

# Wisconsin's Results-Driven Accountability State Systemic Improvement Plan Phase III, Year III

April, 2019



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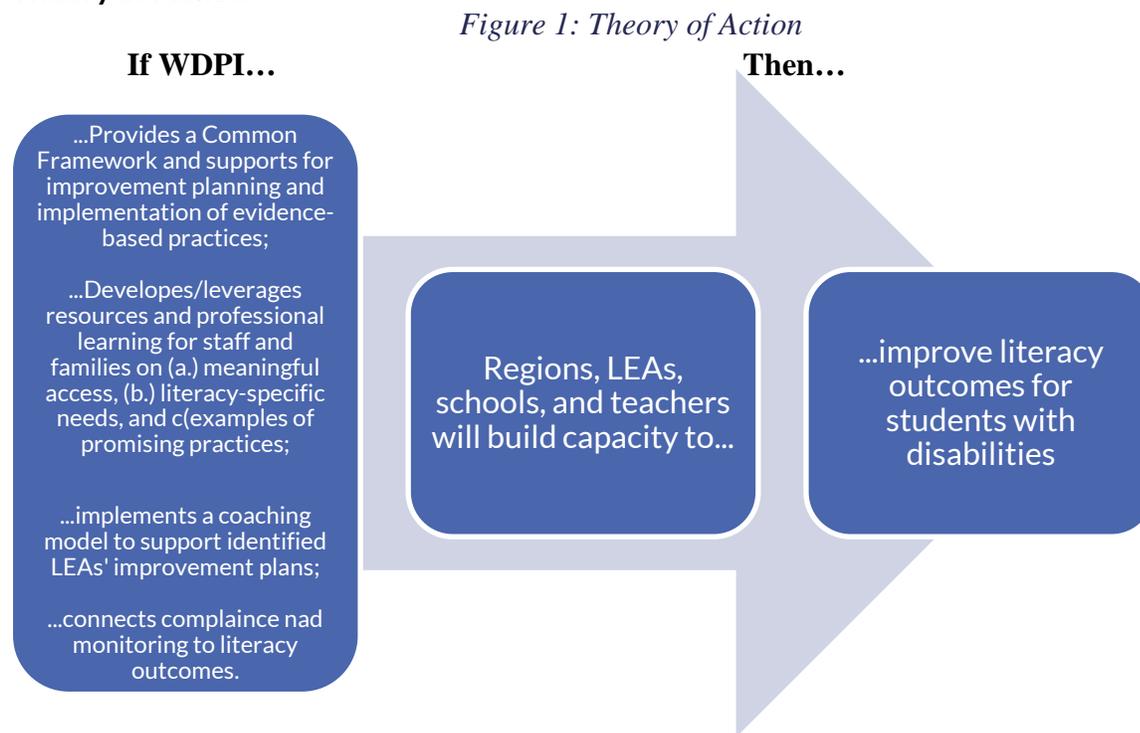
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## I. Introduction and Summary

Wisconsin's Phase III, Year III State Systemic Improvement Plan (SSIP) articulates implementation progress and impact of the improvement strategies outlined in previous Phase II and III submissions. Key data on both implementation and impact are provided, including an explanation of how this data impacted the direction of project implementation. The reader will see evidence of Wisconsin's intentional focus on implementation science and continuous improvement. Information about how stakeholders were meaningfully engaged around each improvement strategy and evaluation procedures is also included. A detailed evaluation plan lays out a progression that begins with implementing the improvement strategy, then focuses on how the strategy impacted adult practices, and finally focuses on student level outcomes, with a particular focus on Wisconsin's State Identified Measurable Result (SiMR). Wisconsin's SiMR is focused on **increasing literacy achievement for students with IEPs in grades three through eight.**

Because of this strong focus on literacy, Wisconsin has retooled the Results Driven Accountability (RDA) acronym to stand for Reading Drives Achievement: Success through Literacy (RDA:StL). A short video articulating this reimagining can be found at <http://dpi.wi.gov/sped/results-driven-accountability>.

### Theory of Action



Wisconsin's theory of action is depicted in Figure 1 above. The theory of action identifies four main improvement strategies that aim to build capacity at the state, regional, district, school, teacher, and family levels in order to improve literacy outcomes for students with disabilities. These four strategies state that the Wisconsin Department of Public Instruction (WDPI) will:

- Provide a common framework and supports for improvement planning and implementation of evidence-based practices;
- Develop and provide resources and professional learning for staff and families on:
  - meaningful access to standards-based general education curriculum and instruction,
  - literacy-specific needs, and
  - examples of promising practices;
- Implement a coaching model to support identified Local Education Agencies' (LEAs') district improvement plans; and
- Connect compliance and monitoring activities to improved literacy outcomes.

By design, Wisconsin's improvement strategies include both technical and adaptive approaches. Some strategies require mostly technical changes and corresponding leadership supports, while others require more adaptive, long-term systems change at the state, region, and district levels. Broad systems change is necessary for sustaining the practices that will result in long-term increased literacy outcomes for students with disabilities. Technical practices are equally necessary and encompass many of the evidence-based practices that move change along. Accordingly, there are varied timelines associated with each of the improvement strategies. Timelines are articulated within the implementation descriptions below.

### **State Identified Measurable Result**

Wisconsin's SiMR is a points-based proficiency measure for students with individualized education programs (IEPs) in the area of literacy, grades three through eight. The annual stakeholder-set targets and progress toward those goals are displayed below in Figure 2. For the first time, Wisconsin did not meet its SiMR target. The slippage from FFY 2016 to FFY 2017 was observed in statewide data of students without IEPs as well, and in both instances correlates with a substantial increase in economically disadvantaged students across grade levels (measured by Free and Reduced Price Lunch eligibility), with average increases ranging from 3% to 5% among students with IEPs. WDPI has made closing achievement gaps a priority focus. As part of this effort, WDPI has been increasing its cross-team coordination with Title 1 services, collaborating and unifying its messaging, professional development, and resources with Title 1 services. WDPI has also added two items to its procedural compliance monitoring system around ensuring that accommodations on assessments are properly considered, documented in the IEP, and implemented. Additional focus will be placed on improvement strategies' direct or indirect

impact on the SiMR, particularly focused on inclusionary practices and the implementation of the services outlined in IEPs.

*Figure 2: SiMR Targets and Results*

FFY	Reporting Date	Target	Data
2013	4/2015	Baseline	29.00%
2014	4/2016	29.00%	31.70%
2015	4/2017	30.00%	31.67%
2016	4/2018	31.00%	32.09%
2017	4/2019	31.00%	<b>30.12%</b>
2018	4/2020	31.67%	

**Changes from Phase III Submission**

Wisconsin saw a unique elevation of its state-wide education vision this year as its State Superintendent of Public Instruction, Dr. Tony Evers, ran for, and won, the governorship for the state. As a lifelong educator and strong advocate for equitable public instruction, Evers took office in January 2019 and appointed Carolyn Stanford Taylor as State Superintendent to carry out the remainder of his term. Stanford Taylor is the former Assistant State Superintendent of Public Instruction for the Division of Learning Support, within which the Special Education Team resides. Subsequently, Stanford Taylor appointed Dr. Barbara Van Haren, former Director of Special Education, to succeed her as Assistant State Superintendent for the Division of Learning Support. This continuity of leadership and vision, along with the heightened education focus within the state capitol, has reinforced and continued to ground Wisconsin Department of Public Instruction (WDPI) staff and extensive network of partners in a vision for equity, resulting in even greater efforts to make every child a graduate, college and career ready. For more information on this agency-wide vision, see <https://dpi.wi.gov/statesupt/every-child-graduate>.

One change from Wisconsin’s Phase III, Year II report, within its Coordinated Improvement Planning improvement strategy, is that Cooperative Educational Service Agency (CESA) 8 and WDPI mutually agreed in May 2018 that the CESA 8 Regional

Implementation Team (RIT) would no longer be an active participant within the first Transformation Zone. This is largely due to the barriers reported in Wisconsin’s Phase III, Year II report. Because the Transformation Zone process is designed as a learning process, it is considered a successful partnership as lessons learned are being used to inform the system both at the state and regional levels, and are particularly being applied to current decisions related to exploration with and mutual selection of future regional implementation teams in additional Transformation Zones. CESA 8 continues to be engaged with WDPI’s system of supports through the Technical Assistance Network for Improvement Supports. More details are provided in the SSIP Implementation Progress section below.

**Organization of the Report**

The information within Wisconsin’s report is presented in four main sections:

- **SSIP Implementation Progress**
- **Implementation and Outcome Data**
- **Stakeholder Engagement**
- **Evaluation**

At the beginning of each section, the items from the State Phase III Report Organizational Outline (Organizational Outline) contained within that section are listed. Detailed descriptions of the improvement strategies are included in phase II and III reports. Key implementation activities and data points are bolded throughout the report. Lastly, similar to last year’s submission, implementation progress and data for professional learning strategies have been moved to the appendices rather than in the body of the report in an effort to increase readability and coherence (see Appendix # 1).

*Figure 3: Key Implementation Milestones for this Reporting Period*

<b>Coordinated Improvement Planning</b>
<b>System of Supports</b>
<b>Transformation Zone:</b>
<ul style="list-style-type: none"> <li>• Cooperative Educational Service Agency #2’s Regional Implementation Team (CESA 2 RIT) fully functioned to support district and building implementation teams</li> </ul>
<ul style="list-style-type: none"> <li>• CESA 2 RIT led exploration/mutual selection and installation activities with district and building implementation teams, yielding two districts, and began installation activities</li> </ul>
<ul style="list-style-type: none"> <li>• Capacity assessments and regular reports on capacity inform action plans and support practice-policy feedback loops at every level of the system</li> </ul>
<b>Technical Assistance Network for Improvement Supports:</b>
<ul style="list-style-type: none"> <li>• The Technical Assistance Network for Improvement Supports was formally installed</li> </ul>

<ul style="list-style-type: none"> <li>• Collaboratively developed and provided capacity-building activities for TA Network members</li> </ul>
<b>Continuous Improvement Process</b>
<ul style="list-style-type: none"> <li>• Provided joint (ESSA and IDEA) federal notification packets to 428 LEAs to inform their continuous improvement efforts</li> </ul>
<ul style="list-style-type: none"> <li>• Identified jointly (ESSA and IDEA) schools and districts for improvement</li> </ul>
<ul style="list-style-type: none"> <li>• Revised criteria related to significant disproportionality in special education, which will increase federal investment in continuous improvement</li> </ul>
<ul style="list-style-type: none"> <li>• Improved and developed continuous improvement process tools and resources, including within the Wisconsin Information System for Education</li> </ul>
<ul style="list-style-type: none"> <li>• Leveraged federal investments to provide technical assistance and support related to continuous improvement for 116 LEAs</li> </ul>
<ul style="list-style-type: none"> <li>• Monitored thirty-five LEAs required to engage in continuous improvement</li> </ul>

<b>Coaching Supports</b>
<b>Coaching Resources</b>
<ul style="list-style-type: none"> <li>• Completed the first PDSA cycle of improvement of the Coaching Competency Practice Profile and created Version 2 in collaboration with the Statewide Coaching Collaborative Partners</li> </ul>
<ul style="list-style-type: none"> <li>• Created and launched a DPI-wide coaching webpage to house all coaching resources and tools</li> </ul>
<ul style="list-style-type: none"> <li>• Developed and published a Coach Self-Assessment tool</li> </ul>
<ul style="list-style-type: none"> <li>• Created a user-friendly Coaching explainer video</li> </ul>
<ul style="list-style-type: none"> <li>• Created exploration stage guidance for Coaching System Development Worksheet</li> </ul>
<ul style="list-style-type: none"> <li>• Provided quarterly Coaching Newsletters and blog posts, aligned to the Coaching Competency Practice Profile (CCPP)</li> </ul>
<ul style="list-style-type: none"> <li>• Aligned DPI coaching resources across the agency</li> </ul>
<b>• Coaching Capacity-Building</b>
<ul style="list-style-type: none"> <li>• Selected, trained and coached 12 regional coaches across the state through the Research to Practice: Inclusive Communities project</li> </ul>

<ul style="list-style-type: none"> <li>Supported coaching capacity-building within major support provider networks, including the TA Network, RIT, and FISSC</li> </ul>
<ul style="list-style-type: none"> <li>Trained CESA regions in the CCPP and supporting tools</li> </ul>
<ul style="list-style-type: none"> <li>Established CESA-based coaching networks</li> </ul>
<ul style="list-style-type: none"> <li>Provided Leadership and Coaching training to 11 teams through the WI RtI Center</li> </ul>

<b><i>Compliance Practices Focused on Literacy Outcomes</i></b>
<b>College and Career Ready IEPs (CCR IEP)</b>
<ul style="list-style-type: none"> <li>Created a state level implementation team</li> </ul>
<ul style="list-style-type: none"> <li>Tailoring training to include more specialized content focused on the role of related services providers, meeting the needs of students with more significant disabilities, and the social, emotional and behavioral needs of students</li> </ul>
<ul style="list-style-type: none"> <li>Developed online modules, including webinars, PowerPoint presentations with speaker notes, and discussion tools</li> </ul>
<ul style="list-style-type: none"> <li>Completed a module on progress monitoring and use of data in special education</li> </ul>
<ul style="list-style-type: none"> <li>Developed a training observation tool</li> </ul>
<b>Reading Drives Achievement: Procedural Compliance Self-Assessment (RDA: PCSA)</b>
<ul style="list-style-type: none"> <li>Implemented the RDA:PCSA in ninety-one districts (the second cohort of a five-year cycle)</li> </ul>

## II. SSIP Implementation Progress

This section is organized by Wisconsin’s improvement strategies and includes information on:

- ✓ Description of the State’s SSIP Implementation Progress (Organizational Outline, Section B.1.)
- ✓ Additional Activities to be Implemented Next Year (Organizational Outline, Section F.1)
- ✓ Anticipated Barriers and Steps to Address those Barriers (Organizational Outline, Section F.3)

### *Coordinated Improvement Planning*

*Figure 4: 2018 Key Implementation Accomplishments – Coordinated Improvement*

<b>System of Supports</b>
<b>Transformation Zone</b>
<ul style="list-style-type: none"> <li>• Cooperative Educational Service Agency #2’s Regional Implementation Team (CESA 2 RIT) fully functioned to support district and building implementation teams</li> </ul>
<ul style="list-style-type: none"> <li>• CESA 2 RIT led exploration/mutual selection and installation activities with district and building implementation teams, yielding two districts, and began installation activities</li> </ul>
<ul style="list-style-type: none"> <li>• Capacity assessments and regular reports on capacity inform action plans and support practice-policy feedback loops at every level of the system</li> </ul>
<b>Technical Assistance Network for Improvement Supports</b>
<ul style="list-style-type: none"> <li>• The Technical Assistance Network for Improvement Supports was formally installed</li> </ul>
<ul style="list-style-type: none"> <li>• Collaboratively developed and provided capacity-building activities for TA Network members</li> </ul>
<b>Continuous Improvement Process</b>
<ul style="list-style-type: none"> <li>• Provided joint (ESSA and IDEA) federal notification packets to 428 LEAs to inform their continuous improvement efforts</li> </ul>
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<ul style="list-style-type: none"> <li>• Monitored thirty-five LEAs required to engage in continuous improvement</li> </ul>

Wisconsin's first improvement strategy is centered on aligning systems and supports under multiple federal programs, with a particular emphasis on special education and Title I, and integrating with Wisconsin's Educator Effectiveness work. **Wisconsin has worked to centralize its equity efforts and align continuous improvement through leveraging research-based improvement and implementation strategies.** LEAs now receive a single identification package outlining requirements and available supports, increasing efficiency and focus of vision, and aligning continuous improvement with their educator effectiveness work using a single continuous improvement framework situated within an equitable Multi-Level System of Supports. Wisconsin's "state to classroom" approach leverages linked teams to ensure a practice to the policy feedback loop for continuous improvement at every level of the system. The work is organized by two main bodies of work outlined below: the **System of Supports** and the **Continuous Improvement Process**.

### **System of Supports**

The first major component to Improvement Strategy #1 is work related to the development of regional supports. The two major components of this work are:

- **System of Supports: Transformation Zone**
  - The Transformation Zone deeply transforms specific regions using a vertical slice of the system (state, region, district, school, and classroom) in order to learn for effective scale-up.
- **System of Supports: Technical Assistance Network for Improvement Supports**
  - Statewide Capacity Building for all CESAs to provide training, coaching, networking, and technical assistance for LEA continuous improvement efforts within an integrated network of supports.

### **System of Supports: Transformation Zone**

Wisconsin remains an active scaling-up state based on a partnership with the State Implementation and Scaling Up of Evidence-Based Practices (SISEP) Center as part of the National Implementation Research Network (NIRN). The Transformation Zone deeply transforms a vertical slice of the system (state, region, district, school, and classroom) within specific regions in order to engage in the deep study of what it takes to effectively scale-up supports to districts/schools for selection, installation, and monitoring of evidence-based improvement strategies. Work in the first Transformation Zone continues during this reporting period with regional partners, led by State Transformation Specialists, and with the support of WDPI's SISEP coach. Ongoing monthly implementation team meetings occur at both the regional and district levels, during which exploration and installation activities build and strengthen team members' readiness and implementation capacity.

During this reporting period, major activities/accomplishments are summarized below:

- **The Cooperative Educational Service Agency #2's Regional Implementation Team (CESA 2 RIT) fully functioned to support district and building implementation teams.**
  - STSs and SISEP coach gradually release more responsibility and leadership to the CESA 2 RIT after significant internal capacity was built on the team regarding SISEP's Active Implementation Frameworks (AIF) (see <https://implementation.fpg.unc.edu/>) during the prior reporting period. As of spring 2018, agendas are co-created with STSs, and by summer 2018 effective meeting structures, action planning, and capacity assessments and reporting are facilitated by the RIT itself with differentiated support from STSs and SISEP coach.
- **CESA 2 RIT led exploration/mutual selection and installation activities with district and building implementation teams.**
  - Exploration activities with districts took place in spring 2018. This included the development of several presentations to key district stakeholder audiences, and use of a rigorous mutual selection process, **yielding two districts** with significant readiness to establish partnership agreements within the Transformation Zone.
  - **Installation activities** with the first District Implementation Team (DIT 1) began in July 2018, while installation kicked off with the second (DIT 2) in January 2019. Both district implementation teams meet monthly with the CESA 2 RIT to engage in readiness and capacity-building activities and receive additional intermittent support from the RIT coordinator and DIT liaison to support ongoing team communication, planning, and workgroup needs. Specifically, DITs have been supported by the RIT in their implementation capacity with regard to the AIFs, in addition to their use of Terms of Reference, Communication Protocols, Initiative Inventory, and the Hexagon Tool. Further, DIT 1 has participated in training on the Observation Tool for Instructional Supports and Systems (OTISS) and anticipates collecting fidelity data on effective teacher practices in literacy classrooms beginning March 2019, with DIT 2 following later spring 2019.
- **Capacity assessments and regular reports on capacity inform action plans and support practice-policy feedback loops at every level of the system.**
  - Capacity assessment administration occurred as follows:
    - WDPI state capacity assessments: April and November 2018
    - CESA 2 regional capacity assessments: August 2018 and February 2019
    - DIT 1 district capacity assessments: July 2018 and December 2019
    - DIT 2 district capacity assessment: January 2019
    - DIT 1/BIT 1 drivers best practice assessment: anticipated April 2019

As noted in last year's SSIP report, "go slow to go fast" continues to bear out in the work of the Transformation Zone, with the work always approached from a perspective of

readiness. While the initial work in the CESA 2 RIT took longer than expected in DIT 1, as the RIT gained experience working in a district and supporting an implementation team, the team can already attest to the more rapid growth of planning for an implementation roadmap in DIT 2. As a result, while previous timelines placed classroom fidelity data collection beginning in October 2018, that has now shifted to April 2019 in DIT 1. The RIT, however, can already anticipate that will occur more quickly in DIT 2, likely late spring 2019.

### **Identified Barriers**

A significant development in the first Transformation Zone with the CESA 8 RIT occurred last spring 2018, in part related to challenges highlighted in last year's SSIP report. As the CESA 8 RIT began planning for exploration/mutual selection and installation activities with districts in their region, they recognized the additional commitment of time required for team members to engage in these activities. It became apparent that the allocation of additional funding for personnel could not be supported by their agency, especially in light of other priorities established by their Board of Control and executive leadership. While the CESA 8 RIT itself had built a significant amount of implementation capacity in an even shorter timeframe than the CESA 2 RIT, despite lengthy, transparent, and collaborative attempts with WDPI to identify a workable solution, it was not feasible to continue their full engagement in the Transformation Zone as an RIT with the intensive support of the STSs and SISEP coach. Subsequently, CESA 8 and WDPI mutually agreed in May 2018 that the RIT would no longer be an active participant within the first Transformation Zone. CESA 8, however, continues to be engaged with WDPI's system of supports through the Technical Assistance Network for Improvement Supports. The lessons learned about readiness and time/resource commitment during their involvement in the first Transformation Zone has and will continue to inform exploration with and mutual selection of future regional implementation teams in additional Transformation Zones.

While some of those same funding and personnel barriers occurred in CESA 2, a more gradual implementation period resulted in a durable commitment from their agency administration to the work. Additionally, the Integrated Contract provided funding that the RIT effectively leveraged for some of the costs associated with their work in the Transformation Zone. Time and effort data paired with anticipated needs based on their implementation roadmap for DIT and BIT work did ultimately identify additional funding shortfalls; through well-established communication protocols between the RIT, STSs, and State Design Team, additional funding from WDPI was provided.

### **Next Steps**

Additional activities, including data collection, to be implemented 2019-20 are as follows:

- First Transformation Zone continues
  - Every six months: Ongoing capacity assessment administration at all levels
  - Spring 2019:
    - Installation of fully functioning BITs in both DITs

- Collection of OTISS fidelity data (then ongoing three times per year)
- Spring/Summer 2019:
  - Training and coaching service delivery model developed based on identified literacy practices
  - DITs and BITs engage in PDSA of effective teacher practices (then monthly)
- Fall/Winter 2019: Based on readiness, DITs 1 and 2 explore possible additional BITs
- WDPI engages in exploration/mutual selection activities for RITs in second Transformation Zone
  - Spring 2019: Revise selection criteria, process, and protocols
  - Summer 2019:
    - Explore with potential regional partners
    - Mutually select and sign partnership agreements with the next two regional implementation teams
  - Fall 2019:
    - Initial installation activities with two regional implementation teams
  - Winter 2019:
    - RIT exploration/mutual selection with DITs
- WDPI strengthens implementation infrastructure
  - Spring 2019: Co-develop with stakeholders implementation guidance documents for regions and districts/schools to support selection and installation of evidence-based practices (usability test fall 2019)
  - Spring/Summer 2019: Develop decision-support data system and install a fully functioning state implementation team to address facilitators and barriers as they arise from what is learned within classrooms as part of the Transformation Zones

As mentioned previously, work in the Transformation Zone goes slow to go fast. Previous timeline estimates have rarely played out based on initial plans, and this is sometimes perceived as a barrier. While we can anticipate that the second Transformation Zone will iterate more quickly than the first, the work is still always approached from the perspective of readiness. Careful attention to practice-policy feedback loops and a strong decision support data system are critical to informing next right steps and addressing facilitators and barriers as they arise.

### **System of Supports: Technical Assistance Network for Improvement Supports**

As part of the Integrated Contract for Improvement Supports, the Technical Assistance Network for Improvement Supports (TA Network) was formally installed during this reporting period. The main function of the TA Network is to leverage federal investments through IDEA and ESSA in order to strengthen the capacity of regional service providers to deliver networking, training, and coaching services to districts and their schools. These services are focused on supporting the continuous improvement efforts of districts and

their schools to select, install, and monitor evidence-based improvement strategies within an equitable multi-level system of support. The Integrated Contract leverages federal funds to ensure that each region's TA Network team members represent expertise in general education/TI, special education, data, equitable multi-level systems of support, and educator development and supports. Capacity building for the TA Network focused on the following objectives:

- Deepen knowledge of the key features of an equitable multi-level system of support
- Understand the continuous improvement process and utilize relevant tools/resources to support district/school improvement efforts
- Learn and apply strategies that support the implementation and improvement efforts of districts and schools
- Identify structures for effective collaboration and aligned service delivery within the TA Network for Improvement
- Strengthen skills for coaching for equity

During this reporting period, major activities/accomplishments for the TA Network are summarized below:

- **The Technical Assistance Network for Improvement Supports was formally installed** for FY2019 (July 2018-June 2019) as part of the Integrated Contract for Improvement Supports
  - During spring 2018, WDPI engaged in listening sessions with CESA representatives to inform contract scope, funding, deliverables, and activities.
  - Developed and revised associated supports for contract implementation based on ongoing feedback (surveys, listening sessions, focus groups) from TA Network members and relevant WDPI staff, including invoice claiming documents and procedures, and guidance for work plan elements and contract deliverables.
- **Capacity-building activities for the TA Network**, supported by investments through the Integrated Contract, occurred throughout the reporting period as outlined below:
  - Three face-to-face professional learning meetings for TA Network teams
  - Blended, asynchronous monthly collaborative professional learning activities for TA Network teams in August, September, October 2018 and February 2019, with a focus on deepening collective capacity regarding:
    - Data inquiry tools and resources
    - Continuous improvement tools and resources
    - Coaching for equity
    - Effective team structures

The year-long capacity building efforts have occurred as planned, with regional TA Network team members participating in face-to-face and asynchronous professional

learning opportunities as outlined in the capacity building learning plan. Event evaluations are consistently completed by participants to inform the planning team's efforts to respond to impact and effectiveness and adjust as needed. To date, initial rounds of regional stakeholder input are being gathered in order to inform revisions to the final 2019-20 Integrated Contract.

### **Identified Barriers**

Barriers associated with the TA Network as a result of this year's implementation of the Integrated Contract are being addressed on both technical and adaptive fronts. A key aspect of addressing those barriers is occurring through the establishment of infrastructure at WDPI to ensure our own continuous improvement of these efforts, and alignment within the broader system to ensure effective allocation of resources, consistent communication, and monitoring/adjusting of action items.

- The establishment of an "Integrated Contract Management Workgroup" brings together key WDPI representatives from the contract's respective program parts, including Special Education, TI, and Educator Development & Supports, in order to review and support the technical implementation of the contract. This group monitors deliverables, activities, and claiming/funds while engaging with regions on a regular basis to ensure an active and ongoing practice-policy feedback loop to identify and address barriers/facilitators.
- A TA Network capacity-building planning group, also comprised of WDPI representatives, has met regularly to plan and coordinate capacity-building activities for the TA Network. As identified in last year's SSIP reporting, the planning group has focused this year's TA Network capacity-building activities, and content on the Continuous Improvement Process (CIP), and the related protocols and resources regional technical assistance providers may leverage within their training, coaching, and networking services that support districts with needs assessment, root cause analysis, selection and installation of evidence-based improvement strategies, and processes to support program evaluation and problem-solving. While these efforts have generally increased the collective floor of fluency for TA Network members, stakeholder input from TA Network members lifts up to WDPI that opportunities are being missed to ensure that capacity-building activities differentiate effectively for adult learners and their varied individual and team-based needs. As a result, WDPI is working to establish a "State Implementation Team" that would include regional stakeholders from the TA Network to inform our regional capacity-building outcomes, content, and activities. For 2019-20 and beyond, the "State Implementation Team," including regional stakeholders, will function, in part, to co-develop and co-monitor our TA Network capacity-building efforts, further strengthening the state's implementation capacity and practice-policy feedback loops.

### **Next Steps**

Additional activities, including data collection, to be implemented 2019-20 are as follows:

- Integrated Contract:
  - Spring 2019: Integrated Contract revised for 2019-20
    - Stakeholder input sessions and survey data collected and analyzed
    - Identify specific facilitators/barriers for the TA Network, and incorporate necessary changes to contract activities and deliverables
    - Introduce Integrated Contract changes to TA Network and other related regional programs to plan for effective 2019-20 implementation
  - Summer 2019: 2019-20 Integrated Contract implementation
    - Onboarding activities with new TA Network members and related program managers
    - Implementation planning meetings with TA Network coordinators (then quarterly touch-bases)
- TA Network Capacity Building
  - Spring 2019: Engage regional stakeholders from TA Network in planning team to:
    - Support outcome development and scope/sequence planning for capacity-building
    - Identify implementation data to be used within decision-support data system to inform regional capacity-building efforts
    - Establish communication and planning structures to ensure sustainability of ongoing monthly planning and coordination efforts
    - Introduce TA Network teams to 2019-20 capacity-building activities
  - Summer -Winter 2019:
    - TA Network teams engage in capacity-building activities as designed
    - WPDI collects training effectiveness data from regions and districts post events
    - TA Network planning team analyzes aggregated implementation data monthly and uses to inform capacity-building plans and state-level teams regarding facilitators/barriers

Regional stakeholder involvement in capacity-building efforts for the TA Network will likely require an additional investment of time for certain regions and may function as a barrier if not properly supported. Funding within the Integrated Contract will be leveraged in order to account for this need.

### **Continuous Improvement Process**

The system of support outlined above is grounded in the second major component of the Coordinated Improvement Planning strategy, the continuous improvement cycle and LEA identifications and reporting requirements. During this reporting period, WPDI completed the following major activities related to the coordinated, continuous improvement planning process:

- **Provided joint (ESSA and IDEA) federal notification packets to 428 LEAs to inform their continuous improvement efforts**

On February 6, 2019, WDPI uploaded joint federal notification packets via the Safe Access File Exchange (SAFE). The packets included two types of reports that align with the two major federal education laws: (1) LEA Determinations for all school districts, which include results and compliance data and identification for needs assistance, under the Individuals with Disabilities Education Act (IDEA), and (2) School-level reports (ESSA), which include identifications, if any, for Comprehensive or Targeted Support and Improvement. Whether or not the packet reflects an identification under ESSA or IDEA for support, the information in SAFE was provided to all LEAs to inform their continuous improvement efforts to eliminate achievement gaps. For a sample of the ESSA report, IDEA LEA Determination Report, and Resources see Appendices #2-7.

