

Thank you for your recent resubmission of the ESSA consolidated State plan. We recognize that you and the State team have been working hard to address the feedback that the Department has provided. We thank you for these efforts. There are three outstanding areas, identified below, for which the plan submitted on December 5, 2018, does not meet statutory requirements of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act of 2015. ESEA Section 8451 requires the Department to issue a written determination within 120 days of the State's submission of its consolidated State plan. Given this statutory requirement, we ask that you revise your plan and resubmit it through OMB Max no later than close of business on January 10, 2018. However, if Wisconsin would like to take additional time to resolve the outstanding issues and resubmit its plan, our ED staff would like to continue to work with Wisconsin on these matters. If you would like additional time, we will need you to acknowledge, by responding to this email, that Wisconsin understands that a determination on the ESEA consolidated State plan may not be rendered within 120 days and provide the date by which you will resubmit your plan.

The outstanding areas in Wisconsin's State Plan are as follows:

**A.4.v.c: If Applicable, Different Methodology for Annual Meaningful Differentiation:** On page 46 of the plan, WI's statement that "Alternate Accountability will not result in identification for Targeted Support and Improvement (TSI) due to the small size or lack of multiple years of data for schools participating in the alternate process." does not meet statutory requirements because small size schools must be included in the identification. WI would need to remove or amend this sentence to meet statutory requirements.

**A.5: Disproportionate Rates of Access to Educators:** On page 59, WDPI provides additional information around how disproportionality data will be provided to LEAS, who will use the data to evaluate placement of students. This data will also be the basis for developing a plan to eliminate disproportionality in the state. However, WDPI does not provide the data on how low income and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers. The state would need to provide this data in its state plan in order to meet statutory requirements.

**E.1: Entrance and Exit Procedures:** On page 94 of their plan, WI needs to clarify a statewide methodology in their reclassification procedures. Using both the ACCESS and the MIPs would be fine if a detailed standardized plan regarding the order and circumstance of their use was detailed.