accountability system	Education Information Services
			Fact Sheet: Every Child a Graduate	Education Information Services
			Fact Sheet: New School Accountability System	Office of Educational Accountability
			Fact Sheet: Higher Expectations	Office of Educational Accountability
			Fact Sheet: World Class Academic Standards	Content and Learning
			Fact sheet: Priority and Focus Schools	Title I
			Fact Sheet: New Assessments	Office of Educational Accountability
			Fact Sheet: Educator Effectiveness	Teacher Education, Professional Development, and Licensing
			Fact Sheet: Innovative Learning	Division for Libraries and Technology
			Fact Sheet: Data Systems	Division for Libraries and Technology
			Media Day	Education Information Services
July-August		Solicit feedback on School Report Cards; host accountability training	**Report Card Survey, Sample Report Cards, Interpretive Guide, Technical Guide**	Office of Educational Accountability
August		Notify Reward Schools	**Fact Sheet:** School Accountability System	Office of Educational Accountability
			Fact Sheet: Every Child a Graduate	Education Information Services
September	9/14/12	Announce Budget	**Budget Request**	Office of the State Superintendent; Education Information Services; Policy and Budget
			News Release	Office of the State Superintendent; Education Information Services; Policy and Budget

September	9/20/12	State of Education Address	**Speech**	Office of the State Superintendent; Education Information Services; Policy and Budget
			News Release	Office of the State Superintendent; Education Information Services; Policy and Budget
			Budget Request	Office of the State Superintendent; Education Information Services; Policy and Budget
September		Announce Reward schools	**Formatted List**	Title I; Education Information Services
			News Release	Education Information Services
			Fact Sheet: New School Accountability System	Office of Educational Accountability
			Fact Sheet: Every Child a Graduate	Education Information Services
September -October		Release School Report Cards. Schools communicate with parents and the media regarding school report cards, school identifications, and student assessment results	Previously Supplied DPI Tools	Office of Educational Accountability; Education Information Services
October		Release Report Cards Publicly	**Report Cards**	Office of Educational Accountability; Education Information Services
			Fact sheet: Every Child a Graduate	Office of Educational Accountability; Education Information Services
			Fact Sheet: New School Accountability System	Office of Educational Accountability; Education Information Services
			Fact Sheet: Priority and Focus	Office of Educational Accountability; Education Information Services
			Fact Sheet: Higher Expectations	Office of Educational Accountability; Education Information Services

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;
  - Alignment with Wisconsin's Model Early Learning Standards (WMELS);
  - Development, adoption, and implementation of the Essential Elements of the CCSS;
  - Lessons learned from a productive partnership with the Wisconsin Response to Intervention Center, which provides excellent methods for differentiation and personalization.
- Wisconsin is transitioning to next generation assessment systems through three assessment consortia:

- Smarter Balanced – developing an accessible, balanced assessment system with precision and adaptive differentiation at the heart of the assessment; implementation in spring 2015;
- Dynamic Learning Maps – developing essential elements of the CCSS and an alternate assessment system; implementation in spring 2015;
- ASSETS Consortium – developing new English Language Proficiency standards rooted in CCSS expectations and an English language proficiency assessment; implementation in 2015-16.

- Recognizing that the early years provide the foundation for later school success, Wisconsin is working through the Governor's Early Childhood Advisory Council (ECAC) to align screening and assessment structures and professional development practices for children from birth to third grade.
- Additional changes in college- and career-ready expectations
- DPI will request funding for EXPLORE, PLAN, ACT, and WorkKeys to for statewide implementation, in recognition that these assessments provide important information regarding a student's trajectory toward college and career readiness, while allowing flexibility in the trajectory by honoring different pathways to college or career.
- DPI will change WKCE cut scores to reflect the more rigorous NAEP proficiency scale.
- DPI proposes changes to state graduation requirements to reflect an increased focus in science, technology, engineering, and mathematics (STEM) fields, in recognition of their importance for 21st Century learning.

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

- Wisconsin will differentiate how schools are characterized by accountability measures, expectations, and interventions that result from accountability determinations; an approach that is an extension of the belief in the power of differentiation and personalization.
- Wisconsin built an accountability index system using priority areas defined by stakeholders that factor in multiple measures, including attainment and growth, to place schools on a differentiated performance continuum while emphasizing the importance of continuous improvement for all students.
- Rewards, interventions, and supports will begin with diagnostic reviews to individualize appropriate next steps using the most effective and efficient school improvement actions.
- Wisconsin has established ambitious but achievable Annual Measurable Objectives (AMOs) for all students and every subgroup in reading and mathematics proficiency as well as graduation rates. These AMOs will provide information supplemental to Wisconsin's state accountability report cards, further helping DPI and districts identify strengths and needs in their work with students and guiding direction for supports.

Principle 3: Supporting Effective Instruction and Leadership

- Wisconsin's Educator Effectiveness Framework includes formative and summative elements and is intended to link each educator's professional development to their individual strengths and weaknesses identified in the evaluation system.
  - This Educator Effectiveness Framework applies to teachers in all content areas and all principals.

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

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

1.A ADOPT COLLEGE- AND CAREER-READY STANDARDS

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

Option A	Option B
☒ The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that are common to a significant number of States, consistent with part (1) of the definition of college- and career-ready standards. i. Attach evidence that the State has adopted the standards, consistent with the State's standards adoption process. (Attachment 4)	☐ The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that have been approved and certified by a State network of institutions of higher education (IHEs), consistent with part (2) of the definition of college- and career-ready standards. ▪ Attach evidence that the State has adopted the standards, consistent with the State's standards adoption process. (Attachment 4) ▪ Attach a copy of the memorandum of understanding or letter from a State network of IHEs certifying that students who meet these standards will not need remedial coursework at the postsecondary level. (Attachment 5)

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

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

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

Proactive Steps Taken Prior to CCSS Adoption

In the year prior to the release of the Common Core State Standards (CCSS) [2009], Wisconsin was deep into state-level revision of English language arts and mathematics standards. The Department of Public Instruction (DPI) was working with state-level leadership teams made up of expert educators from the two disciplines to revise Wisconsin's academic standards with assistance from Achieve and the

Partnership for 21st Century Skills. When CCSS discussions began midway through this project, what had initially seemed like bad timing turned into the first of a series of proactive steps DPI was able to take to prepare Wisconsin for the CCSS. Given the teams' previous charge, the statewide English language arts and mathematics teams were able to quickly shift gears from standards writing to CCSS reviewing, doing so with a clear perspective of what Wisconsin was looking for in new standards. The teams also turned their attention to considering the implementation of new standards, and began to locate the partnerships needed to best ready the field for the monumental task of shifting to the CCSS.

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

Investigation Year (2010-11)

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

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

Guiding Principles for Teaching and Learning

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

core beliefs intrinsic to high-quality teaching and learning. (Appendix 3 and http://dpi.wi.gov/standards/guiding-principles.html). The Guiding Principles are:

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

These guiding principles drive the work of DPI, particularly Principle 1: Every Student has the Right to Learn, and specifically guide work on the Common Core Essential Elements (CCEE), part of DPI's participation in the Dynamic Learning Maps Consortium. It also includes DPI's work to align the Common Core State Standards (CCSS) with English language proficiency standards, discussed below. The CCEE—which will serve as the new alternate achievement standards—will be the foundation of instruction and assessment for students with significant cognitive disabilities, comprising approximately one percent of the total student population, and DPI is playing a key role in the development of those elements. Throughout the 2011-12 school year, DPI-has partnered 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 CCEE A cadre of these representatives guided development of this plan between February and May of 2011. This implementation timeline aligns with that for the alternate assessment, which is slated for initial implementation in the 2014-15 school year, and reflects the approach taken for implementation of the CCSS in alignment with the goal of a cohesive system for both general and special education instruction. See Appendix 4 for the CCSS and CCEE timelines.

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

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

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

Literacy for All

One additional decision made by Wisconsin's CCSS Implementation team that appears to set Wisconsin apart from other states is DPI's approach to the CCSS for literacy in science, social studies, history, and the technical subjects. Quite simply, Wisconsin's CCSS Implementation workgroup determined that all educators must see themselves as part of the CCSS literacy work. This decision compelled DPI to convene a new statewide leadership team for Literacy in All Subjects, or Disciplinary Literacy, in January of 2011. The Disciplinary Literacy team, made up of educators from career and technical education, the arts, health studies, and the four core content areas, was charged with broadening the scope of 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 both the discipline and the reading and writing skills needed to demonstrate learning in that discipline will, in fact, improve students' access to content. This prioritization of content-specific knowledge and communication skills—beyond reading and mathematics skills—enhances students' readiness for college and career. In forcing a deeper connection to the content, and focusing on thinking, reasoning, speaking, listening, reading, and writing like an expert in any content area, students will be better prepared to succeed in work and higher education.

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

The Read to Lead Task Force recommendations include:

- Early literacy screening for all four- and five-year old kindergartners (a recommendation that was followed by passage of legislation—Wisconsin Act 166 (http://docs.legis.wisconsin.gov/2011/related/acts/166.pdf)—to fund and mandate implementation of an early childhood literacy screener in the 2012-13 school year);
- Improvements in teacher preparation programs around early learning, including a new, more rigorous, reading exam (i.e., an updated Praxis) for reading educators;
- Aggressive professional development opportunities to enhance skills of current reading educators, including a professional development portal (http://www.readwisconsin.net/) and an annual reading conference; and
- Creation of public-private partnerships to engage Wisconsin philanthropies and businesses around the goal of ensuring every child can read by the end of the third grade.

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

Moving Forward

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

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

A Center for Standards, Instruction, and Assessment

The model provided by the Wisconsin RtI Center for development and dissemination of high-quality, standardized materials across Wisconsin has guided DPI's planning around the best process and organizational structure for meeting emerging needs of districts, namely, the need for instructional resources directly related to the CCSS. Building upon this model, DPI is designing a Standards, Instruction, and Assessment (SIA) Center. The SIA Center will centralize mathematics and English language arts content and professional learning experts focused on the development of high-quality, standardized CCSS and CCEE resources and training plans that will be easily accessed at low- to no-cost across the state. The SIA Center, a critical component of the State's transition to the Common Core State Standards (CCSS) and the Common Core Essential Elements (CCEE), will serve as a hub of CCSS/CCEE content experts to serve the whole state on a regional basis. Update: All action steps and work plans articulated in the subsequent section pertaining to the "SIA Center" have been and continue to be carried out by the Common Core State Standards team at DPI, a team created in August of 2012 to carry out the proposed work of the "SIA Center." Though the name has changed, the work remains the same.

Design and plans for the SIA Center reflect these priorities:

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

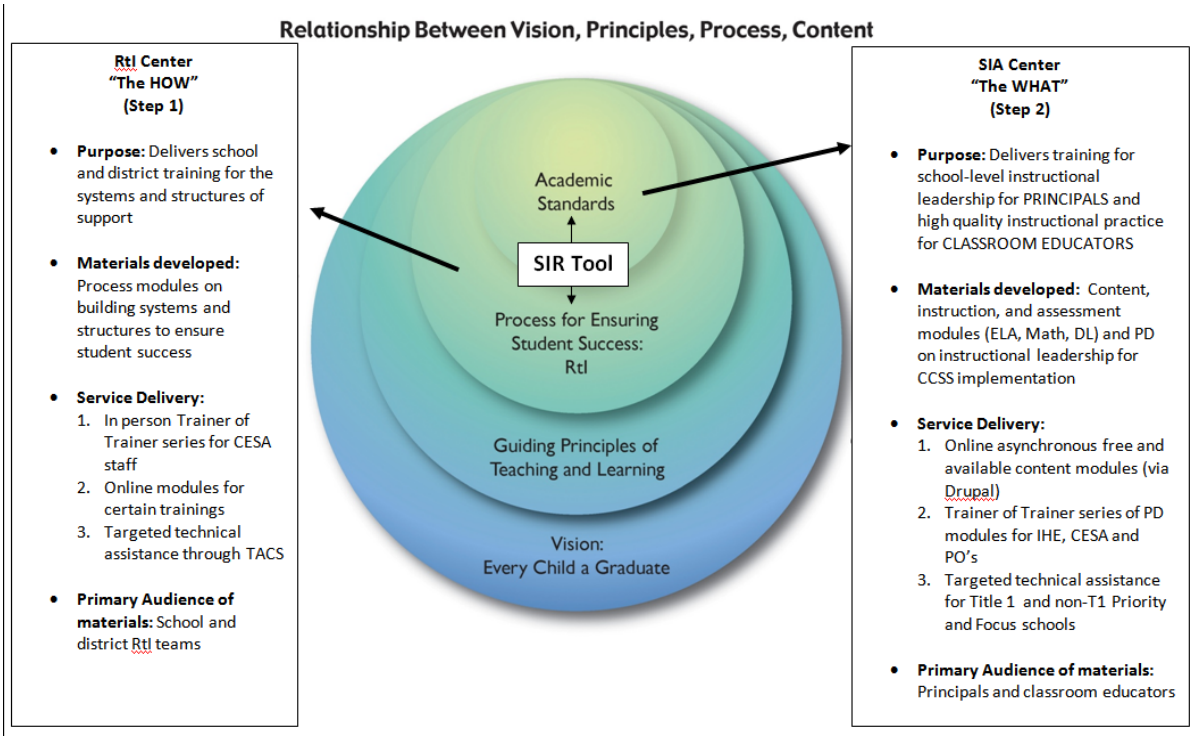
Furthering the state superintendent's mission of Every Child a Graduate: College and Career Ready, the work of the Center is focused on providing leadership to support educators across the state to develop early childhood–grade 12 systems that:

- Develop critical disciplinary-specific content knowledge;
- Use effective instructional practice that is anchored within a disciplinary context;
- Connect common skills and student dispositions across disciplines;
- Incorporate culturally relevant practices;
- Build assessment and data literacy;
- Use effective student support systems;
- Build family engagement;
- Create partnerships with institutions of higher education (IHE), professional organizations, and community groups and businesses; and
- Build leadership skills.

Resources will be developed for statewide distribution using synchronous and asynchronous learning

environments. Onsite support will be provided to DPI-targeted schools (Title I and non-Title I) to improve learning for specific student subgroups (e.g., in a certain district, this may include mathematics for Hmong students, reading for African American middle school and high school students, etc.).

As mentioned above, the SIA Center is envisioned as a complement to Wisconsin's well-established Response to Intervention (RtI) Center. The articulation of this Center-to-Center relationship is provided below.



While the RtI Center focuses on structures of support (i.e., a multi-level system of support that reaches every child), the SIA Center provides specific resources aimed at all classroom educators (those working with general education students, special education students, English learners, and students with gifts and talents, early learners all the way through high school students) and educational leaders. The SIA Center resources tackle the question for teachers of how to prepare each student to be college and career ready through the CCSS, CCEE, and stellar instructional practices.

Resources for classroom educators will focus on how they can improve their practices; resources for principals will focus on how they can best support their classroom educators' improvement. The SIA Center's focus on improving instruction situates it well to provide resources that are focused on helping principals and other administrators serve as strong, instructional leaders in their schools. By aiming strictly to address classroom practices, the SIA Center is well suited to improve those practices by addressing the need for content-driven, integrated professional development for all educators and, as such, to improve outcomes for individual students.

Center resources will be designed using research-based professional development practices as identified in the Learning Forward Standards for Professional Learning and Universal Design for Learning (UDL) principles. Specific resources will be designed to ensure that instruction and instructional materials are not just made accessible for all populations, but are in fact designed specifically to reach all students by removing potential barriers to learning and to instruction. UDL follows naturally from the Guiding Principles, and is a necessary component of all standards, content, and assessment planning in order to ensure that Wisconsin honors those principles.

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

embed

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

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

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

These foci require

- development of resources that provide representative samples of high-quality instruction that includes purposeful, embedded assessment, based in the CCSS and CCEE
- online instruments, including a bank of resources
    - to make resources available across the state
    - to serve as a forum for educators
- an instrument to gauge classroom-level implementation. This would be one of the first resources the SIA Center would provide and would be embedded within an existing RtI Center resource, the Schoolwide Implementation Review (SIR), eliminating duplication and aligning the two Centers in a productive and informed manner.

Further detail regarding scope of work, staffing, and timeline is available in Appendices 4 through 4e.

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

Planning and goal setting for the SIA Center work from a definition of college and career readiness agreed to by the School Accountability Design team. This vision is presented below. Plans also work from the Guiding Principles for Teaching and Learning discussed above. The foundational principle for all work is Principle 1: Every student has the right to learn, which says, "It is our collective responsibility as an education community to make certain each child receives a high-quality, challenging education designed to maximize potential, an education that reflects and stretches his or her abilities and interests. This belief in the right of every child to learn forms the basis of equitable teaching and learning. The principles that follow this main principle cannot exist without this commitment guiding our work." Indeed, the work of the SIA Center, which will focus on classroom practices on *Teaching and Learning*, cannot achieve its potential without intentional acknowledgement and planning around all six Guiding Principles, but especially Principle 1. (Information about Wisconsin's Guiding Principles for Teaching and Learning is available here: http://dpi.wi.gov/standards/guiding-principles.html.)

As mentioned above, SIA Center training and resources will be developed using Universal Design principles to 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 institutes of higher education (IHEs) to produce high-quality, content-rich resources and to create connections among higher education faculty between CCSS and students with disabilities and English 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. DPI staff have already met with postsecondary partners for SIA Center planning purposes, and continued meetings are planned.

The instructional resources and train-the-trainers offered through the SIA Center will complement statewide efforts in Wisconsin's cooperative educational service agencies (CESAs), as well as schools

and districts, to develop rigorous, high-quality curricula that fully capture the intent of the CCSS and ultimately advance education and improve outcomes for all students. These resources cannot stand separate from efforts in IHEs. As such, DPI will continue to partner with content organizations and IHEs to produce additional resources and to target specific audiences, such as pre-service educators and professors of education or CCSS-related content areas in postsecondary institutions. DPI sees an exciting opportunity to connect pre-service with in-service educators through Common Core implementation efforts, and is particularly interested in addressing connections to future educators of students with disabilities and English language learners.

DPI staff recently participated in the Council of Chief State School Officers States' Collaborative on Assessment and Student Standards (CCSSO SCASS) meeting related to Implementing the Common Core Standards. There, staff actively paid particular attention to the need to include instructional leaders—principals and other school and district staff—in the CCSS/CCEE implementation effort. Without supportive, informed leadership, individual educators striving to adjust to and embrace the CCSS/CCEE may be isolated and struggle in their efforts. DPI will mitigate such situations by actively including the Association of Wisconsin School Administrators (AWSA-the State's organization for principals) and current school leaders to design, develop, and implement leader-focused Common Core implementation resources. Resources may include guidance about what a classroom that has fully embraced the CCSS/CCEE looks like; recommendations for supporting educators teaching new content; frameworks for possible changes to school structure and instructional practices in support of the goal of ensuring all students are on track to graduate from high school prepared for success in college and work.

Wisconsin DPI Standards, Instruction, and Assessment (SIA) Center
College and Career Readiness

"Students who are college and career ready have, upon graduation, the knowledge, habits, and skills needed to succeed in postsecondary education and/or training that maximize their options and opportunities to successfully participate in productive and sustainable employment" (DPI ESEA Waiver Application)

CCSS for ELA
Students Who Are College and Career Ready:

- Demonstrate independence
- Build strong content and knowledge
- Respond to varying demands of audience, tasks, discipline, and purpose
- Comprehend as well as critique
- Value evidence
- Use technology and digital media strategically and capably
- Come to understand other perspectives and cultures

CCSS for Math
8 Standards for Mathematical Practice

- Make sense of problems and persevere in solving them
- Reason abstractly and quantitatively
- Construct viable arguments and critique the reasoning of others
- Model with mathematics
- Use appropriate tools strategically
- Attend to precision
- Look for and make use of structure
- Look for and express regularity in repeated reasoning

Next Generation Science Standards
Scientific and Engineering Practices

- Asking questions and defining problems
- Developing and using models
- Planning and carrying out investigations
- Analyzing and interpreting data
- Using mathematics and computational thinking
- Constructing explanations and designing solutions
- Engaging in argument from evidence
- Obtaining, evaluating, and communicating information

What does it mean to be College and Career Ready?

Students can:

- Reason
- Argue
- Apply
- Critique
- Interpret
- Analyze
- Create
- Use tools and technology strategically

By using appropriately challenging content to develop the skills above, students will:

- Be independent
- Persevere
- Take risks
- Communicate
- Value other perspectives and cultures

This focus on college and career readiness places the SIA Center ideally to fulfill agency strategic planning goals to support the state superintendent's vision of Every Child a Graduate: College and Career Ready.

The intent of the SIA Center is to address shortcomings in current agency ability to support integrated professional learning opportunities for all educators, specifically as those learning opportunities relate to Common Core State Standards (CCSS) content and instructional practices. The CCSS and the Common Core Essential Elements (CCEE) are for all students, and all educators need to be prepared to support each student in their acquisition of the knowledge and skills inherent in the standards and their preparation for an eventual successful transition from the K-12 System to postsecondary pursuits, whether further education, service, or the workforce. As such, the SIA Center will focus efforts on braiding high-quality instructional practices around the need to begin preparing students not only to have content-rich background knowledge and skills, but also to be productive and successful members of society at an early age.

The goal in building plans for the SIA Center was to focus on identifying the best organizational structure—one that brings together institutions of higher education, CESAs, and other content and instructional experts—that provides CCSS and assessment-related resources; a structure that, with sufficient DPI oversight, is empowered to address needs related to high-quality instructional practices by quickly developing excellent online resources, training plans, and virtual modules. As a result, the SIA Center will be housed within the Department of Public Instruction (DPI), comprised of new staff, allocated from existing teams throughout DPI, as well as existing staff from across the agency. A sample project (currently underway) is attached (Appendix 4c). Identified staff for the SIA Center is included in DPI's plan for establishment of The Center (Appendix 4d), as well as a sample weekly SIA Center schedule to illustrate the cross-agency approach to this work as well as DPI's plans to situate SIA Center staff in a productive position, isolated from other agency efforts but connected to agency staff. Appendix 4e is a more comprehensive SIA Center planning document.

Working with Higher Education

Wisconsin educator preparation program providers have been included in the Common Core State Standards implementation from the beginning investigation and implementation stages. During the initial phase of awareness-building, educator preparation programs (for both teachers and principals), educators, and school districts were included in regional meetings conducted by the CESAs to learn about the standards. Individual providers were also involved in collaborative work with local LEAs. These efforts took place during the 2010-2011 phase one roll out.

A survey was conducted to document CCSS implementation efforts that were happening by institutions of higher education. The survey was conducted by the University of Wisconsin System Director of PK-12 Relations and the Wisconsin Association of Independent Colleges and Universities (WAICU) teacher education representative. Several promising projects between IHEs and local school districts were identified. These data and a cumulative scan of projects and implementation efforts was discussed at the state superintendent's Collaborative Council meeting on October 18, 2011.

At the November 10, 2011 meeting of Wisconsin Association of Colleges of Teacher Education (WACTE), a presentation on Common Core State Standards was given. The presentation included an overview of the CCSS implementation efforts and directed the programs to the resources available on the DPI website for CCSS implementation. Wisconsin WACTE membership includes deans, directors, field placement personnel, and certification officers from the public and private universities in the state who prepare candidates for educator licensure. A follow up survey took place to continue to pool CCSS efforts going on around the state at the educator preparation programs.

In September, 2011 the state superintendent learned that Wisconsin was selected as one of the seven states to be part of the College Readiness Partnership (CRP) State Leadership Team. The CRP is a collaborative effort between American Association of State Colleges and Universities (AASCU), Council of Chief State School Officers (CCSSO), and State Higher Education Executive Officers (SHEEO) to promote broad implementation of CCSS in mathematics and English Language Arts. The

seven states selected to be in the partnership include: Kentucky, Maine, Massachusetts, Missouri, Oregon, Tennessee, and Wisconsin. The CRP objectives are to:

- *Identify how the CCSS should be implemented in each state in order to improve college and career readiness for all students;*
- *Define how leaders and faculty across K-12 and higher education need to work together to improve both teaching and learning in ways essential to achieving the goal of college and career readiness; and*
- *Delineate the specific steps that higher education and states must take together in order to make effective implementation a reality; in other words, to make college and career readiness expectations more transparent, to align curricula, to assess student performance more effectively, and to improve teacher preparation and professional development.*

Wisconsin shared information about the CRP at the Collaborative Council meeting in October, 2011 and at the WACTE meeting November, 2010. The Wisconsin CRP group includes representation from the public university system, private system, technical college system, CESA system, and the Department of Public Instruction. Wisconsin has attended CRP leadership meetings and has organized state meetings to develop a more specific plan for implementing CCSS in Wisconsin educator preparation programs.

In January, 2012 the CRP team, along with additional DPI staff, participated in a meeting to cast a collaborative vision for the future that included a partnership around implementing CCSS, between the SEA, CESA, and IHEs." As a result the following themes emerged:

- Strong Partnerships
- Shared Values, Understanding and Language
- Curriculum
- Professional Development
- Assessment

As a result the team made a decision to focus on three specific action steps in the immediate future.