- **Identified jointly (ESSA and IDEA) schools and districts for improvement**

On February 6, 2019, WDPI identified nine LEAs as needing assistance (year 2) under IDEA and, under ESSA, 78 schools in need of Comprehensive Support and Improvement (CSI), 155 schools in need of Targeted Support and Improvement (TSI), and 62 schools in need of Additional Targeted Support (ATSI) (Appendix #8). These identified districts and schools are required to engage in continuous improvement as aligned to a Plan-Do-Study/Check-Act cycle and as detailed in the *Continuous Improvement Process Criteria and Rubric* (see [https://dpi.wi.gov/sites/default/files/imce/continuous-improvement/pdf/CIP\\_rubric\\_draft.pdf](https://dpi.wi.gov/sites/default/files/imce/continuous-improvement/pdf/CIP_rubric_draft.pdf)).

WDPI invited these schools and districts to start a planning period and shared a suggested *Timeline of Recommended Actions for Improving Achievement and Closing Gaps* (see <https://dpi.wi.gov/sites/default/files/imce/continuous-improvement/pdf/dpi-timeline-raising-achievement-closing-gaps.pdf>). WDPI recommended that the schools and districts use or build on successful continuous improvement efforts they are already engaged in, such as Educator Effectiveness.

Included in the February 6, 2019, packet was an invitation to identified schools and districts to strengthen their existing improvement efforts, at little or no cost, by taking advantage of new supports and shared information about new coordination among the DPI, CESAs, and other partners, to offer supports throughout the state that are built around what we know works to help schools close achievement gaps. These resources are optional, and the cost, if any, will be minimal for districts and schools. Supports include online tools, availability of funding for schools identified for Comprehensive Support and Improvement, and professional development. Specifically, CESA staff have been trained to support identified schools and districts in continuous improvement, and there are aligned professional learning opportunities scheduled in each CESA through the TA Network described above.

- **Revised criteria related to significant disproportionality in special education, which will increase federal investment in continuous improvement**

While the current federal administration delayed implementation of federal regulations related to “significant disproportionality” in special education identification, discipline, and placement (06/12/18), WDPI elected to move forward with revisions to “significant disproportionality” criteria. WDPI revised criteria for “significant disproportionality” to reflect the stakeholder input collected during the summer and early fall of 2017 (Appendix #9). WDPI collected input per then-in-force December 2016 federal regulations, and because that input reflects the interests of families, communities, and educators related to “significant disproportionality,” WDPI is moving forward with revised criteria. The revised criteria is largely consistent with the December 2016 federal regulations. WDPI will begin using the revised and adjusted criteria starting spring 2019.

LEAs identified as having racial disproportionality in special education identification, discipline, and/or placement are required to engage in the same continuous improvement process as LEAs identified as needing assistance (year 2) and schools identified for improvement under ESSA. Guidance from WDPI support the alignment of school and district improvement planning. Further, LEAs identified as having racial disproportionality in special education identification, discipline, and/or placement will be required to reserve 15% of Part B funds under IDEA for comprehensive coordinated early intervening services (CCEIS) and use these funds in alignment with their continuous improvement process planning. Thus, the change in criteria related to racial disproportionality in special education identification, discipline, and/or placement will increase CCEIS funds dedicated to continuous improvement planning from approximately eight LEAs/year to approximately fifty LEAs per year.

- **Improved and developed continuous improvement process tools and resources, including the Wisconsin Information System for Education**

The tools and resources related to the continuous improvement process is a part of Wisconsin's statewide system of support (see <https://dpi.wi.gov/continuous-improvement>); as such, the tools and resources are available to all districts and prioritized for (1) districts and schools identified under IDEA or ESSA and (2) districts identified under IDEA and ESSA. To effectively and efficiently provide supports to 420+ districts and independent charter schools, WDPI developed the continuous improvement process tools and resources integrated with and to extend the Wisconsin Information System for Education (WISE). WISE is comprised of multiple tools that support identification generation and data collection to meet all required district and school state and federal reporting mandates. These will, in turn, inform education research and data analysis through dashboard and reporting tools to better understand and improve educational outcomes for Wisconsin students.

During this reporting period, the project invested in the following WISE supports:

- **WISELearn:** WISELearn provides a centralized location for classroom resources and professional learning resources for all Wisconsin educators. This free online portal brings WI content to one easy to search spot. Through its Knowledge Mobilization initiative, Wisconsin is working to create “hubs” of research and resources aligned to the key systems features of an Equitable Multi-Level System of Supports as articulated in Wisconsin (<https://dpi.wi.gov/sites/default/files/imce/rti/pdf/rti-emlss-framework.pdf>).
- **WISEdash:** WISEdash is Wisconsin's data dashboard and allows users to compare and explore statistics about Wisconsin public schools. Educators can access student-level data through a secure data portal. During this reporting period, the project enhanced the online Data Inquiry Journal, which is an interactive tool which leads educators and administrators through data inquiry and school improvement planning. The Data Inquiry Journal includes three parts: student data inquiry, practices inquiry, and school improvement. Once complete, educators can export the Data Inquiry Journal to share with stakeholders or for required reporting under ESSA and/or IDEA. When a potential area of concern is identified, Part 1 engages users in student data inquiry to determine a student outcome priority through root cause analysis. This inquiry provides the foundation for follow-up Practices Inquiry (Part 2) and subsequent Improvement Planning (Part 3).
- **WISEExplore:** WDPI partners with the CESA Statewide Network (CSN) to develop a common data inquiry process for teachers and school leaders statewide. This team is called WISEExplore. WISEExplore partners help educators to actively discuss the data available through WISEdash portals and other sources. The partners help school staff grow internal capacity for data inquiry, and to design and implement a thoughtful school improvement action based on their analyses. This project continued to collaborate with WISEExplore to develop, test, and scale resources related to continuous improvement.
- **Leveraged federal investments to provide technical assistance and support related to continuous improvement for 134 LEAs**

During this reporting period, WDPI leveraged long-standing project investments to use, align, or support the continuous improvement process.

IDEA discretionary funds support many statewide grant projects. Two of which are the Early Childhood Program Support Team and the [postsecondary] Transition Improvement Grant (TIG). These projects **use data to identify districts in need of improvement around early childhood inclusion or postsecondary transition. A data-based focus in the early childhood is a high-leverage strategy to increase Wisconsin's SIMR.**

The overarching purpose of the Early Childhood Program Support Team is to provide early childhood program support and leadership to school districts to improve outcomes, with a focus on early language and literacy, for preschool children with disabilities in Wisconsin through evidenced-based and meaningful inclusive practices. By applying the principles of Implementation Science, aligning this work to the Wisconsin Continuous Improvement Process, and the state's priority for continuous improvement for advancing equity, the grant has resulted in a focused district approach to increasing preschool inclusion and improved outcomes for young learners with IEPs who attend and participate in early childhood programs. Before this focused approach, the early childhood grant offered and provided general technical assistance and training to all districts in the state based on who wanted to and who was able to attend. Using data from multiple sources (early childhood indicators, child count, disproportionality), a formula was created to not only identify the focus districts but also to reallocate the funding in a more equitable way to support these identified districts based on needs as seen through the data.

The TIG focuses on success for students with IEPs after they leave the 3-21 public system. The grant funds coordinators throughout the state and the coordinators are charged with providing continuous improvement support to LEAs based on data analyzed from Indicator 1, 2, 13 and 14 of the State and Annual Performance Reports. The continuous improvement process used by TIG is structured transition planning utilizing the Transition Improvement Plan (TIP). The TIP training tool was also revised to include both reviews of graduation and dropout rates as well as equitable practices for evaluating data and transition practices.

The following criteria were used to identify LEAs to which TIG offered an invitation to participate in customized, on-site continuous improvement using the TIP:

- Below the state graduation average of 67.32% for students with disabilities based on Indicator 1, or
- Greater than the state dropout average of 2.45% for students with disabilities based on Indicator 2, or
- 20% non-engagement rate for students with disabilities based on Indicator 14, or
- Districts with a wide graduation dropout rate gap between white exiters and exiters of color.

Another cohort of LEAs was required to participate in continuous improvement: LEAs that received state grant awards under the Transition Readiness Grant. The thirty-eight districts that receive grants have engaged in continuous improvement and now have a TIP in place.

An additional effort to provide continuous improvement supports, as well as to streamline and enhance multiple statewide professional learning offerings, is the planning for the Leading for Learning series. WDPI has partnered with multiple professional organizations and CESAs to combine three existing conferences and an existing learning series into one

kick-off conference followed by a four-part, year-long learning series to begin in the 2019-2020 school year. The four main focus areas are leading for equity; supporting teacher practice; data leadership; and safe, supportive, and rigorous culture.

Lastly, WDPI partners with the CESA Statewide Network (CSN) to develop a common data inquiry process for teachers and school leaders statewide. This team is called WISExplore. WISExplore partners help educators to actively discuss the data available through WISEdash portals and other sources. The partners help school staff grow internal capacity for data inquiry, and to design and implement a thoughtful school improvement action based on their analyses. This project collaborated with WISExplore to develop, test, and scale resources related to continuous improvement. During this reporting period, **eighteen LEA teams participated in cohort-based continuous improvement professional learning and tested the usability of continuous improvement process tools and resources** (Data Leadership Academy, a collaborative project between WDPI's WISExplore team and the Association of Wisconsin School Administrators (AWSA)). The teams represented small, medium and large districts; the teams serve students in urban, suburban, and rural areas of the state; and the teams committed to raising achievement for students with IEPs, students of color, and other marginalized student groups.

- **Monitored thirty-five LEAs required to engage in continuous improvement**

During this reporting period, thirty-five LEAs were identified as having racial disproportionality in special education identification, placement, and/or discipline and required to engage in continuous improvement. Twenty-five identified LEAs elected the continuous improvement process reporting flexibility and submitted locally-developed improvement plans using the continuous improvement process; the remainder used the state-developed tools and resources related to improvement planning. Twenty-six identified LEAs improved on student outcome measures: the districts reduced racial disproportionality in special education identification, placement, and/or discipline.

### **Identified Barriers and Next Steps**

While many milestones and successes were realized, some barriers were encountered as well. During this reporting period, WDPI identified the following barriers and next steps related to the coordinated, continuous improvement process and is planning activities to eliminate these barriers (see details, below):

- **WDPI capacity to monitor jointly all identified schools and districts for improvement:**

Eighteen districts were identified under IDEA (Needs Assistance, Year 2, and/or racial disproportionality in special education) **and** with at least one school identified for support under ESSA, and WDPI projects this number will almost double next year. Currently,

WDPI does not have the capacity to jointly monitor (ESSA and IDEA consolidated monitoring) this increased number of districts.

To address this barrier, during the upcoming reporting period, WDPI plans:

- Q1-2: Plan for a multilevel system of monitoring support
- Q3: Implement a multilevel system of monitoring support
- Q3: Evaluate and adjust/scale-up the implementation of a multilevel system of monitoring support
- **Local flexibility related to improvement planning affects WDPI ability to evaluate continuous improvement process**

WDPI is encouraging identified schools and districts to leverage existing continuous improvement planning processes, including those used to meet state requirements related to Educator Effectiveness, to address gaps flagged in the joint federal accountability systems. Educator Effectiveness is a performance-based continuous improvement system designed to improve the education of all students in the state of Wisconsin by supporting guided, individualized, self-determined professional growth and development of educators and is required by state statute for all educators in Wisconsin. The Office of Socially Responsible Evaluation in Education (SREed) at the University of Wisconsin in Milwaukee, and the Wisconsin Educator Effectiveness Research Partnership (WEERP) conduct a statewide evaluation of Educator Effectiveness (EE) ([see https://uwm.edu/officeofresearch/wisconsin-educator-evaluation-and-development-process-evaluation/](https://uwm.edu/officeofresearch/wisconsin-educator-evaluation-and-development-process-evaluation/)).

WISEgrants is the portal through which districts and schools identified under IDEA and/or ESSA will report on required improvement activities. During this reporting period, the project invested in IT staff to start technical work related to continuing building the reporting portal. WISEgrants is an innovative federal grants management system designed, developed and operated by WDPI staff. The WISEgrants Web Portal was created through a collaboration between the ESEA and Special Education teams at WDPI in regards to constructing a one-stop shop for LEAs to access their federal funds that has resulted in a system that is efficient and standardized for subrecipients. In addition to the requirements of the Federal programs, the two teams involved other WDPI departments in the development of WISEgrants and began a long-term plan of establishing wrap-around processes to connect the various data submissions required of LEAs.

To date, the evaluation of continuous improvement as required under IDEA and/or ESSA and reported via WISEgrants is not connected to the evaluation of continuous improvement under EE.

Wisconsin is one of 47 states having received public funding to create a state longitudinal data system (SLDS). Despite state-to-state differences, each SLDS shares a common

purpose of supporting research and analysis with the intent of informing individual, household, and public policy decisions based on standardized criteria. WDPI is leveraging investments under the SLDS grant to create a cross-agency evaluation plan focused on continuous improvement, using data collected through WISEgrants (for purposes of ESSA and IDEA improvement reporting) and through other data collection tools, for example, related to Educator Effectiveness. WDPI is partnering with the Wisconsin Center for Education Research, the Institute for Research on Poverty, and the Wisconsin Evaluation Collaborative, and the Office of Socially Responsible Evaluation in Education (SREed) at the University of Wisconsin in Milwaukee to build this cross-agency plan. During the upcoming reporting period, WDPI plans:

- Q1-2: Draft collaborative evaluation plan, bringing coherence across the evaluation plan for EE and for improvement under ESSA and IDEA
- Q3-4: Implement, review/revise, and scale collaborative evaluation plan related to continuous improvement
- **Different data collection and analysis under IDEA and ESSA causes confusion at the district and school level and impedes effective continuous improvement**

ESSA and IDEA are values-driven federal laws, with outcome measures rooted in equity for students who have been historically marginalized in public schools. Both laws hold states and local education agencies accountable for gaps in educational measures; both laws analyze and use data related to students with IEPs to make determinations regarding needed improvement at the school (ESSA) and district (IDEA) level. During this reporting period, districts received joint federal notification packets with graduation and participation and proficiency data. The ESSA-specific sections of the packet used source data from 2017-18 (graduation) and 2018-19 (math and ELA participation and proficiency), while the IDEA-specific sections of the packet used source data from 2015-16 (graduation) and 2016-17 (math and ELA participation and proficiency). District staff provided input to WDPI that the different source data years was a barrier to effective, efficient continuous improvement.

During a phone conversation with OSEP on January 9, 2019, OSEP clarified that SEAs are not required to use data as reported in the APR prior to LEA determinations; instead, if more current, valid, and reliable data is available, the SEA may use it. As a result, WDPI is planning to revise data analysis methods to use the same source data for reporting via the federal notification packets:

- Q1: Review data sources and legal requirements under ESSA and IDEA
- Q2: Develop plan, including business rules, for data collection and analysis across ESSA and IDEA and focused on graduation and math and ELA participation and proficiency
- Q3: Implement plan
- Q4: Provide joint notifications using the same source data for graduation and math and ELA participation and proficiency

## Coaching Supports

Figure 5: 2018 Key Implementation Supports - Coaching

Coaching Resources
<ul style="list-style-type: none"> <li>Completed the first PDSA cycle of improvement of the Coaching Competency Practice Profile and created version 2 in collaboration with the Statewide Coaching Collaborative Partners</li> </ul>
<ul style="list-style-type: none"> <li>Created and launched a DPI-wide coaching webpage to house all coaching resources and tools</li> </ul>
<ul style="list-style-type: none"> <li>Developed and published a Coach Self-Assessment tool</li> </ul>
<ul style="list-style-type: none"> <li>Created a user-friendly Coaching explainer video</li> </ul>
<ul style="list-style-type: none"> <li>Created exploration stage guidance for Coaching System Development Worksheet</li> </ul>
<ul style="list-style-type: none"> <li>Provided quarterly Coaching Newsletters and blog posts, aligned to the Coaching Competency Practice Profile (CCPP)</li> </ul>
<ul style="list-style-type: none"> <li>Aligned WDPI coaching resources across the agency</li> </ul>
<ul style="list-style-type: none"> <li><b>Coaching Capacity-Building</b></li> </ul>
<ul style="list-style-type: none"> <li>Selected, trained and coached 12 regional coaches across the state through the Research to Practice: Inclusive Communities project</li> </ul>
<ul style="list-style-type: none"> <li>Supported coaching capacity-building within major support provider networks, including the TA Network, RIT, and FISSC</li> </ul>
<ul style="list-style-type: none"> <li>Trained CESA regions in the CCPP and supporting tools</li> </ul>
<ul style="list-style-type: none"> <li>Established CESA-based coaching networks</li> </ul>
<ul style="list-style-type: none"> <li>Provided Leadership and Coaching training to 11 teams through the WI Rtl Center</li> </ul>

Supports for coaching is another of Wisconsin's improvement strategies due to its critical role as an implementation capacity driver. Programming emphasizes a statewide vision and tools for coaching, as well as more intensive support for high needs LEAs, with a particular focus on LEAs and school identified through Wisconsin's new joint IDEA and ESSA continuous improvement process. WDPI has an internal coaching position, an

external jointly funded (IDEA and ESSA) Statewide Coaching Coordinator, and has scaled this reporting period to fund and build capacity for one coach within each CESA through the new Research to Practice: Inclusive Communities discretionary project. The implementation update below is organized in two main sections: **Resources to Support Coaching** and **Capacity-Building to Support Coaching**.

### **Resources to Support Coaching**

As coaching has become a highly recognized practice to support educators in the field, **WDPI developed a suite of tools aligned to the Coaching Competency Practice Profile**. A new webpage (<https://dpi.wi.gov/coaching>) has been designed to house all resources, tools, and documents created by the agency and related to “coaching.” This webpage is meant to be a “one-stop shop” for administrators, coaches and educators to access resources related to coaching. The webpage was officially launched on August 21, 2018.

Key resources housed on the website include:

- The **Coaching Competency Practice Profile (CCPP)** which is Wisconsin's clear and consistent definition of coaching along with a brief tutorial guiding users on how to use the tool to help inform their work.
- A user-friendly **coaching explainer video** intended for administrators, educators, families, and communities to access and gain a transparent and jargon-free explanation of how coaching can benefit the student.
- A confidential **self-assessment meant to determine personal strengths and growth areas and meant to inform professional growth** and goal development along with a short video explaining the connection to the CCPP and how to use the assessment results. After users complete the assessment, they are provided with a high-level overview including an average rating for each competency. The assessment points out competencies where they scored high, as well as where there are opportunities for growth. Survey results of TA providers are being used to drive state-wide capacity-building plans.
- Articulation of **coaching connections across the agency** to maintain consistency and clarity of alignment and message.
- **Quarterly coaching blogs and newsletters directly aligned to the CCPP** along with a “search” feature to assist users in finding the most appropriate learning and resources for their individual needs. Resources connected to competencies 1a, 2b and 6a have been accessed; further validating the agency's professional learning planning aligned to the CCPP.

### **Next Steps**

As the agency continues to develop tools and resources to support the field of coaching, next steps include adding features and guides to the webpage. A continued focus will be on connecting resources to the CCPP and expanding on the “searchable” feature to help users find what they need more quickly.

Additionally, it is evident that leaders and educators want support in installing coaching at the systems level. WDPI is currently developing a Coaching Systems Development Worksheet toolbox which is meant to serve as a scaffold for regions, districts, and schools to establish a system of coaching. It is a tool adapted from the National Implementation Research Network to fit the needs of Wisconsin educators. The worksheet has been divided into the implementation stages of exploration, installation, initial implementation, and full implementation. Each stage identifies key activities to guide the implementation process and resources and evidence to support the work and help track progression. The worksheet is scheduled to be available by summer, 2019 with a soft launch of the exploration stage by spring, 2019.

Many divisions and teams at DPI are using, or beginning to use, a coaching model in their work. The Statewide Coaching Coordinator has been partnering with teams to share and train on the use of statewide resources. In collaboration with the consultant for coaching supports at WDPI, the statewide coaching coordinator has partnered, at varying degrees, with the following teams in building their awareness and use of statewide coaching supports: early childhood; Student Services/Prevention and Wellness, Wisconsin Safe and Healthy Schools Training and Technical Assistance (WISH) Center; the Regional Special Education Network (RSN) directors; outreach services for the Deaf, Hard of Hearing, and Deafblind; and library and media specialists. The statewide coaching coordinator also partnered with Title I to develop a Promoting Excellence for all (PEFA) eCourse facilitation guide with coaching connections.

### **Capacity-Building to Support Coaching**

Wisconsin reported on its Phase III Year II submission that, due to no longer receiving State Personnel Development Grant (SPDG) funding, some activities would be restructured. Wisconsin took the most effective elements from its last SPDG project and incorporated them into a new, albeit significantly smaller, project called Research to Practice: Inclusive Communities (RPIC). The elements brought forward from the SPDG include an enabling context of Professional Learning Communities (PLC) and cohort-based coaching supports. Inclusive Communities is the new usable innovation (see the Inclusive Communities Practice Profile at <https://dpi.wi.gov/sites/default/files/imce/sped/falleader-16-Inclusive-communities-profile.pdf>) and effective implementation is infused within the project design. Twelve districts will receive a small grant and an external coach. Priority will be given to districts with ESSA and/or IDEA identifications related to the outcomes of students with IEPs. As part of the RPIC grant, one employee was chosen to represent each CESA as the external coach to a district team. Apart from their work with the grant, receiving extensive coaching training will help build regional capacity.

**The CCPP was used to create selection criteria aligned to the competencies to assist CESAs in hiring RPIC coaches.** The selection criteria was shared with CESA directors, and each director was encouraged to reference the criteria during the hiring process.

The CCPP has also been used to design and provide ongoing professional learning and coaching to the group which is operating as a PLC. In this first year, the coaches are coming together for seven monthly virtually meetings and four face-to-face full day meetings. During these meetings, part of the time has been devoted to building coaching capacity. **Coaches created professional growth goals as it related to the results of the self-assessment and that data has, in part, guided the scope and sequence of the learning.**

Personal growth goals were related to competencies 1 (Reflective Practice), 2 (Change Facilitation) 4 (Communication Skills) and 6 (Knowledge Base Development). During the face-to-face and virtual meetings, coaches were given the opportunity to build skills in these targeted areas through focused coaching practice.

Apart from the learning provided through the PLC, coaches have attended a variety of other capacity building opportunities. Coaching-specific learning opportunities include: Seminar of the Inclusive Classroom Profile, WISEcoach Data Leadership Academy, Association of Wisconsin School Administrators (AWSA) Impactful Coaching Academy, Leadership and Coaching training through the Wisconsin Rtl Center, and Coaching for Equity.

Another focus for Wisconsin’s coaching improvement strategy **is capacity-building for the TA Network for Improvement Supports**. The TA Network is committed to providing and building the coaching capacity of all team members from all twelve regional partners (CESAs). The statewide coaching coordinator acts as a member of the planning committee responsible for developing content which is used in monthly learning opportunities; both virtual and face-to-face. When appropriate, opportunities to hone coaching skills are woven throughout the scope and sequence with the understanding that it is a driver of the continuous improvement process. **Participant survey responses drive the creation of subsequent monthly learning plans.** Some sample survey data is presented below.

*Figure 6*

Survey Question	Sample Responses
What part of this month's learning resonated most with your team?	Always appreciate revisiting Coaching Stems.
	Disaggregating the data and identifying the why for districts.
	The conversations regarding equity.

Why did it resonate with you?	[In regards to Coaching Stems] Can be used in a variety of scenarios & situations. Good to remind oneself that there are ways to get to the question w/o challenging someone personally.
How might your learning inform future work?	[In regards to Coaching Stems] If we apply a coaching stem and bring that experience back to the TA Network to share.

This work is a continuation from 2017-2018 and has thus far focused on coaching skills to recognize and disrupt patterns of thinking which continue to perpetuate the marginalization of student groups. As a result of the new IDEA and ESSA joint identification system, feedback from participants, and Federal Investment in Statewide Systems Change (FISSC) Coaching Self-Assessment Tool survey data (described below), the learning has recently focused on Competency 2 from the Coaching Competency Practice Profile: Change Facilitation. This competency is described as, “Intentionally disrupting marginalizing policies, practices, and structures promotes the sustainability of equitable practices. Facilitating change based on both student and systems-level data improves access to quality learning opportunities, redresses systemic inequities, increases the likelihood of adaptive change and builds capacity with the organization.” Participants have had opportunities to explore and develop these skills via team conversations, scenario role play, and data analysis.

A **next step** to more intentionally facilitate coherence with regional CESA partners is to increase the number of days WDPI funds for RPIC coaches to intentionally collaborate with TA Network teams within each CESA.

In addition to the support provided to the TA network, **the statewide coaching coordinator is acting as a member of the first RIT**. Currently, the RIT is engaged with work in two districts. The coaching coordinator shares equal responsibility of all team members to create content and facilitate monthly district meetings as well as to attend monthly RIT meetings. In addition to the shared roles, the coaching coordinator provides feedback to the RIT as they build their own capacity in coaching and will work closely with DITs on developing systems of coaching as they begin to implement their chosen effective innovation. These connections help facilitate the state-to-classroom linked team structure Wisconsin is establishing within its transformation zone.

Another effort to ensure coaching is infused in Wisconsin’s system-change investments as a driver of success and in order to close gaps and improve outcomes for each and every student, **WDPI is leveraging a variety of resources and investments that includes projects/grants as part of the IDEA-funded Federal Investments in Statewide Systems Change (FISSC) network of discretionary projects**. FISSC project/grant staff are critical providers within a coherent and aligned statewide system to support district/school

implementation of equitable multi-level systems of supports (and related practices) using an effective continuous improvement process. It is important that FISCC project staff build their collective capacity in order to provide high quality supports related to LEA improvement strategies.

Project staff participate in an annual face-to-face event focused on priority areas, then participate in interim asynchronous capacity-building. Participation in the 2018 Annual FISCC Conference provided attendees with common tools and strategies to use with districts and schools in their continuous improvement efforts. This year's learning was intended to provide participants opportunities to practice coaching skills in conversations related to equity within the context of 1) individual, 2) team, and 3) system transformation. Participants were immersed in practice, focusing on a variety of coaching competencies and utilizing a number of tools to engage in equity conversations.

The days were organized around equity tools to facilitate conversations and opportunities to practice. Additional tools that support the objective were also utilized throughout the learning opportunity.

The FISCC conference provided opportunities to intentionally connect to specific competencies. Participants were invited to choose a learning path that works best for their professional learning needs as it relates to coaching. As DPI continues to create resources, tools, and supports for coaches, participants can connect directly to learning topics aligned to their professional learning needs based on self-assessment results.

In direct response to the FISCC survey data collected in January 2019, the **next steps** include offering continued independent and asynchronous professional learning focusing on the top responses. Between March 2019 and April 2020, professional learning will include virtual monthly webinars related to the following:

- Root cause analysis
- Problem Solving Tool
- PBIS Field Guide
- Microaggressions
- Equity Decision and Policy Tool

**Additional representative employees from each of the 12 CESAs have been trained on the CCPP and supporting tools** either in a virtual or face-to-face setting. Each CESA has provided a designated contact for coaching work, and they are invited on a quarterly basis to attend a collaborative virtual meeting co-hosted by the statewide coaching coordinator and Rtl coaching consultants. Most of the 12 CESAs are providing coaching network opportunities to coaches in their regions. During this reporting period, **ten of the twelve CESAs, or 83%, purposefully aligned their professional learning offerings to statewide coaching tools; especially the CCPP.**

### **Next Steps**

Next steps include the Statewide Coaching Coordinator will continue to host and facilitate quarterly meetings with CESA coaching contacts. These contacts are aware that the coaching coordinator is available to provide continued support on the development and facilitation of coaching learning opportunities. One exploratory request from CESAs that serve primarily rural districts is a unified coaching event or speaker. As new tools are developed and released, such as the Coaching System Development Worksheet, the coaching coordinator will support efforts to share and provide training on these tools. The coaching coordinator is continuing to collect stakeholder feedback on the document "Coaching with an Equity Lens" which should be released through DPI within the following year.

In the upcoming year, coaches from the RPIC grant will be paired with a district selected to participate in the grant project. Coaches will focus on guiding district leadership teams through the exploration stage of implementation. They will use the training and coaching they have received to work with districts to complete NIRN's District Capacity Assessment and create and work with an improvement plan aligned to project objectives.

With regard to the TA Network, much of this year has been spent in the exploration and creating readiness stage for districts in regards to notifications and continuous improvement. The TA planning workgroup anticipates that the upcoming year will require TA Network teams to engage in coaching as districts and buildings begin to implement plans. The long-term vision for capacity building will include more opportunities to practice coaching skills. The RIT will begin supporting the DIT as they move into buildings (BITS). As innovations are selected, training and coaching will be pivotal to implementation.

### **Leadership and Coaching (Offered through the Wisconsin Rtl Center)**

The Wisconsin Rtl Center currently provides [professional learning](#) in the area of leadership and coaching. In 2017-2018 eleven teams fully participated in the workshop series. This workshop is in the full implementation stage and undergoes annual continuous improvement based on training outcomes and implementation data.

During this reporting period, strengthening the focus on equity with the training series has been a focus. The Rtl Center partnered with Anthony Muhammad to create a new video for participants in order to strengthen equity with the sessions, update knowledge and skills related to positive culture and collaboration based off the updated *Transforming School Culture* text.

Rtl Center staff additionally partnered with WDPI staff and the Statewide Coaching Coordinator to create a document called Coaching for Equity which is intended to provide an intentional focus on equity accounts for and adapts to the diversity of learners and families served by Wisconsin schools.

## Compliance Practices Focused on Literacy Outcomes

Figure 7: 2018 Key Implementation Accomplishments – Compliance Practices

<b>College and Career Ready IEPs (CCR IEP)</b>
<ul style="list-style-type: none"> <li>Created a state level team focused on CCR IEP implementation</li> </ul>
<ul style="list-style-type: none"> <li>Tailored training to include more specialized content focused on the role of related services providers, meeting the needs of students with more significant disabilities, and the social, emotional and behavioral needs of students</li> </ul>
<ul style="list-style-type: none"> <li>Developed online modules, including webinars, PowerPoint presentations with speaker notes, and discussion tools</li> </ul>
<ul style="list-style-type: none"> <li>Completed a module on progress monitoring and use of data in special education</li> </ul>
<ul style="list-style-type: none"> <li>Developed a training observation tool</li> </ul>
<b>Reading Drives Achievement: Procedural Compliance Self-Assessment (RDA: PCSA)</b>
<ul style="list-style-type: none"> <li>Implemented the RDA:PCSA in ninety-one districts (the second cohort of a five-year cycle)</li> </ul>

### College and Career Ready IEPs

As Wisconsin moves toward year four of supporting the use of the College and Career Ready Individualized Education Program (CCR IEP) process as a way to sustain better outcomes for students with IEPs, the focus is on ways to both expand and deepen it as a promising path to realizing better outcomes for our students with IEPs. One of the first steps this year was to formally **create a state level team focused on CCR IEP implementation**. This team supports and coordinates our efforts around CCR IEPs at the state level and also provides a direct conduit for support and communication with the regional level. The implementation team meets monthly to review training data, consider content revisions or additions, and plan for expanding implementation efforts. As the vision is to deepen the work beyond only training, the implementation team will be integral to systematically moving this work forward. Part of the work this year has focused on **tailoring training to include more specialized content focused on the role of related services providers, meeting the needs of students with more significant disabilities, and the social, emotional and behavioral needs of students**. Trainers are largely Regional Special Education Network (RSN) directors who are also TA Network members, creating a systematic link for coherence with the continuous improvement work outlined above.

WDPI continues to offer and **develop online modules, including webinars, PowerPoint presentations with speaker notes, and discussion tools** which any school district in the state can access for free at any time to support their individual learning needs. This year CCR IEP trainings that incorporated discussions and examples based upon a specific lens were piloted. For example, WDPI staff developed training content situated in the role of related services staff (i.e., speech language pathologists, occupational therapists, physical

therapists, etc.) to better support their integration into the team developing and delivering comprehensive services via a student's IEP. Based upon feedback from trainers, as well as the expressed needs of school staff, the team is **completing a module on progress monitoring and use of data in special education**. All CCR IEP resources can be found at <https://dpi.wi.gov/sped/college-and-career-ready-ieps>.

In order to maintain consistency of messaging while also respecting the individual training style and diversity among regions, WDPI has **developed a training observation tool** based on the work of the National Implementation Research Network for monitoring fidelity. The observation tool allows observers of training events to capture data related to essential messaging around CCR IEP content. Members of the state level implementation team have conducted usability testing on the instrument this year and are currently making adjustments to it based on their feedback as well as that of trainers.

### **Barriers and Next Steps**

Two main barriers to the CCR IEP implementation were identified. First, while the vast majority of the state has had at least some exposure to the CCR IEP content, there continues to be strong demand for training and particularly for specialized content. Given the size and geography of Wisconsin, it presents a challenge when one or two trainers are the content experts and must travel throughout the state to reach practitioners. The team plans to address this issue over the course of the next year through the use of technology and varied training formats. Further, the CCR IEP process is a different way of thinking about IEP development and many participants (and trainers) have expressed the desire for additional practice, as well as have indicated that attending a training more than once has been very helpful. As such, the team is currently planning for ways to deepen support for schools if they are to utilize this process successfully.

Secondly, this year brought a number of new staff to regional positions within the CESAs who serve as primary trainers. For CCR IEP trainings, this meant providing a higher level of support to new staff until they became comfortable with the content and training delivery. In most cases, inexperienced trainers were paired with an experienced trainer to co-deliver the training. This worked well to both build capacity of newer trainers as well as maintain consistency of messaging.

Additional next steps include increased implementation supports. Implementation research through the National Implementation Research Network as well as adult learning research, such as that by Joyce and Showers, suggests that training is necessary but not sufficient in order to change practice. Toward this end, the work for the coming year is focused on deepening implementation and expanding support for changing practice.

Beginning in summer, a workgroup will convene to develop a coaching plan and ways to collect data on it and measure impact. The purpose will be to define systems coaching, and

technical assistance as a follow-up support to teams who have attended training and express a need for further support and partnership. It is anticipated that a coaching model will begin within one region and with one district. Starting small will allow for adjustments and improvements to be made for subsequent partnerships, and it is anticipated that additional implementation coaching partnerships between districts and regions will form over the course of the year (up to three in year one).

We also plan to expand the availability of specialized CCR IEP trainings (such as a focus on progress monitoring, students with the most significant disabilities, role of related services providers, and content specific to emergency licensed teachers) by leveraging technology. The trainings will be broadcast to CESA partners with regional staff serving as in-person facilitators. Through offering a menu of training options and dates, regional staff will be able to more purposefully tailor learning to the needs of their regions, more school staff in more areas of the state will have access to the content and travel for individual trainers will be lessened. It is intended for this format to also serve as a relationship builder between regional staff and districts so that as districts leave with an action plan, regional staff can follow up periodically and are familiar with what districts in their regions are working on.

As a support for our trainers, we will offer a monthly training cadre meeting. Especially as systems coaching becomes more widely available and supported around the state, we must support the learning and capacity building needs of our trainers and coaches. The intent of this monthly meeting is to function much like a professional learning community in which trainers/coaches can learn from and with one another, bring dilemmas for the group to process, practice new skills, and learn from experts.

### **Reading Drives Achievement: Procedural Compliance Self-Assessment**

Wisconsin's second main project related to compliance practices that impact outcomes has focused on shifting focus and content for monitoring LEAs toward a more outcome-driven approach. Additional detail and associated resources can be found at <https://dpi.wi.gov/sped/educators/rdapcsa>. In this reporting period, **ninety-one districts (the second cohort of a five-year cycle) conducted the Reading Drives Achievement: Procedural Compliance Self-Assessment (RDA: PCSA)**, which consisted of the following activities:

- After July 1, 2018, each district appointed an ad hoc committee, including parent(s), to determine how and when the self-assessment would be conducted and to review the results of the self-assessment. District staff assigned to review IEP records completed the RDA: PCSA Training and Certification E-Course with one-hundred percent accuracy and each director of special education provided an assurance of completion to the department. The eCourse is designed to develop an understanding of how to assess monitoring standards and promote inter-rater reliability of IEP record reviews.

- By November 15, 2018, districts uploaded WISE IDs of student records to the RDA: PCSA Reporting Tool in the DPI special education secure portal. The reporting tool then generated the record sample. District staff conducted records reviews using the Department's RDA: PCSA Directions & Standards. Each director of special education recorded the district's results in the reporting tool. For any noncompliance identified by the district, the district is instructed in the *RDA: PCSA Reporting Tool* to identify how to correct student-level errors and ensure current compliance. Each district submitted their RDA: PCSA report of errors and corrective action plan.
- In January 2019, the procedural compliance workgroup (PCWG) conducted validation visits in selected representative districts to determine if records were accurately assessed in accordance with the RDA: PCSA Directions and Standards. Districts were notified of any records that were not properly assessed and any additional student-level errors requiring correction. Validation activities inform future training needs and clarifications needed in the Directions and Standards. The results also help to measure the effectiveness of the RDA: PCSA Training and Certification E-Course for ensuring consistency in applying the Directions and Standards during record reviews.
- By January 15, 2019, each of the ninety-one districts corrected student-level errors and provided an assurance that all student-level noncompliance was corrected and actions to ensure current compliance are in progress. The Department began verification of student-level correction of noncompliance in February.
- Members of the PCWG provided training and technical assistance for special education supervisors representing each region in Milwaukee Public Schools (MPS). MPS is the single district in the state with a membership greater than 50,000 and conducts the RDA: PCSA on an annual basis. PCWG debriefed MPS RDA: PCSA training feedback and created supplemental notes to Directions and Standards to help ensure inter-rater reliability.
- Members of the PCWG provided additional training and technical assistance for special education staff in identified districts and charter schools. PCWG debriefed the RDA: PCSA training to help ensure inter-rater reliability.
- Members of the PCWG provided training and technical assistance to the WDPI Special Education Team to enable additional staff members to conduct Step I and Step II verification of correction of identified noncompliance in LEAs.

### III. Implementation and Outcome Data

This section is organized by Wisconsin’s improvement strategies and includes information on:

- ✓ How the State has Demonstrated Progress and Made Modifications to the SSIP as Necessary (Organizational Outline, Section C.2)
- ✓ Assessment of Progress Toward Achieving Intended Improvements (Organizational Outline, Section E.1)

#### *Coordinated Improvement Planning*

##### **System of Supports: Transformation Zone**

The impact of the work of the transformation zone will be evaluated through SISEP assessments, designed to measure leadership, organization, and competency, including fidelity, at all levels of the system. State capacity was initially assessed in October 2015, followed by regions in 2017, and districts in 2018, with an anticipated timeframe of spring 2019 for both school-level capacity and practice fidelity data. The following table outlines the assessment progression.

*Figure 8: Progression of Capacity and Fidelity Assessment Administration*

Assessment	Description of Data	Timeline
State Capacity Assessment (SCA)	Action assessment used by State Education Agencies (SEAs) to examine application of implementation practices and resources in support of effective and sustained use of effective innovations	Initial: October 2015  Administered every six months to present
Regional Capacity Assessment (RCA)	Action assessment that provides a regional education agency (REA) with a structured process for development of a regional capacity implementation plan to supports district implementation teams that will directly benefit students.	CESA 2 – Initial: February 2017; Administered every six months to present  CESA 8 – Initial: July 2017; Final: January 2018

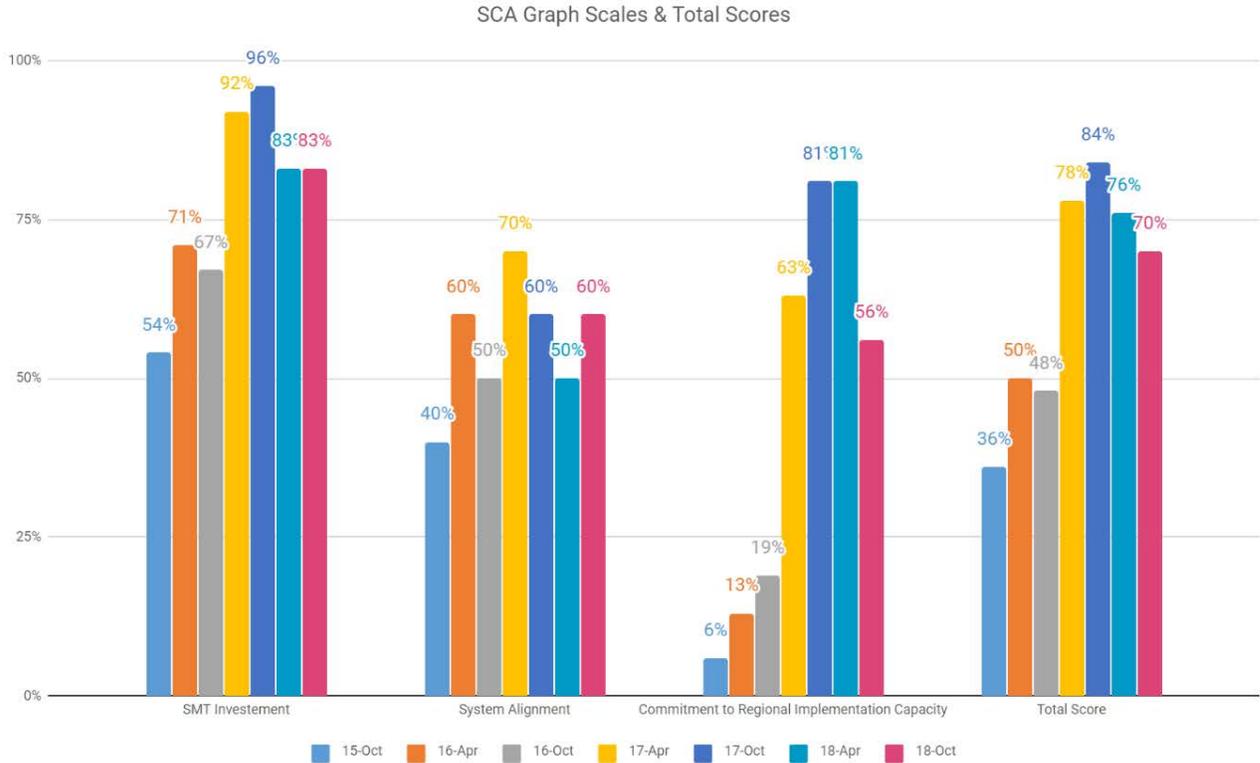
Wisconsin's Results-Driven Accountability State Systemic Improvement Plan  
Phase III, Year III

District Capacity Assessment (DCA)	Action assessment designed to help district leaders and staff more precisely align resources with intended outcomes to support the effective use of an effective innovation.	DIT 1 – July 2018; January 2019 (continue every six months)  DIT 2 – January 2019 (continue every six months)
Drivers Best Practice Assessment	Action assessment designed to help school leaders and staff monitor the implementation components essential for planning effective implementation supports and operationalize best practices for each driver.	DIT 1/BIT 1 – Anticipate first administration April 2019 (continue every six months)  DIT 2 – Anticipate first administration late spring 2019 (continue every six months)
Observation Tool for Instructional Supports and Systems (OTISS)	Classroom walk-through tool to assess the quality of systems and supports that help teachers use best practices for instruction.	DIT 1/BIT 1 - Anticipate first set of classroom data collected in March 2019 (continue three times per year – spring, fall, winter)  DIT 2/BIT 1 – Anticipate first set of classroom data collected late spring 2019 (continue three times per year – spring, fall, winter)

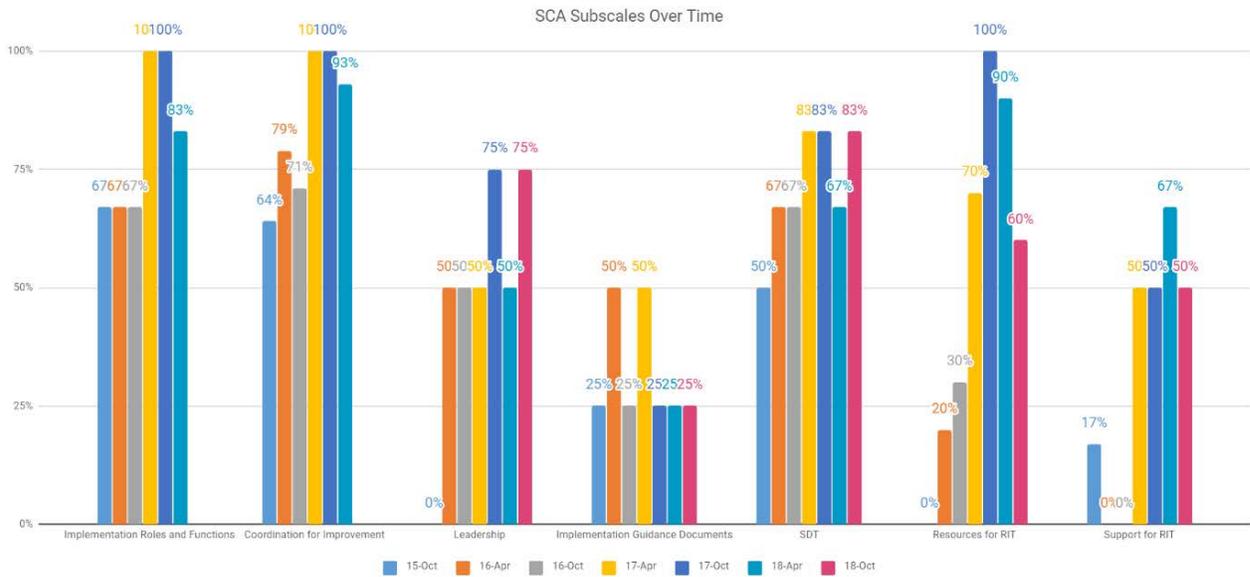
# Wisconsin's Results-Driven Accountability State Systemic Improvement Plan Phase III, Year III

## WDPI State Capacity Assessments

*Figure 9*



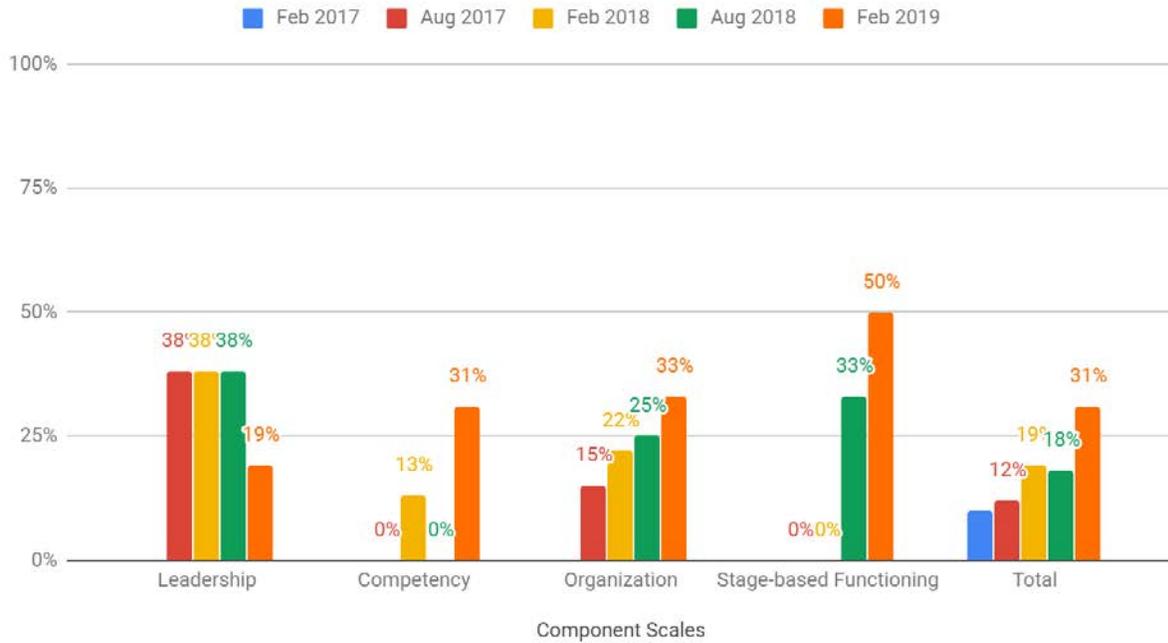
*Figure 10*



CESA 2 Regional Capacity Assessment

Figure 11

Feb 2017, Aug 2017, Feb 2018, Aug 2018 and Feb 2019



DIT 1 District Capacity Assessment

Figure 12

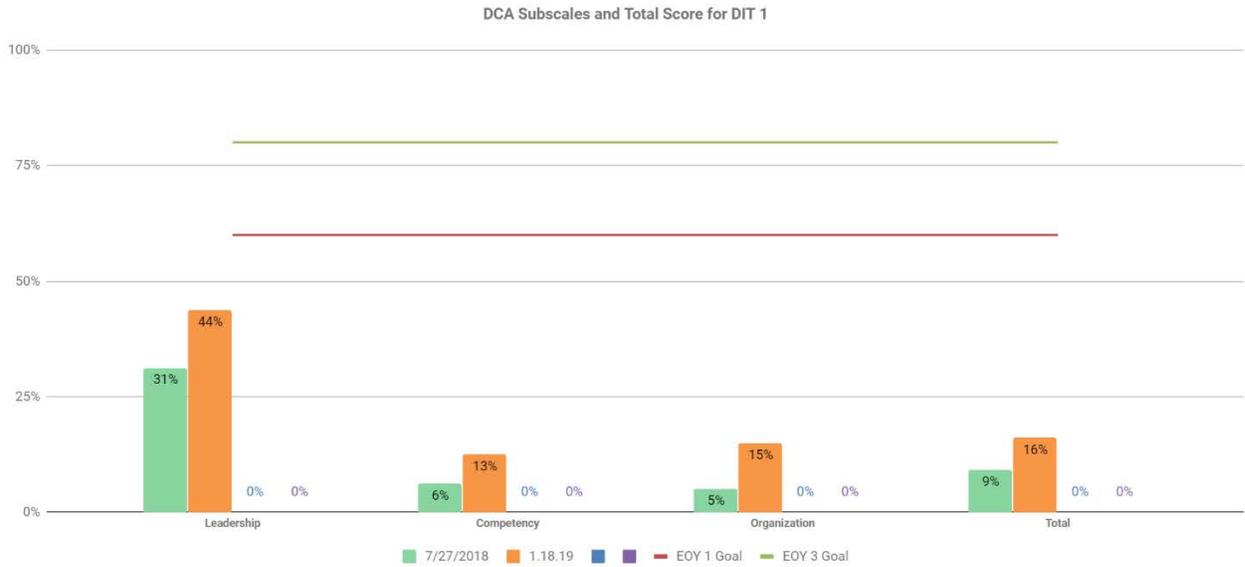
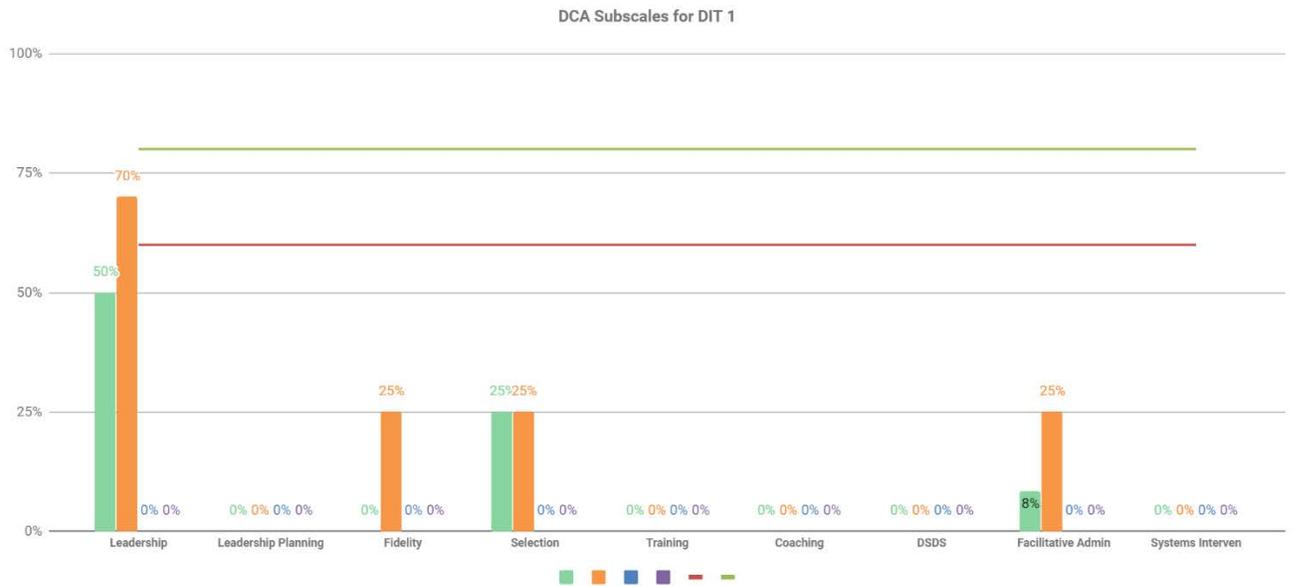


Figure 13



DIT 2 District Capacity Assessment

Figure 14

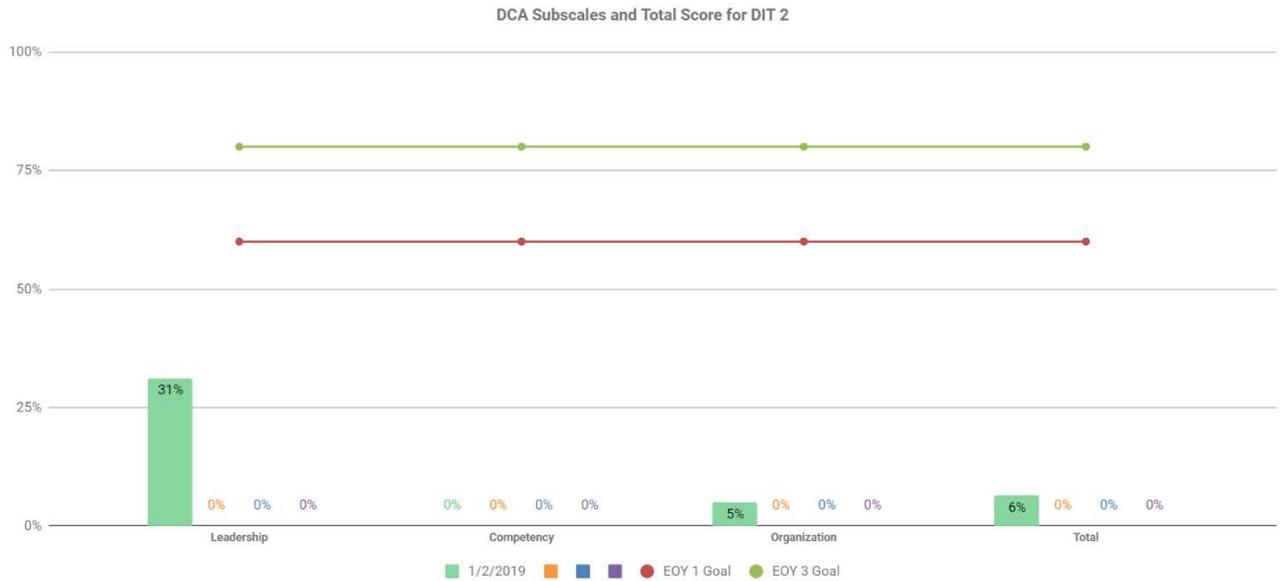
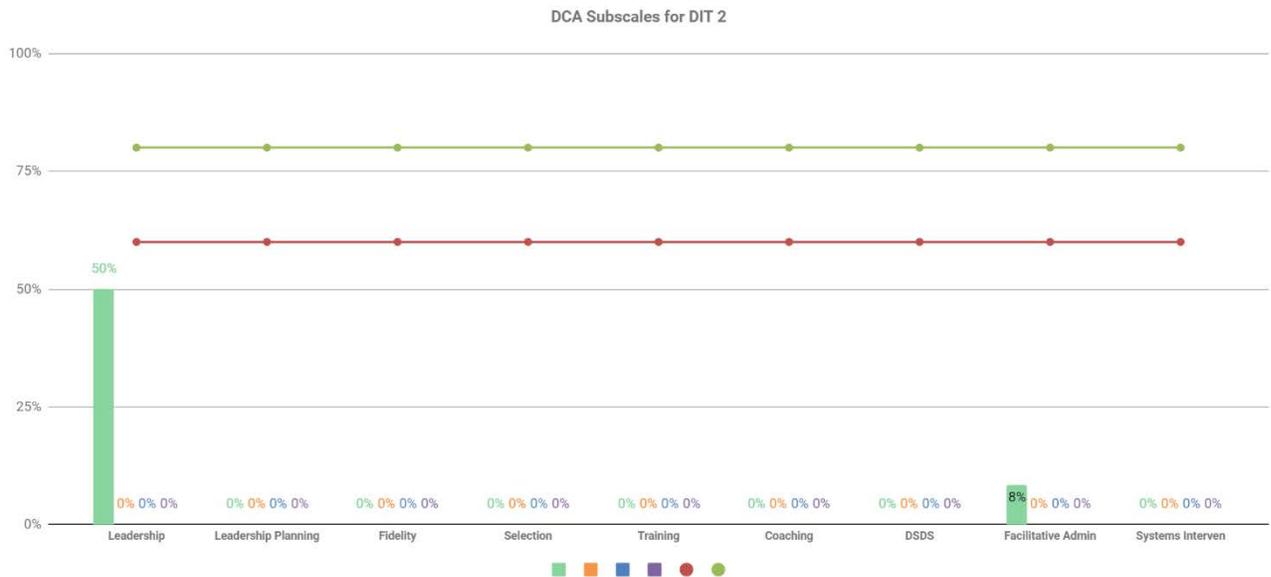


Figure 15



WI Overall System Capacity Data

Figure 16



In WI, the implementation capacity represented by the data above suggests that the **inputs and outputs at one level tend to reflect the subsequent inputs and outputs at the other levels of the system.** In the spirit of “accountability rolling uphill,”

- For WDPI, SCA system alignment data highlights the continued need to develop implementation guidance for regions and districts, reinforced by that equivalent data from CESA 2 RIT and DITs 1 and 2. Further, relatively slow-growing and low capacity scores at the regional and district levels continues to impress upon the state design team the need to strengthen the state-level implementation infrastructure for and alignment of supports, data, and action-items for regional capacity-building.
- Leadership is a strong driver at every level of the system, thus reflecting the significant readiness built through ongoing capacity development at the state and regional levels, and robust mutual selection process for the first two district implementation teams.
- Commitment to regional capacity development has been a strengthening data point in WI; however, the end of CESA 8’s partnership agreement contributes to a recent decline, and points to a need for WDPI to re-initiate exploration activities for mutual selection of additional regions in order to ensure the ongoing opportunities to study variability in implementation efforts in more than one Transformation Zone.

SISEP’s capacity assessments, by design, are action assessments, meant to inform implementation plans and action items for teams. Upon the conclusion of each capacity

assessment administration, the respective teams engage in action planning to identify the next right steps for short term “quick wins,” as well as medium- and longer-term action items for their ongoing implementation efforts.

- WDPI’s action items have recently focused on establishing its own fully functioning teams to specifically support an implementation infrastructure for regional capacity building that supports continuous improvement efforts of districts and their schools.
- Implementation guidance is needed at every level of the system, so specific steps are underway to promote the co-development of tools and resources to support continuous improvement and the selection and installation of evidence-based practices for regions and districts/schools.
- WDPI’s previous exploration/mutual selection activities are under review, and a plan being developed to engage in exploration of our next RITs for the next Transformation Zone.
- Regional and district implementation team efforts within DITs 1 and 2 are shifting toward collection of classroom data using the OTISS fidelity tool in literacy classrooms to inform the supports needed to effectively support their teachers’ classroom practices. This emphasizes the importance of developing that solid implementation structure at the state, and more specifically requires the development of a decision-support data system, and fully functioning teams to address facilitators and barriers as they arise from what we learn within classrooms as part of the Transformation Zone.