1. Determining what is currently happening across the state, and what measures of success those efforts have produced.
2. Communication plan to inform Higher Education (both teacher preparation program and content area staff)
3. Professional development targeting K-12 educators (developed and delivered collaboratively)

As a result of continued dialogue, a strategic plan has been developed and is undergoing a comprehensive review. The strategic plan will guide Wisconsin's efforts to fully integrate the Common Core into Wisconsin's educator preparation programs, and to ensure Wisconsin educators are well versed in and well prepared to teach the Common Core State Standards to all students.

Additionally, as part of Wisconsin's participation in the Smarter Balanced Assessment Consortium, Wisconsin identified a Higher Education Lead to represent the institutes of higher education. Wisconsin's lead is a University of Wisconsin professor of Educational Psychology and the director of Testing & Evaluation Services and the University of Wisconsin Center for Placement Testing. Establishing this formal connection between Wisconsin's IHEs, the SEA staff who are working on implementation of the new assessment system, and the Smarter consortium is a critical step to ensuring that all education partners, P-16, are working towards meaningful implementation of the Common Core and towards a unified goal: college and career readiness for all students.

Assessing the Common Core

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

and career-ready starts early. As such, DPI's plans for creating resources for all students include children from early kindergarten through high school.

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

One component of the Every Child a Graduate vision (http://dpi.wi.gov/sprntdnt/index.html) involves two questions directly related to DPI's planning. The first, "What and how should students learn?" relates directly to the CCSS and CCEE and development of higher standards for Wisconsin's students as well as providing guidance for educators in what great instruction of the CCSS and CCEE looks like (the Wisconsin SIA Center). The second question points to transitions in the world of assessment, which is, after all, a key component of high-quality instructional practices. That question, "How do we know if they've learned it?" along with specific recommendations from the Next Generation Assessment Task Force, convened in 2009, 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 for 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	Grades 3-8 and 10, general education students; all but the 1% population	Smarter Balanced Assessment System	Grades 3-8, all but students with significant cognitive disabilities	2014-15
		ACT Plus Writing	Grade 11, all but students with significant cognitive disabilities	
Wisconsin Alternate Assessment for Students with Disabilities	Grades 3-8 and 10, special education students with significant cognitive disabilities	Dynamic Learning Maps	Grades 3-8 and 11, students with significant cognitive disabilities	2014-15
ACCESS for English language learners	English language learners	ACCESS 2.0 for ELLs	English language learners	2015-16

These transitions represent a new day for assessment in Wisconsin, one in which assessments that

are used for accountability purposes are also designed in such a way as to provide useful, actionable, and timely data directly to educators to help inform classroom practices in an ongoing manner. Further, these assessment consortia, which are designing assessments using UDL principles, are dedicated to considering accessibility issues before, during, and after assessment development to ensure the assessments provide all students opportunities to demonstrate what they know and can do by removing barriers that interfere with access to learning and content.

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

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

Changing Expectations in High School`

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

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

Subject Area	Current Requirement	Proposed Change
Mathematics	2 credits	3 credits
Science	2 credits	3 credits (2 of which would remain traditional science or science equivalency credits)
Elective Courses	0 credits	6.5 credits

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

Wisconsin currently requires four credits of English language arts, but the increased importance of strong educational foundations in mathematics and science in order to be competitive in today's career and collegiate marketplaces cannot be ignored. DPI also recommends putting into statute an additional 6.5 elective credits for graduation, as recommended by the state superintendent last year. Elective courses offer students important opportunities to build upon content-area knowledge and skills with a focus on areas that interest them, and in ways that connect learning to 21st Century Skills. As such, this proposal addresses both the DPI's intention to personalize learning and to increase focus on preparing students to graduate from high school prepared for both college and career.

These recommended requirements would result in a total of 21.5 credits required for graduation (an increase from the current requirement of 13 credits). This proposal aligns to national averages and current local practice in Wisconsin. Additionally, this is a minimum requirement as many districts will

continue to require more credits, and most graduates will complete more credits than the proposed requirement in statute.

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

"We can make our high school graduation requirements more meaningful. Right now, Wisconsin law only requires students to complete 13 credits, the lowest in the nation. Most of Wisconsin's graduates already take at least 21.5 credits. DPI needs to change state law to hold all students to this higher uniform standard, which would put Wisconsin's requirements above the national average." (http://dpi.wi.gov/eis/pdf/dpinr2010_119.pdf)

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

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

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

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

Bridging Secondary and Postsecondary Programs and Opportunities

DPI's Career and Technical Education team, in partnership with postsecondary institutions and other external work groups, has built a model for connecting secondary schools with postsecondary instructional programs and 21st Century careers. Implementing a rigorous Programs of Study framework (designed by the U.S. Department of Education) in Wisconsin has resulted in rich connections between DPI, institutions of higher education, and public schools across the state.

Career clusters and pathways, a critical component of Programs of Study, are grounded in principles that mirror DPI's focus on college and career readiness and belief that, whatever choice a student makes regarding his or her pathway after high school, that student absolutely must have equal opportunity to all options (Appendix 6). Some students will pursue a college degree; others enter the

work force or a specific career. The goal of DPI is that Wisconsin schools prepare each and every student for all avenues those students might pursue following high school graduation: two- and four-year college, certification programs, apprenticeships, formal job training, and military service.

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

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

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

Providing Measures of College and Career Readiness

~~DPI will include funding in the next (2013-15) biennial budget request for schools to administer the EXPLORE, PLAN, ACT, and WorkKeys assessments. This assessment suite provides important information about college and career readiness for students. It also allows for analysis of academic growth during high school, data that are lacking in current assessments.~~DPI has received state funding for the implementation of the ACT Suite of Assessments measuring the Wisconsin Common Core State Standards (CCSS) in English language arts and mathematics as well as college and career readiness. In 9th and 10th grades the ACT Aspire Early High School assessments will be used. In 11th grade students will take the ACT Plus Writing and the WorkKeys test. By using these assessments, Wisconsin will be able to measure high school student growth in both college and career readiness and Wisconsin CCSS.

Further, DPI intends to change cut scores for performance levels on the current state summative assessment, the Wisconsin Knowledge and Concepts Examination (WKCE), so that it provides an indication of student performance on more rigorous assessments, prepping for the transition to the Smarter Balanced Assessment System in 2014-15. Specifically, DPI has statistically aligned WKCE cut scores for reading and mathematics with National Assessment of Educational Progress (NAEP) cut scores.

Several steps were taken to establish the NAEP-based cut scores for the WKCE. Data that was looked at include performance of Wisconsin students on the NAEP from the Spring of 2011 and performance of Wisconsin students on the WKCE for the past five administrations. In addition, linear interpolation was utilized to establish a trend line for non-tested grades. The specific procedures that were followed were to:

- Identify the NAEP percentile ranks (% of students advanced, proficient, and basic) for Wisconsin for the Spring 2011 administration for 4th and 8th grade reading and mathematics.
- Conduct linear interpolation to identify what corresponding percentile rates would be for grades 5, 6, and 7. Utilize the grade 4 NAEP percentile rank as the basis for the WKCE grade 3 rate and the grade 8 NAEP percentile rank as the basis for the WKCE grade 10 rate (see tables below).
    - Note: Extrapolation was considered as an option for grades 3 and 10 and was, ultimately, rejected. The trend line for reading would put the 10th grade advanced percentile rank information at 99 percent which was determined to be too extreme. Also the trend lines for

reading and mathematics at the basic level caused concern because of the degree of the slope and the impact that this would have had on grade 3 and 10 impact data. This linear interpolation approach was approved by DPI's Technical Advisory Committee as well as DPI's current test vendor as statistically sound.

- Utilize the WKCE percentile rank tables from the last five administrations that identify the scale score associated with each percentile rank. Identify the WKCE scale scores for the last five administrations that correspond to the Spring 2011 NAEP percentile ranks.
- Average the derived scale scores from the five administrations and round the result down to the nearest whole number to arrive at the recommended cut scores.

Reading – NAEP percentile rank information and interpolation to identify percentile ranks							
	Duplication from grade 4	NAEP % Rank	Interpolation	Interpolation	Interpolation	NAEP % Rank	Duplication from grade 8
Spring 2011	**3**	**4**	**5**	**6**	**7**	**8**	**10**
Advanced	93.00	93	94.00	95.00	96.00	97	97.00
Proficient	67.00	67	66.50	66.00	65.50	65	65.00
Basic	33.00	33	30.00	27.00	24.00	21	21.00

Mathematics – NAEP percentile rank information and interpolation to identify percentile ranks							
	Duplication from grade 4	NAEP % Rank	Interpolation	Interpolation	Interpolation	NAEP % Rank	Duplication from grade 8
Spring 2011	**3**	**4**	**5**	**6**	**7**	**8**	**10**
Advanced	92.00	92	91.75	91.50	91.25	91	91.00
Proficient	53.00	53	54.50	56.00	57.50	59	59.00
Basic	14.00	14	15.75	17.50	19.25	21	21.00

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 evaluate the new cut scores in comparison with current cut scores and implement the cut scores as part of the DPI-developed accountability index, discussed in Principle 2.B.

The index calculations for the 2011-12 school year 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 2011-12 results will also be used for accountability determinations that will result in the categorization of schools along a continuum, identification of schools requiring specific interventions, and support as well as rewards. This reporting timeline involves intensive communication and professional learning for schools, districts, and the public. DPI has plans to provide support in the form of talking points, letters to parents, and media outreach packets to schools in preparation for this transition.

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

expectations for the new consortium assessments.

Raising Rigor for Alternate Populations

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

Additional Efforts to Raise Rigor and Improve Student Outcomes

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

Moodle

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

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

Individualized Learning Plans

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

ILPs take into account a student's life outside of school and provide a process that opens students up to unique career opportunities. This deep personalization goes beyond delivery of academic content and treats students as whole people,

personalizing long-term planning with the goal that all students will be set up for postsecondary success in college and career.

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

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

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

Reducing Duplication and Unnecessary Burden

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

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

The two major technology and data reporting initiatives mentioned above, a Statewide Student Information System (SSIS) and WISEdash, are key to provision of these reports. These initiatives will significantly impact districts. WISEdash will provide districts with direct access to aggregate student-level data in a secure format. Reports and dashboards will be available on a variety of topics. Initial implementation of WISEdash will be with secure access only, for school- and district-level staff authorized to see non-redacted or suppressed data, and possibly authorized to view student-level information. Eventually, WISEdash will not only replace DPI's current, myriad public reporting systems, updating and locating those reports in a single portal, but will add to the types and topics of available public reports. Accountability reporting will be completed through WISEdash, but so will other public reporting including information about postsecondary transitions, literacy, and other important statewide initiatives. More information about WISEdash is available here: http://www.dpi.wi.gov/lds/wk12bi.html.

Currently, with many different student information systems in districts across the state, districts must submit data they already maintain through separate, time-consuming methods. As data collection requirements only increase in magnitude and number, the burden has a negative impact on districts. In a year in which schools have seen the largest state cuts to education ever, districts are forced to parse

staff time from direct education toward data entry. This does not improve education and is not acceptable. The transition from individual, disconnected data management systems to a statewide system will:

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

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

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

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

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

Option A	Option B	Option C
☒ 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)	☐ 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, 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	☐ 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 standards to the Department for peer review. (Attachment 7)

	achievement standards for those assessments.	
For Option B, insert plan here		

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

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

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

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

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

A Statement about Systems Change

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

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

Key Questions	Related Efforts
What and how should students learn?	-Common Core State Standards implementation - Standards, Instruction, and Assessment Center -Early Learning Standards Implementation -Individualized Learning Plans and Programs of Study -Moodle technology
How do we know if the students learned it?	-Smarter Balanced Assessment -Dynamic Learning Maps Assessment -ASSETS for English Learners -District benchmark assessments -The Wisconsin Information System for Education (WISE) – a statewide data reporting system available spring 2012
How do we support student and school outcomes?	-Wisconsin Statewide Accountability System -School and district report cards -Statewide System of Support for Schools -Educator Effectiveness System -WISE -Moodle technology
How should we pay for schools?	-Fair Funding for our Future

Alone, any of the initiatives in the table—however well devised or well intended—will not achieve desired goals. Isolation suffocates sustainable improvement. The same is true for Wisconsin's statewide accountability system; it is but a part of DPI's work to support and improve education across the state, work that is clearly focused on DPI's three strategic goals (increasing graduation rates, closing graduation and career- and college-readiness gaps, and increasing Wisconsin high school students' career- and college-readiness). That work is comprised of individual efforts that range from reforming school finance to providing nutritious school meals, from increasing academic rigor to fostering a vibrant digital learning environment. Alone, the accountability plan described in this Principle will have limited traction or focus. As part of integrated efforts that share a common goal of ensuring the college- and career-readiness of individual students, this accountability system contributes to something greater and, in doing so, becomes more meaningful and sustainable. Refer to Appendix 7.

Reprioritization and Systemic Changes at the State Level

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

Raising Expectations, Increasing Rigor

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

While Wisconsin has previously emphasized graduation rates (and boasted one of the highest in the nation), the Wisconsin 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

closure of achievement gaps within and across schools as a means to address the state's existing gaps. Using a multifaceted index will help pinpoint areas of need within a school, as well as areas of strength, and help schools track their progress at meeting the needs of all student subgroups. Within the system of support, identified schools will participate in diagnostic reviews and needs assessments (Priority and Focus Schools, respectively), to identify the instructional policies, practices, and programming that have impacted student outcomes and to differentiate and individualize reforms and interventions accordingly. While planning and implementing reforms, schools and districts will have access to increasingly expansive and timely data systems to monitor progress. Additionally, DPI will require Priority and Focus Schools to implement Response to Intervention (RtI, with the support of the Wisconsin RtI Center and its resources) to ensure that all students receive customized, differentiated services within a least restrictive environment, including additional supports and interventions for students with disabilities and English language learners as needed, or extension activities and additional challenges for students exceeding benchmarks.

Developing a Statewide System for Accountability and Support

Currently, Wisconsin's system of support for schools identified for improvement serves Title I schools. Due to funding and capacity, the state's system currently classifies the performance of all traditional public schools and charter schools as required by No Child Left Behind (NCLB), but only requires interventions for Title I schools and districts. Wisconsin's persistently low-performing schools do not experience sanctions or implement targeted interventions prescribed by Wisconsin unless they receive Title I funding.

To address these issues, the Accountability Design Team developed a statewide accountability framework to specifically include~~s~~ *all* state schools, including traditional public schools and charter schools, regardless of Title I funding, as well as private schools participating in Parental Choice Programs (PCP). In this vision, all schools receiving state funds would be part of the state accountability and support system. This statewide system requires legislation, and will initially be implemented within the public school system.

Aligning Relevant State Initiatives

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

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

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

Addressing Capacity

The Accountability Design Team also indicated the state should develop a system based on *reasonable and realistic implementation goals* that address capacity at the state, district, and school levels. Informed by this recommendation, DPI's request for flexibility identifies the most efficient yet effective means to effect change. For example, the proposal to focus reforms at the district level if a district exhibits systemic barriers to improvement was informed by findings from school improvement grant (SIG)

monitoring visits. DPI deemed district level intervention more effective and efficient, and also more likely to create change. The flexibility created through this ESEA Flexibility Waiver opportunity will allow DPI to address these district-level needs to best serve schools and students.

Making Improvements as Necessary

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

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

Newly Developed Statewide System of Accountability

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

New school report cards have been designed, 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 fall 2012. As part of an implementation plan that includes an extensive and necessary feedback period for school staff, DPI will release preliminary report cards directly to districts through a secure reporting system in summer 2012. A survey instrument to collect input and understanding of the accountability index will accompany the report cards. Plans to meet with focus groups, including classroom educators, over the summer are underway. Input collected during the preliminary secure release will be incorporated appropriately into updated report cards to be available (following a final data checking period for schools) in fall 2012. District report cards will be produced for the 2012-13 school year and available in summer 2013. Only school-level report cards will be released in 2012.

Reports highlight areas in need of improvement so schools can target interventions to focus on specific indicators like improving graduation rates (the key indicator in the postsecondary readiness sub-scale area) or closing achievement gaps. Additional expectations for test participation, dropout rates, and absenteeism will be the same across the state and represent that it is important for all schools to achieve certain standards in these areas that impact each of the index's sub-scale areas.

Customized and Differentiated System of Rewards, Recognition, and Support

The Accountability Design Team recognized that systems of accountability must be aligned to systems of support in order to affect change. The Design Team recommended that the new statewide accountability system provide differentiated, targeted systems of support to improve student outcomes.

Additionally, the Accountability Design Team recommended the Wisconsin DPI recognize high-performing schools to incentivize improved outcomes and to disseminate exemplary practices statewide. These recommendations represent a commitment to a statewide system of support (SSOS) aimed at providing differentiated recognition, rewards, and interventions. Interventions will be built upon the core of high quality instruction, collaboration, balanced assessments, and culturally responsive practices in order to successfully meet the state's three strategic goals.

Implementation of New Statewide Accountability System: 2012-Ongoing

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

Timeline for Implementation

DPI will begin implementation of its new accountability system following the 2011-12 school year. At this time, DPI will begin distribution of the new report cards using the accountability index to inform schools and districts of the new system (including reporting of assessment scores using the new cut scores based on comparisons with NAEP performance), and their own strengths and weaknesses within the new system. Priority Schools currently implementing school improvement grants (SIGs) will continue implementation of the turnaround models, and therefore will meet the requirement for implementation of Priority School reforms in 2012-13. The 2012-13 year will represent the final year of SIG implementation for most of these schools, allowing Wisconsin to transition completely to its new accountability system, including plans targeted to the district and school level as appropriate. Focus schools will also begin implementation of required supports and interventions beginning in the 2012-13 school year. Additionally, schools currently required to implement supplemental educational services as a consequence of NCLB will no longer be required to implement this sanction beginning in 2012-13. DPI will expand its current system of recognition and rewards, adding recognition of high achievement and high progress schools effective with the 2012-13 school year.

Table 2.2 illustrates the timeline for implementation of Wisconsin's new system for accountability.

Table 2.2: 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
Pursuing a New Accountability System						
ESEA waiver posted for public comment	SEA	January 23	N/A	N/A	N/A	N/A
ESEA waiver submitted to DOE	SEA	February 22	N/A	N/A	N/A	N/A
Peer Review Process	SEA/ USED	March	N/A	N/A	N/A	N/A
Approval Process with USED	SEA/ USED	Ongoing	N/A	N/A	N/A	N/A
Accountability Index and Reporting						
Technical Advisory Council meetings	OEA	March/ April	Spring	TBD	TBD	TBD
Standards Setting	OEA	April/ May	N/A	N/A	N/A	N/A
Finalization of accountability index, report card design	OEA	April/ May	Spring (Modifications)	TBD	TBD	TBD
Updated preliminary Priority and Focus school lists released (with 2011-12 data)	OEA	April	N/A	N/A	N/A	April (2016 Cohort)
Initial release of report cards (district review only to check data)	OEA	N/A	June/ July 2012	N/A	N/A	N/A
Public release of report cards	OEA	N/A	Fall 2012	Summer 2013	Summer 2014	Summer 2015
Final Focus school lists released (2012 Cohort)	OEA	N/A	June 2012	N/A	N/A	April (2016 Cohort)
Final Priority school lists released (2012 Cohort)	OEA	N/A	June 2012	N/A	N/A	April (2016 Cohort)
Accountability Index and Report Cards updated as necessary	OEA	N/A	August 2012	Ongoing	Ongoing	Ongoing
Supporting School Improvement-Priority Schools						
Release of SIG continuation applications for existing Cohort I and II schools (pending USED timelines)	Title I and School Support Team	N/A	Summer 2012	Summer 2013	TBD	TBD
Development of state-approved turnaround partner list	Title I and School Support Team	N/A	Summer 2012	N/A	N/A	April (2016 Cohort)
Recruitment and training of SEA-district liaisons assigned to Priority Schools	Title I and School Support Team	N/A	June 2012	N/A	N/A	April (2016 Cohort)
LEAs notified of determinations and requirements of Priority Schools	Office of State Superintendent	N/A	June 2012	N/A	N/A	May (2016 Cohort)
SEA conducts meetings and webinars with Priority Schools as well as their LEAs, to clarify expectations, timelines, and grant opportunities.	Title I and School Support Team	N/A	June 2012	Ongoing support and interventions	Ongoing support and interventions	Ongoing support and interventions
SEA provides training to all new Priority Schools and their LEA representatives on Indistar (planning and monitoring tool)	Title I and School Support Team	N/A	Summer 2012	June-July 2013 as needed	June-July 2014 as needed	July-July 2015 as needed
New Priority Schools assigned turnaround partner from state-approved list	LEAs with SEA district liaison	N/A	August 2012	August 2013 if Necessary	August 2014 if Necessary	August 2015 if Necessary
Turnaround partner conducts diagnostic review	Turnaround partner and LEAs	N/A	August - November	August – November as needed	August – November as needed	August – November as needed

	Responsible Party	2011-12 School Year	2012-13 School Year	2013-14 School Year	2014-15 School Year	2015-16 School Year
Using data from diagnostic review, as well as LEA data, SEA monitors Priority Schools' staffing process to ensure LEAs place highly-skilled teachers and leaders in these schools	SEA; Turnaround partner; LEAs	N/A	September	September	September	September
New Priority Schools develop school reform plans aligned to findings from diagnostic review	LEAs with turnaround partner and SEA district liaison	N/A	November - December	Modify plan as necessary	Modify plan as necessary	Modify plan as necessary
Priority Schools submit new or modified reform plans to SEA	LEAs	N/A	December	June 2013	June 2014	June 2015
SEA approves reforms plans	Title I and School Support Team	N/A	December/January	August 2013	August 2014	August 2015
LEAs implement approved school reform plans	LEAs with Turnaround partner and SEA district liaison	N/A	January	Ongoing	Ongoing	Ongoing
SEA monitors implementation of school reform plans to determine compliance with approved plan, as well as quality of implementation as it aligns to the turnaround principles, via Indistar, site visits and reviews of fiscal and achievement data	Title I and School Support Team	N/A	Quarterly	Quarterly	Quarterly	Quarterly
Direct LEA in restructuring Priority Schools that fail to meet performance objectives at end of four years (e.g., increased interventions, restructure as a charter school, closure)	SEA	N/A	N/A	N/A	N/A	*June 2016
Focus Schools						
LEAs notified of determinations and requirements of Focus Schools	Office of State Superintendent	May	N/A	N/A	N/A	May (2016 Cohort)
SEA conducts meetings and webinars with Focus Schools, as well as their LEAs, to clarify expectations, timelines, and grant opportunities.	Title I and School Support Team	N/A	June 2012	Ongoing support and interventions	Ongoing support and interventions	Ongoing support and interventions
Focus Schools develop reform plans specific to RtI and aligned to area(s) of identification (annually).	LEAs; Focus Schools	N/A	September-October	Modify plan as necessary	Modify plan as necessary	Modify plan as necessary
Focus Schools submit reform plan to SEA	LEAs; Focus Schools	N/A	November	June 2013	June 2014	June 2015
SEA approves Focus School reform plan via Indistar (annually)	Title I and School Support, RtI Center	N/A	November	August 2013	August 2014	August 2015
Focus Schools begin implementation of reform plan	LEAs; Focus Schools	N/A	November/December	Ongoing	Ongoing	Ongoing
SEA monitors LEAs' school reform plan (quarterly)	Title I and School Support Team, RtI Center	N/A	Quarterly	Quarterly	Quarterly	Quarterly

	Responsible Party	2011-12 School Year	2012-13 School Year	2013-14 School Year	2014-15 School Year	2015-16 School Year
Focus Schools participate in ongoing state-directed professional development aligned to school reform plans	LEAs with Focus Schools; CESAs; Title I Network; RtI Center; SIA Center	N/A	Begnining Summer 2012 and ongoing	Ongoing	Ongoing	Ongoing
Direct LEAs to implement increasingly intensive interventions in Focus Schools that fail to meet performance objectives at end of four years (e.g., onsite reviews) (cohort)	SEA	N/A	N/A	N/A	N/A	*June 2016
Districts Identified for Improvement						
MPS notified of DIFI status and relative requirements	Office of State Superintendent	May	N/A	N/A	N/A	*June 2016 (if applicable)
Release of RFP for Diagnostic Review (district level) vendor	Title I and School Support Team	May (If applicable)	N/A	N/A	N/A	N/A
SEA selects diagnostic review vendor	Title I and School Support Team	N/A	August 2012	N/A	N/A	N/A
MPS participates in diagnostic review addressing structures and practices of central office (i.e., human resources, finance, leadership, instruction, etc)	External vendor (TBD)	N/A	August - November	N/A	N/A	N/A
MPS develops reform plan aligned to findings of the vendor's diagnostic review and CAR	DIFIs; external vendor; SEA	N/A	November - December	December (modify plan)	December (modify plan)	December (modify plan)
SEA approves DIFI reform plan	SEA	N/A	December/ January	Modify as needed	Modify as needed	Modify as needed
MPS begins implementation of approved reform plan	DIFI	N/A	January	Ongoing	Ongoing	Ongoing
SEA monitors progress of reform plan	SEA staff	N/A	Quarterly	Quarterly	Quarterly	Quarterly
Continuous monitoring of MPS reform plan	SEA; district liaison; external vendor	N/A	Weekly	Weekly	Weekly	Weekly
Continued implementation of SEA-directed Corrective Action Requirements	LEA and its schools	Ongoing	Ongoing	Ongoing	Ongoing	Ongoing
Direct MPS to implement increasingly intensive interventions if district fails to meet performance objectives at end of four years (e.g., require an increasing number of schools to convert to independent charters, open under authority of a vendor, or close)	SEA	N/A	N/A	N/A	N/A	*June 2016

	Responsible Party	2011-12 School Year	2012-13 School Year	2013-14 School Year	2014-15 School Year	2015-16 School Year
Rewards						
Continue Title I Recognition Program						
Schools identified and notified as Beating the Odds (annually)	OEA ; Title I and School Support Team	June 2011	June 2012	June 2013	June 2014	June 2015
Title I Beating the Odds Schools recognized publicly in State Ceremony	Title I and School Support Team	October	October	October	October	October
Teacher Fellowship applications due	LEAs with Schools of Recognition	January	January	January	January	January
Teacher Fellowship grantees announced	Title I and School Support Team; LEAs with Schools of Recognition	March	March	March	March	March
Title I Spotlight Schools applications due	Spotlight Schools and their LEAs	March	March	March	March	March
Notification of Title I Spotlight School awards	Title I and School Support Team	May	May	May	May	May
SEA conducts onsite visits to Title I Spotlight Schools (identified previous spring)	Title I and School Support Team	September-October 2010-11 Cohort	September-October 2011-12 Cohort	September-October 2012-13 Cohort	September-October 2013-14 Cohort	September-October 2014-15 Cohort
Title I Spotlight Schools (identified previous spring) open visits to LEAs and schools statewide	Spotlight Schools and their LEAs	November-April 2010-11 Cohort	November-April 2011-12 Cohort	November-April 2012-13 Cohort	November-April 2013-14 Cohort	November-April 2014-15 Cohort
Ongoing network sessions with principals of Title I Spotlight Schools (identified previous spring)	Title I and School Support Team	September-May 2010-11 Cohort	September-May 2011-12 Cohort	September-May 2012-13 Cohort	September-May 2013-14 Cohort	September-May 2014-15 Cohort
Expanding to a Statewide Recognition Program						
Identify High Achieving and High Progress Schools	Office of Educational Accountability	N/A	June 2012	June 2013	June 2014	June 2015
Identify small, representative sample of Rewards Schools to participate in a diagnostic review of successful practices	Office of Educational Accountability	N/A	N/A	June 2013	June 2014	June 2015
Conduct onsite review of practices in sample of Reward Schools	Title I and School Support Team	N/A	N/A	September-October	September-October	September-October
Rewards Schools publicly recognized	Title I and School Support Team	N/A	Fall 2012	October	October	October
Disseminate best practices of Rewards schools	Title I and School Support Team	N/A	N/A	Ongoing	Ongoing	Ongoing

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

Option A	Option B
☒ The SEA includes student achievement only on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	☐ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system or to identify reward, priority, and focus schools, it must: 3. 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 4. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

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

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

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

Option A	Option B	Option C
☐ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. • Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. • Provide the new AMOs and an explanation of the method used to set these AMOs.	☒ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. ➢ Provide the new AMOs and an explanation of the method used to set these AMOs. ➢ Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. ➢ Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

State Superintendent Tony Evers convened the School and District Accountability Design Team (Accountability Design Team) with other educational leaders because of a shared commitment to improve upon existing accountability structures and ultimately to improve outcomes for all students in Wisconsin. The Department of Public Instruction (DPI) is deep in the work of re-focusing its efforts in a way that braids together agency initiatives, including this accountability plan, to build college- and career-readiness for all students.

An Index-Based Accountability System for Wisconsin

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

In an effort to design a system that reflects this vision and holds schools accountable for high-leverage, measurable, fair indicators of student engagement, progress, and performance, DPI has developed an accountability index system that incorporates multiple measures, including student growth. This index

system reflects the goals of high attainment and growth as well as other key priorities. In all, the accountability index incorporates four sub-scale areas: Student Achievement; Student Growth; Closing Gaps; and On Track to Graduation/Postsecondary Readiness. Schools' index scores and supporting data will be provided to parents, educators, and the general public through a detailed school report card. Data on school performance toward Annual Measurable Objectives (AMOs) will be included in addition to accountability index information. (See Appendix 9 for a draft report card.)

Important Index Miscellany

NAEP-like Scores

Overall accountability index scores are based largely upon student assessment data incorporating the revised NAEP-like Wisconsin Knowledge and Concepts Exam (WKCE) cut scores described in Principle 1. A cut score change incorporating the one percent of students tested with the Wisconsin Alternate Assessment for Students with Disabilities (WAA-SwD) could not be implemented, due to the fundamentally different nature of that assessment and its lack of comparability with NAEP; however, these students will continue to be included in determinations of achievement. Raising expectations for all students, including those taking an alternate assessment, is important to DPI and informs Wisconsin's work with the multi-state Dynamic Learning Maps consortium.

Cell Size

Accountability calculations will apply a minimum group cell size of 20, a change from DPI's current use of a cell size of 40. This change represents a dedication to ensuring that accountability calculations are fair for all populations, while shining a light on subgroup performance in more schools. The only component of DPI's accountability system using a different cell size is the 3rd grade reading/8th grade mathematics measure within the On Track to Graduation/Postsecondary Readiness sub-scale area; because this measure takes the smallest subset of students, thus excluding the largest number of schools, DPI uses a cell size of 20 combined over two years.

Implementation

This proposal brings many significant changes to Wisconsin's accountability system. DPI has a keen desire to ensure an ample implementation period so that educators, the public, and other important stakeholders are well-informed about this new accountability system. As such, DPI intends to phase-in accountability report cards within the requirements of the waiver.

The adjusted implementation timeline results in a shift in the release schedule of school accountability report cards. (District-level report cards will be produced for the 2012-13 school year and available in late fall 2013.) As mentioned in the Accountability System Overview, DPI has an implementation plan that includes an extensive and necessary feedback period for school staff. DPI will release preliminary report cards directly to schools through a secure reporting system in summer 2012. This secure preliminary release provides districts the critical opportunity for technical review and education on the new accountability system, as well as final adjustments to the index and/or report card design before a public release. A survey instrument to collect input and understanding of the accountability index will accompany the report cards. Plans to meet with focus groups, including classroom educators, over the summer are underway. Input collected during the preliminary secure release will be incorporated appropriately into updated report cards to be available (following a final data checking period for schools) in fall 2012. Only school-level report cards will be released in 2012.

Factoring in Subgroups

One of the major systemic issues with No Child Left Behind (NCLB) is that large, diverse schools can miss Adequate Yearly Progress on any one of 64 separate determinations. Balancing an appropriate focus on subgroups—one that does not hide subgroup performance—while acknowledging the importance of performance among all students is crucial to addressing this issue. DPI will continue to incorporate the performance of all students and NCLB-defined subgroups throughout the accountability system as much as possible. In areas where we are currently unable to include all students—such as Student Growth, which cannot be used to evaluate the 1 percent of students taking the alternate assessment—DPI will work toward alternatives that allow inclusion of more students in the future—such

as by evaluating growth with the new Dynamic Learning Maps alternate assessment, scheduled to come on-line in two years. For determinations, subgroup performance forms the basis of the Closing Gaps sub-scale area-as well as attendance, test participation calculations, and achievement and graduation rate AMOs. Determinations of Student Achievement and Student Growth will be based upon all students. DPI believes this is a fairer system that appropriately prioritizes subgroup performance within the context of college- and career-readiness for all students. Accountability report cards disaggregate reporting to the full extent possible balancing cell-size considerations.

A Subgroup for Combined Small, High-Need Groups

Wisconsin's 424 districts are mostly small and rural. As such, many districts have very small numbers of students, and subgroup populations are below even the proposed new minimum group size of 20 required for inclusion in accountability calculations. In order to ensure that more schools without sufficient subgroup size have an opportunity to evaluate performance calculations, DPI will create high-need "supergroups" to factor into the accountability index as recognition of the need to closely monitor the performance of traditionally high-need student populations. Supergroup details are provided in the Closing Gaps sub-scale area description that follows. Further information about the change in cell size as well as the high-need subgroup is presented in Appendix 8.

A Subgroup for Low Performers

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

Effect of Accountability Changes on ESEA Subgroup Consideration

Wisconsin is making ~~three~~ two school accountability changes in the ESEA Flexibility request that affect consideration of ESEA subgroups:

- A cell size of 20 will be used throughout Wisconsin's accountability system.
- ~~Non-tested students will be included in the denominator for assessment-based determinations.~~
- In the Closing Gaps area of the accountability index, "supergroups" will be included made up of students belonging to two or three of the binary ESEA subgroups (students with disabilities, economically disadvantaged students, and limited English proficient students). Rather than substituting these supergroups for ESEA subgroups, they will be used only when the individual subgroups comprising the supergroup do not meet cell size.

Using 2011-12 assessment data the effect of these changes will be illustrated. The first table below shows their impact on the numbers of schools and ESEA subgroup students included for accountability, comparing the numbers of schools and unduplicated subgroup students included under NCLB to the numbers included under ESEA flexibility:

	Schools held accountable for one or more ESEA subgroups		**Unduplicated ESEA subgroup students included in determinations**		**Denominators**	
	Number	*Percentage*	*Number*	*Percentage*	*Schools*	*Students*
NCLB	1,231	62.5%	167,117	88.0%	1,971	189,988
ESEA Flexibility	1,692	85.8%	187,543	98.2%	1,971	190,972
Change	+461	+23.3%	+20,426	+10.2%	0	+984

The second table shows the impact on the numbers of students in ESEA binary subgroups (students with disabilities, economically disadvantaged students, and English language learners) included in accountability determinations under NCLB versus ESEA flexibility. Students can be identified within multiple groups, so totals will exceed the unduplicated totals in the first table:

	Students with Disabilities		Economically Disadvantaged		English Language Learners		Denominators		
	N	*Pct.*	*N*	*Pct.*	*N*	*Pct.*	*SwD*	*Econ.*	*ELL*
NCLB	23,639	46.5%	130,113	89.4%	13,214	54.1%	50,853	145,516	24,405
ESEA Flexibility	44,410	86.5%	143,493	98.2%	19,631	79.9%	51,366	146,185	24,578
Change	+20,771	+40.0%	+13,380	+8.8%	+6,417	+25.8%	+513	+669	+173

Note: This analysis only evaluates the impact of accountability changes to the consideration of subgroups in student achievement. It does not include other aspects of AYP determination, such as graduation or attendance rate, that are based upon all students.

Accountability Rating Category Placement

When constructing simulations of the accountability index and its components, it became clear that certain proposed components of the index were not functioning in ways that were intended. Consequently, DPI staff sought an alternative way to include certain key indicators in the composite index.

Red Flags

The concept of "red flags" is Wisconsin's solution to incorporating measures that are high leverage indicators that impact the reliability of components of the index. As a reflection of the importance of these indicators, accountability scores will be adjusted for schools that receive one or more red flags. Specific impact will be established to ensure that the point deduction is a sufficient deterrent for these critical areas.

There are three red flag indicators that affect particular aspects of a school's index score: test participation, dropout rates, and absenteeism.

Test Participation. This possible red flag reflects the impact of participation rates on the accountability index. ~~In addition to the fact that all achievement-based calculations in the accountability index factor in all full academic year (FAY) enrolled students (as opposed to FAY tested), s~~Schools will receive a red flag if their "All Students" group or any subgroup misses the target in either mathematics or reading test participation. The target test participation rate is 95 percent. This measure looks at all students, not only full academic year students. Up to three years of test participation data are factored into calculations.

~~*A note about test participation: in addition to the red flag, which will result in points deducted from index calculations, DPI will include all enrolled students in achievement calculations, thus ensuring that schools have no incentive to selectively test students as non-tested students will count "against" a school's calculations. That is, in the calculation of the achievement priority area, a student is weighted at "zero" if the student scores in the Minimal Performance category, or if the student is in the "not tested" category.~~

Dropout Rate. Schools will receive a red flag if their dropout rate is ~~above~~ greater than or equal to six percent. This threshold was calculated based on recent statewide data, and was determined as a sufficient threshold for placing focus on the schools contributing heavily to Wisconsin's overall dropout rate.

Student Absenteeism. Schools will receive a red flag if their rate of student absenteeism is ~~above~~ greater than or equal to 13 percent. This threshold was calculated based on recent statewide data, and was determined as a sufficient threshold for placing focus on the schools contributing heavily to Wisconsin's overall absenteeism, an indicator highly correlated with lower achievement and low growth. Future versions of the accountability

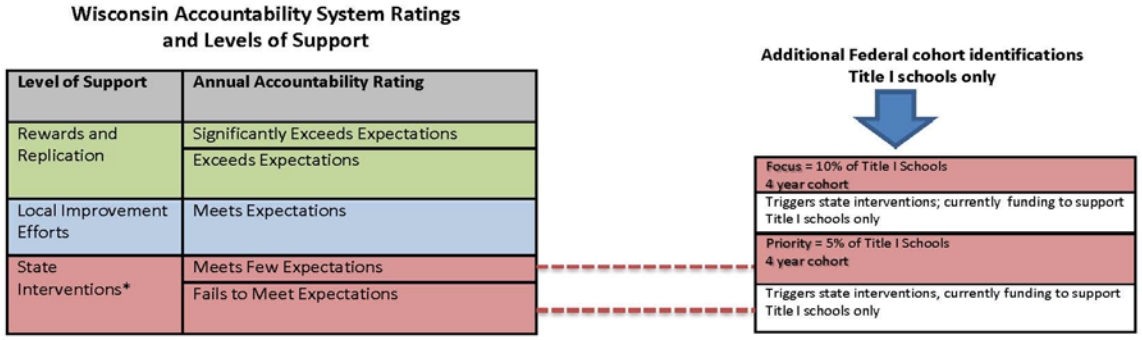
index, enabled by advances in data collection, may factor truancy (which is currently a local determination based on state statute that incorporates more real-time data) rather than absenteeism (which is the percentage of students below an attendance threshold – a snapshot of attendance) as a red flag.

Rating Categories

A school's overall index score will determine its placement into one of five rating categories. These categories are:

1. Significantly Exceeds Expectations
2. Exceeds Expectations
3. Meets-Expectations
4. Meets Few Expectations
5. Fails to Meet Expectations

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



*The placement of state interventions as a level of support reflects the long-term vision for a statewide accountability system that supports all schools. Currently, federal Title I funding is available only to support Focus, Priority, and Title I Reward schools.

Note: Labels, in combination with comprehensive report cards, are intended to provide schools with information that will guide local improvement efforts and inform state intervention planning.

Expectations for Wisconsin Schools

Wisconsin plans to couple these accountability determinations with differentiated interventions and supports for certain schools and development of school improvement tools and resources available statewide with the goal of all schools in the state being at or above the *Meeting Expectations* level

Expectations for Districts

To provide a broad perspective of performance, both school- and district-level report cards are part of Wisconsin's accountability system. District Report Cards will be provided for the 2012-13 school year. In order to focus on overall district performance, students will be aggregated into one group and the Accountability Index calculated as if the district were a large school. The same four Priority Areas used for the School Report Card will be used for the District Report Card, with overall scores placing a district into one of the five existing rating categories. The weighting structure, minimum cell size, and possible deductions based on Student Engagement Indicators are the same for school and district calculations. One slight difference exists within the On-Track to Graduation and Postsecondary Readiness Priority Area; both graduation rate and attendance rate will be used at the district level. School calculations apply either attendance or graduation depending on whether the school graduates students. District Report Card results may differ from their schools' collective results, because more subgroups may meet cell size at the district level and because students who were not full academic year (FAY) at the school level but are FAY for the district will be included in the calculation.

Table 2.3: The Accountability Index, Performance Category, and Identification Process

Steps	Step 1: Calculate Sub-scale Area Scores and Aggregate for Overall Accountability Score	Step 2: Apply Red Flags if Necessary	Step 3: Adjust Scores for Red Flags	Step 4: Place School into Performance Category	Step 5: Identify Schools of Recognition and Schools/Districts in Need of Interventions and Supports
Notes	Four Sub-scale Areas: 1) Student Achievement 2) Student Growth 3) Closing Gaps 4) On-track to Graduation/Post-secondary Readiness Weighting is described in the text below. Overall score scale: 0-100	Red flag categories: 1) Test Participation (<95%) 2) Dropout Rate (>7%) 3) Absenteeism (>13%) Red flag(s) are applied if school misses goal for all students or any individual subgroup depending on the category	Accountability scores will be adjusted based on missing the thresholds described in Step 2. Schools earning red flags will have a score impact that reflects the number of red flags earned.	Schools are placed into one of five categories: 1) Significantly exceeds expectations 2) Exceeds expectations 3) Meets expectations 4) Meets few expectations 5) Fails to meet expectations	Schools of Recognition acknowledge high performance, high progress, and Title I schools that are "beating the odds" Schools with the lowest performance in the state require Priority Interventions and Supports Focus schools are those with the largest gaps or low subgroup performance in reading achievement, math achievement, or graduation rates
Result	Sub-scale Area scores inform school improvement efforts and public reporting Overall score reflects school performance on multiple indicators in a meaningful way	Integrity of accountability index is maintained Attention to subgroups prioritized	Acknowledgement of the importance of these measures by affecting index scores and possible rating category placement.	Categories place schools along a continuum of performance. Categories are included on school report cards and inform school, district, and parental decisions	Schools are identified for interventions based on need and measures that reflect DPI's strategic goals. Identification is differentiated, as are resulting interventions and supports.

Sub-scale Areas and Overall Scores

Within this multiple measures accountability index, sub-scale area scores will be combined into an overall score. A school's index score in each sub-scale area describes its performance on a 100-point scale, and index areas are combined to create an overall score on a similar 100-point scale. The process of translating raw data into sub-scale scores and creating overall scores was developed in consultation with 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. Descriptions follow of how each sub-scale area score is calculated, and how they are combined into the overall school accountability index.

Sub-scale Area 1: Student Achievement

The student achievement sub-scale area is a composite of proficiency rates in reading and mathematics for the "all students" group on the Wisconsin Student Assessment System (WSAS), which includes both the WKCE and the WAA-SwD. After reviewing the impact of the NAEP-like cut score change on the WKCE, DPI decided to use a points-based system for deriving the achievement index:

- Scores are calculated separately for reading and mathematics (50 points each) and added. A school must have both reading and mathematics scores calculated within cell size requirements to have a student achievement index score calculated.
- Each student earns points depending on their WSAS achievement level: 0 points for Minimal ~~Minimum~~ Performance, 0.5 points for Basic, 1 point for Proficient, and 1.5 points for Advanced. The average number of points earned by all full academic year ~~enrolled (as opposed to tested)~~tested students in a school over the three most recent tested years are used to calculate a score.
- Point averages are weighted over the three-year period and pooled by the number of students with data in each year, in order to give more weight to a school's most recent performance while reducing the impact of year-to-year and enrollment-based statistical instabilities in aggregate achievement data.
    - For weighting by year, weights of 1.5 for the most recent year, 1.25 for the prior year, and 1.0 for the year before that are applied. 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. If a school has only the most recent year of data available, only that year's data are used.
    - The weights are adjusted to create a pooled weighted average by multiplying each year's weight by the quotient of that year's number of ~~enrolled~~ tested students with data divided by the average number ~~enrolled~~ tested across all available years.
- For calculating achievement scores, pooled weighted averages have a ceiling of 1. Values greater than 1 will be reported, but the score will be based on a value of 1.
- The pooled weighted average is multiplied by 50 to create a subject achievement score.

Sub-scale Area 2: Student Growth

The methodology behind the student growth sub-scale area uses an adaptation of the principles behind Colorado's "Catch Up, Keep Up, Move Up" measures across multiple levels of achievement. It is a self-differentiating, growth-to-standards measure accounting for schools with high achievement while allowing lower-achieving schools to gain credit for high growth, a priority for this accountability system. Wisconsin is not yet adopting a high school growth measure because students are not tested in the 9th, 11th, or 12th grades; however, DPI will be implementing ACT Aspire in grades 9 and 10,~~intends to request funds for EXPLORE, PLAN,~~ ACT Plus Writing, and WorkKeys in grade 11, starting in 2014-15. ~~which~~This would eventually enable an appropriate growth measure to be calculated for high school students (in addition to providing important college-pathway information to students, parents, and educators).

Background

Student Growth Percentiles (SGP) were originally developed for the Colorado Department of Education.[1] 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."[2] In this method, the statistical program that calculates each student's SGP also projects the SGP they need to achieve the next year in order to grow to a higher proficiency level within a number of years. The next year, their actual SGP is compared to the projection.[2] Using SGPs in this manner is a growth-to-standard measure with the advantage that it evaluates growth relative to how a student is achieving and where they need to go to meet proficiency standards, rather than by a fixed number of scale score points as with a value table.

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

Methodology

This growth measure 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, the output is a single score that encompasses growth across all levels of student achievement. It is also unique because it accounts for both growth and decline in student achievement. The process to determine a school's score is:

- A student is included in the set of students for calculation if DPI is able to calculate their SGPs in two consecutive years. Growth scores are calculated separately for reading and mathematics (50 points each) and added. A school must have both reading and mathematics scores calculated within cell size requirements to have a student growth index score calculated.
- Because Wisconsin currently tests its students in the fall, the school accountable for a student's growth is the school at which they were enrolled in the first year.
- To calculate the growth measure, in the prior 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.[3]
- In the current year, the student's SGPs, describing their growth from the prior year to the current, are compared to their targets for each subject. This comparison is used to determine the number of positive or negative growth points earned by the student, based on a value table:

Prior year proficiency level	*Comparison of current year SGP to prior year target*			
	Does not exceed Basic	*Exceeds*		
		Basic	*Proficient*	*Advanced*
Min. Perf.	**0**	**+1**	**+2**	**+3**
Basic	**0**	**0**	**+1**	**+2**
Proficient	**-1**	**-1**	**0**	**+1**
Advanced	**-1**	**-1**	**0**	**0**

- Positive and negative growth points are considered separately because this model cannot assign points to every student—students who begin at the Advanced level cannot receive positive points, and those who begin at Minimum Performance or Basic cannot receive negative points.

[1] 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.
[2] 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.
[3] Usually, the three-year projection will be lowest and thus the target, but since DPI's cut score progression is not linear there will be times where a student is near an achievement level cut and the one- or two-year projections are lower.

- A school's growth factor (GF) is the average number of positive points earned by the students who begin at ~~Minimum~~ Minimal Performance, Basic, or Proficient in the prior year (Avg_{Pos}) scaled by the proportion of students who begin at Advanced (P_{Adv}):

$$GF = Avg_{Pos} + P_{Adv} - (Avg_{Pos} \times P_{Adv})$$

The calculation is set up such that a school with all Advanced students ($P_{Adv} = 1.0$) will earn full growth credit.

- A school's decline factor (DF) is the average number of negative points earned by the students who begin at Proficient or Advanced in the prior year (Avg_{Neg}) scaled by the proportion of students who begin at Minimum Performance or Basic (P_{MB}):

$$DF = Avg_{Neg} - (Avg_{Neg} \times P_{MB})$$

The calculation is set up such that a school with all Minimum Performance or Basic students ($P_{MB} = 1.0$) will earn no decline credit.

- A school's raw score (RS) is the sum of its growth and decline factors plus 0.5 (RS = GF + DF + 0.5) with a floor of 0 and a ceiling of 1. This creates a rate-like value where 0.5 represents a school with equal growth and decline, more than 0.5 represents more growth than decline, and less than 0.5 represents more decline than growth.
- A 75 percent confidence interval is calculated[4] with RS and the average number of students with SGP data in both years and added to RS to create an adjusted raw score (RS_{Adj}).
- RS_{Adj} is transformed into a growth index score (GS) out of 50 points:[5]

$$GS = ((RS_{Adj} \times 1.01) - 0.16) \times 50$$

- The school's growth sub-scale score is the sum of its reading and mathematics subject scores.

As a baseline to describe the impact on student inclusion in the growth measure, DPI has two years of SGP data for 288,688 (95%) of the 302,545 students in grades 3-7 tested in 2009-10, and 288,680 (95%) of the 303,638 tested in 2010-11. Given the large number of small schools in Wisconsin, DPI considers this rate more than acceptable.

Discussion

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

The creation of this growth measure began by looking at Colorado's "Catch Up" measure, which uses SGPs to characterize student growth to the proficient level. DPI initially developed and evaluated a simplified measure which took the percentage of below-proficient students meeting targets to proficiency, and scaled it with the percentage of proficient students. DPI's approach is a compromise that recognizes USED's stress on growth to proficiency, while reflecting the School Accountability Design Team's strong desire to recognize growth among low- and high-achieving students, in addition to those near the proficiency cutoff. This does result in a more complex measure. This growth measure also has the particular advantage of being a self-differentiating measure. Lower-achieving schools can earn higher scores by showing more growth, since the one-point-per-level scoring system allows lower-achieving students to gain more points. Meanwhile, the measure essentially gives automatic credit for students at the Advanced level, rewarding schools for high achievement rather than punishing them because there is no level to which DPI can compare their highest-performing students.