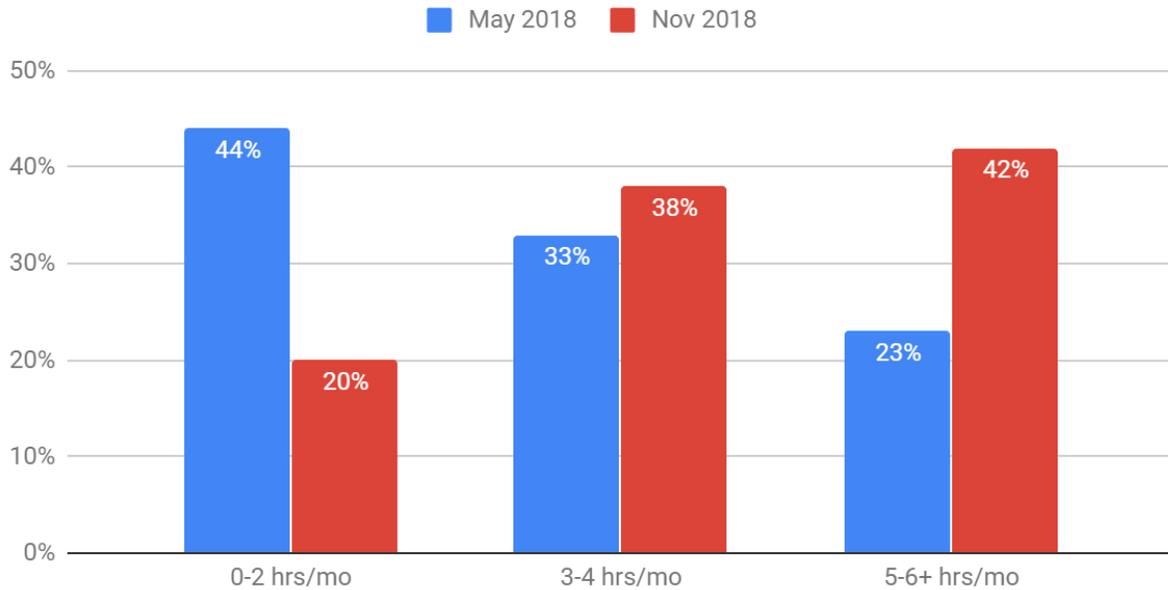
### **System of Supports: Technical Assistance Network for Improvement Supports**

As reported in last year’s SSIP, implementation data from the TA Network has been collected on a regular basis to reflect training effectiveness and inform planning of the state’s capacity-building efforts. Specifically, data is collected regarding time/effort and training effectiveness. With the implementation of the Integrated Contract during 2018-19, a survey tool has been standardized, generally modeled off of SISEP’s event evaluation, and is completed by regional participants quarterly, usually coinciding with our face-to-face professional learning events, in order to more consistently monitor implementation data over time.

EFFORT DATA

Figure 17

Estimated Participant Time Engaged in TA Network  
Team-Based Capacity-Building Activities



TRAINING EFFECTIVENESS DATA

Figure 18

Percentage of Participants Responding Strongly Agree/Agree

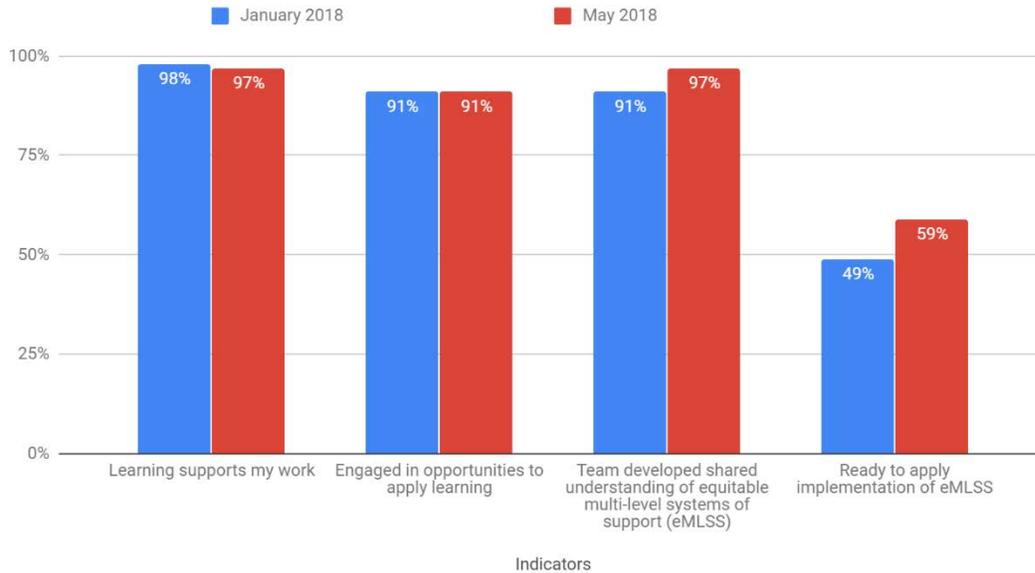
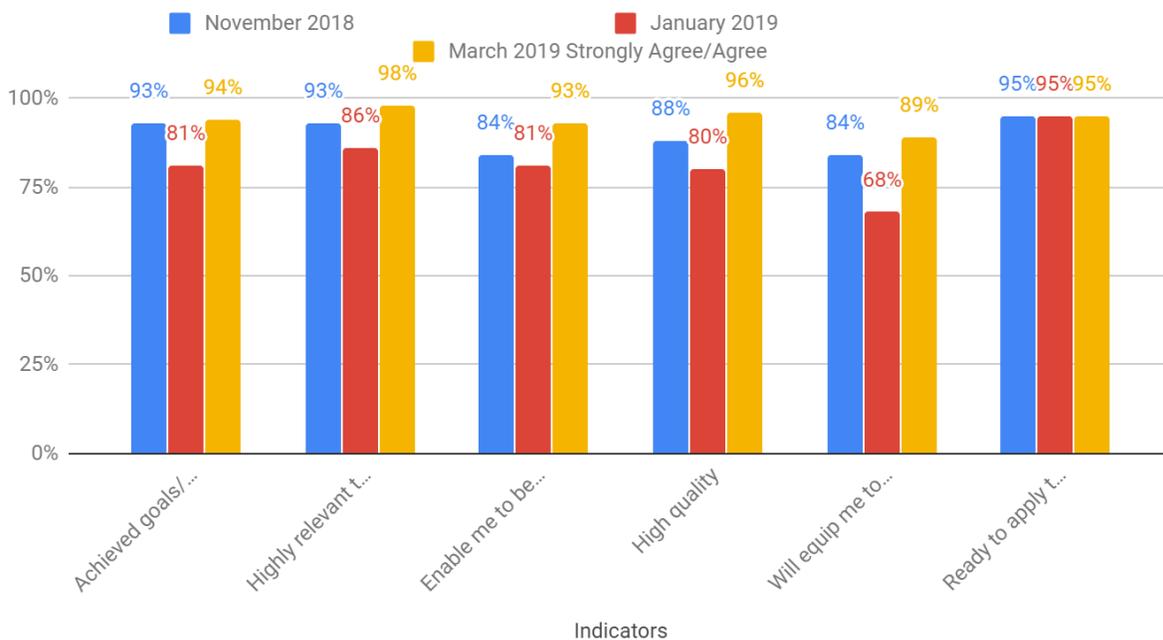


Figure 19

Percentage of Participants Responding Strongly Agree/Agree



**Analysis:**

Significant efforts are being reported by individuals and teams with regard to dedicating time to engage in professional learning. The May 2018 data reflects the expectation that TA Network team members devote approximately two hours per month to team-based capacity-building activities. While 44% of respondents indicated they were approximating that amount of time, more than half indicated that they were exceeding that time. As of November 2018, under the auspices of the Integrated Contract where the expectation increased to four hours per month, 38% of respondents approximated that amount of time, while 42% exceeded it.

With significant time being devoted to regional capacity-building efforts within the TA Network, WDPI is seeing subsequent positive data regarding training effectiveness and impact, with a high percentage of respondents reporting that they strongly agree/agree with the indicators of effectiveness. When paired with qualitative data from both participant surveys and stakeholder focus groups, the Integrated Contract Management workgroup **has leveraged that information to inform technical adjustments to the contract itself** in order to account for time and funding adjustments, while the TA Network capacity-building planning team **addresses rapid cycle improvements to professional learning activities and content** that support opportunities to practice and reinforce the adaptive shifts teams are making relative to supporting their districts' continuous improvement efforts within an equitable MLSS. For example, Figure 19 above shows a decrease in the positive feedback received from the November to January TA Network Face to Face meetings. The planning committee used feedback data to attend to adult learning principles in a more intentional way by infusing individual and team reflection time for each major concept as well as an increased commitment to providing time for teams to plan for applying concepts within their professional learning for districts within their regions. Feedback data from the March meeting indicated these adjustments may have positively impacted learning.

While this data has been significantly useful in WDPI's own continuous improvement efforts, it also reinforces the need to incorporate regional stakeholders in implementation structures. As mentioned above, there is an advantage gained when this data is analyzed alongside regional partners; as such, strengthening implementation structures will be beneficial to more accurately and effectively inform the implementation supports for regional capacity-building efforts through a decision-support data system, and fully functioning teams to address facilitators and barriers as they arise from lessons learned from the TA Network. This will be further enhanced as data collection efforts shift to include not only regional self-reported surveys and general stakeholder feedback, but also training effectiveness data from district/school personnel who access supports from regional providers this spring and as part of the 2019-20 Integrated Contract deliverables.

### Continuous Improvement Process

During this reporting period, WDPI monitored and measured outputs and progress related to the coordinated, continuous improvement process through the following:

- **Data collected through continuous improvement efforts by 116 LEAs served through long-standing project investments**

The Early Childhood Program Support Team collected data related to continuous improvement in service to transition outcomes for early childhood students with IEPs. The baseline data was collected, representing the percent of children ages 3 through 5 who attend a regular early childhood program and receive the majority of their special education and related services in the regular early childhood program. For those districts identified during the first year of the project, the baseline data is from the 2016-17 school year. For those districts identified during the second year of the project, the baseline data is from the 2017-18 school year.

During this reporting period, the Early Childhood Program Support Team **analyzed this data and, based on that analysis, made the following decisions:**

- Revised the grant funding formula and required each Early Childhood Program Support Teacher to continue to work with their Year 1 focus LEA and work with one to seven additional focus LEAs during the 2018-19 school year (determined by the number of discretionary grant days available within the CESA/region)
- Encouraged the use of local data
- Continued to provide professional development to Program Support Team in root cause analysis, development of measurable goals, and coaching/facilitation
- Developed Educational Environment Data Displays

The Transition Improvement Grant (TIG) collected data related to continuous improvement in service to post-secondary outcomes for students with IEPs. **There are currently 287 Transition Improvement Plans (TIPs):**

- 60 TIPs started in 2015-16
- 78 TIPs started in 2016-17
- 83 TIPs started in 2017-18
- 66 TIPs started in 2018-19 to date

**Through the data collected via the TIPs, the TIG knows that the categories of most need are in the areas of employment and career preparation.** The TIPs also identify the supports most needed by the districts, and the TIG uses this data to develop professional learning supports:

- Direct instruction in self-advocacy and self-determination
- Develop school/business partnerships and training sites-educating employers and relevant curriculum based on the local labor market
- Hands-on and community-based career awareness opportunities

- Participate in Wisconsin Indicator 14 annually
- Students attend their IEP meetings utilizing a student-driven IEP

In addition to using data to improve supports, **TIG collects and uses formative evaluation data to improve the TIP tool, itself.** During this reporting period, the TIP was improved as follows:

- Indicator 14 Review tab to match new survey questions
- My Toolbox to facilitate increased user structure
- In-depth Indicator 14 tab - directions, review, report
- Transition Services Rating Scale (TSRS) tab - directions, review, report
- Amazing Race tab - directions, review, report
- Business Tours tab - directions, review, report
- Community Conversations tab - directions, review, report
- Tracking tab - directions
- Admin Reports:
  - Plan Summary Report
  - Active Planning Report
  - Tracking Upload
  - Team Tracking
- **Data from monitoring thirty-five LEAs required to engage in continuous improvement**

WDPI required thirty-five LEAs to submit improvement plans when identified with racial disproportionality in special education identification, placement, and discipline. **One hundred percent of these LEAs submitted plans by the deadline.** Twenty-five identified LEAs elected the continuous improvement process reporting flexibility and submitted locally-developed improvement plans using the continuous improvement process; the remainder used the state-developed tools and resources related to improvement planning. **Twenty-six identified LEAs improved on student outcome measures:** the districts reduced racial disproportionality in special education identification, placement, and/or discipline. For an example of a data profile shared with districts that includes this outcome data, please see Appendix #10.

Through the improvement planning process, WDPI collects data on internal needs of LEAs to address racial disproportionality in special education identification, discipline, and/or placement; **the Department uses this data to make decisions about the direction of the project.** During this reporting period, the LEAs identified 21 internal and 17 external support needs. WDPI uses this data to **drive support prioritization**, particularly through the Disproportionality Technical Assistance Network (<http://www.thenetworkwi.com>), and in the initial phases of collaborating with the TA Network. For example, many districts identified the need for assistance with their data inquiry processes as well as accessing professional learning on culturally responsive practices. The TA Network is positioned to

offer the data inquiry supports and the Disproportionality Technical Assistance Network offers professional learning.

One LEA, Milwaukee Public Schools (MPS), was monitored jointly by WDPI staff funded by Special Education and Title I. The two teams collaborated on monitoring activities and attended meetings onsite with MPS' Advance Team, the team responsible for district improvement activities. During this reporting period, the Advance Team met on the following dates: April 17, 2018; May 29, 2018; June 19, 2018; November 27, 2018; December 18, 2018; January 15, 2019; February 19, 2019; and March 19, 2019. The Advance Team adopted a data review protocol, including action steps. The Advance Team reported on action steps during each meeting.

During this reporting period, MPS set summative goals related to improvement and aligned with the Wisconsin Consolidated State Plan. To achieve these goals, MPS is aligning district and school improvement plans to its theory of change:

- *If MPS focuses our entire district on mastery of literacy and mathematics for ALL students through culturally and linguistically responsive practices; and*
- *If Central Services collaboratively designs systems of support aligned to our district focus and informed by data, school, and district needs; and*
- *If we use an equity lens to implement a system for continuous improvement that emphasizes using data to make decisions and improve adult practices in our schools...*
- *...Then MPS will empower ALL students to succeed.*

MPS is leveraging the Ambitious Instruction initiative to address the gaps in student group performance. The Ambitious Instruction roadmap identifies five priorities for success:

- increase academic achievement and accountability
- improve district and school culture
- develop staff
- ensure fiscal responsibility and transparency
- strengthen communication and collaboration

For more details, see materials at

<https://esb.milwaukee.k12.wi.us/attachments/e68f2643-39d3-443f-8d71-8ad1b73c47d8.pdf>.

Continuous improvement efforts are built upon the framework of an equitable multi-level system of supports (MLSS). In Wisconsin, this represents a framework for the systematic provision of equitable services and practices to all students based on their responsiveness to effective instruction and intervention. While implementation of an equitable MLSS is not required of Wisconsin schools, the WDPI continues to fund the Wisconsin RtI Center/PBIS Network to provide statewide training and technical assistance at the school and district level (<https://www.wisconsinrticenter.org>).

Statewide eMLSS implementation data is gathered primarily through self-assessments (see <https://www.wisconsinrticenter.org/school-implementation/assess-system/>) taken annually at the school level. **Schools use self-assessment tools as a way to measure implementation progress, identify areas of growth, and determine system fidelity** of an equitable multi-level system of supports. Completing assessments in the different content areas (reading, mathematics or behavior) provides schools with a more complete understanding of their implementation. These assessments measure various components of a multi-level system of supports including systemic implementation, a strong universal level of support, leadership, family and community engagement, evidence-based practices, data-based continuous improvement, a continuum of support, and positive culture. Highlights from the 2017-18 Annual Report provide a picture of implementation and are outlined below:

#### Implementation

- Since 2009, **93% of public school districts** in Wisconsin have engaged with the RtI Center/PBIS Network through professional learning opportunities and technical assistance.
- Within the 2,260 schools that comprise those districts, **80% (1,804) have participated in professional learning offered by the Center, and 61% (1,106) of those have reached fidelity or full implementation** of one or more levels of their systems.
- **93% of schools that have engaged in professional learning from the Center have self-assessed** at least one level of the system, supporting the continuous improvement of their overall systems
- During the 2017-18 school year, the Center held **41 professional learning opportunities across all 12 CESA regions**
- The 2017-18 Annual statewide PBIS conference hosted **1200 participants** and continues to be one of the most widely attended conferences sponsored by WDPI funds

#### Impact

- **Statistical significance** was achieved within schools that sustained fidelity of implementation of an equitable multi-level system of supports for at least two of three consecutive years and **shows promise for eliminating race and ability as a predictor of success** for students.
- Schools implementing PBIS tier 1 and 2 achieved a **34% reduction of overall student suspensions, and reduced the gap in suspensions between White and Black students by 26%, between White and Latinx students by 70%, and between students identified as having a specific learning disability and students without a disability by 40%.**
  - Based on an average of 2 hours of administrative processing time per suspension, this translates into **1,007 days of administrative time and 17,455 days of instructional time saved** among the 267 schools included

- Schools implementing Rtl in reading at the universal level achieved a **34% reduction of overall student suspensions and reduced the gap in suspensions between White and Black students by 33%, White and Latinx students by 79%, and between students identified as having a specific learning disability and students without a disability by 44%**
  - Based on an average of 2 hours of administrative processing time per suspension, this translates into **700 days of administrative time and 15,137 days of instructional time saved** among the 182 schools included

Additional goals for the next year include:

- Increase the number of schools self-assessing their equitable MLSS by 10%
- Increase the number of school self-assessing at fidelity or full implementation by 5%
- Study the impact of equitable MLSS implementation on school benchmark Reading achievement in aggregate and by student groups (race, ability, language)
- Increase the involvement and relevance of Center Technical Assistance Coordinators on TA Network teams statewide

## Coaching Supports

### Resources to Support Coaching

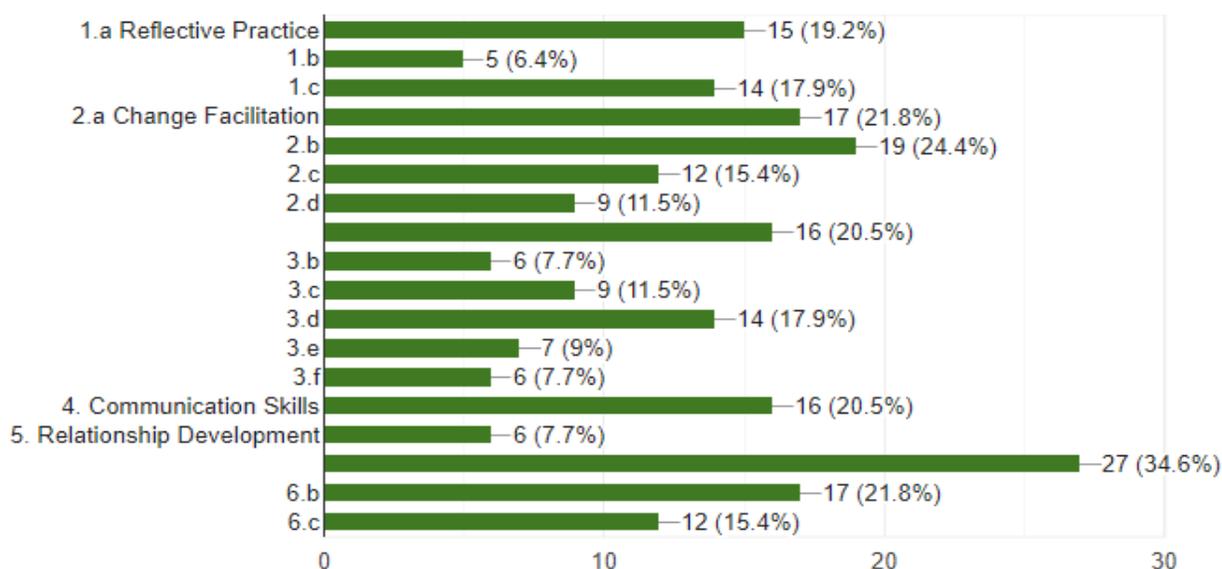
The coaching webpage was officially launched on August 21, 2018. Between launch and February 11, 2019, **the webpage had 2307 views**. There are several weeks that stand out with significantly higher views than others, each corresponding to conference presentations or marketing events (see Figure 20 below). There are 89 subscribers to the coaching newsletter. The “subscribe” button was accessed 95 times which means that 95% of interested readers chose to subscribe to the newsletter.

Figure 20



On January 23, 2019, the agency utilized the annual FISSC meeting to gauge the learning needs of this essential group of stakeholders based on the coaching competencies outlined in the CCPP through the use of the Coach Self-Assessment Tool. Participants are funded through DPI to provide coaching, professional learning, or technical assistance throughout the state. Most have coaching or coaching-like responsibilities as part of their position responsibilities. There were 78 responses to the survey and results are shown below in Figure 20.

Figure 21



It is clear from this survey that competency 6a, Knowledge Base Development - Understanding systemic oppression and how it is interwoven and affects all pieces of a system) was chosen most often by participants as needing the most support. The second highest response for needing support was for competency 2b. This is Change Facilitation - supporting the client to develop action plans and goals that include evidence-based, high-quality educational practices implemented with fidelity.

In response to the FISSC survey data collected in January 2019, WDPI plans to offer continued independent and asynchronous professional learning focusing on the top responses.

RPIC Coaches created professional growth goals as it related to the results of the Coaching Competency Self-Assessment, and that data has, in part, guided the scope and sequence of the learning. Below are several examples of goals for the group:

Figure 22

Related Competency	Personal Growth Goal
2 & 6	<i>By the end of the 2018-19 coaching training cycle, I will have strengthened my ability to be an agent of change facilitation by becoming more familiar with the various styles of coaching along with different coaching stems, and I will practice using these coaching techniques and questioning strategies on multiple occasions to better develop coaching relationships in an effort to get to the root of the problem during a coaching conversation.</i>
1	<i>I will record a minimum of 2, 10-minute segments of my coaching sessions. I will review the recordings and reflect, self-assess and further develop my level of competency as a coach.</i>
4	<i>By January 2019, I will have learned two different communication strategies to leverage others' strong emotions during a coaching conversation, PD, and/or written &amp; verbal communication in order to maximize productive outcomes.</i>
2 & 6	<i>By the end of January 2019, when coaching clients, I will listen with compassion and curiosity and without judgment. I will assume positive intent making sure to pause, then question the client further if that intent is not apparent to me. In the beginning, when this practice is still new to me, I will make sure that I am doing this by consciously rephrasing or summarizing what the client has said at least three times within a session. When I have attained this goal, I will be able to establish myself as a trusted coach who then, will be able to assist the client in improving their instructional practices by creating a safe, honest place for them to be vulnerable and enter that, sometimes, uncomfortable space where growth happens.</i>
1, 2 & 4	<i>My goal is to recognize and accept resistance to change and to proactively address it in my coaching conversations. Through ongoing scenario work and self-reflection, I will gain confidence in disrupting deficit-based conversations and addressing resistance to change. This work will be ongoing, but with each new experience, I will gain confidence and skills to better equip me in achieving this goal. I plan to have significant improvement in this rating by this time next year.</i>

Personal growth goals were related to competencies 1 (Reflective Practice), 2 (Change Facilitation) 4 (Communication Skills) and 6 (Knowledge Base Development). During the face-to-face and virtual meetings, **coaches were given the opportunity to build skills in**

these targeted areas through focused coaching practice.

TA Network participant survey responses likewise drive the creation of subsequent monthly learning plans. Some sample survey data is presented in the SSIP Implementation Progress section above. This work is a continuation from 2017-2018 and has thus far focused on coaching skills to recognize and disrupt patterns of thinking which continue to perpetuate the marginalization of student groups. Given the new IDEA and ESSA joint identification system, feedback from participants, and Federal Investment in Statewide Systems Change (FISSC) Coaching Self-Assessment Tool survey data (described below), the learning has recently focused on Competency 2 from the Coaching Competency Practice Profile: Change Facilitation. This competency is described as, "Intentionally disrupting marginalizing policies, practices, and structures promotes the sustainability of equitable practices. Facilitating change based on both student and systems-level data improves access to quality learning opportunities, redresses systemic inequities, increases the likelihood of adaptive change and builds capacity with the organization." Participants have had opportunities to explore and develop these skills via team conversations, scenario role play, and data analysis.

#### **Leadership and Coaching (Offered through the Wisconsin Rtl Center)**

86% or more of participants agreed that each of the 16 training objectives was met and additionally showed gains in each objective on pre-post self-assessments. This has remained consistent with last year's high ratings from the participants attending trainings. Additional data from implementation assessment subscales related to leadership and coaching are used to inform the direction of these particular supports.

### ***Compliance Practices Focused on Literacy Outcomes***

#### **College and Career Ready IEPs**

Wisconsin has developed and began usability testing of a **training observation instrument to support fidelity** in the delivery of training content. As usability testing has only just begun and adjustments are being made to the instrument this year, there is not reliable data yet from which to draw conclusions. The goal is to more widely and consistently use the observation tool across the state next year when it is in final form.

In-person trainings held around the state continue to generate data. **Approximately 960 participants across 35 learning events** have taken part in a full day CCR IEP training since the last reporting period. The primary data set relative to CCR IEP trainings is a follow-up survey of training participants to measure intended training outcomes. For the current reporting period, **205 participants responded to the survey.**

*Figure 23: Primary Role(s) on IEP Team (able to select more than one)*

Role	Percent of Respondents
Special Education Teacher	68%
LEA Representative	16%
Interpreter of Data/Diagnostician	12%
Related Service Provider	15%
Parent	2%
General Education Teacher	4%

*Figure 24*

Survey Question	Average Response (scale of 1 to 7, where 7 is high)
Prior Knowledge: What amount of training did you have on the CCR IEP Five Beliefs, Five Step Process, or I-4 sample linking form BEFORE the CCR IEP Training Day?	3.4
<b>I will use and incorporate the information learned in this training when participating in an IEP team meeting to develop or revise a student's IEP.</b>	6.1
<b>As a result of this training, I can better assist in developing IEPs that link student present levels, to disability-related needs, to goals, to services.</b>	5.9
<b>As a result of this training, I can better assist in developing IEPs that will improve reading outcomes for students with IEPs.</b>	5.6
My role is to provide training, coaching, or professional learning to others.	66% yes 34% no
<b>As a result of this training, I am better able to provide support and training to others.</b>	5.8
Would you recommend the CCR IEP Training Day to a colleague?	83% yes 14% maybe 3% no

In addition to the Likert scale responses, written comments from participants were analyzed for themes and indicated the following:

- *Training presents a lot to think about and process*
- *Content is highly relevant/useful for improving special education*

- *Training focus areas of disability-related needs, concrete examples, sentence starters, and practicing with a real IEP were all highlighted by participants as especially helpful*
- *Participants often identify systemic barriers as they learn the five-step process*
- *Students with most significant disabilities, students with speech/language identification, students exhibiting challenging behaviors and the high school context are common areas for questions and wanting to learn more*
- *Participants continue to request more student-level examples*
- *More time to practice using the process and documenting discussions while in training*

Common themes from follow up conversations with individual trainers included:

- *Training is overall very well received by participants and engagement in training is high*
- *Add more activities/practice opportunities within training day*
- *Pre-work may be needed since there tends to be wide variation in readiness among participants*
- *Participants have benefitted from attending more than once*
- *Popular as fee for service as many districts want an individualized or tailored training for their staff*
- *Disability-related need (root cause, etc.) most difficult for participants to understand and apply*
- *Progress monitoring in special education and use/analysis of data is a need*
- *Need for supporting next steps at district level, including systems coaching to support implementation*

Both data sets are shared in the aggregate with trainers as a feedback mechanism. **This data set, along with individual coaching conversations with trainers, informs content revisions, additions, and future training offerings.** In looking ahead to next year, an improved version of the follow-up survey for training participants will be used, and there will be the ability to disaggregate and share regional data with trainers as part of coaching conversations.

### **Reading Drives Achievement: Procedural Compliance Self-Assessment**

For the RDA: PCSA process, LEAs initially self-assess and correct student-specific records. WDPI staff then monitors for correction of noncompliance using a two-step process. In Step I, WDPI verifies that all student-level errors have been corrected. Step II of the process includes WDPI monitoring an additional set of records to ensure current compliance on each item where errors were initially found. WDPI will report on the current compliance of Cohort II in next year's SSIP submission. **For the 91 LEAs conducting the Reading Drives Achievement: Procedural Compliance Self-Assessment (RDA: PCSA) this year:**

- **91 districts submitted RDA: PCSA results**

- 83 districts reported at least one instance of noncompliance on one or more items
- 1838 IEP and evaluation records were reviewed
- 495 IEPs were assessed for implementation
- 83 discipline records were reviewed

Some of the **RDA: PCSA items most directly related to literacy** are outlined below with compliance rates for Cohort II. For a more detailed report including data from all assessed items, see appendix #11.

*Figure 25: RDA Literacy Compliance Indicators*

RDA: PCSA Item	Percent Compliant Cohort I	Percent Compliant Cohort II
The student's IEP includes a description of how the student's disability affects the student's progress toward grade-level reading standards, or for preschoolers early literacy standards for language development, communication, and/or early literacy.	93.87	86.56
If the student has a disability-related need affecting reading, the IEP includes one or more annual goals designed to enable the student to be involved in the general education curriculum and progress toward grade-level reading achievement, or for preschool children, to participate in age-appropriate activities and progress toward early literacy standards.	95.96	94.02
If the student has a disability-related need affecting reading, each annual goal designed to enable the student to be involved in the general education curriculum and progress toward grade-level reading achievement, or for preschool children, to participate in age-appropriate activities, and progress toward early literacy standards includes a measurable level of attainment.	94.41	90.48
If the student has a disability-related need affecting reading, each annual goal designed to enable the student to be involved in the general education curriculum and progress toward grade-level reading achievement, or for preschool children, to participate in age-appropriate activities and progress toward	93.94	92.49

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early literacy standards includes a statement of how the student's progress toward achieving the goal will be measured.		
If the student has a disability-related need affecting reading, the IEP must include special education services to address the need.	96.03	94.29
The LEA ensures the specially designed instruction listed in the IEP is provided as described.	94.53	92.53
The LEA ensures the supplementary aids and services listed in the IEP are provided as described.	95.40	93.74
In the case of a student whose behavior impedes his or her learning or that of others, the positive behavioral interventions and supports and other strategies to address that behavior were implemented as described in the student's IEP.	97.16	97.17
Periodic reports are provided to the parents as specified in the IEP on the progress the student is making toward meeting each goal.	94.53	84.85
If the student has a disability-related need affecting reading, each annual goal designed to enable the student to be involved in the general education curriculum and progress toward grade-level reading achievement, or for preschool children, to participate in age-appropriate activities and progress toward early literacy standards, contains a <b>baseline</b> from which progress can be measured.	90.98	90.7
The IEP includes a statement of the student's present levels of academic achievement and functional performance.	New item beginning with Cohort II	79.05
The IEP includes a statement of the student's disability-related needs.	New item beginning with Cohort II	85.85
Note on Certification Participation: Of the 91 LEAs in Cohort II, <b>91 (100%) completed the online certification tool</b> . WDPI required LEAs to complete the tool prior to beginning the RDA: PCSA.		