[4] This calculation uses the Wald formula: $\pm 1.15\sqrt{(P(1-P)/N)}$

[5] This formula aligns the overall distribution of growth scores to approximate the distribution of achievement scores. DPI is not able to calculate growth scores for small schools with student populations too small to meet cell size. If growth is not aligned toward achievement, it creates a bias in a school's overall index score depending on whether or not it incorporates a growth score. However, repeating this alignment process every year would simply create a normative measure. The values included in this formula were derived from three years of data and will not be recalculated every year. Like any criterion-based measure, the numbers are created with a normative process but applied consistently over time. The same process is used to transform raw scores into index scores in the Closing Achievement Gaps sub-scale area.

Sub-scale Area 3: Closing Gaps

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

Closing gaps is a priority for Wisconsin, burdened by one of the largest black-white achievement gaps in the nation. The design of this accountability system, while it aims to eradicate existing gaps across subgroups, also focuses on moving up all low performers. Wisconsin's accountability system reflects this priority by including a specific sub-scale area for closing gaps in the index calculation for accountability determinations. This sub-scale area includes two components, Closing Achievement Gaps and Closing Graduation Gaps; a school's total sub-scale score (out of 100 points) is the sum of these two components.

High-Need "Supergroups"

The Closing Gaps component of Wisconsin's new accountability index evaluates subgroups within a school in order to make an accountability determination for that school. As a result of impact analyses, DPI determined that inclusion of a high-need supergroup is an appropriate additional step when there are insufficient numbers for separate subgroup evaluation to ensure that more schools are represented in the accountability system and to closely monitor the performance of traditionally high-need student groups.

DPI defines four supergroups: one including the students identified as belonging to any or all of the three binary groups and three including students belonging to either/both of two groups:

Supergroup	Includes
Supergroup 1	Students with disabilities and/or economically disadvantaged and/or English language learners
Supergroup 2	Students with disabilities and/or economically disadvantaged
Supergroup 3	Students with disabilities and/or English language learners
Supergroup 4	Economically disadvantaged and/or English language learners

For a supergroup to be included in determination of a school's closing gaps score, the supergroup must meet the cell size of 20 students with none of the binary groups that constitute that supergroup meeting the cell size. Students are counted in a supergroup only one time; an economically disadvantaged student who is also an English language learner is counted in Supergroup 4 as one student.

Closing Achievement Gaps

Earlier versions of DPI's "closing gaps" measure could more accurately be described as "characterizing gaps," in that school scores were based on the difference between a subgroup and its comparison group. Feedback from DPI's Technical Advisory Committee and from a separate two-day standards review session identified this conflict between label and content as a particular weakness of the overall school accountability system. After further development and review of other states' waiver applications, DPI staff developed a new measure that bases school scores on progress in improving student group achievement from the prior year to the current year; this measure replaces both the "Achievement Gap" and "Growth Gap" components in DPI's original waiver application.

An alternative using subgroup growth scores was evaluated but found to correlate highly (more than 80 percent) with growth sub-scale scores, conflicting with DPI's overall goal of a differentiated accountability system. The method presented here has a lower correlation with growth (30-35 percent), and the correlation that exists is concentrated among schools with higher growth scores—conceptually consistent with the definitions of both measures but still differentiated.

The methodology for calculating a school's closing achievement gaps score is:

- Closing achievement gaps scores are based on aggregate-level data for the subgroups

mentioned above, and are calculated separately for reading and mathematics and added. If a school also has a closing graduation gaps score calculated, each subject score is out of 25 points; otherwise each is out of 50 points. A school must have both reading and mathematics scores calculated to have a closing achievement gaps score calculated.

- For each of the five racial/ethnic groups, and each of the binary groups and supergroups and their complement groups (students not within the group), achievement point averages are calculated for the current and prior years. ~~with the methodology used to calculate the pooled weighted averages (the numbers multiplied by 50 to get subject scores) in the achievement sub-scale area.~~
- The trend in achievement over the past five years is calculated for each group as the slope of the line of best fit. ~~The change in achievement point average from the prior year to the current year is calculated for each group.~~
- Pairs of groups are compared to arrive at a raw closing achievement gaps score for each pair. These pairs are:
  - Racial/ethnic groups: Each of Asian, Black (not Hispanic), Hispanic, and American Indian students, compared to White (not Hispanic) students.
  - Binary groups: Each of students with disabilities, economically disadvantaged students, and English language learners, compared to its complement.
  - Supergroups (when applicable): Each supergroup compared to its complement at the state level.

  A raw score for a group is calculated as the difference in slope between the line of best fit of the target group and the line of best fit of the comparison group at the state level. If a school has a large difference in slope resulting from a decline in the state comparison group, a difference of slope of zero is assigned.[6] ~~A raw score for a group is the change in its achievement point average; if the comparison group's achievement point average declined, a value of ½ the decline is subtracted from the raw score as a penalty[7].~~

  ~~Example 1: $\Delta Avg_{Black} = 0.10$; $\Delta Avg_{White} = 0.05$~~

  ~~$Raw_score_{Black} = \Delta Avg_{Black} = 0.10$~~

  ~~Example 2: $\Delta Avg_{SwD} = 0.10$; $\Delta Avg_{Not_SwD} = -0.10$~~

  ~~$Score_{SwD} = \Delta Avg_{SwD} + (\Delta Avg_{Not_SwD} \times 0.5) = 0.10 + (-0.10 \times 0.5) = 0.05$~~
- A school's overall raw score ~~(RS_{Avg})~~ is the average of the raw scores for all the groups present in that school.
- ~~RS_{Avg}~~ The raw score is transformed into a closing achievement gaps index score (CAGS) out of the total number of possible points (~~Pts_{Poss};~~ 25 if a closing graduation gaps score is present or 50 if it is not):[8]

  ~~$CAGS = ((RS_{Adj} \times 3.18) + 0.65) \times Pts_{Poss}$~~
- The school's total closing achievement gaps score is the sum of its reading and mathematics subject scores.

Closing Graduation Gaps

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 over coming years. DPI's method for evaluating schools' progress in closing graduation gaps is similar to that for achievement gaps:

- Closing graduation gaps scores are based on aggregate-level data for the subgroups mentioned above. If a school also has a closing achievement gaps score calculated, the graduation score is

[6] The purpose of including comparison group decline as a penalty is a desire to close achievement gaps by improving performance among historically lower-achieving groups, not by reducing performance among higher-achieving groups.

~~[7] The purpose of including comparison group decline as a penalty is a desire to close achievement gaps by improving performance among historically lower-achieving groups, not by reducing performance among higher-achieving groups.~~

[8] See footnote 6.

out of 50 points; otherwise it is out of 100 points.

- For each of the five racial/ethnic groups, and each of the binary groups and supergroups and their complement groups (students not within the group), four- and six-year cohort graduation rates are calculated and averaged, in each of the current and prior years.[9]
- The change in average of the four- and six-year cohort graduation rates from the prior year to the current year is calculated for each group.
- Pairs of groups are compared to arrive at a raw closing graduation gaps score for each pair. These pairs are:
    - Racial/ethnic groups: Each of Asian, Black (not Hispanic), Hispanic, and American Indian students, compared to White (not Hispanic) students.
    - Binary groups: Each of students with disabilities, economically disadvantaged students, and English language learners, compared to its complement.
    - Supergroups (when applicable): Each supergroup compared to its complement.

  A raw score for a group is calculated as the difference in slope between the line of best fit of the target group and the line of best fit of the comparison group at the state level.~~A raw score for a group is the change in its graduation rate average; if the comparison group's graduation rate average declined, a value of ½ the decline is subtracted from the raw score as a penalty.~~
- A school's overall raw score ~~(RS_{Avg})~~ is the average of the raw scores for all the groups present in that school.
- ~~RS_{Avg}~~ The raw score is transformed into a closing graduation gaps index score (CGGS) out of the total number of possible points (~~Pts_{Poss};~~ 50 if a closing achievement gaps score is present or 100 if it is not):[10]

$$\cancel{CGGS = ((RS_{Adj} \times 0.79) + 0.65) \times Pts_{Poss}}$$

Sub-scale Area 4: On-Track to Graduation/Postsecondary Readiness

The On-Track to Graduation/Postsecondary Readiness (OT/P) sub-scale area consists of a number of measures designed to identify whether schools are meeting benchmarks in preparing students for postsecondary success. It includes graduation or attendance rate, 3rd grade reading and/or 8th grade mathematics achievement, and ACT participation and performance. All measures use data for the "all students" group.

Graduation or Attendance Rate

Wisconsin has high overall rates of high school graduation and school attendance, but also a number of high gaps—particularly Wisconsin's Black-White graduation gap—driven by a small number of schools concentrated in certain areas. The result is that the overall distributions of graduation and attendance rates are highly compressed, with narrow peaks in the 90-95 percent range and long tails encompassing lower rates. This can have a distorting effect on the overall index.

DPI's Technical Advisory Committee recommended that, because the distributions of graduation and attendance rates are virtually identical, and because attendance due to its high correlation with graduation is included, Wisconsin adopts an either-or method: if a school has a graduation rate, it forms the basis of this component of the On-Track Postsecondary (OT/P) sub-scale score; otherwise attendance is used. Further, DPI staff proposed and committee members supported fixing the weight of this component within the overall index. If the weight of a skewed measure like graduation or attendance is allowed to vary, depending on how many other sub-scale areas are present for a school, it creates a bias that increases the scores of schools with fewer areas.

Methodology:

- Graduation: A school's raw graduation score is the average of its four- and six-year cohort graduation rates.[11] (Because Wisconsin only began reporting cohort rates in 2009-10, for the first

[9] In the first year of this accountability system, DPI will only have two years of four-year cohort rates available and will use only those data. In the second year, two years of five-year rates will become available and be used in place of six-year rates for this Graduation Gaps calculation.
[10] See footnote 5.

year of this new accountability system DPI has only the four- and five-year rates available; the five-year will be used in place of the six-year rate.)

- Attendance: For a school that does not have a raw graduation score, its raw attendance score is simply the attendance rate, the number of days attended by students in a school divided by the total possible number of days.
- A school's graduation or attendance score is the raw rate multiplied by 80 points. The weight of this score is fixed at 20 percent of the overall accountability index (not the OT/P sub-scale area) as described in the "Creating the Overall Index" section below.

Other On-Track/Postsecondary Measures

The other measures within this sub-scale area—3rd grade reading achievement, 8th grade mathematics achievement, and ACT participation and performance—vary in terms of their individual presence within a particular school's index score. Wisconsin has a number of schools that do not fit within traditional elementary/middle/high grade span definitions; for example, a grades K-8 school could have both 3rd grade reading and 8th grade mathematics scores. At this time, these three measures together are worth a possible 20 points and weighted at a fixed 5 percent of the overall index (not the OT/P sub-scale area). The number of possible points for each measure depends on which are present:

3rd Grade Reading	Alone	20 points
	With 8th grade mathematics	10 points
	With both 8th grade mathematics and ACT participation & performance	5 points
8th Grade Mathematics	Alone	20 points
	With 3rd grade reading	10 points
	With ACT participation & performance	10 points
	With both 3rd grade reading and ACT participation & performance	5 points
ACT Participation and Performance	Alone	20 points
	With 3rd grade reading and/or 8th grade mathematics	10 points

As this accountability system evolves, DPI anticipates identifying and adding additional measures to this sub-scale area of the index. That process will include evaluating the impact on point values for other measures, within an overall goal of maintaining the fixed 20 percent weight of graduation/attendance.

3rd Grade Reading/8th Grade Mathematics

In adhering to DPI's overall goals of improving high school graduation and college readiness for all Wisconsin students, DPI has included third grade reading and eighth grade mathematics achievement as a specific area of focus in Wisconsin's index. Empirical evidence has consistently shown reading performance in third grade to be a significant predictor of future success (See Appendix 10). Students who have a solid reading foundation in third grade are better able to build their skills around this foundation throughout their academic career. Reading ability in the third grade has been empirically linked to high school performance, high school graduation, and college enrollment; students who read at or above grade level in third grade tend to have better outcomes in all of these areas. Like its third grade reading counterpart, eighth grade mathematics is being leveraged as a high-impact measure because of its importance in predicting success in secondary mathematics. Eighth grade mathematics performance is also an important measure in current early-warning research.

Methodology

[11] Both the four- and six-year rates are included because of DPI's overarching *Every Child a Graduate* mission. It is important for all students who are able to graduate within four years to do so, but Wisconsin recognizes that some students need more than four years. One of the clearest messages from DPI's School Accountability Design Team and waiver public comment processes was support for including the six-year rate from advocates for students with disabilities.

- 3rd grade reading/8th grade mathematics scores are based on aggregate-level data using a reduced cell size of 20 students over the two most recent tested years.
- For the "all students" group, an achievement point average in the tested grade and subject is calculated with the methodology used to calculate the pooled weighted averages (the numbers multiplied by 50 to get subject scores) in the achievement sub-scale area.
- A school's 3rd grade reading/8th grade mathematics score is the achievement point average multiplied by the number of points possible.

ACT Participation and Performance

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

Methodology

- The ACT participation rate is calculated by first identifying twelfth grade students with a composite ACT score. The number of students with a score is divided by the total number of twelfth grade students in the school to arrive at the ACT participation score. Schools must meet the minimum cell size of 20 for twelfth grade students.
- Four ACT college-readiness performance rates are calculated by identifying the number of students classified as meeting the College Readiness Benchmark established by ACT for each test area (English, reading, mathematics, and science) and dividing by the total number of tested students.
- The ACT participation rate and the four ACT college-readiness performance rates are averaged to arrive at the overall ACT participation and performance score. A school must have a participation rate calculated to have the overall score calculated.

Future Postsecondary Indicators

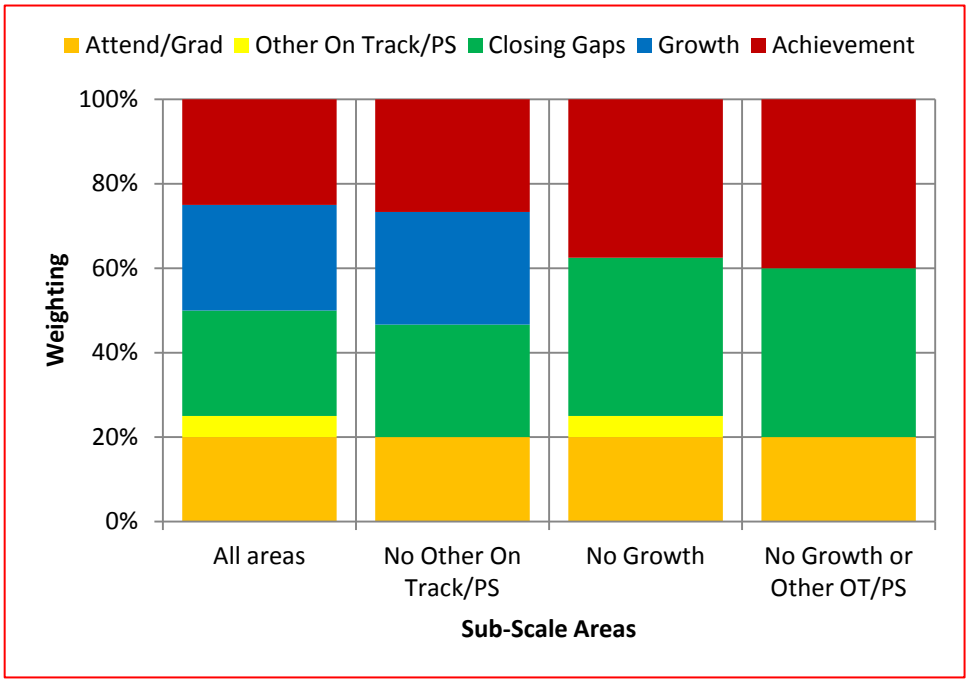
The School and District Accountability Design Team supported the idea of evolving accountability systems that incorporate additional meaningful measures when the data are available in a reliable, high-quality manner. DPI intends to include other postsecondary data, including (but not necessarily limited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

Creating the Overall Index

DPI's original waiver application described the overall index score in general terms as being based on an average of all the sub-scale scores calculated for a school. After its submission, DPI staff addressed the issue of inequities between schools created by the presence or lack of sub-scale scores with different distributions. One way to address this problem is to transform raw data into scores with similar distributions, as DPI has done with the Student Growth and Closing Gaps sub-scale areas. This process is analogous to creating a scale score for a student assessment like the WKCE: scale scores are reported rather than reporting percentages answered correctly, in part because the assessment contains different types of questions whose scores have different meanings.

Graduation and attendance scores cannot, however, be transformed in the same way; those rates have simple, direct meanings and a transformation would introduce variation that does not exist in the data. After consultation with Wisconsin's Technical Advisory Committee, DPI solved this problem by fixing the weight of the graduation/attendance component of the On-Track to Graduation/Postsecondary Readiness sub-scale area at 20 percent of the overall index. The other components of this area, when present, are fixed at 5 percent, based on an "ideal" scenario of having four sub-scale areas each worth 25 percent. Because the other three sub-scale areas—Student Achievement, Student Growth, and Closing Gaps—have similar distributions, DPI can weight the scores calculated for a school equally within the remaining space in the index without creating inequities.

By developing an overall weighting scheme that aligns Student Growth and Closing Gaps with Student Achievement, and fixes components of On-Track to Graduation/Postsecondary Readiness to specific weights of the index, DPI has developed a system that holds accountable as many schools as possible without unfairly disadvantaging schools that cannot be measured with every component of the index. This overall weighting scheme is illustrated by the figure on the next page.



(Note: This figure is schematic and for illustrative purposes; it does not display every possible weighting scenario possible for Wisconsin schools.)

The process for combining sub-scale scores into an overall index score is:

- An average is calculated from the Student Achievement, Student Growth, and Closing Gaps scores calculated for a school and multiplied by 3, giving a value out of 300 points.
- If a school has scores for both graduation/attendance (out of 80 points) and the other components of On-Track to Graduation/Postsecondary Readiness (out of 20 points), those are added to the average from the other areas and the sum is divided by 4, giving an overall score out of 100 points.
- If a school only has a score for graduation/attendance (out of 80 points), with none for the other components of On-Track to Graduation/Postsecondary Readiness, it is added to the average from the other areas and the sum is divided by 3.8 (380 ÷ 100 = 3.8), giving an overall score out of 100-points.

Table 2.4. Overview of Wisconsin Accountability Index by School Level

School Level	Relevant Sub-scale Area(s)	Measures Used	Subgroups
Elementary (K-5)	Student Achievement	Reading Achievement Mathematics Achievement	All Students
	Student Growth	Reading Growth Mathematics Growth	All Students
	Closing Gaps	Closing Reading Gaps Closing Mathematics Gaps	ESEA Subgroups *High-Need Supergroup when applicable*
	On-Track to Graduation/	Attendance	All Students

	Postsecondary Readiness	3rd Grade Reading *Possible Future Indicators:* *Science Achievement* *Social Studies Achievement*	
School Level	**Relevant Sub-scale Area(s)**	**Measures Used**	**Subgroups**
Middle (6-8)	Student Achievement	Reading Achievement Mathematics Achievement	All Students
	Student Growth	Reading Growth Mathematics Growth	All Students
	Closing Gaps	Closing Reading Gaps Closing Mathematics Gaps	ESEA Subgroups *High-Need Supergroup when applicable*
	On-Track to Graduation/ Postsecondary Readiness	Attendance 8th Grade Mathematics *Possible Future Indicators:* *Science Achievement* *Social Studies Achievement*	All Students
High (9-12)	Student Achievement	Reading Achievement Mathematics Achievement	All Students
	Student Growth	*Reading Growth* *Mathematics Growth*	*All Students*
	Closing Gaps	Closing Reading Gaps Closing Mathematics Gaps Closing Graduation Gaps *Possible Future Indicators:* *Postsecondary Enrollment gap* *Industry Certification gap*	ESEA Subgroups *High-Need Supergroup when applicable*
	On-Track to Graduation/ Postsecondary Readiness	Graduation ACT Participation and Performance *Possible Future Indicators:* *Postsecondary Enrollment* *Industry Certification* *Rates of college credit earned in high school*	All Students
Note: Items shown in *gray italics* are not currently included in accountability calculations, but may be in future versions of the accountability index given advances in data collection systems. Not all Wisconsin schools fall within these generic grade band descriptions; those schools' scores will be based on measures appropriate to their particular grade bands.			

Annual Measurable Objectives

Existing outside the accountability index but reported alongside it, schools will have ambitious but achievable annual measurable objectives (AMOs) in reading and mathematics proficiency and in graduation rate. In addition, AMOs will be used as part of the exit criteria for Title I Focus and Priority Schools.

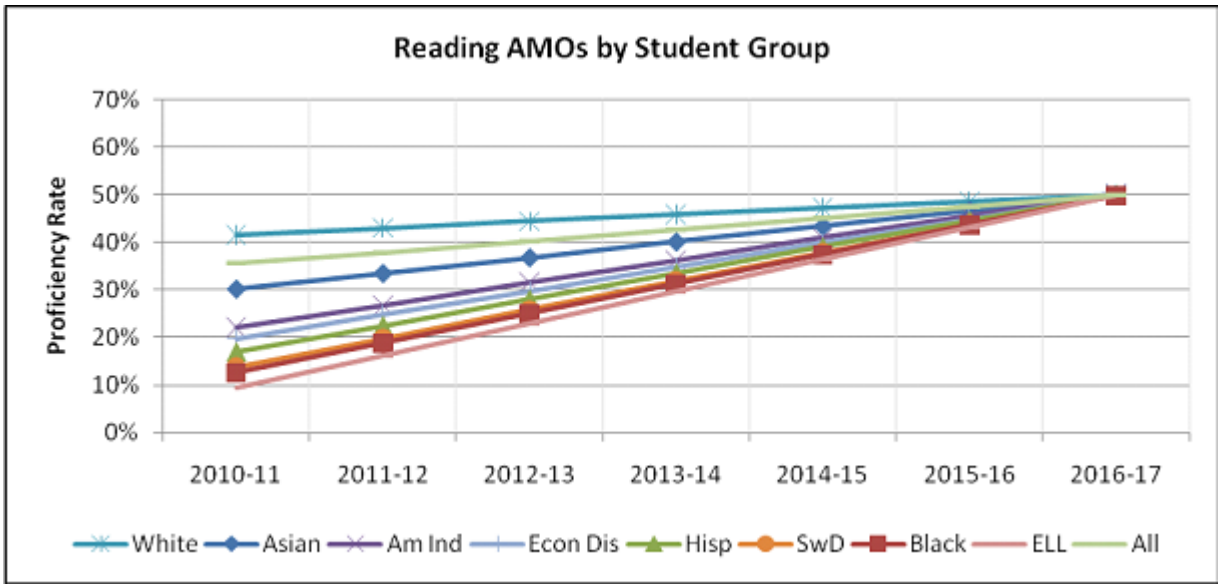
Reading and Mathematics

The Wisconsin Department of Public Instruction (DPI) has carefully weighed multiple options for Annual Measurable Objectives (AMOs) in reading and mathematics for all students and each subgroup.

Wisconsin's approach to selecting AMOs was based on the following premise: in order for AMOs to be ambitious as well as achievable, targets must be set based on a combination of known data (i.e., what are the best schools able to accomplish?) and ambitious timelines that press a sense of urgency. Wisconsin's re-setting of proficiency based directly on the NAEP proficiency level sets an ambitious goal, and one that involves the need for rapid progress by groups that are traditionally under-achieving.

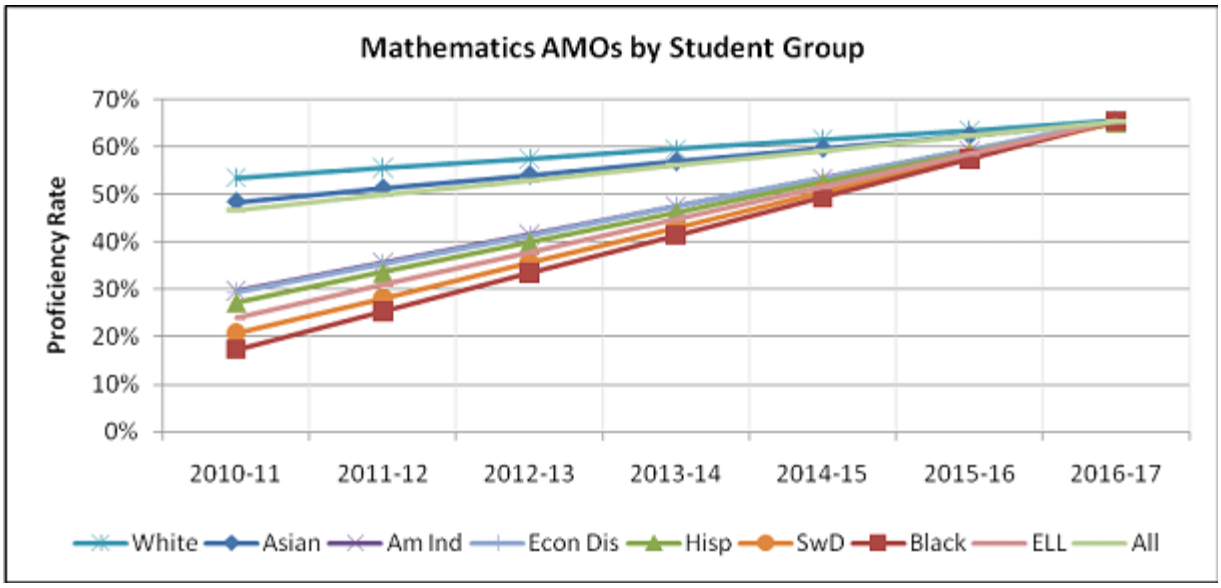
As a result, DPI proposes to set AMOs that reflect the approach taken by New Mexico: to set targets based on the performance of the best combined with a timeline that incentivizes rapid acceleration to those goals. Specifically, DPI proposes that its AMOs be set to move all schools in the state to the level of Wisconsin's schools performing at the 90th percentile in the state within six years.