WDPI also conducts onsite validation visits in identified districts each year. The purpose of validation is to allow an opportunity for districts to provide feedback on the RDA: PCSA process and to determine if RDA: PCSA Directions and Standards are clear and lead to correct identification of noncompliance, consistent with the Directions and Standards.

The Procedural Compliance Workgroup **validated Cohort II districts and did not identify any needed revisions to the RDA: PCSA checklist or to the Directions and Standards.** Districts understood the procedures and applied them consistently.

The PCWG also analyzed the electronic RDA: PCSA Statewide Report results for Cohort II, **to determine any needed revisions to the checklist or Directions and Standards, as well as needed training and technical assistance.** The three lowest scoring items in the checklist were: 1.) After the 10th cumulative school day of removal in the same school year, the LEA provided services during any subsequent removals. 2.) The IEP includes a statement of the student's present levels of academic achievement and functional performance. 3.) The IEP describes the extent, if any, to which the student will not participate with non-disabled students in the regular education environment. 4.) Periodic reports are provided to the parents as specified in the IEP on the progress the student is making toward meeting each goal. **Training and technical assistance will focus on these and three other items with scores of less than 90%.** This is the second year for the RDA: PCSA checklist. More districts have participated in CCR IEP training and use the e-Course earlier to prepare for the self-assessment. **The lower results on the RDA: PCSA overall are likely due to a more accurate assessment, adherence to the Directions and Standards, and closer alignment with the CCR IEP 5-Step process; however, for a few items in the checklist, further clarification is needed to ensure consistent application of the standards. This is particularly true of the new items added to the checklist during the second year of the cycle.**

The Procedural Compliance Workgroup piloted a CCR IEP Checklist ([see https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-iep-checklist-final-2018-19.pdf](https://dpi.wi.gov/sites/default/files/imce/sped/pdf/ccr-iep-checklist-final-2018-19.pdf)) during Cycle I's Step 2 verification process. The checklist is now posted on the WDPI's website and available for district use. **The CCR IEP Checklist is a bridge between compliance and results** and is integrated as part of the SSIP improvement activities. The checklist includes elements from the WDPI's CCR IEP 5-Step Process for IEP teams to consider during IEP development and in preparation for the RDA: PCSA. WDPI consultants continue to use the CCR IEP Checklist during Step 2 Verifications to provide technical assistance on IEP development.

**The RDA: PCSA is aligned very closely with the WDPI's recommended 5-Step process of CCR IEP development;** however the first two steps in the process were not included in the RDA: PCSA checklist during 2017-2018. Step 1 of the process is about understanding the student's current levels of academic achievement and functional performance. Step 2 asks the IEP team to identify the student's disability-related needs by conducting a root-cause analysis of this data. **The checklist was revised to correct this oversight.** For Cohort II, the WDPI **added guidance to the RDA: PCSA Training and Certification E-Course to assist districts and parents in understanding these concepts, and added corresponding items to the RDA: PCSA checklist to ensure attention is given to these**

**essential steps for improving literacy outcomes.** The State Superintendent's Advisory Council on Special Education approved of these changes.

## IV. Stakeholder Engagement

This section is organized by Wisconsin's improvement strategies and includes information on:

- ✓ Stakeholder Involvement in SSIP Implementation (Organizational Outline, Section B.2.)

### *Coordinated Improvement Planning*

#### **System of Supports: Transformation Zone**

During this reporting period, stakeholders had a voice and were involved in decision-making regarding the ongoing implementation of the project through the following:

- Key stakeholders relative to the Transformation Zone include:
  - WDPI cabinet representatives
  - WDPI state design team members
  - Regional implementation team members
  - District implementation team members
- Key structures by which practice-policy feedback loops were employed include:
  - Capacity report that includes work progress updates and specific facilitators/barriers based on feedback and input from regional and district implementation teams is shared monthly with the state design team and cabinet representatives
  - Bi-weekly stand-up meetings are held with STSs, key consultants, and directors to address just-in-time technical facilitators/barriers that may arise between monthly meetings
  - Monthly meetings with regional and district implementation teams, including their executive leadership, plus additional regional planning/coordination meetings are held to provide intensive supports while surfacing facilitators/barriers that are used to strategically inform the monthly capacity report, and agenda items for stand-up and state design team meetings

#### **System of Supports: Technical Assistance Network for Improvement Supports**

During this reporting period, stakeholders had a voice and were involved in decision-making regarding the ongoing implementation of the project through the following:

- Key stakeholders relative to the TA Network include:
  - WDPI Integrated Contract Management workgroup
  - WDPI TA Network Capacity-building Planning team
  - TA Network members, including CESA staff and RtI Center staff
  - CESA Statewide Network (CSN – comprised of agency administrators)
  - District/school personnel
- Key structures by which practice-policy feedback loops were employed include:

- Bi-monthly Integrated Contract Management workgroup meetings to address ongoing issues related to the technical implementation of the Integrated Contract
- Regular planning meetings of the TA Network Capacity-building Planning team to review implementation/effectiveness data and plan/adjust content and activities
- TA Network members:
  - Completed quarterly surveys on training effectiveness and time/effort
  - Engaged in quarterly focus group sessions with WDPI staff to address barriers/facilitators regarding 2018-19 contract deliverables and activities that subsequently informed both the Contract Management workgroup and TA Network planning team
  - Completed winter 2019 survey regarding technical aspects of Integrated Contract to inform 2019-20 contract planning
  - Engaged in winter 2019 focus groups regarding adaptive aspects of Integrated contract to inform 2019-20 contract planning
- CSN engaged with WDPI staff in strategic planning conversations for Integrated Contract planning in Spring 2018 and Winter 2019
- Key district personnel participated in winter 2019 focus groups to inform Integrated Contract planning

During this reporting period, stakeholders had a voice and were involved in decision-making regarding the ongoing implementation related to the coordinated, continuous improvement process through the following:

**Joint (ESSA and IDEA) federal notification packet – technical assistance and input sessions**

Sixty-six districts participated in technical assistance calls with WDPI staff. WDPI invited all district administrators to sign up for a 30-minute technical assistance phone consultation to (1) understand and plan to use the data included in the joint (ESSA and IDEA) federal notification packets and (2) provide input into the joint federal accountability system. Staff at WDPI hosted technical assistance calls with school and district staff from districts across the state between December 6, 2018 (date of release of preliminary joint federal notification packets) and February 6, 2019 (date of release of final joint federal notification packets). The technical assistance calls in particular afforded an opportunity for close data and business rules reviews and did result in a small number of changes in identifications, which were directly communicated to the impacted districts and meaningful improvements of the business rules and joint federal notification packets.

**Data collected through continuous improvement efforts by 134 LEAs served through long-standing project investments**

Seventy districts provided input into the continuous improvement process facilitated by the Early Childhood Program Support Team. The process was revised to meet the needs and feedback of the districts.

Thirty-four districts provided input into the TIP process as they developed and implemented improvement plans related to graduation and post-secondary transition for students with IEPs.

Eighteen districts provided input to the continuous improvement process facilitated by the WISExplore team through the *Data Leadership Academy*. The process was revised to meet the needs and feedback of these districts.

### **Monitored thirty-five LEAs required to engage in continuous improvement**

All identified districts provided input to the identification and monitoring process related to racial disproportionality in special education identification, discipline, and/or placement. Their input is collected through the improvement plan application, onsite technical assistance, and technical assistance calls.

### **WI RtI Center**

In April 2009, WDPI formed the Wisconsin RtI Center/PBIS State Leadership Team (SLT). This team is charged with providing insight and advice on the design and development of long-range planning and continuous improvement for equitable MLSS in Wisconsin schools and districts, including quality training, technical assistance and evaluation, identifying resources, and providing input on enhancing the coordination of equitable MLSS with other initiatives in the state. The SLT team is comprised of representatives from school districts, statewide professional organizations, institutes of higher education, cooperative education service agencies, Wisconsin Education Association, and the WDPI. The team meets three times annually and, additionally, each team member serves on a workgroup to support specific goals in the areas of district leadership, equity, students with disabilities, family engagement, and institutes for higher education. The district leadership, equity, and students with disabilities workgroups have all made recommendations into the supports for coordinated improvement planning.

### ***Coaching Supports***

The agency convened a robust and diverse group of stakeholders invested in coaching work. The stakeholder group consists of both internal and external professionals connected to coaching in the field. The stakeholder group, dubbed “Statewide Collaborative Coaching Partners” met two times (May and October 2018) for the purpose of connecting the DPI coaching resources to the field of coaching, gathering stakeholder feedback and providing educators with the tools they need to inform a comprehensive coaching system. As the Coaching Competency Practice Profile (CCPP) is the foundational

document from which other coaching tools and resources are built, it has been an essential function of this group to gather feedback from external users of the tool. The feedback is continually documented and the group discusses how best to incorporate changes to reflect best practices. In May 2018, a second version of the CCP was completed based on stakeholder feedback and published for the public at <https://dpi.wi.gov/coaching>.

## ***Compliance Practices Focused on Literacy Outcomes***

### **College and Career Ready IEPs**

Through follow up surveys, feedback is routinely solicited from training participants. In addition, state team members regularly meet with regional staff who provide training. In order to best support the needs of trainers, a protocol has been established for revisions to training content so that all changes or additions are drafted, brought to trainers for feedback and then shared and explained prior to being used. Based upon practitioner feedback and questions collected through follow up surveys and at in-person trainings, trainings are revised, content added and learning opportunities are added.

Stakeholders are involved in the co-creation of future iterations of this work and are brought on board very early in the process. As new ideas for moving CCR IEP implementation are brainstormed, they are brought to stakeholders at regular meetings for feedback, questions and to determine whether there is sufficient support for moving forward.

In addition to established avenues of working with CESAs and statewide network of directors of special education, the team is intentionally connecting to a general education audience. These efforts have particularly focused on building principals, given the pivotal role they play in school improvement. The team is working with the Association of Wisconsin School Administrators (AWSA) to plan for ways to partner.

The State Superintendent's Council on Special Education was pivotal in informing the initial direction of the project, and has routinely been informed of content development, providing input and encouraging connections to the RDA: PCSA work.

### **Reading Drives Achievement: Procedural Compliance Self-Assessment**

The Special Education Team met with the State Superintendent's Advisory Council on Special Education in March 2018, and provided updates on the implementation of the RDA: PCSA and received input and feedback.

The Department provided training at the State Superintendent's Special Education Leadership Conference in October 2018. Approximately seventy directors of special

education attended the sectional. The sectional included a panel of directors of special education from around the state who shared their experiences with the Procedural Compliance Self-Assessment.

DPI provided updates at the spring and winter WCASS conferences to directors of special education and other stakeholders from around the state during keynote presentations.

Monthly updates on the RDA: PCSA are provided by the procedural compliance workgroup for RSNs. RSNs provide feedback on how the RDA: PCSA process is progressing in districts and bring forward any questions or concerns that have arisen. RSNs provide technical assistance with the RDA: PCSA in districts in each region of the state.

A real-time document, *RDA: PCSA Questions and Answers*, is updated regularly on the Department's website to provide statewide distribution. Stakeholder questions are addressed in a timely manner.

## V. Evaluation

This section includes information on:

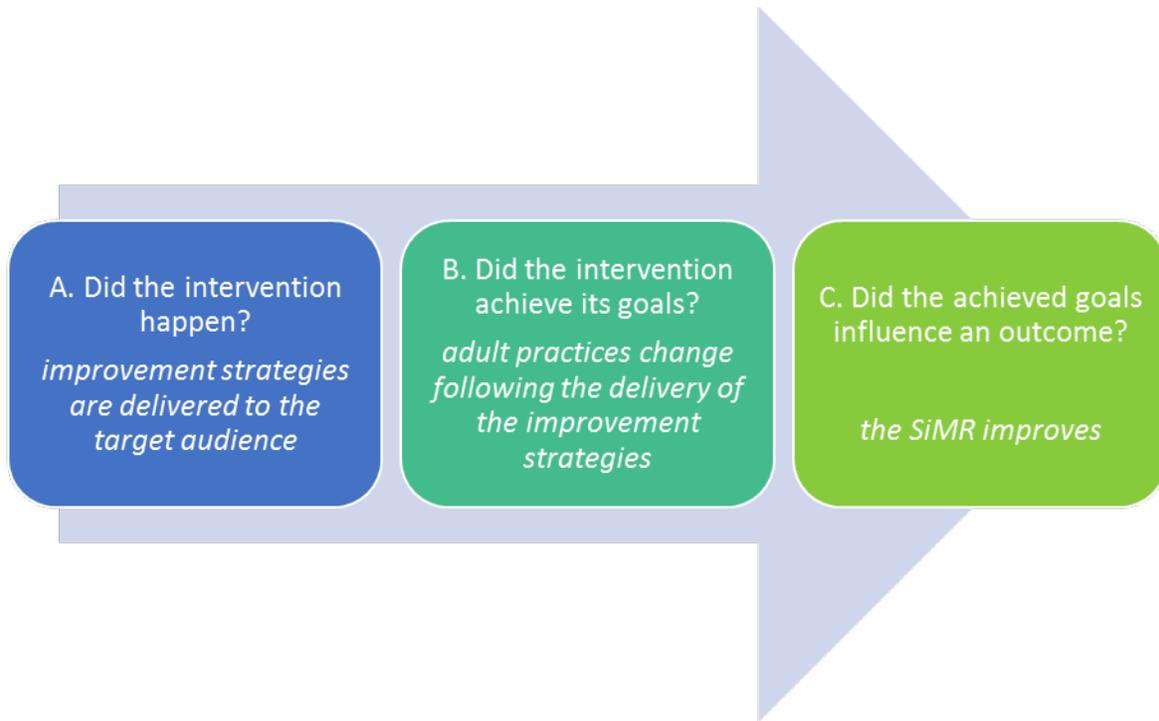
- ✓ How the State Monitored and Measured Outputs to Assess the Effectiveness of the Implementation Plan (Organizational Outline, Section C.1)
- ✓ Stakeholder Involvement in the SSIP Evaluation (Organizational Outline, Section C.3)
- ✓ Data Quality Issues (Organizational Outline, Section D.1)
- ✓ Planned Evaluation Activities Including Data Collection, Measures, and Expected Outcomes (Organizational Outline, Section F.2)

### Alignment with Theory of Action

As articulated in its Phases II and III reports, Wisconsin created a detailed evaluation plan to monitor and measure outputs of the improvement strategies composing the foundation of the SSIP. This evaluation plan extends the theory of action into a SSIP Evaluation Model that uses three levels of assessment aligned with the Theory of Action. These three levels also correspond to short-term outcomes, intermediate outcomes, and long-term outcomes.

The three levels of the SSIP Evaluation Model are shown in Figure 26, and are based on the assumptions that in order for desired changes in an outcome to occur, an intervention expected to influence that outcome must first be delivered sufficiently among enough of its target audience that intended changes in adult practices resulting from the intervention could reasonably be expected to occur, and second, that these intended changes in adult practices (that are expected to translate into improved student outcomes) must occur as expected. Thus, the three SSIP Evaluation Model levels assess 1) whether the improvement strategy was delivered to the target audience, 2) whether expected changes in adult practices occurred following the delivery and/or implementation of the improvement strategy, and 3) whether the SiMR improved following the implementation of the improvement strategies and resulting changes in adult practices, as expected. Much of the data reported within Wisconsin's Phase III, Year III report focuses on the first two levels of the evaluation model.

Figure 26: SSIP Evaluation Model Levels



### Data sources

The sources of data that are used to answer each evaluation question are outlined in the SSIP Evaluation Plan Summary (Figures 27 - 30). These data sources include nationally known instruments, measures customized for the SSIP Evaluation, comprehensive reviews, and statewide student assessments. Established assessments developed by experts in Implementation Science, such as the State, Regional, and District Capacity Assessments, are being used to measure improvement in coordinated planning efforts at each level. Other measures are customized to most effectively assess the specific needs of the SSIP Evaluation Plan, such as the fidelity of the coaching provided by regional coaches, and measures assessing the accomplishment of key learning objectives from the professional learning resources that are most aligned with improving the SiMR. Survey development to measure the accomplishment of key learning objectives from professional learning resources has been delayed slightly due to staff capacity. The Special Education team currently employs one data and evaluation consultant. Demand is proving to exceed current capacity for one individual to serve as both the sole special education data analyst

as well as program evaluation consultant. The Special Education Team is both embarking on a partnership with a cross-divisional external evaluation of the CIP work as well as exploring the feasibility of hiring a program evaluation consultant.

Qualitative processes are also involved in the SSIP evaluation, such as comprehensive reviews of district improvement plans to ensure alignment between ESSA and IDEA, and of district Procedural Compliance Self-Assessments to determine compliance and alignment with WDPI's Reading Drives Achievement initiatives. The data source for Wisconsin's SiMR is the statewide assessments for grades 3-8. These include both the regular assessments, the Wisconsin Knowledge and Concepts Exam (until 2014-15), the Badger Exam (2014-15), and the Forward Exam (2015-16 forward), as well as Dynamic Learning Maps (Wisconsin's Alternate Assessment for Students with Disabilities).

*Figure 27: SSIP Evaluation Plan Summary: Coordinated Improvement Planning*

SSIP Evaluation Questions	Method	Supporting Data	Years of Data Availability & Associated Tables
Did State Design Teams and regional teams form?	Agendas and Meeting notes demonstrating the formation and ongoing convening of State Design Team and Regional Implementation Teams	Agendas and Meeting notes	2015-16 SDT 2016-17, 2017-18, and 2019 regions 2018-19 districts
Did 100% of identified LEAs complete the improvement planning process?	Descriptive statistics on LEAs' approved improvement planning process completion steps in WISEgrants	WISEgrants online application	2019-20
Did 80% of identified LEAs use Regional Supports to help them complete the improvement planning process?	Descriptive statistics on the Regional Supports each LEA accessed	List available from a uniform documentation process	Initial access 2018-19; data available 2019-20
Did capacity increase at the State and Regional level to implement a statewide system of supports that provides leadership for coordinated improvement planning?	Descriptive statistics on increases on the State Capacity Assessment & Regional Capacity Assessment measures over time	State Capacity Assessment & Regional Capacity Assessment	SCA and RCA 2017-18; 2018-19  <i>SCA results can be found in Figures 9-10</i>  <i>RCA results can be found in Figure 11</i>
Did improvement planning for ESSA and IDEA become more aligned?	Descriptive statistics on LEAs that have had their Improvement Plans approved in WISEgrants	WISEgrants online application	2019-20
Did alignment improve between LEA and school improvement goals / action plans and identified root causes?	Descriptive statistics on LEAs that have had their Improvement Plans approved in WISEgrants	WISEgrants online application	2019-20

*Figure 28: SSIP Evaluation Plan Summary: Coaching Supports*

<b>SSIP Evaluation Questions</b>	<b>Method</b>	<b>Supporting Data</b>	<b>Years of Data Availability</b>
Did regional coaches provide coaching with fidelity?	Descriptive statistics on fidelity levels from WI coaching fidelity tools.	Fidelity measures from WI coaching fidelity tools	2019-20
Did using a coach increase LEAs' capacity to implement improvement strategies well?	Comparison of baseline versus final available score on District Capacity Assessments among LEAs using regional coaching supports (using inferential statistics)	District Capacity Assessments	2019-20

*Figure 29: SSIP Evaluation Plan Summary: Compliance Practices*

<b>SSIP Evaluation Questions</b>	<b>Method</b>	<b>Supporting Data</b>	<b>Years of Data Availability &amp; Associated Tables</b>	<b>Cohort I</b>
Did 100% of LEAs participating in the RDA:PCSA have staff complete the online RDA:PCSA certification tool?	Descriptive statistics on the number of LEAs that have an assurance from the Special Education Director uploaded to a web tracking system	List of LEAs that have an assurance from the Special Education Director uploaded to a web tracking system	Data from 1 <sup>st</sup> of 5 total cohorts in 2017-18, from 2 <sup>nd</sup> cohort in 2018-19, etc.	89.77% of LEAs completed e-Course prior to conducting RDA: PCSA.
Were 100% of LEAs in the given RDA:PCSA cycle year in current compliance with all assessed items?	Descriptive statistics on the number of LEAs meeting this requirement, as identified through the Procedural Compliance Self-Assessment process	Procedural Compliance Self-Assessment documentation	Data from 1 <sup>st</sup> of 5 total cohorts in 2017-18, from 2 <sup>nd</sup> cohort in 2018-19, etc.	One district from Cohort I did not correct all identified noncompliance within one year of identification.
Were 100% of LEAs for the RDA:PCSA cycle year in current compliance by demonstrating full implementation of students' IEPs?	Descriptive statistics on the number of LEAs meeting this requirement, as identified through the Procedural Compliance Self-Assessment process	Procedural Compliance Self-Assessment documentation	Data from 1 <sup>st</sup> of 5 total cohorts in 2017-18, from 2 <sup>nd</sup> cohort in 2018-19, etc.	100% of LEAs demonstrated full implementation of students' IEPs.
Did 100% of LEAs in the RDA:PCSA cycle develop IEPs with PLOEPs linked to goals and services to address students' disability related needs?	Descriptive statistics on the number of LEAs meeting this requirement, as identified through the Procedural Compliance Self-Assessment process	Procedural Compliance Self-Assessment documentation	Data from 1 <sup>st</sup> of 5 total cohorts in 2017-18, from 2 <sup>nd</sup> cohort in 2018-19, etc.	100% of LEAs developed IEPs with PLOEPs linked to goals and services to address students' disability related needs.

*Figure 30: SSIP Evaluation Plan Summary: Long-Term Outcomes*

Long-Term Outcomes SSIP Evaluation Question			
SSIP Evaluation Questions	Method	Supporting Data	Timeline for Results
Once the improvement strategies have been fully implemented, and after there has been reasonable time for the expected changes in adult practices to occur, was there an increase in the SiMR?	Inferential statistical comparison of:  statewide SiMR at baseline year versus 2019-20	Statewide assessment data on Reading / English Language Arts used to calculate the SiMR	SiMR submitted annually, Results for this question 2018-19 and beyond

Wisconsin's SiMR is a points-based proficiency measure for students with IEPs in the area of literacy, grades three through eight. Baseline, stakeholder-set targets, and progress toward targets are displayed below. For the first time, Wisconsin did not meet its SiMR target. The slippage from FFY 2016 to FFY 2017 was observed in statewide data of students without IEPs as well, and in both instances correlates with a substantial increase in economically disadvantaged students across grade levels (measured by Free and Reduced Price Lunch eligibility), with average increases ranging from 3% to 5% among students with IEPs. WDPI has made closing achievement gaps a priority focus. As part of this effort, WDPI has been increasing its cross-team coordination with Title 1 services, collaborating and unifying its messaging, professional development, and resources with Title 1 services. WDPI has also added two items to its procedural compliance monitoring system around ensuring that accommodations on assessments are properly considered, documented in the IEP, and implemented. Additional focus will be placed on improvement strategies' direct or indirect impact on the SiMR, particularly focused on inclusionary practices and the implementation of the services outlined in IEPs.

*Figure 31: SiMR Targets and Results*

FFY	Reporting Date	Target	Data
2013	4/2015	Baseline	29.00%
2014	4/2016	29.00%	31.70%
2015	4/2017	30.00%	31.67%
2016	4/2018	31.00%	32.09%
2017	4/2019	31.00%	<b>30.12%</b>
2018	4/2020	31.67%	

### **Baseline data for key measures**

The most appropriate year of baseline data for each evaluation question varies based on the timing of development for the components of each improvement strategy.

Baseline data for the key outcome measure (the SiMR) was submitted in FFY 2013. The SiMR is a points-based proficiency measure using a three year average of Reading/English Language Arts statewide assessment data for students with disabilities in grades 3-8, and this measure is aligned with accountability data reported annually to the public on state report cards. The baseline data is calculated from the years 2011-12, 2012-13, and 2013-14. Baseline data for the State Capacity Assessment was taken from the first administration of this assessment, in October 2015. Similarly, baseline data for Regional and District Capacity Assessments is based on the first administration of the assessments. For the RCA, that date is February of 2017. For the DCA, those dates are July 2018 and January 2019 for DIT's one and two, respectively. Data on the LEAs completing the RDA:PCSA training tool became available in fall of 2017.

### **Data collection procedures and associated timelines**

Similarly, data collection procedures vary based on the data source, and include online grants systems, event registration systems, online professional learning registration systems, external technical assistance partners, existing procedures for assessing LEA IDEA compliance, and existing statewide procedures for collecting assessment data and educational environment data. Data on State, Regional, and District Capacity Assessments is being collected by Wisconsin's State Transformation Specialists in collaboration with SISEP. Documentation demonstrating alignment between IDEA and ESSA planning, as well as alignment between root cause analysis and school improvement plans, will be submitted via WISEGrants by districts. Registration systems also collect data on participants accessing online and in-person Professional Learning Resources.

Data collection procedures for key learning objectives of Professional Learning Resources vary; most utilize web-based surveys. Standardized data collection procedures for tracking which regional supports are accessed by LEAs are in development, with the initial rollout in Spring, 2019. The delay in tool development is explained above. The Coach Observation Form will be used for collecting data on coaching fidelity. A web-based training for the new RDA:PCSA certification collects data on the LEAs completing this compliance training. Existing Procedural Compliance Self-Assessment procedures will collect data for evaluation questions on IEP compliance.

Wisconsin is well-positioned to complete all data collection needed due to the depth of application development capacity, evaluator experience in survey development and administration, and existing structures of coordinated planning and professional development service delivery.

While timelines for data collection, analyses, and results in the SSIP Evaluation Plan are based on the timing of development and implementation of the components of each improvement strategy, interim and formative data for those components are provided wherever possible.

### **Sampling procedures**

Because the District Capacity Assessment takes a significant amount of time and must be carefully administered, all identified districts will not use this capacity assessment. Districts involved with the Transformation Zone and RPIC cohort will create the data set for this part of the evaluation plan.

### **Planned data comparisons**

Efforts to extend access to supports and improvement planning to as many districts as possible, though enhancing the state's capacity for improved literacy outcomes, will simultaneously limit the potential for available comparison groups. Additionally, data collection over few time points minimizes burden on individual educators and districts, but simultaneously limits capacity to describe progress over time. Baseline and ongoing data will be compared where possible, such as on District Capacity Assessments and the SiMR.

### **Data management and data analysis procedures lead to assessment of progress toward achieving intended improvements**

The second level of the three level SSIP Evaluation Model is focused on evaluation questions that will assess progress on the intended improvements in adult practices. This model will be implemented with planned data management and data coordination across improvement strategies to support the capacity for high quality assessment and evaluation.

### **Stakeholder engagement in the SSIP evaluation**

The State Superintendent's Advisory Council on Special Education has been regularly informed of the details of the SSIP through updates and guidance. In March 2019, Council engaged in updates, discussion, and input about Wisconsin's Annual Performance Report and SSIP. The SSIP evaluation plan served as a foundation for the SSIP conversation. Time was particularly devoted to key data points realized by each of the improvement strategies. Council members offered concrete feedback on data that was more and less meaningful, as well as suggestions for communicating progress to the public.

### **Data Quality**

Wisconsin continues to be a leader in designing and implementing high quality integrated data systems for student-level data. In 2016-17, WDPI transitioned to a new system, WISEdata, to reduce duplicate data collection tools and processes and replace outdated data collection software. This has resulted in reduced burden and streamlined data

reporting requirements for districts. Like many states, WDPI has experienced changes in regular statewide assessment tools (in 2014-15 and 2015-16) that can complicate year to year comparison of test results. However, Wisconsin's SiMR is designed as a points-based proficiency measure averaged over three years of data, and is thus more resilient to changes in assessment than a raw single year proficiency rate might be. Maintaining accurate and comprehensive data has been a key goal in the design of data collection tools and systems used in the SSIP Evaluation, and Wisconsin's depth of application development resources will allow us to accomplish this goal.

## VI. Conclusion

This section includes information on:

- ✓ The State Describes any Needs for Additional Support and/or Technical Assistance (Organizational Outline, Section F.4)

With the release of the first joint federal identifications, the 2018-2019 school year was an initial implementation year for many of Wisconsin's improvement strategies. Collecting meaningful data, and using them to make informed decisions has become a part of the culture of project management and continuous improvement. Wide-reaching leadership sifts throughout the Department have caused very few changes to the focus of Wisconsin's SSIP improvement strategies, pointing to effective and lasting teaming and communication structures, largely as a result of the intentional systems and structures put into place through these strategies.

Wisconsin continues its close relationship with many OSEP-funded technical assistance centers. Wisconsin remains an active scaling-up state through SISEP, and will continue to work side-by-side the SISEP coach in developing implementation capacity state-wide. Wisconsin also remains an active member of the National Center for Systemic Improvement's Systems Alignment Learning Collaborative where Wisconsin representatives have the opportunity to learn from and contribute to the learning of other states on systems change related work. Wisconsin also maintains a close relationship with its representative from the IDEA Data Center, particularly as it relates to evaluation and the application of technical assistance tools. Finally, Wisconsin is actively involved with both the Midwest Regional Educational Laboratory and the Midwest and Plains Equity Center. Through these ongoing and extensive supports, as well as an engaged and responsive OSEP state lead, Wisconsin is well-supported.

## VII. Appendices

## ***Professional Learning Resources***

As districts identify improvement strategies aligned with data and root cause analyses, LEAs will be coached to strategically select appropriate professional learning resources, as well as be coached through the stages of implementation of the new learning concepts and strategies. WDPI is developing new and leveraging existing professional learning resources and opportunities to meet the needs of LEAs both at the universal level and the targeted/intensive levels of support. Wide stakeholder input guided the prioritization of development of specific resources. Detailed background information on each resource is articulated in Wisconsin's Phase III report submitted in April, 2017. This appendix provides information on the Professional Learning improvement strategy that supplements Wisconsin's three main improvement strategies. Implementation updates and data from this reporting period are provided.

## **Universal Design for Learning**

The Universal Design for Learning Grant focuses on three areas to support implementation and affect student outcomes: 1) LEA teams and systems supports for applying UDL Principles and Guidelines, 2) Professional Learning capacity of regional intermediate agencies to support statewide coordination of UDL implementation, and 3) UDL Systems Coaching to bring relevance to UDL and its impact on student outcomes. The following are major accomplishments in this reporting period:

- 4 face-to-face, and 4 virtual meetings with regional agency staff (CESA) to address UDL implementation across roles and responsibilities in programs and services within their respective agencies
- Continued partnership with the Center for Applied Special Technology (CAST), including keynote speakers and breakout session presenters to support action planning for LEA UDL implementation during statewide conference
- National UDL trainers' technical assistance and webinars to support a cadre of educators over an 8-week course to develop UDL lessons, deliver instruction, and measure change in educator practice and improvement in student outcomes
- 29 teams of special education and regular education teachers completing 3 3-week UDL Implementation Trials (plan-do-study-act) cycles, with a target to improve literacy (reading comprehension and writing) and mathematics outcomes
- 696 teachers, principals, and district-level administrators participating in onsite, job-embedded professional learning activities around core UDL competencies

UDL Implementation Teams in each participating LEA compiled a mid-year and an end-of-year report with verification of activities completed, and reporting of change in educator practice, and impact on student outcomes. Educators from 15 districts reported UDL training and implementation scaling up which impacted 991 regular and special education teachers, principals, and district level administrators. Approximately 4,907 students, with 1,245 of those identified for special education were impacted by UDL implementation.

UDL Implementation Teams also reported a baseline and three subsequent scores for a sample of students, including those identified for special education while implementing UDL Guidelines and Checkpoints to improve reading comprehension, writing, and/or

mathematics problems solving, as well as 4 observable characteristics of student engagement. Data was compiled in a standard format for all teams and included a local threshold level designation of proficiency. All 15 districts (100%) met or exceeded their trajectory of proficiency in both academic and engagement student performance.

The data sources that inform the status of the UDL efforts in WI are varied, and triangulate around professional learning and changes in educator knowledge, and practice, and intentional data points on literacy (reading) improvement in student performance. The data at this point shows that more emphasis is needed in supporting our statewide trainers and their colleagues at the regional level, and continue to make connections with other statewide initiatives.

The next phase of the UDL implementation efforts in WI will be to activate a statewide rubric for the status of how aligned the LEAs work is to core tenets of UDL, and the extent of implementation across the district.

There will be a face-to-face and virtual meeting with regional UDL trainers to support their role to advance UDL within their agencies and their regions. Data to be collected includes: level of UDL understanding and application in professional learning contexts via training evaluation; number of educators trained in UDL Lesson Design; and lesson artifacts with embedded video.

The Wisconsin UDL Website (<https://dpi.wi.gov/universal-design-learning>) will be refresh with tools for reflecting on effectiveness of UDL implementation via UDL Look-Fors Protocol for use in guiding classroom observations by visitors to any of 11 UDL Demonstration Sites. Data to be collected includes: LEAs and number of educators visiting Demonstration Sites; and feedback on visit to inform progress or next steps in UDL implementation of visitors via exit survey.

Anticipated barriers to gathering statewide data will be the amount of responses gathered from training evaluations. Steps to address this will be to create a link that can be embedded within any of the regional agencies' training evaluations, so they can still get information they'd like to gather, and the state would be able to get consistent statewide data.

Stakeholder involvement has been facilitated by regional agency UDL trainers, working with their regional Board of Control, district administrator leadership network, and regional teams of directors of special education and curriculum. Large district participants have videotaped students presenting at school board meetings and teachers sharing the changes they've experienced based on this UDL statewide project. Feedback is looped from the local, regional, and state level, to inform next steps with supports needed, training to provide, and resources to develop. A key lens of equity has provided much motivation to keep building UDL capacity in Wisconsin.

## Reviewing Universal Reading (Offered through the Wisconsin Rtl Center)

This three-day workshop series is offered through the Wisconsin Rtl Center. This workshop is in the full implementation stage, and undergoes annual continuous improvement based on implementation data. Implementation and impact data for the 2016-2017 school year points to continuing the supports as they are currently delivered. In the 2016-2017 school year, 94 educators participated in the training series. 95% or more of participants agreed that each of the 5 training objectives were met. This has remained consistent with last year's high ratings from the participants attending trainings. Key implementation milestones for this reporting period include:

- Embedded Culturally Responsive Practices throughout entirety of training
- Included content related to the secondary level
- Aligned Training with the Key Features of an Equitable Multi-level System of Support (see <https://dpi.wi.gov/sites/default/files/imce/rti/pdf/rti-emlss-framework.pdf>)
- Provided TA, coaching and follow-up after training to school and district teams
- Access to training across the state continues into 2018-2019

46% of fully trained teams assessed their Universal Reading systems using the School-Wide Implementation Review (SIR) (see <https://www.wisconsinrticenter.org/school-implementation/assess-system/>) during the 2016-2017 training year. 33% of these trained schools assessed their systems implementation again in 2017-2018. These teams' average score on the 2016-2017 SIR Reading Universal subscales was 71 (initial implementation). Their average SIR Universal score in 2017-2018, the year following training, was 70 (initial implementation). 47% of fully trained teams assessed their Universal Reading systems using the SIR, in 2017-2018. Their average score on the 2017-2018 SIR Reading Universal subscales was 63.74 (initial implementation).

Rtl Center staff uses the Universal Average and High Quality Instruction Universal Subscales on the SIR to give statewide trainers a pulse of where schools are at in implementation of their universal level of support. This data is used both statewide and regionally to guide decisions regarding reading training locations, and what to intensify/differentiate within the reading training by region.

They additionally use training evaluation data as a formative assessment to adjust adult professional learning practices, such as increased team time, embedded analysis, next steps and documented need for further professional learning throughout templates, and embedded coaching questions/prompts.

The Universal Reading Review Training was designed to be a review of a school/district's current universal system for reading, there is an outline template created for each major component of effective reading instruction to help capture "current reality" of implementation. Trainers look at completed outlines to determine where they need to spend more time explicitly teaching, sharing resources, and giving teams additional time

to read the research and build capacity. They look at these templates during the training and after, making necessary changes within the current training and for future trainings.

- Trainers have found 6 main areas (based on the outline templates completed by schools) to be consistent areas of need throughout the state:
- The need for common foundational beliefs or reading instruction, centered on each and every child being able to learn to read and write at high levels
- Positive Culture including a system built on organizational trust
- An agreed upon academic instructional framework for literacy (for example Gradual Release of Responsibility), including guaranteed instructional practices within the chosen framework
- Systemic Culturally Responsive Literacy Practices throughout the entire agreed upon instructional framework
- Systemic Classroom Management, in relationship with a culturally responsive integrated matrix
- Instructional Time and the Physical Environment for engaged learners

These themes are incorporated into implementation plans teams create during the training.

Each team also leaves a team reflection statement with trainers at the end of the training series. They are asked to state what they collectively are ready to do as a result of this learning opportunity. These statements help gauge how to follow-up and promote/coach for further implementation.

## Co-Teaching

The Co-Teaching workgroup at WDPI developed a revised timeline in spring, 2018 with the following objectives:

- Develop a practice profile following the process described by Allison Metz in her white paper created for the National Implementation Research Network (NIRN). Completed and ready for usability testing (August 2019)
- Review/Rework existing products to intentionally align messaging, guidance and tools with ongoing work across the department focused on equity and social justice, particularly a newly completed Inclusive Learning Communities Practice Profile that is a foundational document for the co-teaching work. (ongoing)
- Present an updated PowerPoint presentation at multiple conferences, that used the Inclusive Learning Community Practice Profile as foundational to supporting the department's commitment to social justice and equity, and the starting point for developing a functional and sustainable co-teaching partnership. The group used each conference's feedback to improve after each presentation, with the end result being a presentation that will be posted on the website available for any district or school to use as part of their own staff development time. (August 2019)
- Create supporting materials for these two professional development cornerstones. (ongoing)

## Identified Barriers

- A significant percentage of workgroup membership turnover over a short period of time.
- A need to communicate/collaborate across a large agency while keeping the forward momentum
- A shortage of dedicated time from workgroup members who have significant obligations to other projects.

Information provided from educators working in districts/schools, from previous surveys and at this year's conference presentations, created a picture of a large number of co-teaching arrangements with structural flaws. These included:

- Class rosters that were not reflective of the school's demographics; in many instances the co-taught classroom/section created a de facto "tracked" classroom by including only students at risk of not succeeding along with students with disabilities.
- Co-teachers were not provided adequate, if any, collaborative planning time.
- In many instances the roles of the two (or more) co-teaching team did not reflect typical teaching responsibilities, instead one teacher, generally the special education staff, was underutilized, completing responsibilities typically assigned to paraprofessionals.
- Co-teaching was often implemented at the request of two highly motivated staff, and there was minimal attention to assessing its place in relation to other district/school initiatives, strategic plans, mission and vision.

This supported our commitment to continue to develop materials that provide a clear description of the core elements, with observable practices that occur within a foundational commitment to equity.

Attendees were most interested in how to incorporate specially designed instruction within a co-taught setting. This aligns with how co-teaching in WI has been defined as a service delivery model, with an objective to use the expertise of both teachers with equivalent licensure. The practice profile is an excellent choice for positioning this practice as a usable innovation. Practice profiles describe the practice in observable, teachable and replicable terms. By using the Inclusive Learning Community Practice Profile (ILC-PP) as the foundation (both within the group and to stakeholders), the workgroup was able to clearly consider equitable practices within the creation of any co-teaching environment.

To ensure stakeholder input as our work moves forward, an initial draft of the Co-Teaching Practice Profile will be shared with a large and diverse group of stakeholders spring (2019) as it is developed and once again with the same respondents when there is a completed product. This decision was made based on feedback during the development of the ILC-PP. When stakeholders were asked to interact with a completed document, some expressed concern that their input felt like a formality, and not a true request for interactive feedback. This feedback will be incorporated as the practice profile Version 1.0 is completed.

The PowerPoint presentation will be posted on the DPI website and users will be asked to complete a survey regarding its effectiveness as a professional development tool in their district/school.

In May, 2019 the full co-teaching workgroup will develop an action plan for 2019-2020. Proposed actions/product development include:

- Usability testing for Co-Teaching Practice Profile Version 1.0
- Updating previously developed white paper on co-teaching from a WI perspective
- Development of a fidelity tool based on installation stages
- Materials to support foundational PowerPoint as “download and go” professional learning opportunity
- Other suggestions by membership

Since the inception of the co-teaching work at DPI, many stakeholders have been consulted or been a part of the work of creating tools and guidance useful to WI educators. These stakeholders have included members from teams at DPI whose work intersects, as well as members of regional service agencies and educators working in districts. We have also established a collaborative relationships with institutions of higher education in WI (various; currently Carroll University) and in NY (Columbia Teachers College).

Time commitments and travel continue to create barriers for persons whose interaction with the work would add value to what is developed. To accommodate these barriers we have moved to a meeting model of 4x/year for a large review group, while a smaller subgroup meets more often to develop products. The larger group provides initial feedback, and then are instrumental in distributing surveys widely while tools/guidance are in development. In this way we are able to gather significant feedback from a more diverse audience with limited availability.

### **Wisconsin Family Assistance Center for Education, Training and Supports (WI FACETS) Literacy Project (Proyecto de Lectoescritura)**

The Engaging Families in Literacy Series, developed through the collaborative work of WI FACETS, the Wisconsin Statewide Parent Educator Initiative (WSPEI), and Early Childhood Program Support Teachers and Wisconsin Department of Public Instruction, is intended to be a 3-4 session series for families of children with IEPs. The focus is on helping families understand literacy terms, standards, and literacy/reading assessments used by their child’s school, but even more importantly, to learn about **strategies and resources that they can access and use to help their child with literacy and/or reading at home**. This Literacy Series is also intended to enhance the collaboration between school district staff and WI DPI Discretionary Staff in providing technical assistance and ongoing support to families, providing them opportunities to be engaged in their child’s education so that improved literacy outcomes for students can be realized.

In partnering with school districts, the intention is to enrich families' learning in relation to literacy and how it can be supported at home, along with other areas of their child's learning. This can be accomplished by providing scaffolding for increased levels of knowledge, confidence, and communication.

In spring of 2018, the Engaging Families in Literacy Series was conducted by WI FACETS in two Milwaukee Public Schools (Allen-Field and Doerfler). Both schools provide Bilingual-Bicultural/Multicultural Programs which build on the students' primary language (Spanish) skills and expands their English-language skills to enable each student to achieve proficiency in both languages. In total 13 unique families completed the series.

Surveys were conducted at the beginning (Class 1) and the end (Class 4) of the series to measure the degree of usefulness of the information for families. Of the families who responded to the final survey, the evaluation data received showed the families rated the classes overall in the following manner:

- Do you feel more confident to support your child's literacy at home than you did on the first class? **78% of parent participants reported feeling more confident following the series.**
- Do you feel more confident to communicate with your child's teachers/school than you did on the first class? **100% of parent participants reported feeling more confident following the series.**

This data shows that the project elicited the desired outcome of improved home-school communication surrounding literacy concepts as well as an improvement in families' confidence in supporting literacy at home.

Revisions were made to the Literacy Series in 2018, with extensive additions to the presenter notes as well as supplemental handouts and activities to offer even better resources for families to utilize at home and in the community to improve the outcomes for literacy of students with disabilities. More emphasis was placed on extending resources for learning literacy concepts for Early Childhood. In the future, WI FACETS hopes to improve the Spanish language version of the Literacy Series to infuse it with even more culturally relevant content and activities.

WI FACETS is currently piloting the most updated version of the Literacy Series in a bilingual school in MPS, ALBA Elementary. Families are already giving feedback as to how the series could be improved, such as asking for more effective and relevant materials and suggestions for middle-schoolers and how to engage them in literacy.

WI FACETS also plans to provide this newly updated Literacy Series in a Madison Area school district with Spanish speaking families in spring of 2019. Information collected through a series of surveys throughout the course will be used to monitor families'

improved understanding of literacy concepts and use recorded verbal as well as written suggestions for additions and improvements.

WI FACETS will make available the updated Literacy Series materials in English and Spanish for stakeholders through a shared Google Drive with the hope that all who use it will report back with suggestions for improvement.

### **Family Engagement Newsletter**

WI FACETS continues to produce a monthly Family Engagement newsletter targeted at families and educators interested in engaging families. The newsletter focuses on a different disability-related topic each month and includes a real-life story about the topic, online resources, research to read, statewide events, instructional trends, web trainings, and home-based learning activities. The newsletter reaches about 2,800 recipients. Each month, the home-based learning section includes literacy activities, which change on a monthly basis. These activities may include links to daily literacy calendars with suggested activities, book lists, e-book access, ideas for day trips or family activities, crafts and activities that promote multi-sensory learning, games, strategies for struggling learners, writing prompts, cultural learning activities, and materials in different languages. Many of the activities are targeted toward early and elementary readers, but resources for middle and high school aged children are also included. Survey data on how readers are using the home-based literacy strategies will be forth coming.

WI FACETS will continue producing the Family Engagement Newsletter through the 2019-2020 school year and will continue to seek input from consumers and stakeholders, using it to provide information most sought-after by readers.

# Preliminary District Summary Report-ESSA and IDEA

December 6, 2018

## Example District

### Introduction

The Every Student Succeeds Act (ESSA) and Individuals with Disabilities Education Act (IDEA) have shared goals: educational equity and student success. The Department of Public Instruction has coordinated notification across these two federal systems. This report summarizes the ESSA and IDEA identifications for your district.

### **District-Level Notifications (IDEA)**

#### Preliminary LEA Determination

The Individuals with Disabilities Education Act (IDEA) requires the Department of Public Instruction to determine annually if each local educational agency (LEA) meets the requirements of IDEA Part B. The criteria the Department considers when making this determination of whether the LEA “meets requirements”, “needs assistance”, “needs intervention”, or “needs substantial intervention” is available at <https://dpi.wi.gov/sped/about/state-performance-plan/determinations>.

The purpose of this preliminary determination is to inform LEAs of their IDEA compliance based on the data they submitted to DPI, and in doing so provide them with information and resources to guide their improvement planning. Though this determination is preliminary, the underlying student-level data are considered certified; the data are not subject to change. When determinations are final, LEAs that “need assistance” may not reduce their maintenance of effort obligations, unless the reduction is by less than half of the increased amount (the “50% Adjustment” rule). LEAs that “need assistance” for two or more years will be asked to engage in continuous improvement that includes a goal related to the data in the final determination. Final determinations are expected in early 2019.

*Determination: Meets Expectations*

#### Racial disproportionality in special education identification, discipline, placement

*This report will be updated in spring 2019 with this determination.*

## School-level Notifications (ESSA)

The purpose of the proposed ESSA accountability system is to identify and support schools with very low overall performance for all students and those with the lowest performing student groups. As such ESSA accountability functions as a federal identification system in which there are two identification categories, and two types of identifications within each category.

### Comprehensive Support and Improvement (CSI)

- CSI-Low Performance
- CSI-Low Graduation Rate

### Targeted Support and Improvement (CSI)

- Targeted Support
- Additional Targeted Support

While the federal system is intended to identify schools for support and improvement, all schools with sufficient data are reported (including those Not Identified).

The following table summarizes the identifications for each school within the district, including schools that are now closed but were open in the 2017-18 school year. The table indicates which identification categories are applicable, but, in cases of multiple identifications, the table does not distinguish between CSI-Lowest Performance and CSI-Grad Rate. Similarly, in cases of multiple student groups identified for Targeted Support, the table does not indicate how many student groups within the school qualified for TSI or ATSI. For that detail, and to view school and group level indicator data, please refer to the ESSA Accountability Reports, which are produced for each school.

School	Result
Example Elementary	Targeted Support
Example Middle	Not Identified
Example High	Not Identified

## Next Steps

These preliminary federal identifications provide an opportunity to better understand your school's and district's performance, and to continue to improve outcomes for each and every student. We invite you to start a planning period for your district or school – as you'll see from the Timeline of Recommended Actions for Improving Achievement and Closing Gaps ([click here](#)). We recommend taking this opportunity to use or build on successful continuous improvement efforts you are already engaged in, such as Educator Effectiveness, or starting a new, continuous improvement cycle. An important first step in this work is to understand the needs in your school and/or district. You can start this by reviewing the Preliminary ESSA Accountability Report and the Preliminary IDEA LEA Determina-

tions Report, both of which are available in SAFE.

You have the opportunity to strengthen your existing improvement efforts, at little or no cost, by taking advantage of new supports. Thanks to new coordination among the DPI, CESAs, and other partners, available supports throughout the state are built around what we know works to help schools close achievement gaps. These resources are optional, and the cost, if any, will be minimal for districts and schools.

Supports include online tools ([click here](#)), future availability of funding for schools identified for Comprehensive Support and Improvement, and professional development. Specifically, CESA staff have been trained to support you in continuous improvement, and there are aligned professional learning opportunities scheduled in each CESA ([click here](#)).

In our new, flexible approach, districts and schools that are identified in the final ESSA identification will be required to demonstrate they are engaged in continuous improvement - with some specific components - that addresses systemic issues.

If you are an administrator of a district with any preliminary school- or district-level identifications, we urge you to set up a technical assistance phone consultation with DPI as your first step. DPI staff with expertise in these federal systems will walk you through your preliminary identifications and address your questions. We urge you to invite others to participate in the call, such as CESA staff focused on improvement efforts and building leaders from schools with preliminary identifications. [Click here](#) to reserve a time slot.

# Preliminary 2017-18 ESSA Accountability Report

This report contains preliminary ESSA identification results and accompanying data to inform school-level continuous improvement planning. All identifications, scores and technical specifications related to the proposed ESSA accountability system contained in this report are considered both secure and preliminary. Final identification results will be reported in the Spring of 2019.

## Example District - Example School

### Introduction

The Elementary and Secondary Education Act, reauthorized as the Every Student Succeeds Act (ESSA), requires state education agencies to report on the performance of all students and student groups. Additionally, states are required to notify schools that, based on the performance of all students or student groups, qualify for Comprehensive, Targeted, or Additional Targeted Support and Improvement.

Important data notes:

- **Current Data** - In this preliminary report, the 2017-18 school year is the most current year, though multiple years of data are used throughout. For graduation data and chronic absenteeism data, the most recent available data are from the 2016-17 school year.
- **Cell Size** - In order to receive an indicator or summary score, a school or student group must have at least 20 students. This preliminary report does not include results for student groups with fewer than 20 students. The report indicates with 'NA' when this cell size rule has not been met.
- **Final Source Data** - Though this report is preliminary, the underlying student-level data are considered certified; the data are not subject to change.

Important terminology:

- **CSI: Comprehensive Support and Improvement**
- **CSI-Low Performance:** an identification based upon the performance of all students in the school. This identification is only available to Title I schools.
- **CSI-Grad Rate:** an identification based upon average four- and seven-year graduation rates below 67 percent, for any school with enough students to calculate such a rate.
- **TSI: Targeted Support and Improvement:** an identification based upon the overall performance of specific student group(s) in the school.

- ATSI: Additional Targeted Support and Improvement: an identification based upon the overall performance of specific student group(s) in the school that would qualify for Comprehensive Support.
- ELs: English Learners
- ECD: Economically Disadvantaged (students experiencing poverty)
- SWD: Students with Disabilities
- ELA: English Language Arts

#### Identification Criteria:

- Identifications (aside from CSI Low Grad) are based upon summary scores. A school or student group has to have indicator scores for Academic Achievement and Absenteeism in order to receive a summary score.
- A school may be identified for both categories of Comprehensive Support (CSI-Low Performance and CSI-Low Graduation Rate).
- A school identified for Comprehensive Support and Improvement (CSI) may not also be identified for Targeted Support and Improvement (TSI/ATSI). However, if a student group in a Comprehensive Support school would qualify for Targeted Support, the report states "below TSI threshold."
- A school may be identified for Additional Targeted Support and Improvement (ATSI) and Targeted Support and Improvement (TSI). The tables below indicate which, if any, student groups in the school demonstrate the need for Targeted Support or Additional Targeted Support.

## Your School's ESSA Identification Status:

### Not Identified

Identification year/cohort: 2018-19

School Received Title I funds in 2017-18 school year: No

Note that this school participated in the Alternate Accountability process for the 2017-18 school year due to data availability. As a result, this report does not include summary scores.

## Preliminary Identifications Summary

### Comprehensive Support and Improvement

CSI Type	Result
Lowest Performance	Not Identified
Low Graduation Rate (<67%)	Not Identified
ATSI Conversion	Not Identified

### Targeted and Additional Targeted Support and Improvement

Student Group	Result
Asian	Not Identified
Black	Not Identified
Hispanic/Latino	Not Identified
Amer Indian	Not Identified
Pacific Isle	Not Identified
Two or More Races	Not Identified
White	Not Identified
Econ Disadv	Not Identified
EL	Not Identified
SWD	Not Identified

This table shows whether student groups in this school are identified for Targeted Support or Additional Targeted Support. Student groups with a summary score in the bottom ten percent for that group's category (with racial groups in one category and service provision groups - EL, SWD, ECD - in another category) statewide and in the bottom ten percent of summary scores for the All-Students group in schools across the state have a demonstrated need for Targeted Support. Student groups that qualify for Targeted Support and that have a Summary Score that is also below the identification threshold for Comprehensive Support qualify for Additional Targeted Support. See appendix tables for thresholds.

### Preliminary Summary Scores

The purpose of the table below is to inform understanding of performance of all students and student groups relative to possible identifications. The table provides preliminary summary scores for your school and for student groups in your school. It also lists applicable preliminary identification thresholds.

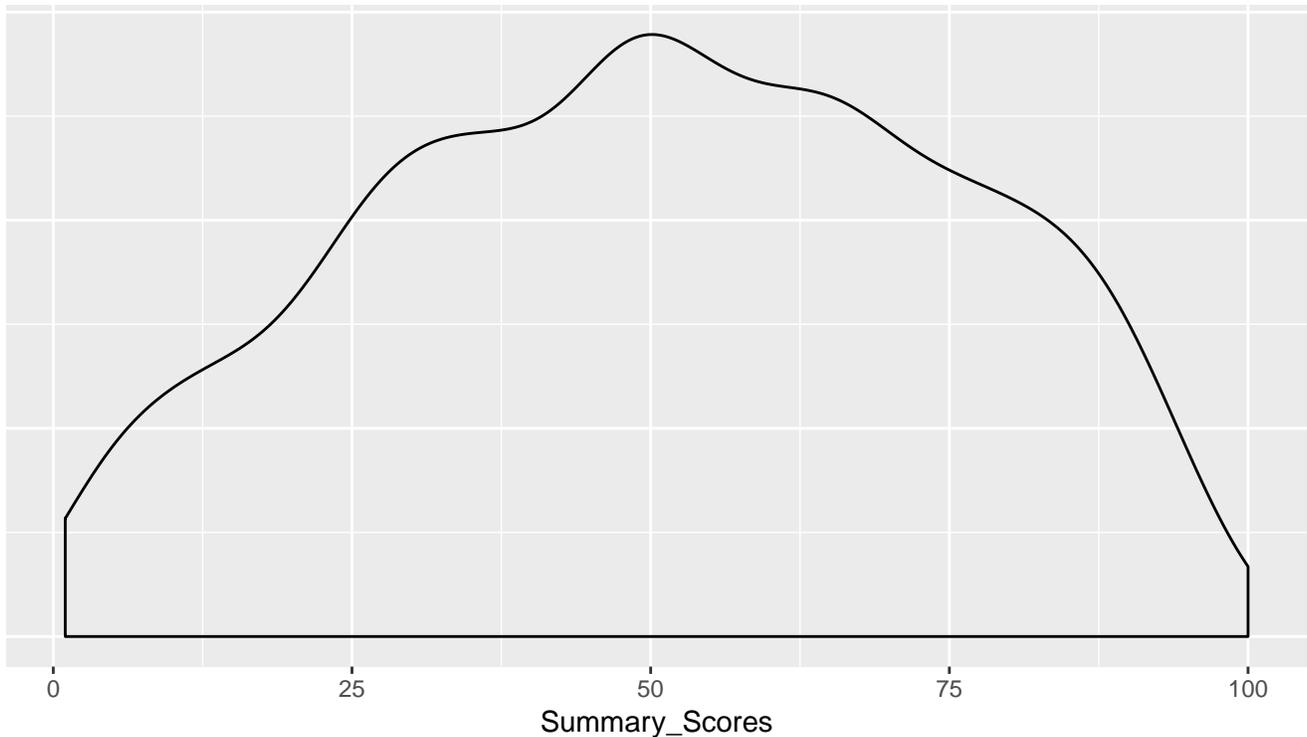
Student Group	Summary Scores		Applicable Thresholds			Threshold Warning
	Current	Prior	CSI	ATSI	TSI	
All-Students	NA	NA	NA	NA	NA	NA
Asian	NA	NA	NA	NA	NA	NA
Black	NA	NA	NA	NA	NA	NA
Hispanic/Latino	NA	NA	NA	NA	NA	NA
Amer Indian	NA	NA	NA	NA	NA	NA
Pacific Isle	NA	NA	NA	NA	NA	NA
Two or More Races	NA	NA	NA	NA	NA	NA
White	NA	NA	NA	NA	NA	NA
Econ Disadv	NA	NA	NA	NA	NA	NA
EL	NA	NA	NA	NA	NA	NA
SWD	NA	NA	NA	NA	NA	NA

Notes:

- 1.) Only schools receiving Title I funds are eligible for Comprehensive Support based on all student performance. However, data are provided whether the school receives Title I funds or not.
- 2.) Identification for Targeted Support requires that a student group’s summary score falls below thresholds in both the 2016-17 and 2017-18 school years. The “Threshold Warning” column indicates if a student group’s current score is within five points of the threshold - “Close to threshold” - or if the group’s current score is below the threshold for the first time in the current year - “First year below threshold.” In this case, the school could qualify for Targeted Support next year if the same student group’s score is below next year’s threshold.

**Statewide Distribution of Summary Scores for the All-Students Group**

This graph shows how the summary score for all students in your school compares to other schools. The curve is the statewide distribution of summary scores for the All-Students group (i.e., school summary scores). The vertical line is the summary score for your school’s All-Students group.



## **ESSA Accountability Indicators: Preliminary Results**

The proposed ESSA accountability system includes five indicators: Academic Achievement, Student Growth, Graduation Rate, Progress in Attaining English Language Proficiency (ELP Progress), and Absenteeism. A table of summary scores for all students and each student group with a score is on the previous page. Information about the school's performance across all ESSA indicators is provided below to help inform local improvement planning.

### **Summary of 2017-18 Indicator Outcomes and Indicator Percentiles (IP)**

The table below includes two pieces of Indicator data: an outcome based on the primary calculation (e.g., points-based proficiency rate), and an Indicator Percentile (labeled IP), which is an indication of rank for the given outcome. For schools, the ranks are established separately for the All-Students group in schools that graduate students and schools that do not graduate students. For student groups, the ranks are established separately for racial/ethnic groups and for service provision groups (economically disadvantaged students, English learners and students with disabilities), and separately for schools that do and do not graduate students. The percentile also serves as the Indicator score for each group.