Wisconsin's AMOs would expect, at a minimum, a 1% increase in proficiency rates annually. This assures that the top-performing subgroups must continue to make progress. The six-year targets of 50.9% proficiency in reading and 66.9% proficiency in mathematics reflect dramatic increases in performance for most subgroups. For reading, achievement gaps would close in six years. For mathematics, achievement gaps would nearly close in six years. This represents steeper progress for subgroups than has previously been achieved by most schools in the state. Preliminary graphs showing these trajectories and specific AMOs are below.



Wisconsin Annual Measurable Objectives - Reading Proficiency								
Student Group	**Annual Increase**	**AMOs**						
		2010-11	***2011-12***	***2012-13***	***2013-14***	***2014-15***	***2015-16***	***2016-17***
All Students	**2.4%**	**35.5%**	**37.9%**	**40.3%**	**42.7%**	**45.1%**	**47.5%**	**49.9%**
American Indian	**4.7%**	**22.1%**	**26.8%**	**31.5%**	**36.2%**	**40.9%**	**45.6%**	**50.3%**
Asian or Pacific Islander	**3.3%**	**30.2%**	**33.5%**	**36.8%**	**40.1%**	**43.4%**	**46.7%**	**50.0%**
Black not Hispanic	**6.2%**	**12.6%**	**18.8%**	**25.0%**	**31.2%**	**37.4%**	**43.6%**	**49.8%**
Hispanic	**5.5%**	**17.0%**	**22.5%**	**28.0%**	**33.5%**	**39.0%**	**44.5%**	**50.0%**
White not Hispanic	**1.4%**	**41.6%**	**43.0%**	**44.4%**	**45.8%**	**47.2%**	**48.6%**	**50.0%**
Students with Disabilities	**6.0%**	**13.8%**	**19.8%**	**25.8%**	**31.8%**	**37.8%**	**43.8%**	**49.8%**
Economically Disadvantaged	**5.0%**	**19.8%**	**24.8%**	**29.8%**	**34.8%**	**39.8%**	**44.8%**	**49.8%**

English Language Learners	**6.7%**	**9.6%**	**16.3%**	**23.0%**	**29.7%**	**36.4%**	**43.1%**	**49.8%**



Wisconsin Annual Measurable Objectives - Mathematics Proficiency								
Student Group	**Annual Increase**	**AMOs**						
		2010-11	***2011-12***	***2012-13***	***2013-14***	***2014-15***	***2015-16***	***2016-17***
All Students	**3.1%**	**46.7%**	**49.8%**	**52.9%**	**56.0%**	**59.1%**	**62.2%**	**65.3%**
American Indian	**5.9%**	**29.7%**	**35.6%**	**41.5%**	**47.4%**	**53.3%**	**59.2%**	**65.1%**
Asian or Pacific Islander	**2.8%**	**48.4%**	**51.2%**	**54.0%**	**56.8%**	**59.6%**	**62.4%**	**65.2%**
Black not Hispanic	**8.0%**	**17.4%**	**25.4%**	**33.4%**	**41.4%**	**49.4%**	**57.4%**	**65.4%**
Hispanic	**6.3%**	**27.3%**	**33.6%**	**39.9%**	**46.2%**	**52.5%**	**58.8%**	**65.1%**
White not Hispanic	**2.0%**	**53.5%**	**55.5%**	**57.5%**	**59.5%**	**61.5%**	**63.5%**	**65.5%**
Students with Disabilities	**7.4%**	**20.8%**	**28.2%**	**35.6%**	**43.0%**	**50.4%**	**57.8%**	**65.2%**
Economically Disadvantaged	**6.0%**	**29.4%**	**35.4%**	**41.4%**	**47.4%**	**53.4%**	**59.4%**	**65.4%**
English Language Learners	**6.9%**	**24.0%**	**30.9%**	**37.8%**	**44.7%**	**51.6%**	**58.5%**	**65.4%**

For a school, a group's performance compared to its AMO is measured by the higher of (1) the

proficiency rate in the current year; or (2) the average proficiency rate in the current year and the prior year. A cell size of 20 and a 95 percent confidence interval will be applied to determination of whether or not an AMO was missed.

Graduation

Wisconsin will continue to use the graduation AMOs included in its amended accountability plan of December 9, 2011, and approved by the U.S. Department of Education. DPI will use an extended-year adjusted-cohort (six-year) graduation rate in conjunction with the required four-year rate to establish and make AMO determinations beginning with those based on 2011-12 assessment results (using 2011 graduation data). DPI will report both the four- and six-year adjusted cohort rates. (In the first year of this accountability system DPI will not have a six-year rate available; a five-year rate will be used in its place for this year only.)

As part of its process for including the six-year rate in AMO determinations, Wisconsin will use its current graduation rate goal of 85 percent. Separate graduation rate targets will be used for the four- and six-year rates. The approved graduation targets for AMO determinations beginning with those based on 2011-12 assessment results are:

Graduation Rate	Four-Year Rate Improvement Target	Six-Year Rate Improvement Target
60% to 85%	2 percentage points	5 percentage points
Less than 60%	5 percentage points	5 percentage points

A school will meet the graduation rate AMO for graduation:

- If the graduation rate for the most recent year, or for the most recent two years combined, meets the 85 percent goal; or
- If the improvement in graduation rate meets the applicable target.

Wisconsin will first evaluate whether a school met the goal or target for the four-year rate. If it does not, the school will be evaluated using the six-year rate.

For a school, a group's performance compared to its AMO is measured by the higher of the four- or six-year cohort graduation rates for that group. (As with other graduation components of this system, for the first year a five-year cohort rate will be used in place of the six-year rate.) A cell size of 20 and a 95 percent confidence interval will be applied to determination of whether or not an AMO was missed.

Next Steps

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

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

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

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

This index system is a work in progress. DPI has continued fine-tuning the index since submission of its initial waiver request in February the operational details of the accountability system with Wisconsin's Technical Advisory Committee, incorporating their feedback and recommendations. A standards review was completed, which provided valuable insights that drove further refinement of the index. Continual input from the field was gathered, including consultation with regional service agency staff, superintendents, and others. Refinements will continue leading up to a full public launch and implementation of the accountability system this fall:

- DPI will complete its standard setting process to create final accountability category definitions.
- DPI will field-test report cards with schools over the summer for technical and editorial review.
- DPI will resolve how "special case" schools lacking key measures can be included in the accountability system. For example, K-2 schools do not have assessment data and are thus missing three-fourths of the index.
- DPI will implement a communications plan to explain the new accountability system to educators, parents, the media, and the general public.
- DPI will establish an ongoing framework to review and incorporate other measures into the index. For example, Advanced Postsecondary Infrastructure project, involves Wisconsin's public and private postsecondary institutions, will allow Wisconsin to gather data such as postsecondary measures of enrollment, remedial coursework, and credit accumulation.
- DPI will collect input and feedback on school report cards during the public release period, further informing possible improvements to the design of the system or reports for the following year.

Summary

By identifying four key sub-scale areas, and high-leverage measures within those sub-scale areas, DPI is creating an index-based accountability system that places schools on a continuum to inform differentiated interventions and supports. Ambitious but achievable annual measurable objectives will complement the accountability index and further inform improvement for all student populations. Data will be presented to educators, parents, and the general public on a report card designed to identify particular strengths and weaknesses, rather than naming and shaming schools for missing only one of 64 indicators. A school's determination will be the beginning, not the end, of an ongoing improvement process.

Wisconsin is making dramatic changes in how it thinks about accountability across the state. While work remains, this waiver request represents a significant commitment from DPI as well as a public statement that building and implementing a meaningful, transparent, statewide accountability system, while complicated and time-consuming, must continue to move quickly and must reflect the priorities of Wisconsin to move toward college and career readiness for every Wisconsin student. As mentioned above, work on the accountability index continues. A timeline for this continued work is provided in Appendix 11

2.C REWARD SCHOOLS

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

Reward School Identification Process

A. High-Achieving Rewards schools were identified using the following process:
   1. A list of 1,052 Title I schools with reading and mathematics achievement data was generated and rank-ordered. Up to three years of data were used to calculate aggregate performance.
   2. Any Title I school that did not meet their achievement and graduation AMOs for the "All Students" group and all subgroups, and/or missed their participation requirement was eliminated from the list.
   3. Any Title I school with "significant achievement gaps that are not closing" was eliminated from the list. This was defined as at least one gap of 3 percent or greater between an ESEA subgroup and its comparison group in reading, mathematics, or graduation, where the gap was larger in the current year than the previous year.
   4. Any Title I school that did not fall into the top Accountability Index category of *Significantly Exceeds Expectations* was eliminated from the list.
   5. Any Title I school that had their "All Students" group or any subgroup performing below the state average for that group was removed.
   6. All Focus and Priority schools were removed for the list.

A total of ten schools were identified using this methodology. Rather than use a numerical or percentage cut point to separate the highest-performing schools from all other schools, we used the criteria that a school must fall within the top Accountability Index category of *Significantly Exceeds Expectations*. Using this as a criterion is stricter than applying a cut point of the top 15%. DPI believes that, because multiple data points are factored in, that the highest index category is a more rigorous and holistic representation of high performance.

In order to determine the High-Achieving list, the steps described in the documentation "Demonstrating that an SEA's List of Reward, Priority, and Focus Schools meet ESEA Flexibility Definitions" section: Alignment with the Definition of Reward Schools" were followed, with results shown below.

To compare the outcome of using the top category Accountability Index as a cut point rather than a top percentage cut point, we followed the steps below:

1. A list of 1,052 Title I schools with reading and mathematics achievement data was generated and rank-ordered. Up to three years of data were used to calculate aggregate performance.
2. Any Title I school that did not meet their achievement and graduation AMOs for the "All Students" group and all subgroups, and/or missed their participation requirement was eliminated from the list.
3. Any Title I school with "significant achievement gaps that are not closing" was eliminated from the list. This was defined as at least one gap of 3 percent or greater between an ESEA subgroup and its comparison group in reading, mathematics, or graduation, where the gap was larger in the current year than the previous year.
4. All Focus and Priority schools were removed from the list.
5. The top 15% cut point was identified for the list of remaining schools. A total of 152 schools were remaining and the top 15% cut point was .82. A total of 24 schools met this cut point and are listed in the table below. Also included in this table is the Accountability Index Category for each school. All of the 10 schools identified as High Performing using the top category of the Accountability Index as a criterion, are also included in the list identified by using the top 15%.

DISTRICT	SCHOOL	Aggregate Read/Math	Accountability Index Category
redacted	redacted	0.96	Exceeds Expectations
redacted	redacted	0.96	Significantly Exceeds Expectations
redacted	redacted	0.93	Significantly Exceeds Expectations
redacted	redacted	0.92	Exceeds Expectations
redacted	redacted	0.90	Significantly Exceeds Expectations
redacted	redacted	0.89	Significantly Exceeds Expectations
redacted	redacted	0.89	Exceeds Expectations
redacted	redacted	0.89	Exceeds Expectations
redacted	redacted	0.88	Significantly Exceeds Expectations
redacted	redacted	0.88	Significantly Exceeds Expectations
redacted	redacted	0.88	Significantly Exceeds Expectations
redacted	redacted	0.87	Exceeds Expectations
redacted	redacted	0.86	Exceeds Expectations
redacted	redacted	0.85	Exceeds Expectations
redacted	redacted	0.85	Exceeds Expectations
redacted	redacted	0.85	Significantly Exceeds Expectations
redacted	redacted	0.84	Exceeds Expectations
redacted	redacted	0.84	Significantly Exceeds Expectations
redacted	redacted	0.84	Exceeds Expectations
redacted	redacted	0.83	Exceeds Expectations
redacted	redacted	0.83	Exceeds Expectations
redacted	redacted	0.82	Exceeds Expectations
redacted	redacted	0.82	Exceeds Expectations
redacted	redacted	0.82	Significantly Exceeds Expectations

B. High-Progress Rewards schools were identified using the following process:
   1. The initial pool for this award consisted of 10% of Title I schools with
      a. the highest Accountability Index Student Growth sub-scale area scores (which describe improvement among all students in reading and mathematics achievement); and/or
      b. the highest improvement in four-year cohort graduation rates. The thresholds for these values are a Student Growth score of 78.8 or greater, or an increase in the four-year cohort graduation rate of 9.9 percent or greater.
   2. Any school identified as a Title I Priority or Focus School were removed.
   3. Any school with "significant achievement gaps that are not closing" were removed. This was defined as at least one gap of 3 percent or greater between an ESEA subgroup and its comparison group in reading, mathematics, or graduation, where the gap was larger in the current year than the previous year.
   4. Finally, any school already identified as a High-Achieving Rewards school was excluded.

A total of 44 schools were identified using this methodology.

Please note that Wisconsin also has a Title I reward program called Schools of Recognition. This award has been in place for many years, and recognizes Title I schools that are "beating the odds"—

that is, those schools that are performing in the top for schools with similar free/reduced lunch levels. This award will continue, creating a third category of Title I reward schools. As this award is not part of the ESEA Flexibility application, that list has not been included in DPI's application.

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

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

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

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

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

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

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

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

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

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

Spotlight Schools must host at least three visits to their school from school teams across the state in order to demonstrate and disseminate successful practices. Visiting teams observe classrooms,

participate in discussions with administration and staff, and reflect upon the experience. Grantees must also develop a plan to communicate their spotlighted practices to schools unable to participate in visits within their region and across the state.

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

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

Basic eligibility requirements include the following:

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

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

Enhancements to Wisconsin's Existing Recognition and Rewards Program

This application provides DPI an opportunity to enhance its existing recognition and rewards program to include more rigorous identification criteria using the new accountability index system (as described in Section 2.B). DPI plans to introduce two new categories:

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

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

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

additional state resources, including staffing and funding.

Rationale for School Rewards and Recognition

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

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

These stakeholders have directly informed the inclusion of future recognition initiatives through the Accountability Design Team process, as well. Accountability Design Team members, (Appendix 2A), supported the recognition of high-performing schools identified using indices under the New Statewide Accountability System that will be implemented in 2012-13. (See Section 2.B for more information regarding these processes)

Table 2.2 illustrates the timeline for implementation of Wisconsin's rewards programs.

2.D PRIORITY SCHOOLS

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

Priority schools, as the lowest performing schools in the state, are identified using the Student Achievement sub-scale area of the accountability index. Title I schools are be rank-ordered by Student Achievement sub-scale score. The cut point includes the bottom 5 percent of Title I schools (59 schools). As per SIG methodology, no alternative schools are included in Priority calculations.

DPI does not include "high schools with less than 60% graduation rates" on the Priority list. Wisconsin does not have any high schools (other than dropout recovery high schools) that meet this criterion.

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.

Plans for Reform in Priority Schools

Wisconsin will use this flexibility request to entirely reprioritize its efforts working in persistently low-

achieving schools at the state, district, and school level. DPI recognizes that challenges must be identified as early as possible in order to align districts and schools to appropriate resources and interventions to ensure that these systems of support affect change. Informed by evidence from the implementation of previous statewide reforms, as well as the monitoring processes applicable to those grants, DPI understands that simply directing interventions at the school level will not necessarily succeed in improving student outcomes if policies and practices at the district level create barriers to the required reforms. As such, the state superintendent will utilize his or her authority, as defined by Act 215, as necessary to enact intensive reforms at the district level in order to ensure reforms are implemented in the most efficient and effective manner, while developing the local capacity to sustain reforms after four years of implementation. Specifically, beginning in 2012-13, DPI will emphasize improvement efforts in Milwaukee Public Schools (MPS) within central office at the district-level, with effects permeating throughout the numerous Priority Schools (53 schools) identified within the district (described in further detail below).

Timeline for Implementation:
Beginning in 2012-13, the Department of Public Instruction (DPI) will begin implementation of the proposed system of supports and, as such, will waive Supplemental Education Services (SES) and no longer require identified Title I schools and districts to set aside 10 percent of funds allocated at the school and district level for the purpose of professional development. DPI will continue to require district-level corrective action requirements (CAR) and restructuring as required under the current Elementary and Secondary Education Act (ESEA), if applicable.

Milwaukee Public Schools (MPS)
Due to the overrepresentation of Milwaukee Public Schools identified as Priority Schools, DPI determined that emphasizing reforms at the district level would address state and district capacity to serve the large proportion of schools, as well as identify and resolve existing systemic challenges at the district level which appear to create challenges for schools attempting to implement reforms. Specifically, the DPI determined that when 31 percent of schools within a district have been identified as Priority Schools, representing 92 percent of all Priority Schools across the state, the district has demonstrated it does not have the capacity to support reforms in its schools. As such, DPI will target reforms at the district level, while requiring Priority Schools to continue to implement the turnaround principles, as required within CAR. DPI believes that changing structures at the district level will more likely result in long-term reform than changing structures within a school which still operates within a persistently low-achieving district exhibiting systemic limitations. This flexibility request provides DPI the opportunity to introduce reforms informed by prior experiences and differentiated based on identified needs, resulting in unprecedented change in local districts and schools.

District Diagnostic Review and Turnaround Partners
DPI will contract with an external district diagnostic review expert with proven expertise in reform at the district level (e.g., conducting diagnostic reviews, identifying existing strengths and weaknesses which affect student and school outcomes, and developing reform plans informed by reviews, as well as the turnaround principles), as measured by rigorous evaluation criteria for applicants. Once selected by DPI, the district diagnostic review expert will complete a review of MPS central administration's critical systems and structures, including human resources, curriculum and instruction, finance, and leadership. The district diagnostic review expert will present its findings and recommendations to the state superintendent and DPI. Informed by these recommendations, the state superintendent will require specific, directive reforms at the local education agency (LEA) level, while also requiring schools to continue implementing existing reforms, including DPI Corrective Action Requirements (CAR). Upon identification of the state superintendent's requirements, the district diagnostic review expert will act as a liaison between DPI and the district, developing a reform plan which aligns to the state's directives, as well as the turnaround principles, supporting high quality implementation of the plan in the district and its schools, and providing objective information to DPI regarding implementation status and progress towards outcomes. DPI believes that this directed effort at the district level will result in significant improvements in Priority Schools across the district.

Reform Plans
Although new, specific requirements within the MPS central office reform plan will be developed in

response to the district diagnostic review, DPI will require the district to maintain existing requirements which have proven to positively impact school and student outcomes, including Corrective Action Requirements (CAR) and Committee on District and School Improvement (CODSI).
Corrective Action: As previously noted, the DPI will maintain and enhance the current Corrective Action Requirements (CAR) implemented in all Milwaukee Public Schools (MPS) due to the evidence that these structures and interventions have positively impacted individual school performance and student achievement across the district, while building the LEA's capacity to sustain these reforms with quality across years. The CAR emphasizes three key goals directly aligned to the turnaround principles to ensure that all MPS students succeed academically. These goals include:

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

To meet these goals, DPI requires the following:

Highly qualified teachers and leaders (Turnaround Principles 1 and 2). In addition to existing requirements stated within the CAR which specify that MPS must staff all its schools with highly qualified teachers and leaders, DPI has also developed requirements which prioritize staffing in the district's lowest performing schools (i.e., SIG schools). Specifically, DPI will leverage SIG funds to require the district to prioritize staffing of highly qualified, as well as highly skilled, teachers and leaders in its SIG schools, and have the schools fully staffed by a clearly defined date in fall 2012.

Teachers. The district diagnostic review will include expertise and recommendations in recruiting, inducting, training, and retaining highly qualified, as well as highly skilled staff. Additionally, the district expert must demonstrate expertise and recommendations in identifying educator needs, implementing aligned professional development in an appropriate learning environment, as well as providing consistent and ongoing support to ensure implementation of new strategies or practices.

Leaders. Prior to contracting with DPI, the district diagnostic review expert must demonstrate expertise in identifying, recruiting, training, and retaining highly skilled leaders and administrators to ensure effective and sustainable implementation of newly developed reforms. A primary outcome of the district diagnostic review will be staffing turnaround schools with effective leaders willing and able to create change, providing these leaders adequate professional development aligned to needs, and creating the flexibility at the district level necessary for the school to succeed. MPS currently uses an internally developed principal evaluation system and replaces ineffective principals based on the results. MPS has provided rationale to DPI for all principals replaced or retained under the current system. MPS has adopted the state approved principal evaluation system beginning in the 2014-15 school year. This evaluation system will be used to determine which principals have the requisite skills to lead turnaround efforts, and which principals are being replaced with more effective leaders. Based on these evaluations MPS will submit to DPI justification regarding the leadership staffing of Priority schools, including which principals are being retained and which are being replaced. DPI will review this justification to ensure compliance with the turnaround principles. DPI will also review the MPS principal evaluation system to ensure it is being implemented with fidelity.

Improving Student Performance.
CAR required the development and implementation of one district-wide comprehensive literacy and math plan in all district schools—which replaced the existing seventeen plans—to ensure that students transferring to other schools in the highly mobile district received consistent and effective instruction in core content areas.

Response to Intervention (Turnaround Principles 4 and 5). Identified as a strategy to effectively implement differentiated and customized instruction in order to improve individual and student subgroup outcomes, DPI mandated MPS to fully implement RtI in all of its schools by 2014, and this must be evident in SIG applications, as well as turnaround reform plans.

Positive and Safe Learning Environments (Turnaround Principle 6)**.** MPS school reform plans must include methods to provide a safe and disciplined learning environment. The district 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.

MPS must also ensure Priority Schools implement Positive Behavioral Intervention and Supports (PBIS) for students across multiple domains (e.g., social, emotional, behavioral) in order to increase positive academic outcomes.

Committee on District and School Improvement: To support MPS and the implementation of CAR within its schools, the state superintendent established the DPI Committee on District and School Improvement (CoDSI), which sets annual CAR implementation benchmarks, reviews impact data, and directs agency resources to support improved core instruction in reading and mathematics, universal screening, data analysis, interventions, and progress monitoring. CoDSI is staffed by experts within the agency, including Directors representing Title I, Teacher Education and Licensing, Content and Learning, Special Education, and Charter Schools. DPI will maintain CoDSI to continue its current work with MPS, while also enhancing its existing structure to monitor and support the work implemented at the district level by the turnaround partners.

This structure creates capacity and sustainability beyond the four year cohort. CoDSI members, the district liaison, and the state-approved district expert will guide and support implementation of the reforms locally at the district and school level under the direction and guidance of the state superintendent.

Table 2.6 (below) outlines the current implementation plan for CAR/Turnaround Principles in MPS Priority Schools.

Table 2.6. Implementation of Turnaround Principles in all 53 Milwaukee Priority Schools, By Year and Grade Span

		2012-13		2013-14		2014-15		2015-16	
		K-8 n=29	9-12 n=25	K-8 n=29	9-12 n=25	K-8 n=29	9-12 n=25	K-8 n=29	9-12 n=25
Principle 1[a] Skilled leaders	Implementation Level	Full	Full	Full	Full	Full	Full	Full	Full
	Percentage of MPS Priority Schools within each grade span	100%	100%	100%	100%	100%	100%	100%	100%
Principle 2[b] Skilled educators	Implementation Level	Full	Full	Full	Full	Full	Full	Full	Full
	Percentage of MPS Priority Schools within each grade span	100%	100%	100%	100%	100%	100%	100%	100%
Principle 3[c] Extended learning time	Implementation Level	--	Full	Full	Full	Full	Full	Full	Full
	Percentage of MPS Priority Schools within each grade span	--	48%	48%	76%	76%	100%	100%	100%
Principles 4 and 5[d] RtI	Implementation Level	Full	Partial	Full	Full	Full	Full	Full	Full
	Percentage of MPS Priority Schools within each grade span	100%	100%	100%	100%	100%	100%	100%	100%
Principle 6[e] PBIS	Implementation Level	Partial	Partial	Full	Full	Full	Full	Full	Full
	Percentage of MPS Priority Schools within each grade span	100%	100%	100%	100%	100%	100%	100%	100%
Principle 7[f] Family engagement	Implementation Level	Full	Full	Full	Full	Full	Full	Full	Full
	Percentage of MPS Priority Schools within each grade span	100%	100%	100%	100%	100%	100%	100%	100%

Level of Implementation Required of 25 Milwaukee Priority Schools Serving Grades 9-12, by Year

	2012-13	2013-14	2014-15	2015-16

Principle 1[a] Skilled leaders	Full	Full	Full	Full
Principle 2[b] Skilled educators	Full	Full	Full	Full
Principle 3[c] Extended learning time			Full	Full
Principles 4 and 5[d] RtI	Partial	Full	Full	Full
Principle 6[e] PBIS	Partial	Full	Full	Full
Principle 7[f] Family engagement	Full	Full	Full	Full

All Other Priority Schools

DPI will provide targeted support to newly identified Title I Priority Schools outside of MPS (6 schools) to improve student outcomes. The same support and requirements will also apply to all schools identified as *Persistently Failing to Meet Expectations*, pending availability of additional state resources.