Student_Group	Achievement		Growth		Graduation		ELP Progress		Absenteeism	
	Points-based Proficiency Rate		Average SGP (ELA and Math)		Average Graduation Rate		Average ACCESS SGP		Chronic Absenteeism Rate	
	Outcome	IP	Outcome	IP	Outcome	IP	Outcome	IP	Outcome	IP
All-Students	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Asian	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Black	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hispanic/Latino	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Amer Indian	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pacific Isle	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Two or More Races	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
White	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Econ Disadv	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
EL	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SWD	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

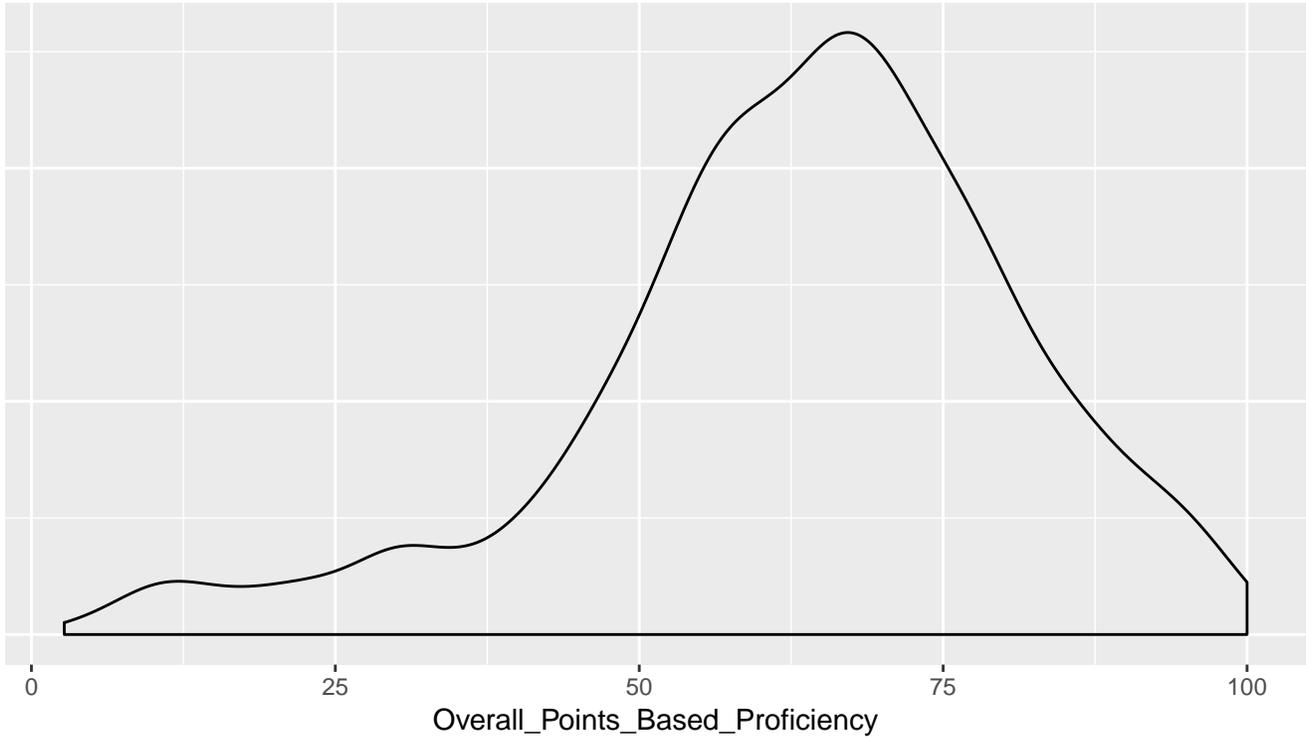
## Academic Achievement Indicator

The Academic Achievement Indicator, as proposed, provides information to schools about the distribution of student performance on required statewide academic assessments. Specifically, results are based on the Forward Exam, ACT with writing, and Dynamic Learning Maps assessments. Up to three years of assessment results are used. A points-based proficiency rate awards points for student performance as follows:

Performance Level	Points
Advanced	1.5
Proficient	1.0
Basic	0.5
Below Basic	0.0

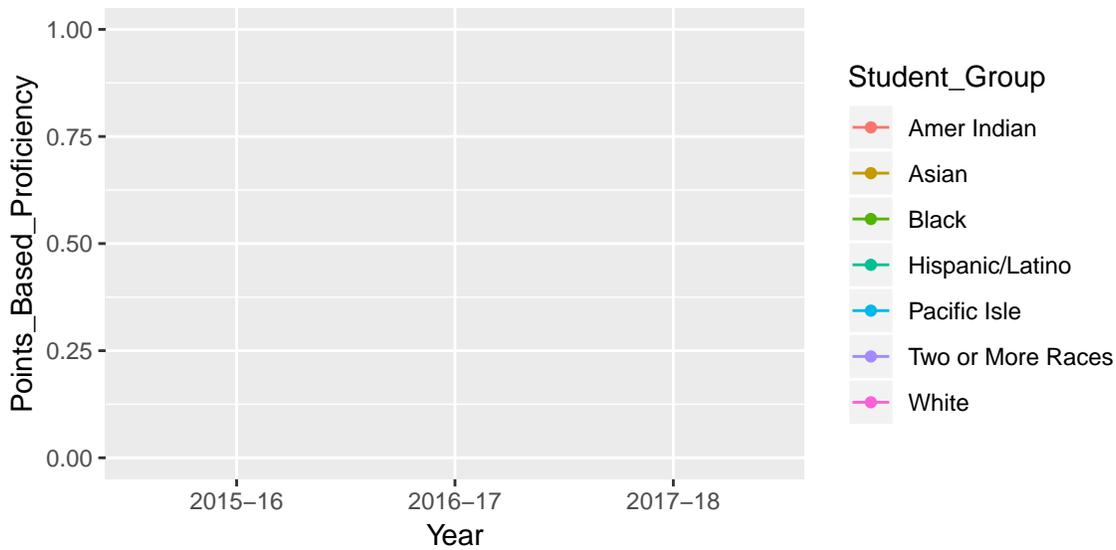
## **Statewide Distribution of Achievement Indicator Outcomes for the All-Students Group**

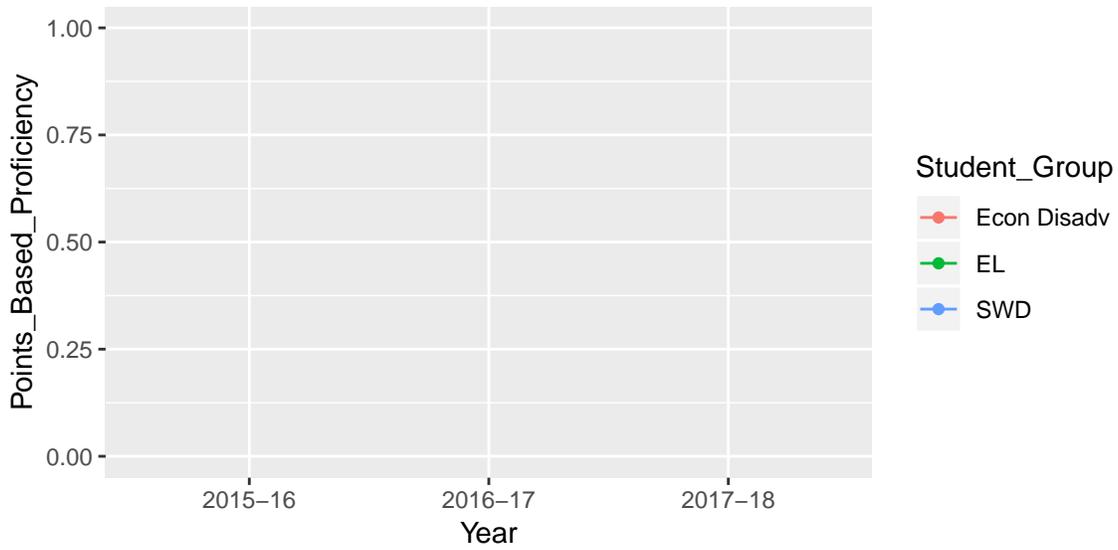
The graphs below show the statewide distribution of average points-based proficiency rates for the All-Students group. The vertical line shows your school's rate.



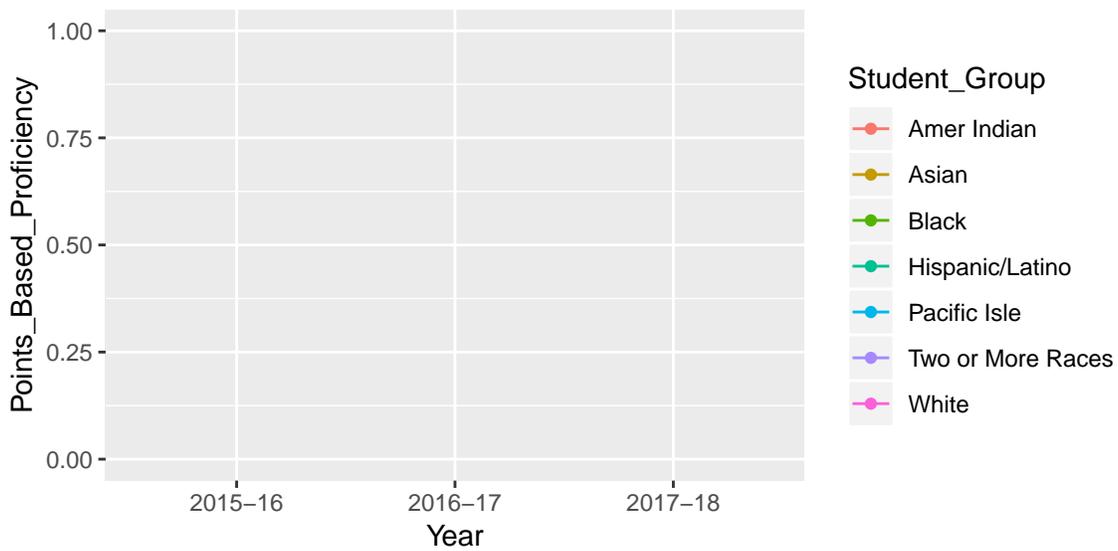
### School Preliminary ELA Points-Based Proficiency Rates Over Time, By Student Group

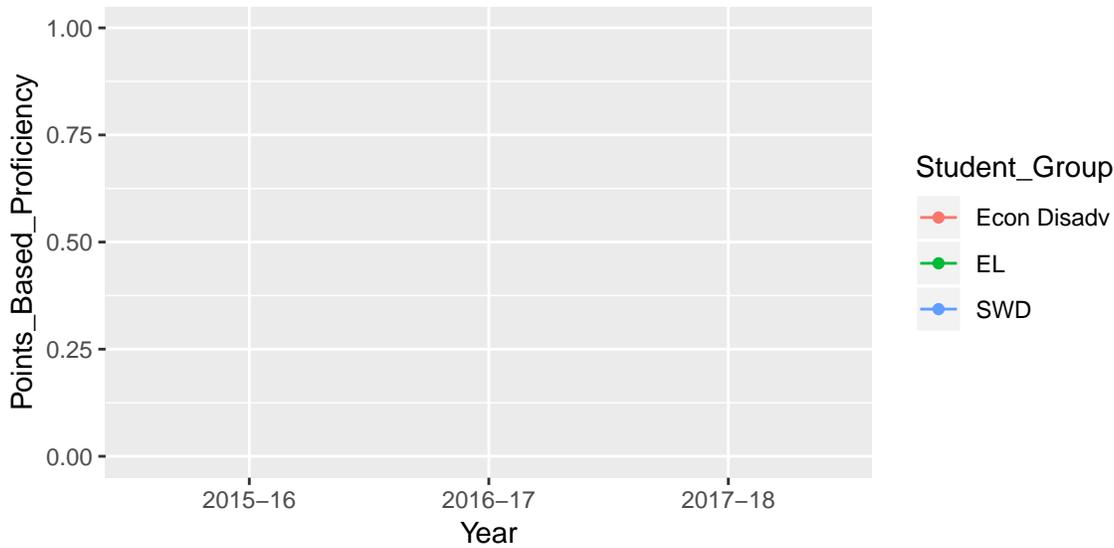
The graphs below show trends in points-based proficiency rates for each student group in your school with at least 20 tested students who were enrolled for the full academic year.





### School Preliminary Mathematics Points-Based Proficiency Rates Over Time, By Student Group





The tables below provide detailed information about student performance on the Forward Exam, ACT with writing, and Dynamic Learning Maps assessments. Specifically, they show the percentage of students with results in each of the performance levels. This distribution can inform how your school focuses improvement efforts.

### ELA Achievement Data - Percentage of Students in Proficiency Categories

Student_Group	2015-16				2016-17				2017-18			
	Adv	Prof	Basic	Below	Adv	Prof	Basic	Below	Adv	Prof	Basic	Below
All-Students	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Asian	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Black	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hispanic/Latino	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Amer Indian	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pacific Isle	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Two or More Races	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
White	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Econ Disadv	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
EL	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SWD	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

**Mathematics Academic Achievement Data - Percentage of Students in Proficiency Categories**

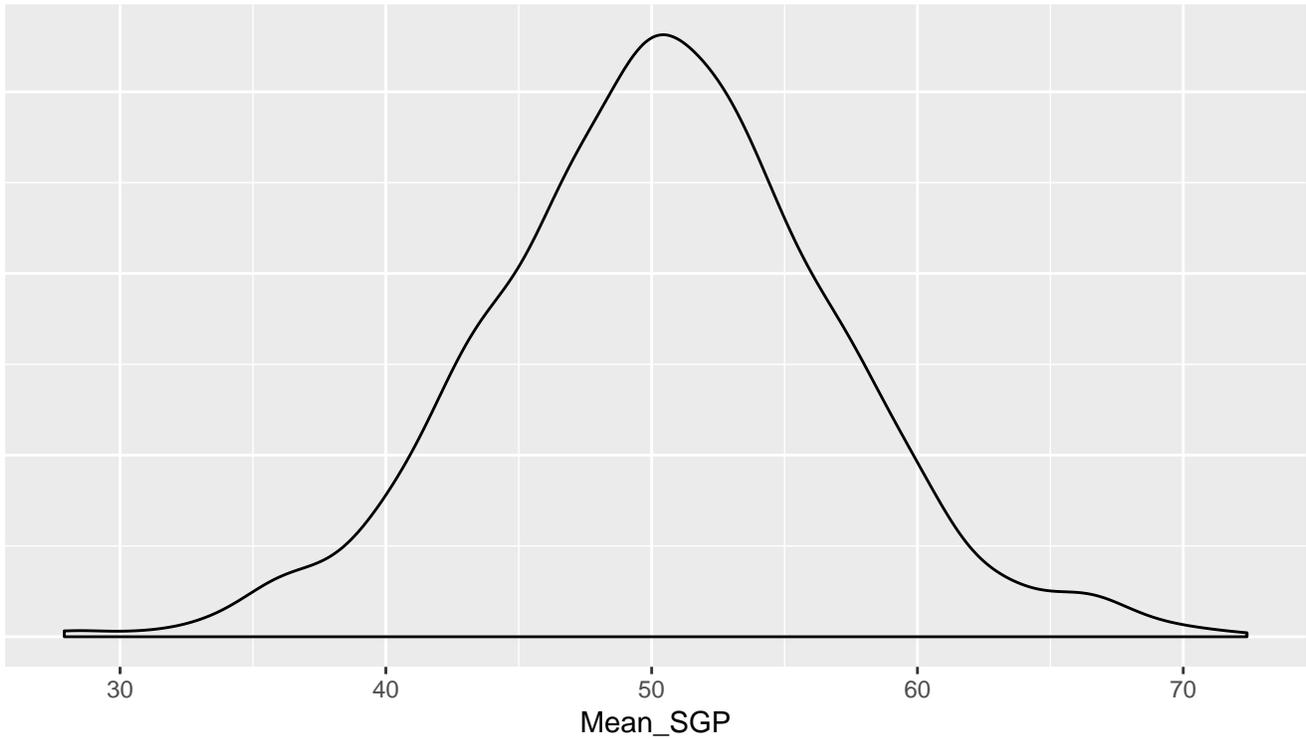
Student_Group	2015-16				2016-17				2017-18			
	Adv	Prof	Basic	Below	Adv	Prof	Basic	Below	Adv	Prof	Basic	Below
All-Students	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Asian	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Black	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hispanic/Latino	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Amer Indian	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pacific Isle	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Two or More Races	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
White	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Econ Disadv	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
EL	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SWD	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

**Student Growth Indicator**

The Student Growth Indicator, as proposed, summarizes how rapidly students are gaining knowledge and skills from year to year, based on up to five years of assessment (Badger and Forward) results. The calculation is an average of these rates of growth in each of the given years - either for the all-students group in the school or for any student group in the school with at least 20 students who have growth scores. The Indicator Outcome is a weighted average of these rates across multiple years. All improvement, regardless of a student’s starting point, can contribute positively to the Indicator Outcome for all students or a given student group.

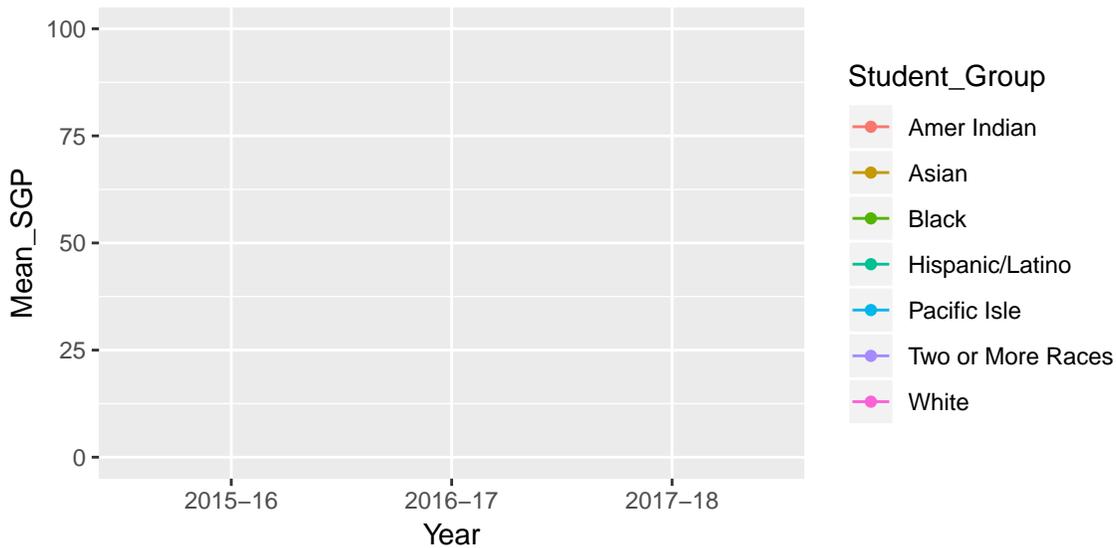
The graph below shows the statewide distribution of multi-year average student growth percentiles (SGPs) for the All-Students group (i.e., schoolwide growth percentiles). The vertical line shows average growth for All-Students group in your school.

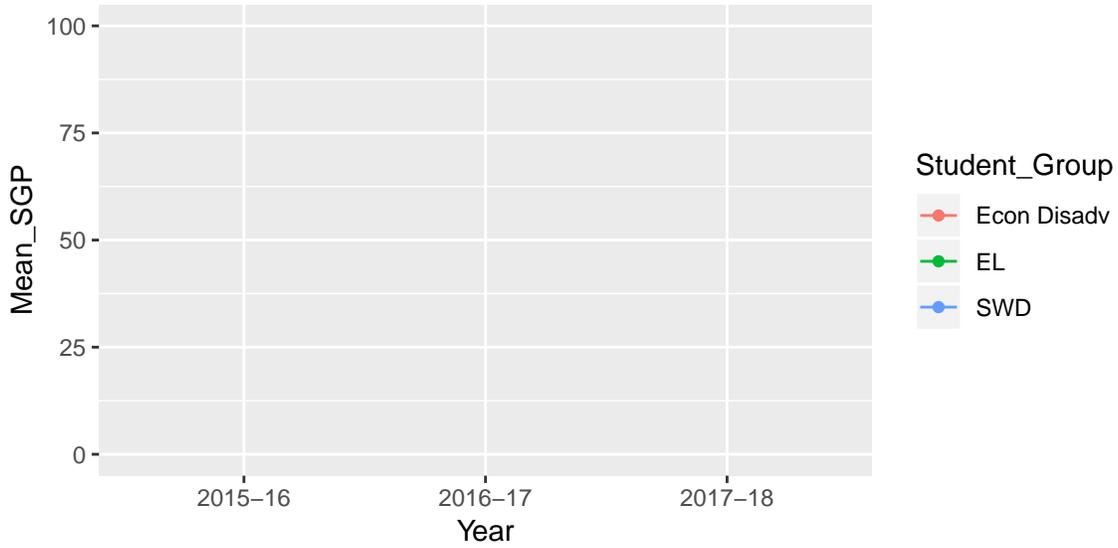
### Statewide Distribution of Growth Indicator Outcomes for the All-Students Group



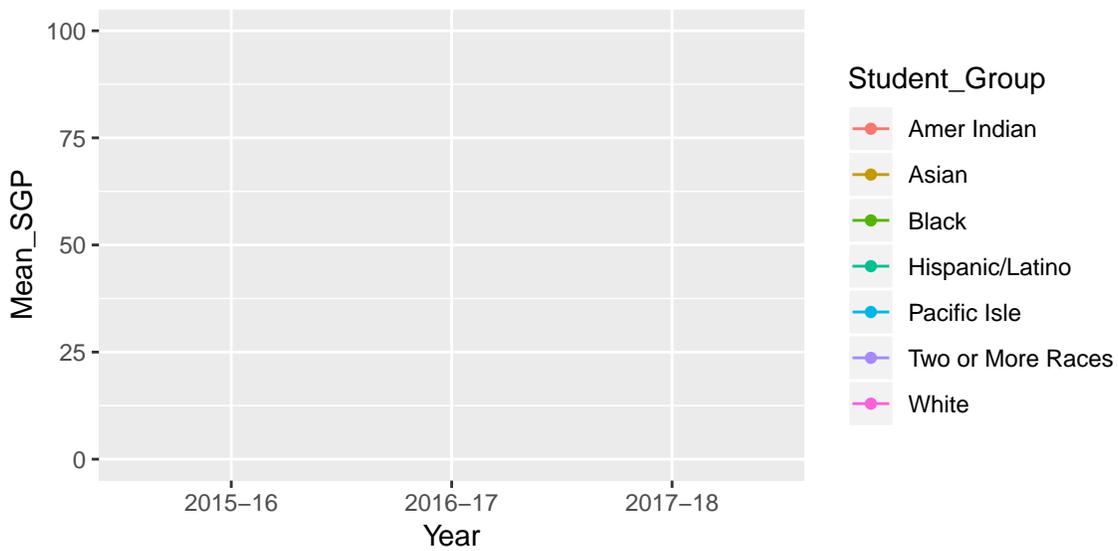
The graphs below show trends in average growth percentiles for each student group in your school with at least 20 tested students who were enrolled for the full academic year in the given year and who had test results in the relevant prior year.

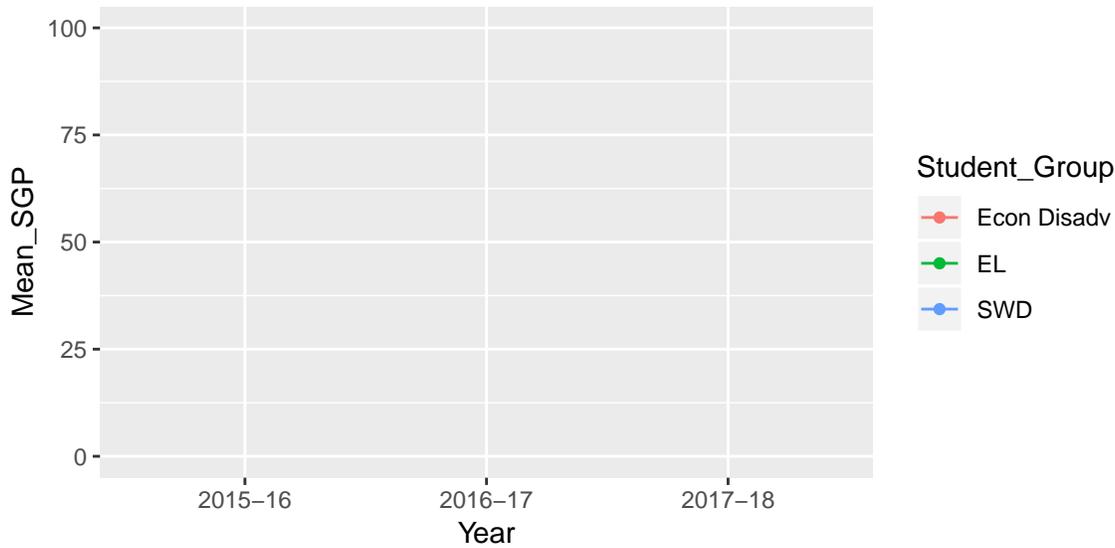
### School Mean English Language Arts SGPs Over Time, By Student Group





### School Mean Mathematics SGPs Over Time, By Student Group





The tables below provide detailed information about student growth. Specifically, each table shows the number of students with growth results in the given year, and the average growth for students in each group. Understanding rates of improvement for different groups of students can help inform how you target academic and other supports for students in your school.

**ELA Mean SGPs, by Student Group**

Student_Group	2015-16		2016-17		2017-18	
	Count	Mean	Count	Mean	Count	Mean
All-Students	NA	NA	NA	NA	NA	NA
Asian	NA	NA	NA	NA	NA	NA
Black	NA	NA	NA	NA	NA	NA
Hispanic/Latino	NA	NA	NA	NA	NA	NA
Amer Indian	NA	NA	NA	NA	NA	NA
Pacific Isle	NA	NA	NA	NA	NA	NA
Two or More Races	NA	NA	NA	NA	NA	NA
White	NA	NA	NA	NA	NA	NA
Econ Disadv	NA	NA	NA	NA	NA	NA
EL	NA	NA	NA	NA	NA	NA
SWD	NA	NA	NA	NA	NA	NA

## Mathematics Mean SGPs, by Student Group

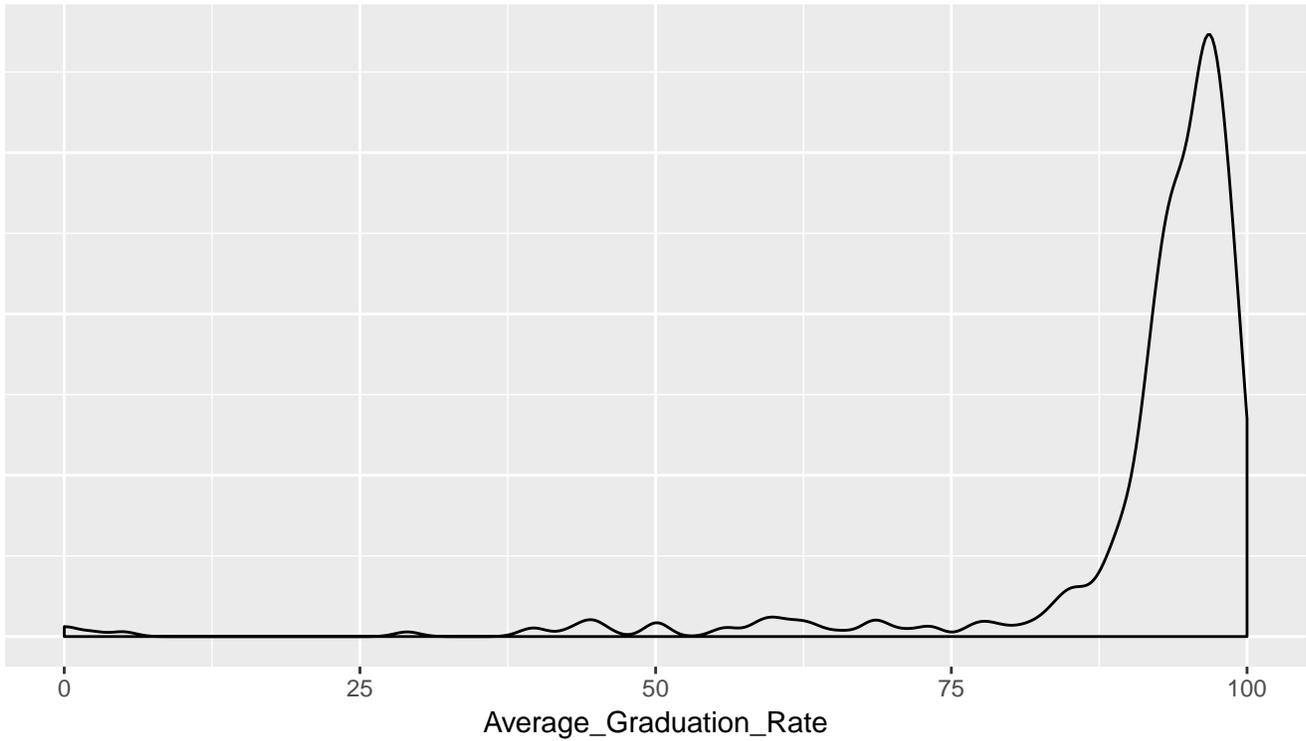
Student_Group	2015-16		2016-17		2017-18	
	Count	Mean	Count	Mean	Count	Mean
All-Students	NA	NA	NA	NA	NA	NA
Asian	NA	NA	NA	NA	NA	NA
Black	NA	NA	NA	NA	NA	NA
Hispanic/Latino	NA	NA	NA	NA	NA	NA
Amer Indian	NA	NA	NA	NA	NA	NA
Pacific Isle	NA	NA	NA	NA	NA	NA
Two or More Races	NA	NA	NA	NA	NA	NA
White	NA	NA	NA	NA	NA	NA
Econ Disadv	NA	NA	NA	NA	NA	NA
EL	NA	NA	NA	NA	NA	NA
SWD	NA	NA	NA	NA	NA	NA

## Graduation Indicator

The Graduation Rate Indicator, as proposed, provides information about the rate at which students in your school, and student groups within your school, are graduating from high school within four or seven years. Specifically, the measure is an average of the four-year and seven-year adjusted cohort graduation rates.