School Requirements

School Improvement Turnaround Partner and Diagnostic Reviews

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

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

*Reform Plan*s. Priority Schools must submit a reform plan, informed by recommendations from the diagnostic review and aligned to the turnaround principles. The plans must be submitted to and approved by DPI.

Components of the Plan. All LEAs with Priority Schools must commit to a single reform plan within each Priority School which aligns to the turnaround principles and will incorporate and expand upon any other existing state or local requirements and improvement plans (such as a Title I schoolwide plan, LEA required school improvement plan, or persistently dangerous school plan).

- **Highly Skilled Leaders** (Turnaround Principle 1) If a district wishes to retain the current principal in a Priority School, the district must produce data which demonstrates the principal has improved student learning in the school across multiple years. Regardless of whether the district replaces or retains the principal, the district must provide continuous support for its leaders, increase principals' capacity to implement reform plans and lead change with his/her staff by creating opportunities for ongoing learning through job-embedded professional development. Additionally,

the district must communicate its plan to implement a leadership evaluation as part of its newly developed educator evaluation system. Principals must be given operational flexibility over budgets, staffing, schedules, and curriculum.

- **Highly Skilled Educators** (Turnaround Principle 2) Priority School reform plans must describe how the district's systems and structures will ensure all teachers are not only highly qualified for their assignment, but also demonstrate effectiveness. Specifically, the plan must demonstrate that the district will implement an Educator Evaluation system by 2014-15 that aligns to the existing statewide framework (refer to Principle 3). Additionally, the district must create opportunities for continuous learning through job-embedded professional development designed to increase all teachers' capacity to implement their school's reform plan. Administrators must describe the systems and structures in place which will support alignment of findings from the newly implemented Educator Evaluation system to specific, differentiated professional development and training opportunities.
- **Extended Learning Time** (Turnaround Principle 3) Due to the extensive research suggesting that schools providing high quality, extended learning time results in greater student outcomes, Priority Schools must add a minimum of 300 hours of instruction for all students. This may be achieved through alternative schedules, extended day, Saturday school, or extended year/calendar. Reform plans must articulate how schools will redistribute resources and time in order to add 300 hours to current schedules.
- **Response to Intervention** (Turnaround Principles 4 and 5) Identified as a strategy to effectively implement differentiated and customized instruction in order to improve individual and student subgroup outcomes, Priority Schools must implement Response to Intervention (RtI) for academics and behavior. The reform plan must describe in detail how the school will utilize RtI as a strategy to meet the individualized needs of all students, as well as student subgroups, including students with disabilities (SwD) and English language learners (ELL).
- **Positive and Safe Learning Environments** (Turnaround Principle 6) The reform plans must include methods to provide a safe and disciplined learning environment. The districts must prioritize the distribution of pupil services staff (e.g., school social workers, nurses, psychologists, and guidance counselors) to each Priority School, and staff schedules must allow for adequate time to serve students. Districts must also ensure Priority Schools implement Positive Behavioral Intervention and Supports (PBIS) for students across multiple domains (e.g., social, emotional, behavioral) in order to increase positive academic outcomes.
- **Family Engagement** (Turnaround Principle 7). 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). The plan must also include strategies to meaningfully engage family members in the education of their children, including: 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.

Indistar: Schools must develop and submit their plans to DPI within 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 turnaround and improvement strategies 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). Specifically, schools complete a needs-assessment aligned to the turnaround principles and indicators. Any indicator which has not previously been fully implemented (as determined by the needs assessment) is automatically pre-populated into the planning tool. Within the planning process, the tool requires schools to identify discrete tasks, as well as the person(s) responsible for completing the task and their deadlines. The tool's pre-populated indicators draw upon the vast turnaround literature and will ensure that Priority Schools conduct a continuous cycle of assessment, planning, implementation, and progress monitoring to progress towards full implementation of the turnaround principles. In addition, Indistar allows for customization, and Wisconsin intends to enhance the system to ensure it can effectively support school and district planning, as well as state monitoring, while remaining streamlined and reducing unnecessary burden at the local levels. DPI will provide schools and districts Indistar training, as well as an extensive rubric to communicate the state's expectations of schools and their plans.

Closure

If a Priority School, or its LEA, does not wish to implement the required interventions, as noted above, the district can opt to close the school, starting the following school year.

Supplemental Educational Services

DPI will use the ESEA flexibility as an opportunity to waive Supplemental Educational Services (SES) from the new accountability system. The primary basis for this request is tied directly to the limited evidence of positive impact on student achievement. Specifically, analyses of SES programs in Wisconsin districts conducted by the Wisconsin Center for Research and Evaluation suggest that SES has minimal impact on student outcomes. For more information about these reports, please refer to the following website: http://sesiq2.wceruw.org/. Additionally, DPI and district staff could use the time currently required to implement, maintain, and monitor SES programs much more effectively to target the needs in low-performing schools to implement effective interventions that are aligned with current best practices.

DPI has consulted with Milwaukee Public Schools (MPS), a district required to implement SES since the 2003 school year. Given this long history with the program, DPI consulted district staff to identify specific advantages and disadvantages of waiving SES. Based on their input, DPI believes districts would benefit by waiving the current provisions around SES and receive flexibility in developing and implementing supports that more closely align with local school and district reading and mathematics curricula. In addition, there was significant support based on the feedback received from the waiver survey, where 52 percent of respondents agreed to waive SES from the current accountability system.. Lastly, as a result of this flexibility, DPI would no longer maintain a DPI-approved SES provider list. However if a district, through consultation with parents, chooses to continue to contract with current SES providers, they would have that *option. Currently, four districts (representing 32 schools) are required to provide SES statewide.*

School Improvement Grants

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

DPI has assigned each district with a SIG school a liaison. The role of the liaison is to work closely with district and school leadership to observe and provide feedback on reform plan implementation. The liaison does not act as a monitor; the liaison assists the district in identifying and removing district or DPI barriers (e.g., licensure, funding) that may hinder rapid reform in the Priority School.

DPI staff monitor SIG reform plan implementation via Indistar (for a description of Indistar, see Section 2.F) and onsite visits. Each SIG school receives quarterly onsite monitoring visits, the results of which are reported to the state superintendent. Each month, SIG schools report achievement data to DPI via Indistar. DPI conducts regular data reviews to ensure that schools and districts make progress towards their goals. DPI will provide ongoing fiscal oversight of expenditures submitted by Title I districts serving SIG schools to ensure claims match activities included within approved budgets.

Department of Public Instruction Support and Monitoring

School Reform Plans

Beginning in the fall of 2012, all districts with Priority Schools that opt to implement a turnaround model must develop and implement a single reform plan for each Priority School via submission in Indistar. Indistar is a web-based system implemented by DPI for use with district or school improvement teams to inform, coach, sustain, track, and report improvement activities. Indistar requires activities within plans to align with indicators of evidence-based practices at the district, school, and classroom levels. The tool's pre-populated indicators draw upon the vast turnaround literature and, once embedded in the aligned school reform plan, will ensure that Priority Schools progress through a continuous cycle of assessment, planning, implementation, and progress monitoring. In collaboration with their turnaround partner, school staff will complete the needs assessment included within Indistar and begin developing a plan aligned to the weaknesses illustrated within the diagnostic review and needs assessment. As previously noted, when approving reform plans, DPI will ensure that the plans meet the following turnaround principles:

- Response to Intervention
- Extended learning time
- Highly skilled educators and leaders
- Positive and safe learning environments
- Family engagement

In 2012-13, DPI will expand its recently enhanced system of monitoring and support for SIG schools to include all Priority Schools. The system will consist of onsite diagnostic reviews by contracted experts, the Indistar online system, a DPI liaison, fiscal monitoring, data reviews, and site visits.

Increasing Interventions after Four Years

Traditional Public Schools

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

Table 2.2 illustrates the timeline for implementation of Wisconsin's new system for accountability.

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.

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 four years. Priority schools, due to their significant need, will not be allowed to exit Priority status prior to the end of their four-year improvement cohort. At the end of four years, three sets of criteria will be applied in order to determine a school's readiness to exit Priority status:

1. A school no longer satisfies the initial criteria for identification
2. The school meets its AMOs for two consecutive years, **or;** based on the two most recent

years, the school is on a trajectory to meet its AMOs by the end of the 2015-16 school year.

3. A school demonstrates successful implementation of school turnaround strategies (as measured by monitoring tools (Indistar)) and processes for two consecutive years

Schools must meet **each** of these criteria in order to exit from Priority status.

Priority schools can meet their exit criteria by meeting their "All Students" AMO for two consecutive years. *However,* given that this is a highly ambitious goal (and one that will almost certainly not be achievable in the first year of Priority status), schools can also meet through being on a *trajectory* to meet their future AMOs. This exit criterion is defined in terms of schools showing strong enough growth to meet their 2015-16 AMO.

The Trajectory AMO is calculated individually for each school, using the identification year (2011-12) as the baseline for calculating a trajectory to the AMO in the final year of the cohort (2015-16.) This is done by finding the average yearly gain in proficiency that a school needs to make, which is equal to one quarter of the difference between the target AMO and the 2011-12 proficiency rate. A school's 2012-13 Trajectory AMO would then be equal to that school's 2011-12 proficiency rate **plus** that school's average yearly gain; a school's 2013-14 Trajectory AMO would be equal to that school's 2011-12 proficiency rate **plus** two times that school's average yearly gain; etc.

DPI believes that allowing schools multiple ways to meet their exit criteria strikes an ideal balance between ambitious and achievable, as it requires high levels of achievement or high levels of growth from Wisconsin's lowest-performing schools.

Table: Priority Exit Criteria 1 (AMO) Compared With
Priority Exit Criteria 2 (Trajectory AMO)

	Average 2011-12 Proficiency	2012-13 Exit Criteria 1: AMO	2012-13 Exit Criteria 2: Average Trajectory AMO
Reading	6.6%	40.3%	16.8%
Mathematics	9.0%	52.9%	22.3%

2.E FOCUS SCHOOLS

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

Identification of Focus Schools

DPI will identify Focus Schools based on large within-school achievement gaps between demographic subgroups, low performing subgroups within a school, large gaps in graduation rates between subgroups within the school, and low subgroup graduation rates within a school.

Specifically, schools may be identified as a Focus School six ways:

- • Large subgroup gaps in math achievement
- • Large subgroup gaps in reading achievement

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

A subgroup and its comparison group must each have at least 20 students in order to meet cell size and be included in calculations.

Identification of Focus schools with *low performing subgroups* will be based on reading and mathematics subgroup Achievement sub-scale scores of the Accountability Index.
A reading and mathematics Achievement Index score will be calculated for each subgroup separately within a school, and a school level average subgroup Achievement Index score (across all subgroups) will be determined for reading and mathematics separately. DPI applied averages across subgroups not to obscure subgroup performance, but to better capture subgroup performance. By focusing solely on the lowest performing subgroup, almost all focus schools would be identified – whether by gaps or low subgroup performance—due to differences in performance between their students with disabilities and students without disabilities population. Working to address the needs of all student groups is critical to the success of any individual student. DPI's approach reflects this by enabling identification as a focus school based on one or multiple subgroups. Detailed data provided in school report cards, including AMOs, will help guide interventions and support for specific groups in identified schools.

To identify schools with large *within-school achievement gaps* between subgroups, proficiency rates for each demographic subgroup and their comparison group will be evaluated for each school. Accountability index scores for closing reading gaps and closing mathematics gaps will be calculated. A reading and mathematics Gap Index score will be calculated for each subgroup separately within a school, and a school level average subgroup Gap Index score (across all subgroups) will be determined for reading and mathematics separately.

The average subgroup reading achievement index score, the average subgroup math achievement index score, the average subgroup reading gap index score, and the average subgroup math index score will be rank ordered for each school. The bottom 86 schools with the lowest achievement index scores and the bottom 28 schools with the lowest gap index scores will be identified as Focus Schools. The rationale for selecting 86 low achieving schools and 28 schools with large gaps is based on the fact that 1) more schools have subgroup achievement data than have gap data due to small cell sizes when comparing gaps, and 2) DPI chose to place greater weight on achievement to target low performing schools that were not included on the Priority schools list.

To identify schools with *low subgroup graduation rates*, graduation rates for each subgroup were determined, and an average graduation rate across all subgroups was calculated. The closing graduation gaps Accountability Index score is used to identify schools that are not closing *large gaps between their subgroup graduation rates*. The average gap closure across all subgroups is used to determine the Gap Index score. Both the average subgroup graduation rates and the average subgroup graduation gap scores were ranked and the bottom 4 schools 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.

Focus School Requirements: 2012 - Ongoing

The Department of Public Instruction (DPI) will provide targeted support to Focus Schools to improve student outcomes. Wisconsin Focus Schools are identified based on significant gaps or low-performing subgroups within three primary measures: reading, mathematics, and graduation. As such, the DPI will require Focus Schools to assess and address instructional practices which impact student outcomes—specifically, outcomes of student subgroup populations—through a self-assessment and reform plan.

Self-assess core instruction and interventions in reading and mathematics

In keeping with Wisconsin's strategic plan to close achievement gaps through the implementation of individualized student learning plans, school staff must assess the school's Response to Intervention (RtI) implementation practices. Schools will conduct this self-assessment using WI RtI Center's School Improvement Review (SIR) and submitted via Indistar, provided by the Center for Innovation and Instruction (CII). Indistar is a web-based system used with school improvement teams to inform, coach, sustain, track, and report improvement activities. The tool's pre-populated indicators draw upon the vast turnaround literature, including RtI (65 specific RtI indicators), as well as indicators supporting success for individual student populations, such as English language learners (ELLs) (19 indicators), Students with Disabilities (SwD) (10 indicators), and various levels (e.g., high school). (Refer to Appendix 12 to review the specific indicators) In addition, Indistar allows for customization, and DPI intends to enhance the system to better align to Wisconsin's vision of RtI, as well as implementation of the Common Core State Standards (CCSS).

Additionally, WI will draw upon experience using the tool (current SIG schools) to modify the tool to increase efficacy. Specifically, WI will ensure indicators provide concrete actions/strategies that school leadership teams will complete (not an individual) and will drive the school's actions in making progress outlined in the reform plan. Having school-specific data will assist schools in customizing a reform plan that will support implementation and identify different professional development needs that specifically address the individualized strengths and weakness of each school. DPI will provide Indistar training to all Focus Schools to accomplish the following objectives: learn the technical components and capacity of the tool and understand the process for which the tool will be utilized (support, reform planning and modification, and progress monitoring), including revising the plan as needed (based on SEA approval).

Develop and implement a school reform plan to ensure RtI is implemented with fidelity in reading and mathematics

Following completion of the annual self-assessment, districts must ensure each 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. To receive approval from DPI, the reform plans must address how each Focus School will implement a school-wide RtI system and must include the following components:

- Coordination of RtI Initiatives. The reform plan must address how districts will coordinate the readiness and professional development of the school's leadership and staff to implement the Wisconsin RtI Framework. This must include ongoing analysis of RtI implementation via Indistar, as well as ongoing training and support around universal curriculum and instructional practices provided by the WI RtI Center and the WI Standards, Instruction, and Assessment (SIA) Center.
- Positive Behavioral Interventions and Supports. The reform plan must address implementation of a school-wide, systematic implementation of Positive Behavioral Interventions and Supports (PBIS). Districts will have access to consultation, training, and ongoing technical assistance from Wisconsin's PBIS Network, developed in coordination with the WI RtI Center. The Wisconsin PBIS Network will provide necessary support to high schools struggling to establish a positive school culture, increase academic performance, improve safety, and decrease negative behaviors. The Wisconsin PBIS Network, in collaboration with the Wisconsin RtI Center, will provide support to Focus Schools regarding PBIS implementation and methods for sustainability.
- Collaborative Planning Time. If necessary, schools must modify the current school schedule to allow grade-level and/or specific content area teams (i.e., reading and mathematics) teachers

and support staff to meet frequently in order to review student data and modify instruction and interventions.

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

- Early Warning Systems. Each district must ensure its Focus Schools implement an early warning system, using available data to target interventions that support off-track students. Through the implementation of an early warning system, schools will identify specific patterns and school climate issues that may contribute to disproportionate dropout rates. The early warning system will rely on student information that exists at the school level and that will exist within the statewide student information system (SSIS), which districts can access beginning in fall 2012.

Reporting RtI implementation progress and student achievement data

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

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

Statewide Data Collection

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

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

Implementation of the Plans

In order to effectively develop and implement the required plans, Focus Schools must partner with the WI RtI Center and the Standards, Instruction, and Assessment (SIA) Center referenced in Principle 1, as well as DPI to receive extensive supports and trainings addressing high quality implementation of RtI systems and structures, such as:

- An online intervention bank of resources that range from intensive interventions to evidence-based practices in reading and mathematics, all of which will align to the Common Core State

Standards (CCSS) (August 2012).

- Universal review of reading and mathematics instruction training (June 2012).
- Ongoing development of webinars which include: balanced assessment systems; family engagement; screening and progress monitoring.
- Ongoing development of online Learning Modules targeting the following topics: collaboration, balanced assessment, and high quality instruction. These modules include online videos that highlight best practices, parent and educator handouts, as well as conversation guides. An example of these online modules as well as other online RtI resources can be found at: http://www.wisconsinrticenter.org/.
- Development of a quarterly online newsletter that is forwarded statewide to all key stakeholders to increase awareness and accessibility of the Center's services/resources.
- Development of peer-to-peer network meetings that will be facilitated quarterly by RtI Center staff beginning in Fall 2012. All Focus Schools will be required to send a team of school staff (including the principal) to at least two of these meetings to increase awareness and knowledge of RtI, facilitate networking opportunities, and increase resources at school level.

The DPI meets regularly with RtI Center staff to develop a plan of implementation for Focus Schools. Based on this consultation, DPI developed the following table to illustrate the state's expectations of all Focus Schools. This plan will become more differentiated as DPI gains access to data from ongoing reviews and monitoring of each Focus School's implementation.

Implementation Plan for Focus Schools (Year 1 and 2)

Action/Event	Objective	Outcomes	Timeline	Party Responsible
Orientation Meeting (required)	Build commitment, strengthen leadership	Understand "label" and receive list of requirements and supports	June 2012	DPI Title I Team
Indistar Training (required)	Resource mapping	Become familiar with Indistar in order to engage in self-assessment to map resources and develop action plan	Year One August/September 2012	DPI Title I Team and Indistar
Foundational Overview – 1 with elementary focus, 1 with secondary focus, principal and leadership team in attendance (required)	Build commitment, strengthen leadership, resource mapping	Understand RtI, begin self-assessment to map resources and develop action plan	Year One October/November 2012, two-day event	RtI Center
Coaching Training – at both school and district level (required)	Build commitment, strengthen leadership	Receive tools to strengthen leadership	Year One 6 separate days throughout 2012-13 school year	RtI Center
Indistar self-assessment in curriculum and instruction, Common Core Standards Training (required)	Increase core high-quality instruction and assessment, resource mapping, action planning	Engage in self-assessment and resource mapping, develop action plan, align instruction and assessment to Common Core	Year One	RtI Center/SIA Center/DPI Content & Learning Team/CESA SIS

		Standards		
Formal Network Meeting (required)	Build commitment, strengthen leadership	Share/Receive support	Year One Two days throughout 2012-13 school year	RtI Center/DPI Title I Team
Visit Demo Sites/Spotlight Schools (optional)	Increase core high-quality instruction and assessment, strengthen leadership	Receive support, strengthen leadership, increase high-quality instruction	Year One During 2012-13 school year	Focus Schools, Demo Sites, Spotlight Schools
Universal Core Reading Instruction/Math Instruction	Increase core high-quality instruction and assessment	Increase high-quality instruction and assessment	Year Two As offered in 2013, three-day event	RtI Center/SIA Center
Action/Event	**Objective**	**Outcomes**	**Timeline**	**Party Responsible**
Screening and Progress Monitoring (required)	Increase high-quality instruction and assessment, increase expertise with data	Determine how to identify students in need of additional support, increase differentiation of high-quality instruction and assessment	Year Two As offered in 2013, two-day event	RtI Center
Formal Network Meeting (required)	Build commitment, strengthen leadership	Share/Receive support	Year Two Two days throughout 2012-13 school year	RtI Center/DPI Title I Team
Coaching Support – at both school and district level (required)	Build commitment, strengthen leadership	Receive tools to strengthen leadership	Year Two Two separate days throughout 2012-13 school year	RtI Center
Coaching Support – at both school and district level (required)	Increase high-quality instruction and assessment, increase expertise with data, assess and increase quality of interventions	Increase differentiation of high-quality instruction and assessment, support students in need of additional academic support	Year Two As offered in 2013, after Universal Core Instruction event, one day	RtI Center
Visit Demo Sites/Spotlight Schools (optional)	Increase core high-quality instruction and assessment, strengthen leadership	Receive support, strengthen leadership, increase high-quality instruction	Year Two During 2012-13 school year	Focus Schools, Demo Sites, Spotlight Schools

Flexibility in the use of Title I funds

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

State Support for Focus Schools

Wisconsin RtI Center

DPI, in collaboration with the 12 regional cooperative educational service agencies (CESAs), developed and funds a statewide RtI Center. The Wisconsin RtI Center provides high quality professional development and technical assistance and will play a critical role in providing training, expertise, and

support to each school and their district. The DPI established the Wisconsin RtI Center to support schools through the phases of RtI implementation to increase success, as well as sustainability. Wisconsin is one of a small number of states to establish, develop, and utilize a comprehensive, statewide RtI Center. The Wisconsin RtI Center exists to develop and provide high quality professional development and training opportunities, as well as to gather, analyze, and disseminate DPI's implementation data to enhance RtI implementation statewide (see Figure 2.1).

Figure 2.1

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

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

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

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

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

Regional Technical Assistance Coordinators (RTACs): The Wisconsin RtI Center employs five Regional Technical Assistance Coordinators that are instrumental in shaping and providing long-term supports at both the school and LEA level. The RTACs are available to provide consultation with the leadership team aligning to the school's RtI framework. The Wisconsin RtI Center will align RTAC activities and responsibilities to ensure the Focus Schools' needs are being met. Additionally, a primary role of the RTAC will be to assist districts and their schools with RtI implementation that include any necessary follow up technical assistance after a Wisconsin RtI Center training.

The RtI Center will also add two additional full-time positions targeting Culturally Responsive Practices and students with disabilities. The addition of these positions will provide additional expertise and will be instrumental in coordinating PD targeting these populations, state-wide. The responsibilities of these positions include:

Culturally Responsive Practices (one additional FTE): Culturally Responsive Practices will be infused throughout all professional development and technical assistance that is offered through the RtI Center and PBIS Network. Additionally, to provide professional development on specific classroom skills, Culturally Responsive Classroom Practices will be scaled-up to meet the needs and demand of Wisconsin as well as schools with racial achievement gaps.

This position will:

- Research effective aspects of culturally responsive multi-level systems of support
- Coordinate infusion of a culturally responsive focus in all RtI Center/PBIS Network PD and technical assistance (TA)
- Coordinate the transition and scale-up of Culturally Responsive Classroom Practice
- Coordinate adaptation or creation of needed additional PD and TA
- Coordinate demonstration sites piloting culturally responsive systems and plan for scale-up of practices
- In-depth knowledge of all PD and TA offered through the Center
- Closely collaborate with DPI consultant for culturally responsive practices

Students with Disabilities/At Risk Services (one additional FTE): Professional development will be created and delivered to provide the supports necessary to increase the academic and behavioral success of students with disabilities. Supports will be targeted at the school and CESA level. Supports will focus on student access to the universal curriculum as well as intensive supports and interventions.

This position will:

- Coordinate creation and delivery of PD and TA on access to universal curriculum and instruction (differentiation, accommodations/modifications, etc.)
- Coordinate creation and delivery of PD and TA on intensive academic and behavioral interventions, standards-based individualized education programs (IEPs), and universal design for learning
- Develop resources that address progress monitoring toward IEP goals and team teaching
- Closely collaborate with DPI consultant for special education academic improvement (TBD)

For more information regarding the training and technical assistance provided by the Wisconsin RtI Center, refer to Appendices 14 and 15.

Standards, Instruction, and Assessment Center

Currently in development, the Standards, Instruction, and Assessment (SIA) Center, based on the successful model of the WI RtI Center, will centralize content experts focused on development of high-quality, standardized resources and training plans available at low- to no-cost across the state in partnership with Institutes of Higher Education. Recognizing that the RtI Center has successfully promoted "how" to implement quality instructional programming through modifications to schools' and districts' systems and structures, DPI is developing a Standards, Instruction, and Assessment Center to work in tandem with the RtI Center as a means to inform districts and schools about "what" constitutes quality instructional programming. Specifically, the Center will synthesize existing best practices and research-based interventions, as well as play a critical role in providing systematic professional development and resources statewide. For example, the SIA Center will be pivotal in the statewide roll-out of the Common Core Statewide Standards, including data-based decision making and assessment practices that improve learning and inform instruction.

Statewide Title I Network: In collaboration with the 12 regional cooperative educational service agencies (CESAs), the DPI developed the Title I Network. Through the Network, each of the 12 CESAs receives funding to provide a specific set of deliverables to increase 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. Beginning in 2012-13, Title I Network contracts with DPI will require CESAs to provide more targeted support to schools to improve student achievement or narrow achievement gaps. Network contracts will specify that CESA Title I staff serve as a "point of contact" for their respective regions in order to build networks and awareness of RtI resources as well as attend RtI trainings, where applicable, provided by the Wisconsin RtI Center.

Flexibility in the use of Title I funds

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

After Four Years of Implementation

A school identified as Focus remains in the cohort for four years. Reforms must begin to be implemented by January of Year One. Wisconsin chooses to set the cohort as four years to align with the cohort length of four years for Priority identification to reduce confusion about when cohorts begin and end. In addition, the RtI Center that is at the core of Focus assistance recommends two years to "gear up" via trainings and implementation of reforms, followed by two additional years of data gathering to ensure that reforms are resulting in improved learning for students.

If, after four years of reform and Focus School status, the school does not exit Focus School status, DPI will increase the level of involvement at the state level to become much more prescriptive with regard to the school requirements. Rather than requiring schools to conduct a self-assessment, a team of DPI and RtI Center staff will conduct an onsite school diagnostic review to thoroughly evaluate the level and quality of RtI implementation. The diagnostic review will focus on the following key elements:

- Strong leadership
- Team approach (leadership and staff/teachers sharing a common vision; collaboration; communication)
- Curriculum, instruction, and assessment aligned with state standards
- Data informed instruction
- Focused professional development (addressing areas of need identified in needs assessment; research-based interventions; evaluation of PD) / ongoing evaluation of instruction and interventions
- Safe school environment
- Engagement of families and stakeholder buy-in (family/community involvement)

Upon completion of the review, DPI will provide specific requirements for staff training addressing student interventions, assessments, and instructional methods which directly align to findings from the onsite review and are consistent with needs identified in the data for specific student groups. For example, DPI consultants with expertise in ELL educational programs will provide expertise and technical assistance to schools identified due to low performance of ELL students. Additionally, all RtI practices must be approved by the appropriate DPI expert (special education, ELL, reading, mathematics). Depending on the need(s), these schools may be required to implement reforms similar to Priority Schools including extended learning opportunities, placement of highly skilled educators and leaders, and family engagement. In addition, DPI's role/presence will increase in these schools, in terms of monitoring and support, which will consist of onsite diagnostic review, monthly review of the Indistar online system, fiscal monitoring, data reviews, and on-site visits.

Rationale for Focus School Requirements

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

Literature Review

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[12] (2011) explain that "few intervention programs have included ELLs in their norming samples" (as cited in Hughes. C., & Dexter, D., 2010). Therefore, educators must use what is currently known regarding effective instruction in literacy for ELLs at all grade levels of the multi-level prevention system.

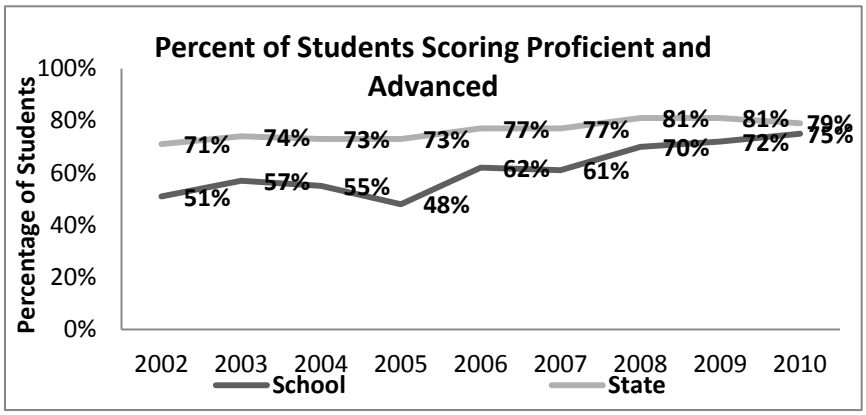
- Within Wisconsin, evidence suggests RtI has positively impacted instruction for ELLs and assisted in closing school achievement gaps. For example, one Wisconsin Title I school serving students from low income households (32 percent) and English language learners (21 percent) saw the percentage of students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

Similarly, in another Title I school implementing RtI serving high poverty (25 percent) and limited English proficient (LEP) (10 percent) populations saw an 11 percent increase (from 84 percent to 94 percent) in the proportion of students scoring proficient or advanced across the past five years. Additionally, data

[12] For a full literature synthesis of RtI, including citations, please see Appendix 16

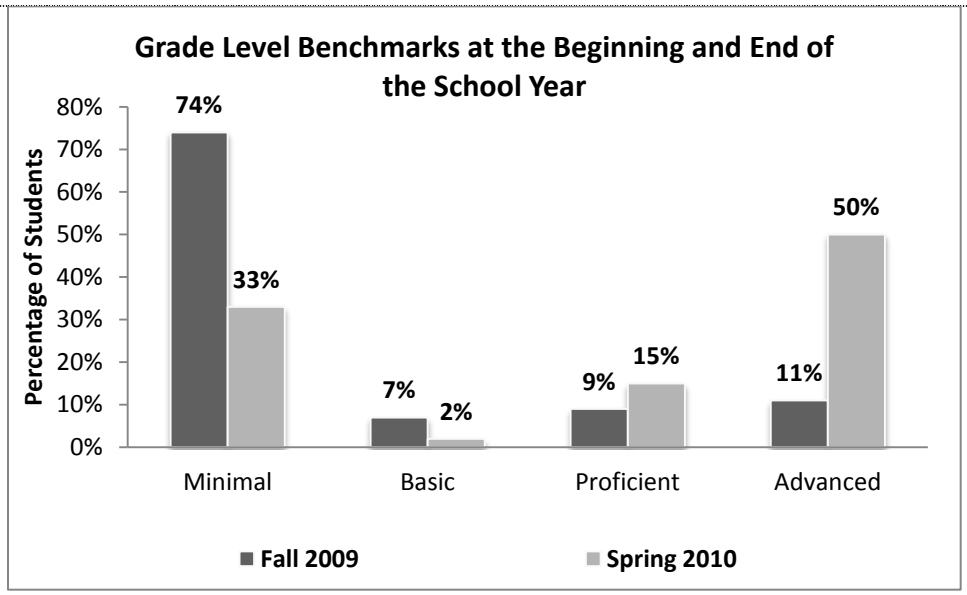
from a Wisconsin district located in a different region of the state serving a diverse student population (73 percent poverty, 53 percent minority with 24 percent black and 29 percent Hispanic, and 15 percent LEP) suggests RtI is an effective practice in closing achievement gaps. As illustrated in Figure 2.2, this district successfully reduced the achievement gap between its low income, high minority, and LEP students and the state average from 28 percent to five percent across eight years due, in part, to high-quality RtI implementation.

Figure 2.2.



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

Figure 2.3.



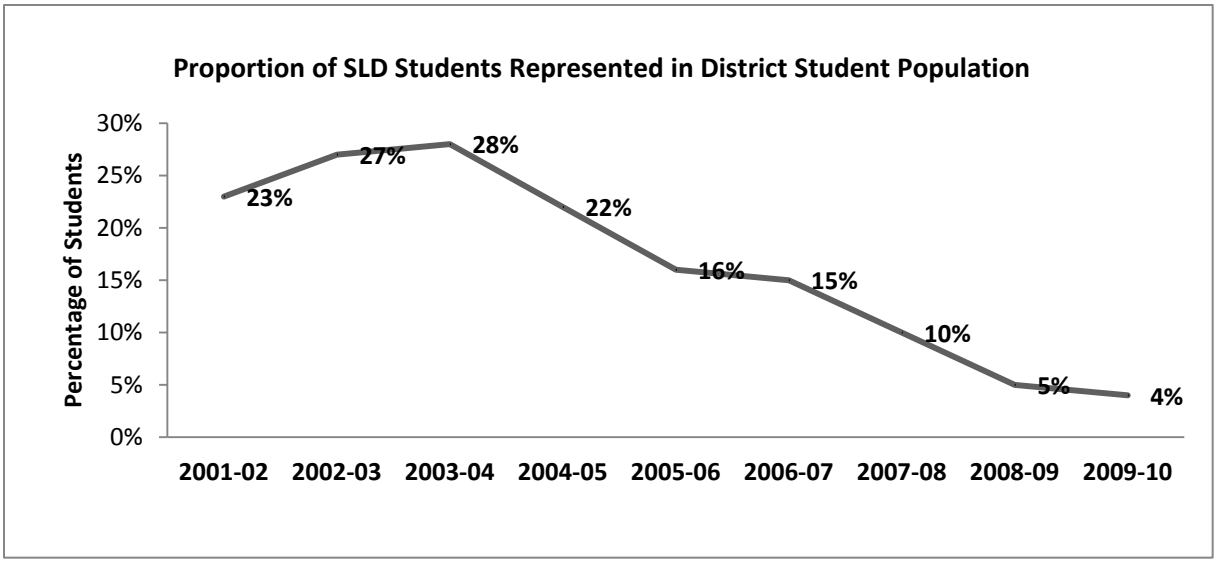
Students with Disabilities

Six of the 16 studies analyzed by Hughes and Dexter[13] reported data on the effects of their programs on special education referral and/or placement rates. Bollman and colleagues (2007) examined the "effect of the St. Croix River Education District (SCRED) model on the rate of identification for special education services" (as cited in Hughes. C., & Dexter, D., 2010) and reported that placement rates dropped from 4.5 percent to 2.5 percent over a 10-year period. They indicate that the statewide prevalence rate over the same time period dropped from 4 percent to 3.3 percent. Calendar (2007) reported that placements decreased by 3 percent for "districts with at least one RBM school," whereas the state rate decreased by 1 percent. Marston and his co-authors (2003) "indicated that special education placement rates stayed constant over time for Minneapolis problem-solving model schools," as did the district as a whole (as cited in Hughes. C., & Dexter, D., 2010). Peterson, Prasse, Shinn, and Swerdlik (2007) reported similar information: Referrals and placements stayed relatively stable over time after RtI implementation. O'Connor et al. (2005) examined the "effect of the tiers of reading intervention model on placement rates" (as cited in Hughes. C., & Dexter, D., 2010). They found that during the four years of implementation, rates fell to 8 percent compared to an historical contrast group (same schools, same teachers) for which the rate was 15 percent. Finally, VanDerHeyden and colleagues (2007) reported that "for the four schools included in their study, there was a decrease in referrals and an increase in placements" (as cited in Hughes. C., & Dexter, D., 2010). The authors interpreted this pattern as an indication of more appropriate referrals.

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

[13] For a full literature synthesis of RtI, including citations, please see Appendix 16

Figure 2.4.

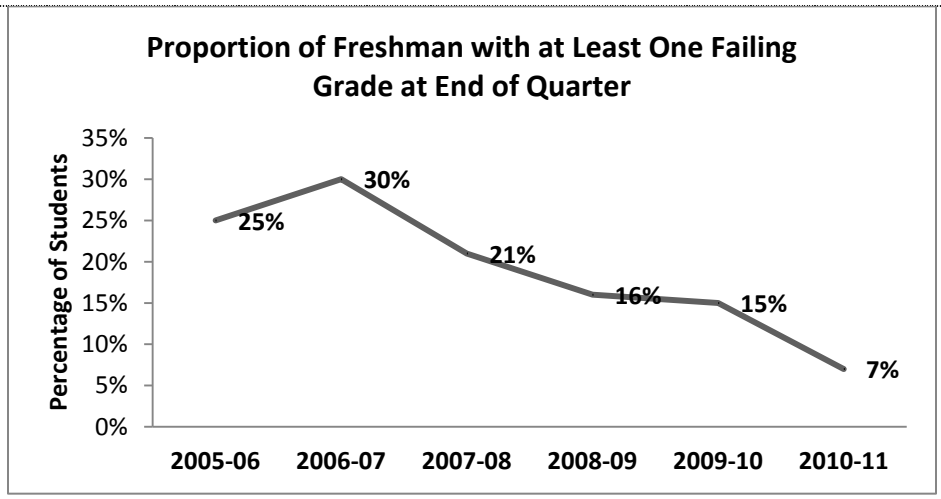


Secondary Schools

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

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

Figure 2.5.



Academically Related Behaviors

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

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

Table 2.2 illustrates the timeline for implementation of Wisconsin's new system for accountability.

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.

Focus School Exit Criteria

DPI will identify Focus schools every four years. Focus schools are able to exit Focus status prior to the end of their four-year improvement cohort, provided they demonstrate the following:

1. A school no longer satisfies the initial criteria for identification
2. For each subgroup for which a school was identified:
   a. The school meets its AMOs for two consecutive years, **or;**
   b. Based on the two most recent years, the school is on a trajectory to meet its AMOs by the end of the 2015-16 school year.
3. A school demonstrates successful implementation of school turnaround strategies (as measured by monitoring tools (Indistar)) and processes for two consecutive years

Schools must meet **each** of these criteria in order to exit from Focus status.

Focus schools can meet their exit criteria by meeting their subgroup AMO for two consecutive years. However, given that this is a highly ambitious goal, schools can also meet by being on a *trajectory* to meet their future AMOs. This exit criterion is defined in terms of schools showing strong enough growth to

meet their 2015-16 AMO, the end of the four year cohort.

The Trajectory AMO is calculated individually for each school and subgroup, using the identification year (2011-12) as the baseline for calculating a trajectory to the AMO in the final year of the cohort (2015-16.) This is done by finding the average yearly gain in proficiency that a school needs to make in each of its subgroups, which is equal to one quarter of the difference between the subgroup's target AMO, and the subgroup's 2011-12 proficiency rate. A school's 2012-13 Trajectory AMO for each subgroup would then be equal to that school's 2011-12 subgroup proficiency rate **plus** that school's average yearly gain for each subgroup. A school's 2013-14 Trajectory AMO for each subgroup would be equal to that school's 2011-12 subgroup proficiency rate **plus** two times that school's average yearly gain for each subgroup; etc.

DPI believes that allowing schools multiple ways to meet their exit criteria strikes a balance between ambitious and achievable, as it requires high levels of achievement or high levels of growth from schools in Wisconsin that have targeted areas for improvement.

The following table shows the average subgroup performance across all Focus schools in reading and mathematics. To give an indication of the amount of progress required by each subgroup, DPI has provided an average subgroup AMO and Trajectory AMO. This table illustrates the marked increases required of schools to exit Focus status. Please note that both the AMO and Trajectory AMOs for Focus schools will be individually based on their subgroup performance and that this table is an indication of the average progress schools will need to demonstrate.

Table: Focus Exit Criteria 1 (AMO)
Compared With Focus Exit Criteria 2 (Trajectory AMO)

Reading					
Subgroup	**2011-12 Focus School Average Proficiency**	**2012-13 Exit Criteria 1: Subgroup AMOs**	**2012-13 Exit Criteria 2: Average Focus School Trajectory AMO**	**2013-14 Exit Criteria 1: Subgroup AMOs**	**2013-14 Exit Criteria 2: Average Focus School Trajectory AMO**
Asian	22.9%	36.8%	30.0%	40.1%	37.0%
Black	11.9%	25.0%	20.0%	31.2%	28.0%
Hispanic	11.9%	28.0%	20.2%	33.5%	28.5%
American Indian	18.4%	31.5%	27.0%	36.2%	35.6%
White	29.7%	44.4%	34.9%	45.8%	40.1%
English Language Learners	5.2%	23.0%	14.7%	29.7%	24.2%
Students with Disabilities	9.7%	25.8%	18.3%	31.8%	26.9%
Economically Disadvantaged	12.6%	29.8%	20.6%	34.8%	28.7%
Mathematics					

Subgroup	2011-12 Focus School Average Proficiency	2012-13 Exit Criteria 1: Subgroup AMOs	2012-13 Exit Criteria 2: Average Focus School Trajectory AMO	2013-14 Exit Criteria 1: Subgroup AMOs	2013-14 Exit Criteria 2: Average Focus School Trajectory AMO
Asian	33.3%	54.0%	41.3%	56.8%	49.3%
Black	17.3%	33.4%	27.5%	41.4%	37.7%
Hispanic	23.4%	39.9%	32.4%	46.2%	41.5%
American Indian	29.2%	41.5%	38.8%	47.4%	48.4%
White	40.2%	57.5%	46.5%	59.5%	52.7%
English Language Learners	16.6%	37.8%	27.2%	44.7%	37.8%
Students with Disabilities	14.7%	35.6%	25.5%	43.0%	36.4%
Economically Disadvantaged	21.8%	41.4%	31.2%	47.4%	40.6%

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. See attachment 9.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

LEA Name	School Name	School NCES ID #	REWARD SCHOOL	PRIORITY SCHOOL	FOCUS SCHOOL
Please see Attachment 9 for School List					
TOTAL # of Schools:					

Total # of Title I schools in the State: 1,183
Total # of Title I-participating high schools in the State with graduation rates less than 60%: 0

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-1.** Title I-participating high school with graduation rate less than 60% over a number of years **D-2.** Title I-eligible high school with graduation rate less than 60% over a number of years ➢ Tier I or Tier II SIG school implementing a school intervention model	**Focus School Criteria:** ➢ 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 ➢ Has a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate ➢ 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.

The Department of Public Instruction (DPI) encourages continuous improvement in ***all*** other Title I schools. To improve student and school outcomes across the state, DPI has developed an extensive menu of targeted resources and services designed to support increased achievement in schools failing to meet annual measurable objectives (AMOs), as well as improve Title I programming in all other Title I schools. The following sections describe these supports in greater detail.

SUPPORTING TITLE I SCHOOLS FAILING TO MEET ANNUAL MEASURABLE OBJECTIVES
Prior to approval of its ESEA consolidated application, DPI will require any district with schools failing to meet their AMOs for all students or student subgroups to align Title I funds to missed AMOs. Until satisfactorily meeting this expectation, DPI consultants will not approve district applications.

Required Interventions
When reviewing the ESEA consolidated application of a district with schools failing to meet AMOs, DPI Title I consultants will ensure the district has allocated Title I funds to specific activities designed to improve student outcomes (i.e., *approved interventions* and *professional development*). The districts must demonstrate or justify how the selected activities will improve achievement in areas of identified need within these schools.

State-Approved Interventions
Districts with schools failing to meet AMOs must implement instructional interventions selected from a menu of state-approved, evidence-based, proven resources and interventions. Informed by the work of Dr. Allen Coulter, a national expert in early intervening services and improving outcomes for students with disabilities, as well as his team of contracted national experts with expertise in literacy, math, behavior, RtI systems, and bilingual instruction, DPI has begun developing an initial list of interventions. The state will continue to identify state-approved, evidence-based, proven resources and interventions meeting specific criteria (i.e., similar to the criteria used by the National RtI Center) from highly regarded sources (e.g., National RtI Center and the What Works Clearinghouse). Additionally, DPI will continue to create resources and strategies to address common needs within schools failing to meet AMOs that existing resources often do not address (e.g., proven high school interventions—as opposed to proven interventions used in high school, culturally responsive practices, etc.) in an effort to ensure all students, including SwDs and ELLs, graduate ready for college and career.

Preliminary List of Approved Interventions (DRAFT)

Subject Area	Elementary and Middle School		Secondary	
	Tier 2	Tier 3	Tier 2	Tier 3
Reading	• Academy of Reading • Academy of Reading by EPS • Excel in Reading Through Technology • LIndamood Phonemic Sequencing • Literacy Navigator • My Reading Coach • Peer Assisted Learning Strategies (PALS) • Ramp up Literacy • Reading Toolkit • Strategic Intervention Model • Tesoros de Lectura - Intervencion • Wilson Reading SYStem • Word Journeys • Words Their Way	• SRA Skillbuilder	• Academy of Reading • My Reading Coach • Strategic Intervention Model	--
Math	• America's Choice Math Navigator • Building Blocks for Math • Cognitive Tutor • Computation of Fractions • Computation of Integers • Fraction Nation • Go Solve • Hot Math • Odyssey Math • Ramp it UP • Solve It! • Solving Equations • TransMath • Voyager Math	• Algebraic Thinking • Math U See • Number Worlds	• Math U See • Odyssey Math • Transition Mathematics • TransMath	--
Writing	• Writing Aviator	--	--	--

Professional Development

Districts with schools failing to meet AMOs must also participate in professional development opportunities provided by the Title I Network and designed in collaboration with DPI to support improved student outcomes. With financial support from DPI, each cooperative educational service agency (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. In addition to services available to all Title I districts, DPI revised Title I Network contracts for 2012-13 to explicitly require CESAs to provide differentiated, individualized technical assistance and professional development aligned to the needs of schools failing to meet AMOs (as identified by data analyses). CESA coordinators will work in collaboration with school leadership teams to analyze data and select appropriate, effective, research-based interventions. As such, Network coordinators must include evidence of increased, targeted supports for schools failing to meet AMOs, as well as justification for selection of the specific services provided, as part of the deliverables submitted to Title I quarterly as a requirement of contract continuation.

Consultation with Experts
As a requirement of ESEA application approval, DPI consultants will also require districts with schools missing AMOs for a specific subgroup population to consult with DPI consultants with expertise in improving outcomes for high-need subgroup populations, such as SwDs and ELLs. Districts will align Title I funds to appropriate resources and supports identified in consultation with the DPI experts.

- Supporting Students with Disabilities
  To support schools' efforts in improving instruction for students with disabilities, DPI developed self-assessments which provide the necessary structure and resources for districts and schools to conduct in-depth data analyses that lead to a comprehensive plan to improve student outcomes for SwDs. Additionally, DPI provides guidance online regarding the process of writing IEPs aligned to standards, resources for each of the 20 indicators in the State Performance Plan (SPP), links to recorded online modules and webinars, a calendar of professional development and technical assistance spanning the year, strategies for increasing accessibility across the content areas, and resources to enhance parent involvement and understanding of their child's educational progress. Schools missing AMOs for students with disabilities must consult with DPI special education consultants to determine which, if any, of these available resources will best support local efforts to improve student outcomes.

- Supporting English Language Learners
  With an increasing population of ELLs across the state, DPI recognized the need to hire education consultants with expertise in instructional strategies to support language acquisition and ELLs. As such, DPI hired consultants to review agency resources, materials, and systems of support to ensure they were adequate, appropriate, and effective for the language learning population. Additionally, these education consultants provide technical assistance to stakeholders in the field and align them to appropriate resources as necessary and requested. A large proportion of the technical assistance provided, in collaboration with the CESAs and WIDA, address:
  - English language development standards;
  - Differentiated instruction for ELLs;
  - Academic content language for ELLs;
  - ACCESS for ELLs; and
  - Title III technical assistance

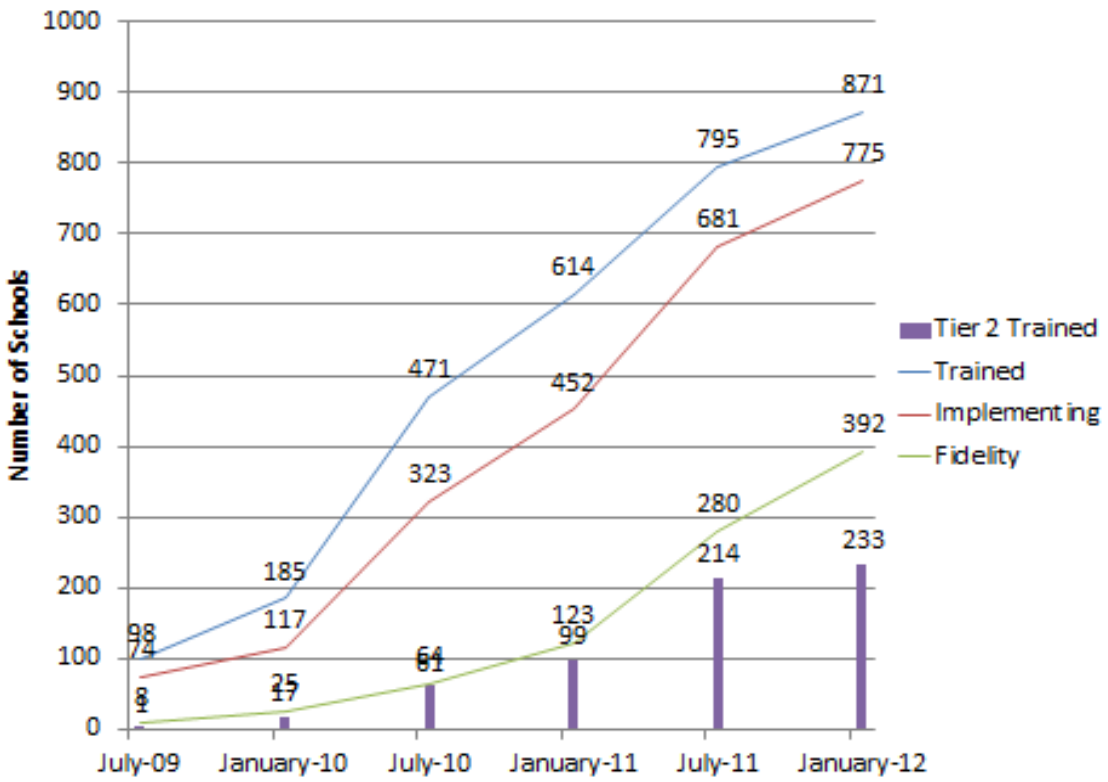
  As the population of ELLs increases each year, the number and quality of professional development addressing instructional practices to support improved outcomes for ELLs has also increased statewide. The following provide examples of some professional development opportunities offered during 2011-12:
  - Principles of Effectiveness: Best Practices for ELL Instruction and Programming;
  - Reading, Writing, Thinking: Literacy Instruction for ELLs;
  - Leveraging Technology to Support ELLs;
  - Common Core and More: Making the Right Connections for Language and Academic Achievement of ELLs;
  - Designing Formative Assessments to Promote ELL Achievement;
  - Data Discovery: Understanding and Using ACCESS for ELLs and GREAT for ELs;
  - Data to Promote Success and Achievement;
  - Supporting ELLs in Mainstream Classrooms;
  - RtI for ELLs and Culturally Responsive Practices;
  - Supporting ELLs in Early Childhood settings; and
  - Involving Parents and Families of ELLs in their education

  Schools missing AMOs for English language learners must consult with DPI consultants to determine which, if any, of these available resources will best support local efforts to improve student outcomes.

ALIGNMENT TO RESOURCES
In addition to the previously noted requirements, DPI consultants will align districts with schools failing to meet AMOs to available resources and supports as appropriate.

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

Since its inception, the Wisconsin RtI Center continues to mature and gain implementation data from schools accessing its resources. As services continue to expand, so does the statewide awareness of this resource and its benefits. In addition, the services offered through the RtI Center are available to every school district in the state for a nominal fee. The graph below provides an example of the increase in the number of schools accessing training and implementing PBIS, statewide. More specifics about the Wisconsin RtI Center are provided in 2.E.iii.



Standards, Instruction, and Assessment Center
As previously noted, Wisconsin is currently developing a Standards, Instruction, and Assessment (SIA) Center that will provide content experts focused on the development of high-quality, standardized resources, and training plans. Districts with schools failing to meet AMOs will have guaranteed access to these resources at low- to no-cost. The SIA Center will serve as a separate, but connected, entity funded in part by DPI. The key priorities of the Center include:

- standardization of materials and fidelity of implementation,
- low- to no-cost resources,
- increased access to content expertise across the state (specifically targeted to Common Core State Standards),
- centralized leadership connected to DPI, and
- agility, speed, and responsiveness to needs across the state.

Spotlight Practices
In the future, the Spotlight Practices website will provide Wisconsin schools access to a comprehensive database of effective practices implemented across the state, as well as opportunities to learn from other Wisconsin educators. This website will provide schools not meeting AMOs with meaningful and applicable information, such as hyperlinks for specific spotlight schools to view relevant videos, documents, innovative practices, and implementation strategies in order to improve student achievement in their own schools. DPI, in collaboration with the Title I Network, will require schools failing to meet AMOs 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).

Indistar
Beginning in the fall of 2012, all districts will have the option to develop and monitor their own school improvement plan via submission on Indistar. Indistar is a web-based system designed to inform, coach, sustain, track, and report improvement activities. Indistar requires improvement plan activities to align with indicators of evidence-based practices at the district, school, and classroom levels designed to improve student achievement. The tool's pre-populated indicators draw upon the vast school improvement and turnaround literature and, once embedded in the aligned school reform plan, will ensure progress through a continuous cycle of assessment, planning, implementation, and progress monitoring. School staff can complete the needs assessment included within Indistar and begin developing a plan aligned to identified areas of need. Although all districts will have access to this online tool, DPI consultants will provide greater levels of technical assistance to districts with schools failing to meet AMOs in order to support comprehensive planning and improved student outcomes.

SUPPORTING IMPROVED OUTCOMES FOR ALL TITLE I SCHOOLS
While DPI created the previously noted supports and services in order to support schools failing to meet AMOs, DPI will provide these resources to all Title I schools pending availability (i.e., DPI will prioritize serving schools not meeting AMOs before all other Title I schools). DPI will also align schools to additional resources designed to support the implementation of high quality instruction as necessary.

Common Core State Standards
In 2010, Wisconsin became the first of 40 states to adopt the Common Core State Standards (CCSS) in mathematics, language arts, and literacy across disciplines. Developed in collaboration with numerous stakeholders, the CCSS emphasize 21st Century Skills embedded within expectations for the understanding and application of rigorous core content knowledge. In collaboration with two multi-state consortia, Wisconsin is currently developing new CCSS for science and social studies. DPI provides online resources and guidance to ensure districts and schools implement the CCSS with fidelity. Specifically, online resources address Wisconsin's Guiding Principles for Teaching and Learning, local implementation of CCSS, curricular alignment, assessments, and instructional practices. When a school fails to meet its AMOs in any given subject, the Title I education consultant will align the school and its district to *subject-specific online resources, online forums,* and *professional development* as appropriate.

Online Resources
In order to support the implementation of the Common Core State Standards and high quality instructional practices, DPI's Content and Learning team provides subject-specific online resources.

English language arts. The Department of Public Instruction (DPI) addresses curriculum, instruction, and assessment in English language arts in many ways:

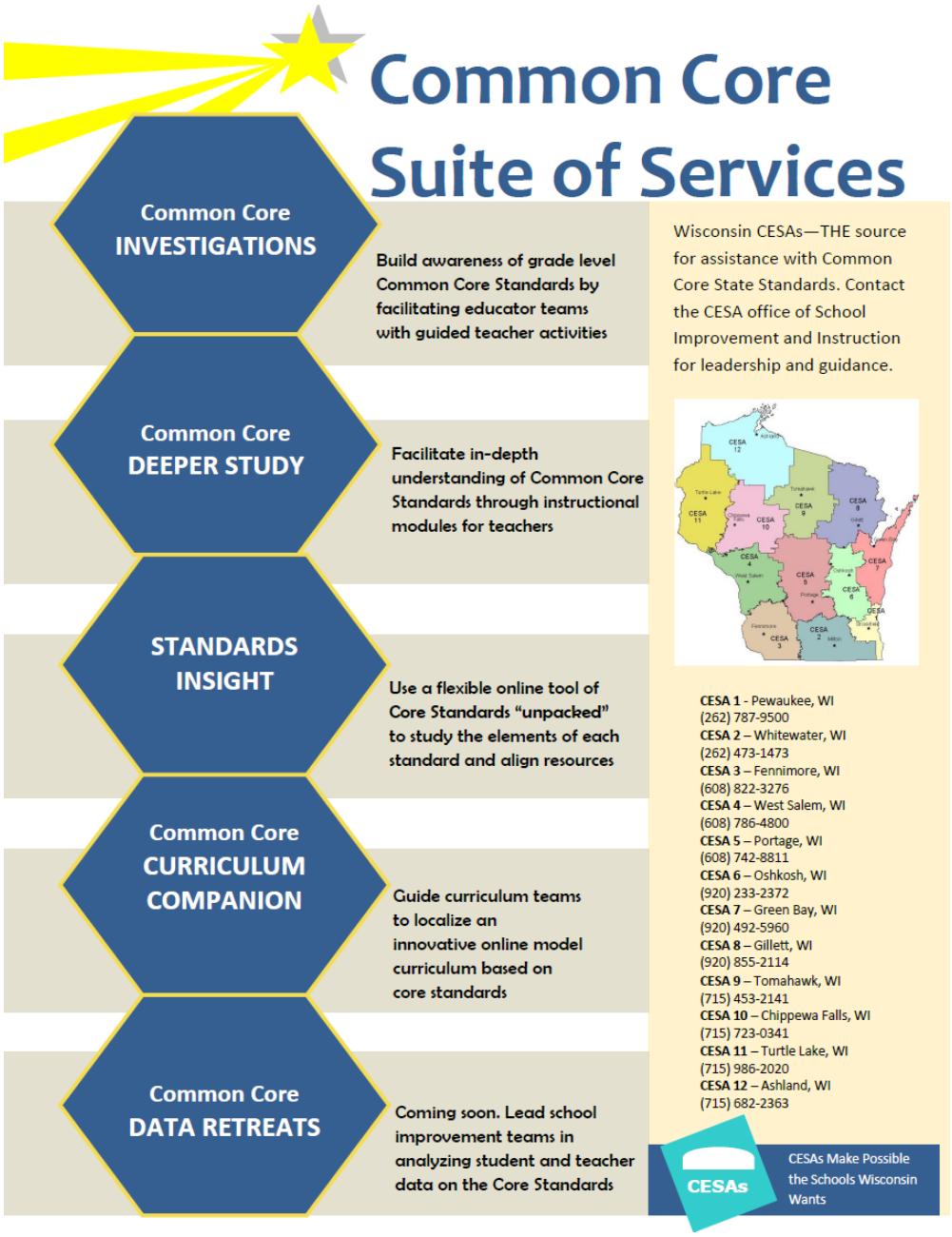
- Disseminating and supporting application of the Common Core State Standards for English Language Arts as frameworks for state and local efforts related to the four content standards:
  - Reading
  - Writing
  - Speaking and Listening
  - Language
- Publishing and disseminating current research, theory, and best practices through publications such as:
  - Planning Curriculum in English Language Arts
  - Classroom Activities in Listening and Speaking
  - Planning Curriculum in Classroom Drama and Theatre
- Providing leadership and consultation to local districts related to curriculum development and instructional planning.
- Working with state, regional, and national professional communities on shared goals.
- Supporting professional development for teachers and teacher educators.

Mathematics. Similarly, DPI's Content and Learning education consultants created a webpage with resources, including reports, research, and notices for future professional development opportunities.

Online Forums
Recently, DPI has also created an online reading forum to help promote and support implementation of quality literacy instruction, a major emphasis of DPI's initiatives across the past year. In the forum, educators can access resources, websites, videos, research briefs, and podcasts, as well as provide educators an opportunity to communicate with their peers regarding instructional practices. To ensure the resources are of high quality, DPI reviewers use the following criteria before posting resources:

- Resource is explicitly targeted toward educators and/or parents for use
- Resource does not endorse products or purchased services
- Resource is free and available to all (no membership requirements)
- Resource addresses one or more of the five elements of effective reading instruction (phonemic awareness, phonics, vocabulary, fluency, comprehension)
- Resource will direct users toward specific tools, videos, resources whenever possible
- Within broad reading sites, resources will focus on particular aspects of that site, rather than the broad link (e.g., link to the Parent section of Reading Rockets, rather than the home page)
- Resource will reflect the highest quality and most stringent validation possible (national, regional or statewide resources rather than individually owned pages)
- Emphasize quality over quantity for uncovering resources.

Professional Development
DPI has partnered with the twelve regional cooperative educational service agencies (CESAs) to provide districts CCSS training in a systematic, efficient manner. The CESAs provide a "suite of service," designed in collaboration with DPI, to districts in their region. District teams then implement a "train-the-trainer" model locally to increase staff's understanding of the new standards. Initial trainings provided Wisconsin educators with the foundational overview of the CCSS, followed by more in-depth analysis of the standards to ensure Wisconsin educators have a deep understanding. These training opportunities will continue, as the CESAs guide district teams through curriculum development and implementation. Districts with schools failing to meet AMOs will have priority when registering for these training sessions.



Statewide Title I Network

As previously noted, DPI collaborated with the 12 CESAs to create the Title I Network. The Title I Network provides increased access to technical assistance and professional development for Title I districts and schools. With financial support from DPI, each CESA provides free or reduced cost Title I services for all school districts in their CESA designed to increase student outcomes and close the achievement gap. Services currently provided by the Title I Network to support Title I districts and schools include the following:

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

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

Professional Development. Biennially, DPI conducts a statewide assessment of Title I professional development needs and uses that data to shape requirements for CESA services. The inter-agency agreement between DPI and CESA mandates that the CESAs provide professional development that fits the statewide identified needs as well as regional needs. The Title I Network provides multiple regional professional development opportunities based on an annual assessment of Title I school and district needs. As a result, professional development offered by the CESAs align with statewide and local needs through the following methods:

- Using statewide survey results to drive professional development requirements at each CESA.
- Specifying professional development offerings so they are consistent between CESAs; professional development offerings will align with identified themes provided by DPI (such as structuring Title I within RtI systems, Title I interventions in literacy and mathematics, Title I instruction and Common Core State Standards, etc.). Examples of professional development provided by the Title I Network include Leveled Literacy Interventions, Math Strategies that Motivate and Engage Students, Add+Vantage: Math Recovery, Matching Kids to Text: Choosing Appropriate Books for Students, and Title I Paraprofessional Development Series.
- Communicating correlations between expressed needs and professional development offerings statewide via DPI and CESA websites, newsletters, etc.
- Annually assessing the needs of each CESA and biennially assessing the needs statewide to ensure that the professional development offerings consistently meet the expectations and the needs of Title I schools.

Response to Intervention. Beginning in 2012-13, Title I Network contracts with DPI will require CESAs to provide more targeted support to schools to improve student achievement or narrow achievement gaps. Network contracts will specify that CESA Title I staff attend RtI trainings, where applicable, provided by the Wisconsin RtI Center and will serve as a primary point of contact for RtI in their region.

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

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

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

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

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

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

New Consolidated ESEA Application
In the 2012-13 school year, DPI will roll out a new Consolidated ESEA Application DPI designed to generate greater transparency while reducing burden at the state and local levels related to the application and claiming process. Districts will submit claims electronically, as opposed to the current paper process. Once the initial applications are submitted and approved for the 2012-13 school year, DPI estimates that the agency and districts will conserve substantial amounts of time. DPI plans to reallocate Title I consultants' additional time to provide more frequent assistance to school districts across the state as they implement Title I programs. Consultants will have greater access to district and school data through the implementation of the new Accountability Index and Report Cards and this information will inform consultants' conversations with districts regarding areas of identified academic and instructional needs, as well as their subsequent plans for use of ESEA funds to support school and district improvements in these areas.

Indistar
Although DPI will require identified schools to utilize Indistar (an online planning, monitoring, and coaching tool), the DPI will make the tool available to any interested school or district at no cost. The implementation of Indistar statewide builds consistency of expectations and reduction of duplication across the state. Informed by lessons learned using the tool in school improvement grant (SIG) schools, DPI intends to continually modify and improve the tool to ensure all key elements of the new accountability system, as well as best practices, are embedded within the system to allow all schools across the state the ability to monitor their progress towards full implementation of research-based practices designed to improve student and school outcomes.
Existing Expertise

DPI Liaison
DPI will expand upon the successful implementation of a DPI liaison within identified districts (currently MPS) to provide a liaison to each district with a Priority School. The liaisons will work closely with district and school leadership to observe and provide feedback on reform plan implementation. The liaison is provided to the district to assist in identifying and removing district or DPI barriers that may hinder rapid reform in the Priority School.

Statewide Networks
Recently, the DPI has brought together all of its key statewide networks, including the Wisconsin RtI Center, School Improvement Services (SIS), Regional Service Network (RSN), and Title I Network, in order to systematically provide updates regarding the agency's developing initiatives, as well as a way to build collaboration between the networks in an effort to systematize the statewide efforts and provide technical assistance and professional development in an efficient and effective manner. DPI has

committed to ensuring all districts across the state receive adequate, equitable support while reducing the duplication of services provided by the various networks.

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

Services currently provided by the Title I Network to support Title I districts and schools include the following:

- **Title I Application**. District Title I coordinators can consult with CESA staff regarding Title I law, programming, reporting requirements, and monitoring, as it applies to their program planning and grant application processes.
- **Title I Coordinator Leadership Development**. District Title I coordinators are provided information and resources through a Title I coordinator orientation, one-on-one technical assistance, and regional meetings. This support is designed to enhance the quality of Title I programs in all districts and ensure implementation of effective programming.
- **Professional Development**. Biennially, DPI conducts a statewide assessment of Title I professional development needs and uses that data to shape requirements for CESA services. The inter-agency agreement between DPI and CESA mandates that the CESAs provide professional development that fits the statewide identified needs as well as regional needs.
  - Align professional development with statewide and local needs
  - Use statewide survey results to drive professional development requirements at each CESA
  - Dictate professional development offerings so they are consistent between CESAs; professional development offerings will align with identified themes provided by DPI (such as structuring Title I within RtI systems, Title I interventions in literacy and mathematics, Title I instruction and Common Core State Standards)
  - Communicate correlation between expressed needs and professional development offerings statewide via DPI and CESA websites, newsletters, etc.
  - Annually assess the needs of each CESA and biennially assess the needs statewide to ensure that the professional development offerings consistently meet the expectations and the needs of Title I schools
  - Examples of professional development provided by the Title I Network include Leveled Literacy Interventions, Math Strategies that Motivate and Engage Students, Add+Vantage: Math Recovery, Matching Kids to Text: Choosing Appropriate Books for Students, and the Title I Paraprofessional Development Series.
- **Response to Intervention**. Beginning in 2012-13, Title I Network contracts with DPI will require CESAs to provide more targeted support to schools to improve student achievement or narrow achievement gaps. Network representatives will provide the Wisconsin RtI Center trainings to districts in their respective CESA. Network contracts will specify that CESA Title I staff attend RtI trainings, where applicable, provided by the Wisconsin RtI Center and will serve as a primary point of contact for RtI in their region.
- **Resources and Collaboration**. The Title I Network also connects district staff to pertinent information and resources regarding local and statewide initiatives and agencies supporting Title I programming to improve student outcomes.
- **School incentives for utilizing the Statewide Title I Network.** CESAs can partner with Institutions of Higher Education (IHE) to offer credits for professional development so that teachers can renew their license/advance on the salary scale. CESAs will offer professional development “strands” to address the most common Professional Development Plan (PDP) goals so that teachers can advance/renew their license(s).

RtI Center
As previously mentioned, Wisconsin will be partnering with the statewide RtI Center to provide targeted professional development and technical assistance to Focus Schools. In addition, the DPI will fund additional staff positions to increase the Center's capacity to assist in supporting these newly identified schools (2 FTE), as well as all other Title I schools in need of assistance across the state (1 FTE). The new staff will assist the Center with the roll-out of coordinated professional development sessions, collaborate with CESA staff including the Title I Network in the development of resources (e.g., new online modules, seminars), and build capacity for Focus Schools as well as any other schools interested in the Center's services, statewide.

New Expertise
Turnaround Partners
Beginning in the 2012-13 school year, the DPI Title I team will also begin to utilize the expertise of external Lead Turnaround Partners operating in Priority Schools, such as learning from existing challenges and barriers to implementation of reforms, as well as strengths which can be replicated to support Title I schools across the state. Additionally, DPI will analyze district and school diagnostic reviews conducted in Priority Schools in an effort to identify potential programming needs and instructional trends across the state. Title I consultants will use results of the analyses to actively address identified areas of need within Title I schools across the state.

Standards, Instruction, and Assessment Center
Currently in development, the Standards, Instruction, and Assessment (SIA) Center, based on the successful model of the WI RtI Center, will centralize content experts focused on development of high-quality, standardized resources and training plans available at low- to no-cost across the state in partnership with Institutes of Higher Education. Recognizing that the RtI Center has successfully promoted "how" to implement quality instructional programming through modifications to schools' and districts' systems and structures, DPI is developing a Standards, Instruction, and Assessment Center to work in tandem with the RtI Center as a means to inform districts and schools about "what" constitutes quality instructional programming. Specifically, the Center will synthesize existing best practices and research-based interventions, as well as play a critical role in providing systematic professional development and resources statewide. For example, the SIA Center will be pivotal in the statewide roll-out of the Common Core Statewide Standards including data based decision making and assessment practices that improve learning and inform instruction.

Comprehensive Monitoring of and Support for Priority Schools

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

Turnaround Partners. DPI will approve turnaround partners for Priority Schools that demonstrate evidence of experience and expertise in successful reform initiatives. Under contract with DPI, the experts will assess the schools' core instructional program (specifically reading and mathematics), teacher collaboration, data systems, progress monitoring methods, and supports for struggling learners. Based on the diagnostic review findings and in collaboration with the turnaround partner, districts with Priority Schools will develop and submit for DPI approval a school reform plan for each Priority School in the district.

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

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

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

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

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

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

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

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

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

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

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

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

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

Funding Flexibility

DPI intends to allow LEAs funding flexibility for funds currently used under ESEA to support the requirements for Priority and Focus Schools.

Districts with Priority and/or Focus Schools will have the option, under this waiver, to transfer up to 100 percent of certain ESEA programs such as Title II A into Title I A in order to support schoolwide reforms. Transfers of funding must not reduce equitable services available to private school students and staff. Prior to making decisions affecting equitable services for private schools, LEAs must consult with private school representatives. In addition, any school identified as Priority or Focus may operate as a schoolwide school even if it has a poverty rate below 40 percent in order to use the Title I allocation to implement state required reforms.

Given the new Accountability Index, Title I schools identified for improvement and districts identified for improvement will no longer be required to set aside 10 percent of funds allocated at the school level and at the district level (respectively) for the purpose of professional development.

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

Comprehensive Monitoring of and Technical Assistance for all Title I Schools

Although DPI does not have the capacity to closely monitor the instructional programs of all Title I schools in the state, DPI will provide levels of increasingly intensive monitoring strategies to all Title I schools in the state.

			School Visits
			Fiscal Monitoring
		Data Reviews	Data Reviews
		Implementation of Plans	Implementation of Plans
Needs Assessments (Optional)	Needs Assessments	Needs Assessments	Needs Assessments
ESEA Application (Basic)	ESEA Application Monitoring	ESEA Application Monitoring	ESEA Application Monitoring
All Other	**Missing AMO**	**Focus Schools**	**Priority Schools**

Title I Schools Missing AMOs
In 2012-13, the SEA will introduce a new, online consolidated ESEA application designed to generate greater transparency regarding the use of federal funds while reducing burden for districts and schools by streamlining the application and claiming process. Wisconsin estimates that both the district and DPI will conserve significant amounts of time using this new process. Title I consultants will use the additional time to closely monitor the applications of schools missing their AMOs. Specifically, consultants will have access to data identifying which AMO(s) a school missed and why. With this information, the consultant will ensure the district's ESEA program plans and budgets align to the identified needs. For example, if a school misses a math AMO for English language learners, the Title I consultant will look for a budget item which supports improvement in this area. If this area is not addressed in the budget, the consultant will contact the district to ascertain why it was not included and determine if the explanation is adequate. Additionally, with the introduction of an electronic claims submission process directly linked to the districts' approved plans and budgets, DPI will ensure districts use federal funds appropriately to support student and school improvement in areas of identified need.

A complete description of the technical assistance provided to all Title I schools is provided in 2F.

All Other Title I Schools
Similarly, the introduction of the Accountability Index system will provide more information regarding school and district performance in various subscale areas (i.e., achievement, growth, closing gaps, on track for graduation or postsecondary readiness). With this information, consultants will ensure districts' program plans and budgets support areas of identified need.

Additionally, all Wisconsin school districts will have access to the online Indistar tool for use with their schools. While the DPI will not monitor Indistar plans in these schools, the district will have the opportunity to clarify its expectations for its schools in the tool, as well as monitor the schools' progress towards said expectations.

Districts Identified for Improvement
DPI will maintain and enhance its existing accountability structures, including its authority to intervene in Districts Identified for Improvement (DIFI). DPI understands that a complete system of support includes a strong accountability component. The accountability system described in detail below will ensure that districts are responsible for improved achievement, particularly for Priority and Focus Schools.

In accordance with 2009 Wisconsin Act 215 which states, "The State Superintendent shall promulgate rules establishing criteria and procedures for determining whether a school or district is in need of improvement," DPI will modify the criteria for identification as a DIFI. Districts will be identified for improvement if they have one or more schools persistently failing to meet expectations **or** if the district misses its annual measureable objectives (AMOs) at the elementary, middle, and high school levels. Any district identified for improvement under the provisions of this waiver may be subject to state interventions at the discretion of the state superintendent.

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

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

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

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

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

Under this waiver, DPI will maintain its authority to implement similar requirements in other Districts Identified for Improvement at the discretion of the state superintendent (Refer to Principle 2.D for more information).

DPI Will Use This Waiver to Reduce Burden on Districts Through a Number of Means

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

Requiring RtI implementation under the direction of the Wisconsin RtI Center will streamline the implementation of RtI. Districts are requesting more direction and guidance on specific interventions and best practices in implementing an effective RtI system, rather than developing these systems individually. The waiver would provide very specific expectations for RtI implementation and build additional resources and professional development.

The roll-out of the statewide Standards, Instruction, and Assessment (SIA) Center will ensure consistency around instruction and assessment. Districts and schools will have much greater access to best practices which will inform instructional practice. Additionally, the SIA Center will greatly enhance the collaboration with Wisconsin's institutes of higher education, which in turn will positively impact the education and training of new teachers.

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

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

PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP

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

Principle 3 will be reviewed by the U.S. Department of Education at a later date.