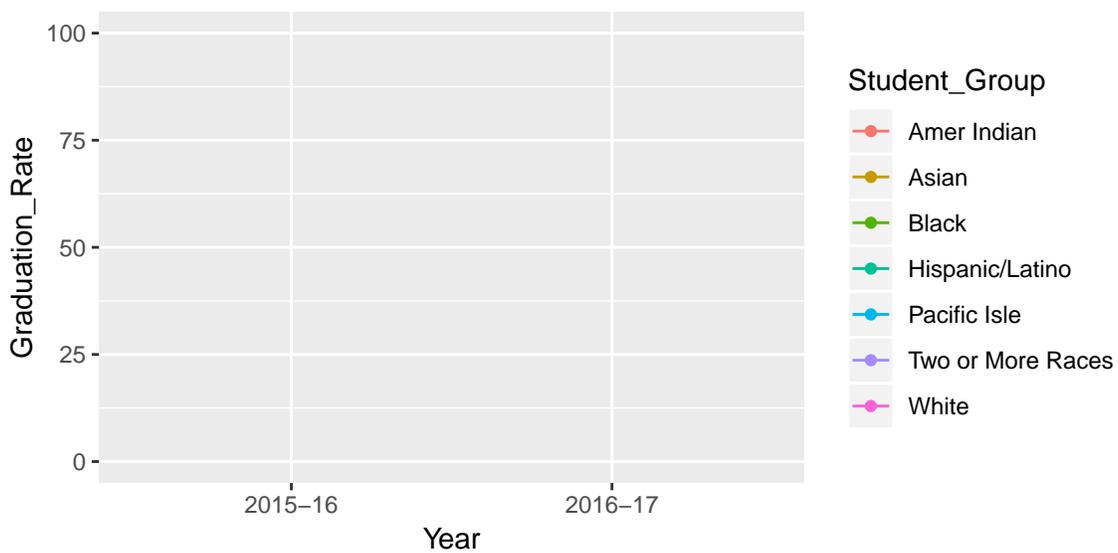
The graphs below show the statewide distribution of average four- and seven-year graduation rates for the All-Students group if there were at least 20 students in each of the cohorts. The vertical line shows your school's average rate.

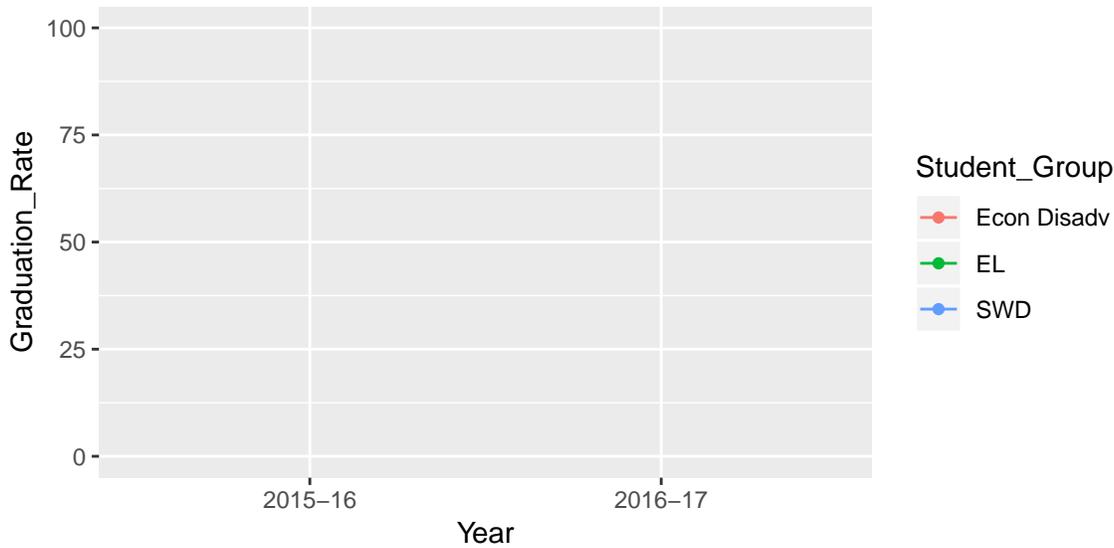
### Statewide Distribution of Graduation Indicator Outcomes for the All-Students Group



The graphs below show trends in graduation rates. Specifically, they show the four-year adjusted cohort graduation rate for each student group in your school with at least 20 students in the cohort in each of the given years.

### School 4-Year Graduation Rate Over Time, By Student Group





The table below provides detailed information about graduation rates in your school. Specifically, the table shows the number and percentage of of students who graduate from high school within four or seven years. Understanding these graduation rates is important because graduating from high school on-time, whether in four years or, in accordance with an education plan, over a longer period, is a critical academic milestone. The proposed Graduation Indicator is an average of four- and seven-year rates; that average is also provided in the table.

**Four and Seven Year Graduation Rates, by Student Group**

Student_Group	4-Year		7-Year		Average
	Cohort	Rate	Cohort	Rate	Average
All-Students	NA	NA	NA	NA	NA
Asian	NA	NA	NA	NA	NA
Black	NA	NA	NA	NA	NA
Hispanic/Latino	NA	NA	NA	NA	NA
Amer Indian	NA	NA	NA	NA	NA
Pacific Isle	NA	NA	NA	NA	NA
Two or More Races	NA	NA	NA	NA	NA
White	NA	NA	NA	NA	NA
Econ Disadv	NA	NA	NA	NA	NA
EL	NA	NA	NA	NA	NA
SWD	NA	NA	NA	NA	NA

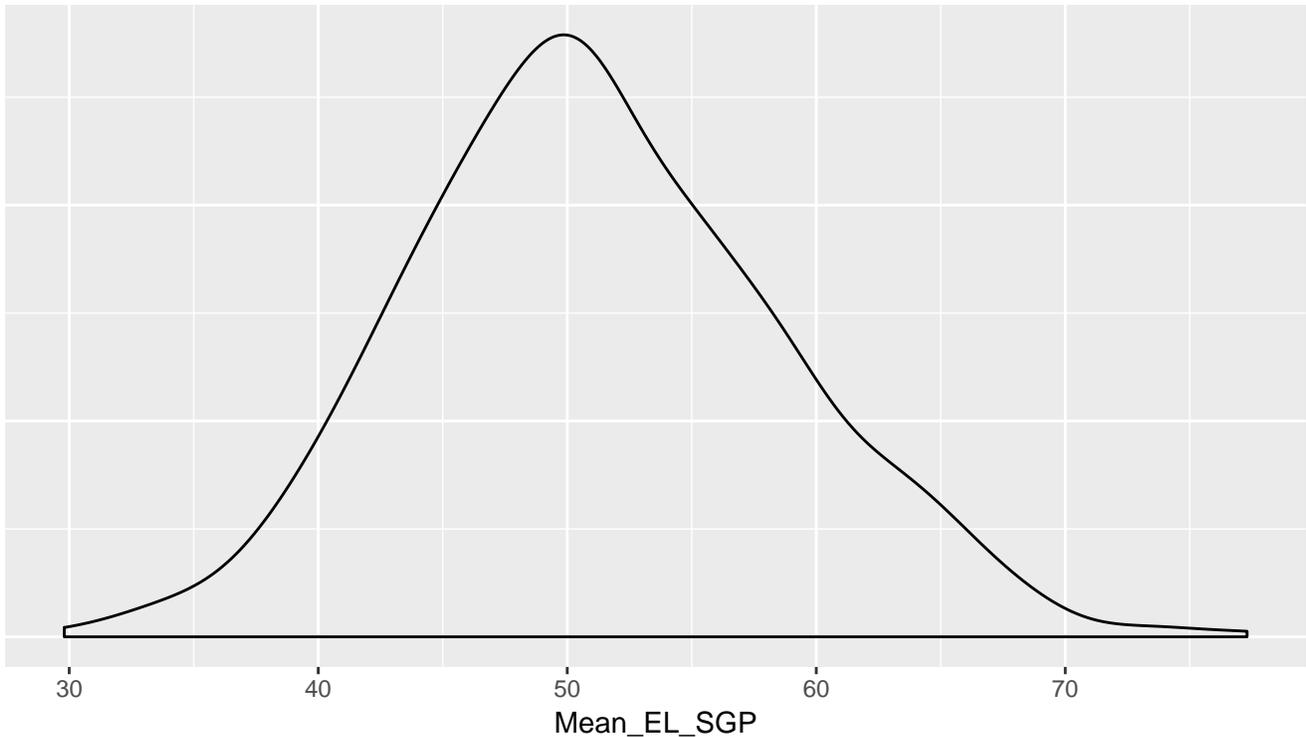
**ELP Progress Indicator**

The Progress in Attaining English Language Proficiency indicator, as proposed, summarizes how rapidly English learners in your school are progressing on their path to English language proficiency, based on up to five years of

results on the ACCESS for ELLs exam. The calculation is an average of these individual rates of growth for English learners in the school for the given year, and the Indicator Outcome is a weighted average across years. All improvement, regardless of a student's starting point, can contribute positively to the Indicator outcome.

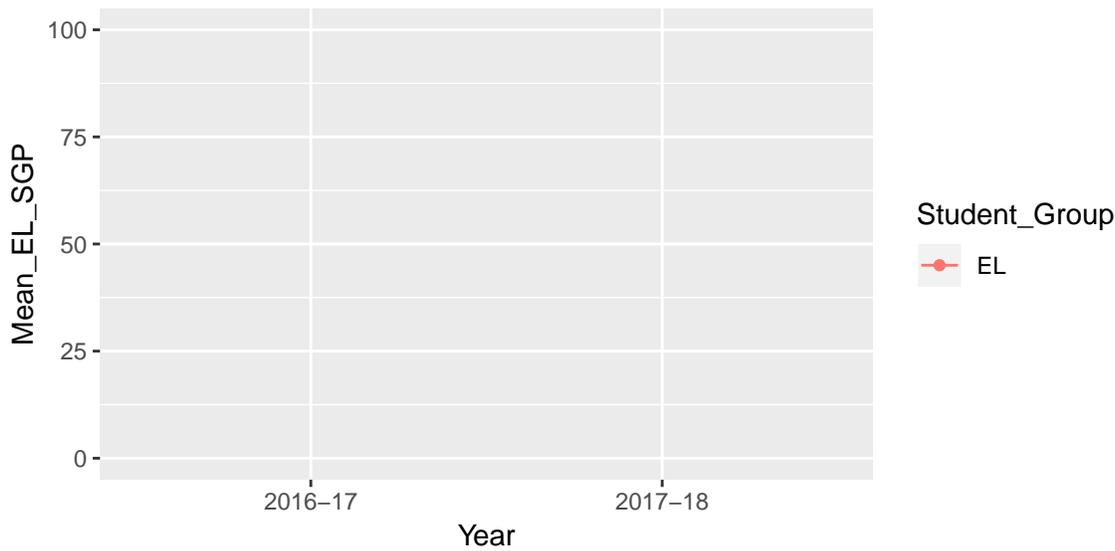
The graphs below show the statewide distribution of outcomes for this ELP Progress Indicator. The vertical line shows the average growth for English learners in your school.

### Statewide Distribution of ELP Progress Outcomes for English Learners



The graphs below show trends in average growth percentiles for English learners in your school who had test results on the ACCESS for ELLs exam in the given year and applicable prior year.

### School Mean ACCESS SGPs Over Time



The table below provides information about student growth on the ACCESS for ELLs Exam. Specifically, the table shows the number of English learners with growth results in the given year and the average growth for those students. Understanding rates of improvement for this group of students in attaining English language proficiency can help inform how you target academic and other supports for English learners in your school.

### Mean ACCESS SGPs Over Time

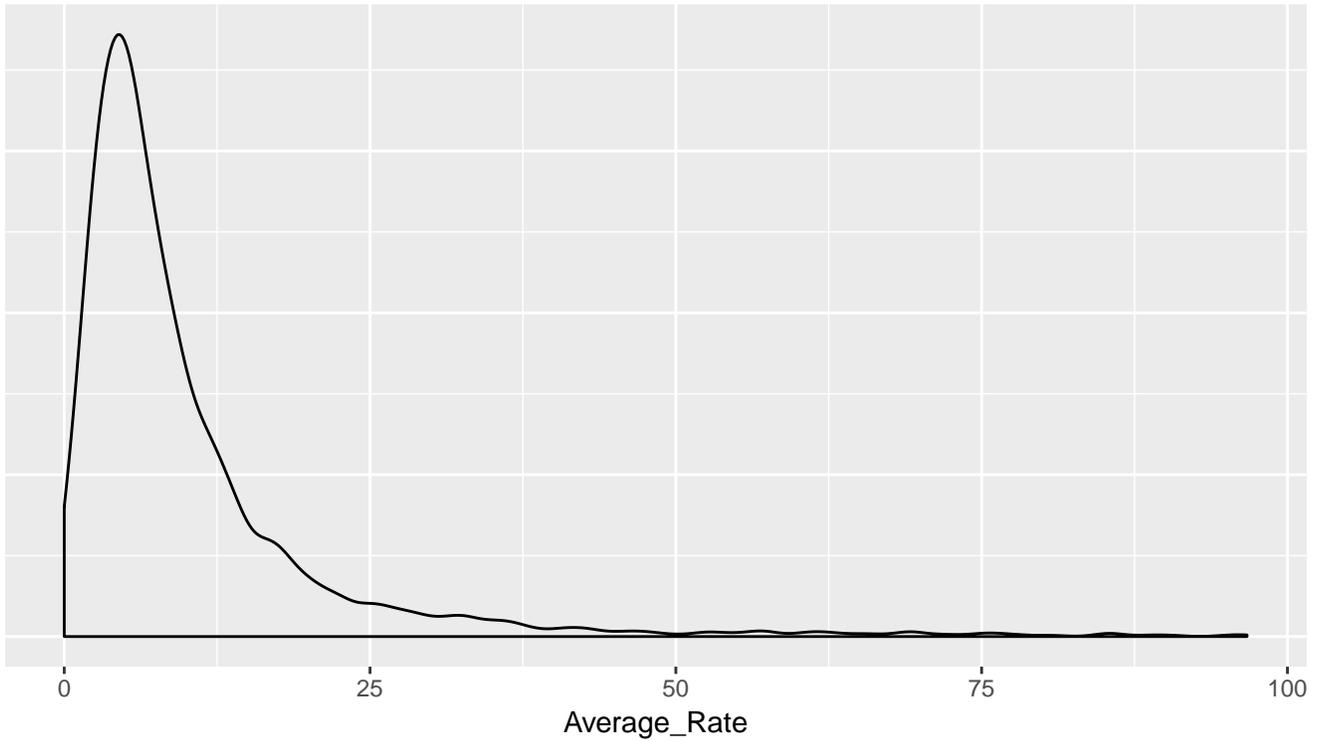
Student_Group	2016-17		2017-18	
	Count	Mean	Count	Mean
EL	NA	NA	NA	NA

### Chronic Absenteeism Indicator

The Absenteeism indicator, as proposed, provides information about the extent to which students in your school, or student groups in your school, are missing instructional time. Specifically, the proposed measure reflects a multi-year average of the the percentage of students who were absent more than ten percent of the days they could attend.

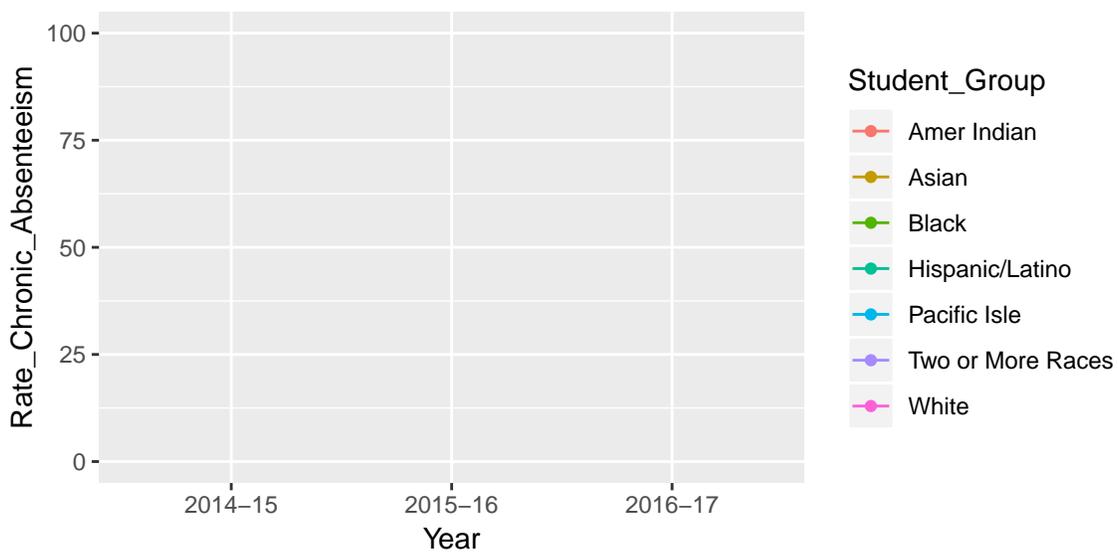
The graphs below show the statewide distribution of average absenteeism rates for the All-Students group. This reflects the average percentage of students enrolled for at least half the academic year with attendance rates below 90% in 2016-17, 2015-16, and 2014-15. The vertical line shows your school’s average rate.

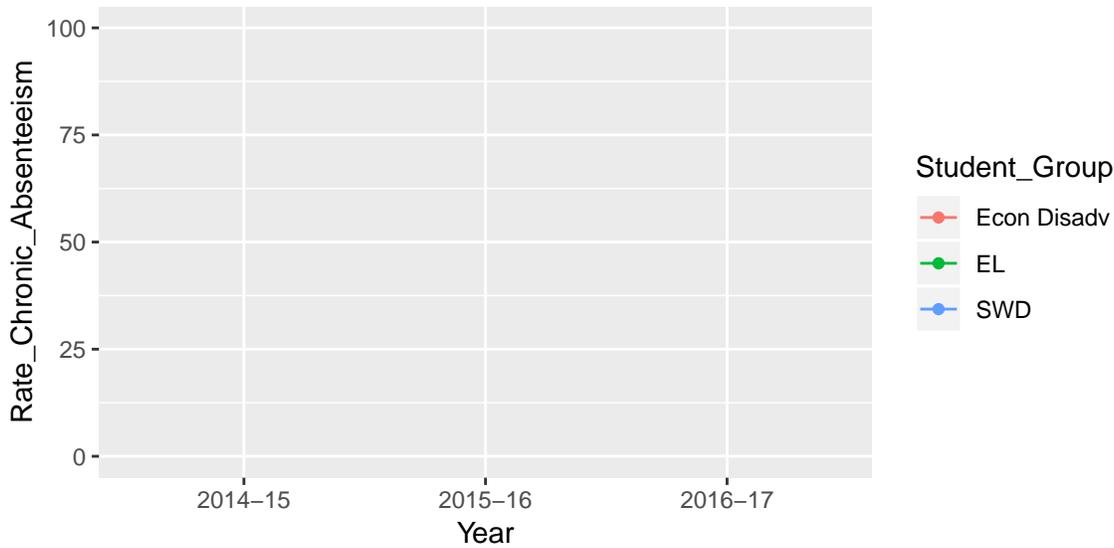
### Statewide Distribution of Absenteeism Outcomes for the All-Students Group



The graphs below show trends in absenteeism rates for student groups in your school with at least 20 students enrolled for at least half the given academic year.

### School Chronic Absenteeism Trends, by Student Group





The table below shows detailed information about absenteeism for all students and for groups of students in your school, over three years, with 2016-17 as the most recent year. Specifically, the table shows the number of students who were enrolled for at least half the academic year, and the percentage of students who were chronically absent (i.e., with attendance rates below 90%) in the given year. Note that a lower rate of chronic absenteeism results in a higher rank on this indicator.

**Rate Chronically Absent, By Student Group**

Student_Group	2014-15		2015-16		2016-17		Multi-Year Rate
	Count	Rate	Count	Rate	Count	Rate	
All-Students	NA	NA	NA	NA	NA	NA	NA
Asian	NA	NA	NA	NA	NA	NA	NA
Black	NA	NA	NA	NA	NA	NA	NA
Hispanic/Latino	NA	NA	NA	NA	NA	NA	NA
Amer Indian	NA	NA	NA	NA	NA	NA	NA
Pacific Isle	NA	NA	NA	NA	NA	NA	NA
Two or More Races	NA	NA	NA	NA	NA	NA	NA
White	NA	NA	NA	NA	NA	NA	NA
Econ Disadv	NA	NA	NA	NA	NA	NA	NA
EL	NA	NA	NA	NA	NA	NA	NA
SWD	NA	NA	NA	NA	NA	NA	NA

## Additional Data - For Informational Purposes

### Test Participation

Most of the results of these preliminary accountability calculations are based upon how students perform on various statewide assessments. It is important, for both the validity of the results, and for the ability to act upon these results, that as many students as possible participate in the required assessments. The table below provides information about student participation in the assessments included in the proposed accountability calculations reflected in this preliminary report.

The Every Student Succeeds Act reflects this priority of test participation by requiring states to calculate achievement outcomes based upon the higher of 95% of students or the actual number of students tested. The Achievement Indicator, as proposed, incorporates this requirement.

### Full Academic Year Tested Students: English Language Arts

Student_Troup	2015-16		2016-17		2017-18	
	Count	Rate	Count	Rate	Count	Rate
All-Students	<20	NA	<20	NA	<20	NA
Asian	<20	NA	<20	NA	<20	NA
Black	<20	NA	<20	NA	<20	NA
Hispanic/Latino	<20	NA	<20	NA	<20	NA
Amer Indian	<20	NA	<20	NA	<20	NA
White	<20	NA	<20	NA	<20	NA
Pacific Isle	<20	NA	<20	NA	<20	NA
Two or More Races	<20	NA	<20	NA	<20	NA
SWD	<20	NA	<20	NA	<20	NA
Econ Disadv	<20	NA	<20	NA	<20	NA
EL	<20	NA	<20	NA	<20	NA

### Full Academic Year Tested Students: Mathematics

Student_Group	2015-16		2016-17		2017-18	
	Count	Rate	Count	Rate	Count	Rate
All-Students	<20	NA	<20	NA	<20	NA
Asian	<20	NA	<20	NA	<20	NA
Black	<20	NA	<20	NA	<20	NA
Hispanic/Latino	<20	NA	<20	NA	<20	NA
Amer Indian	<20	NA	<20	NA	<20	NA
White	<20	NA	<20	NA	<20	NA
Pacific Isle	<20	NA	<20	NA	<20	NA
Two or More Races	<20	NA	<20	NA	<20	NA
SWD	<20	NA	<20	NA	<20	NA
Econ Disadv	<20	NA	<20	NA	<20	NA
EL	<20	NA	<20	NA	<20	NA

### Identification Thresholds

This ESSA accountability system, as proposed, identifies schools for Comprehensive, Targeted, or Additional Targeted Support by comparing the summary scores of all students and each student group with a summary score in the school to applicable score thresholds. The tables below display the various thresholds.

#### All-Students

	CSI Threshold - Low Performance*
Schools with a 12th grade	8.4
Schools without a 12th grade	6.4

\*Note that, for identification purposes, this threshold is applied only to Title I-receiving schools.

#### Student groups: race/ethnicity

	TSI Threshold	CSI Threshold (for ATSI)
Schools with a 12th grade	15.7	8.4
Schools without a 12th grade	14.9	6.4

**Student groups: service provision (ECD, EL, SWD)**

	TSI Threshold	CSI Threshold (for ATSI)
Schools with a 12th grade	24.6	8.4
Schools without a 12th grade	16.4	6.4

# IDEA 2018 LEA Determinations

## Statewide Data

The Individuals with Disabilities Education Act (IDEA) requires the Department of Public Instruction to determine annually if each local educational agency (LEA) meets the requirements of IDEA Part B. The criteria the Department considers when making this determination of whether the LEA “meets requirements”, “needs assistance”, “needs intervention”, or “needs substantial intervention” is available at [dpi.wi.gov/sped/about/state-performance-plan/determinations](http://dpi.wi.gov/sped/about/state-performance-plan/determinations). This information is also integrated throughout this document.

The purpose of this determination is to inform LEAs of their IDEA compliance based on the data they submitted to DPI, and in doing so provide them with information and resources to guide their improvement planning. The data used for these determinations are **certified**; it is not subject to change, as it comes from the corresponding snapshots for each indicator. LEAs that “need assistance” may not reduce their maintenance of effort obligations, unless the reduction is by less than half of the increased amount (the “50% Adjustment” rule). LEAs that “need assistance” for two or more years will be asked to engage in continuous improvement that includes a goal related to the data in the determination.

Please note that, due to the inclusion of unredacted data, **this report is considered sensitive and confidential**. Therefore, this document should not be shared with the public and is not subject to open records requests. Redacted versions of the data used in this report are available publicly at [DPI's public data files](#), the [WISEdash Public Portal](#), and the Special Education Team's [District Profile Application](#).

Determination Scoring Cutoffs	
IDEA Determination	Criteria
Meets Requirements	Total Score is at least 80%
Needs Assistance	Total Score is at least 60% but below 80%
Needs Intervention	Total Score is less than 60%
Needs Substantial Intervention	The Department determines an LEA needs substantial intervention in implementing the requirements of IDEA Part B or that there is a substantial failure to comply with any condition of eligibility.

Note: Calculations are rounded to the nearest percent.

The Department has reviewed the necessary data and has determined that your LEA has a determination of “**Meets Requirements**.” This document breaks down how this calculation was made by each indicator, provides you with the data your LEA reported for your review, and shows your LEA’s performance along each indicator compared to other LEAs.

When calculating the 2018 IDEA determinations, the Department continued the process of gradually shifting toward equally weighting results and compliance indicators.

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**Compliance & Results Weighted by Year**


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Indicator Type	2016	2017	2018
Compliance	0.9	0.75	0.65
Results	0.1	0.25	0.35

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**Your LEA at a Glance**


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**LEA Calculation**


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Indicator Type	Numerator	Denominator	Group Score
Compliance	14	14	100.00
Results	7	12	58.33

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**Calculated Score: 85%. LEA Meets Requirements**

Note: Determinations are rounded to the nearest percent.

Below is a summary of your LEA's performance across all indicators.

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**LEA Summary**


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Indicator	Name	Type	Rate	Percentile	Points
1	Graduation	Results	74.64	36	1
2	Dropout	Results	1.23	30	0
3bm	Math Assessment Participation	Results	97.05	37	2
3br	ELA Assessment Participation	Results	96.99	37	2
3cm	Math Proficiency	Results	15.07	59	1
3cr	ELA Proficiency	Results	15.25	59	1
4b	Dispro Disc	Compliance	NA	NA	2
9	Dispro ID All	Compliance	NA	NA	2
10	Dispro ID Cat	Compliance	NA	NA	2
11	timely evaluation	Compliance	97.55	20	2
12	PK transition	Compliance	96.42	8	2
13	Secondary Transition	Compliance	NA	NA	NA
corr	corrected noncompliance	Compliance	NA	NA	2
data	timely and accurate data	Compliance	NA	NA	2

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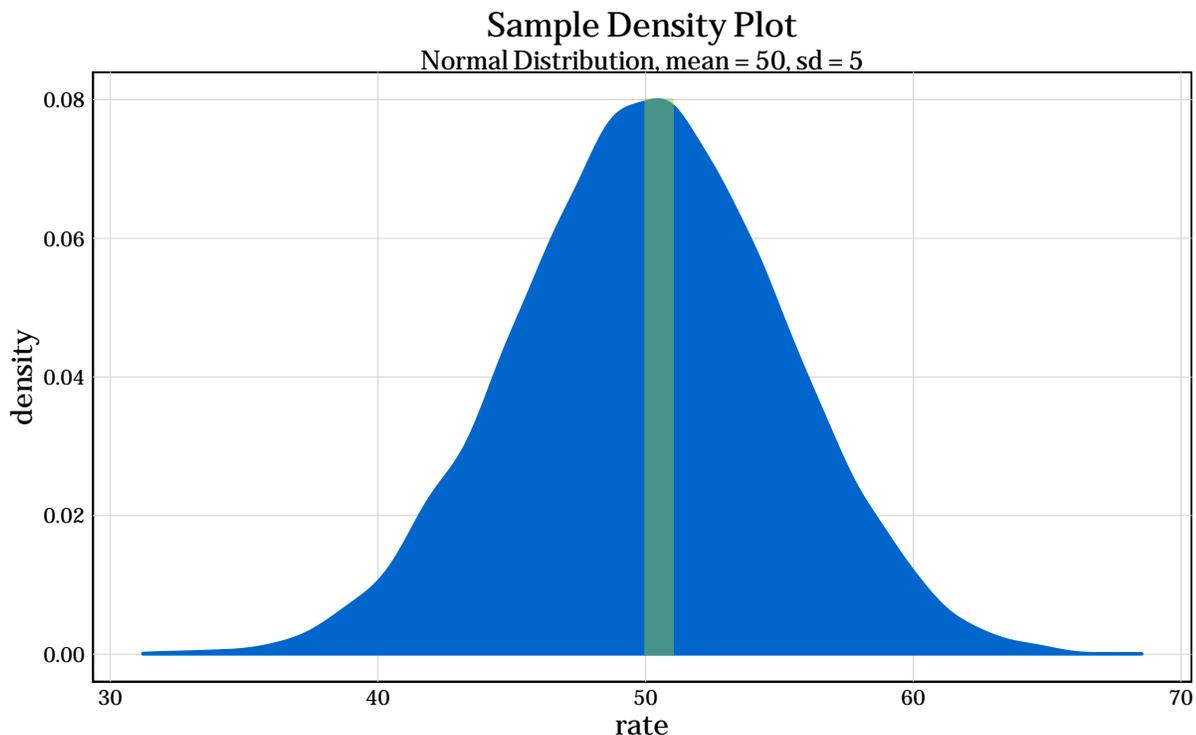
## Understanding the Data

In subsequent sections, more tables and data visualizations are provided to help facilitate your LEA's improvement planning. Here you will find a brief overview of the terminology used in those tables and visualizations.

'Rate' refers to your LEA's calculated percentage for each indicator, and results in the points earned. 'Percentile' refers to your LEA's percentile rank compared to all other LEAs using minimum values to resolve tied scores; a percentile rank of 70, for example, means that the LEA performed better than 70% of all other LEAs on that indicator, and 30% of other LEAs performed equally well or better. Percentile rankings do not directly affect scores, but rather are provided for informational purposes.

A density plot is provided for each relevant indicator, showing the statewide distribution in that performance area. If the indicator pertains to your LEA, a pink, vertical line indicates where your LEA's performance places you in this distribution. Green and yellow backgrounds indicate the cutoffs between two- and one-points, respectively. Areas of the density plot with no background shading indicate that districts that fall in this area received zero points for this indicator.

While a valuable visual tool, density plots may need additional explanation to be easily understood. To get a general sense of where your LEA falls in the statewide distribution, you can focus on where the pink, vertical line falls in relation to the overall distribution. Otherwise, you can refer to the values along the y-axis (labeled 'density') to read additional information from the chart. These numbers refer to the percent of the sample that falls within one whole unit along the x-axis. Because the distribution changes across each indicator, so too will the range of densities across indicators. See the accompanying figure to review a sample density plot and explanation of its appropriate interpretation.



'Density' refers to the percentage of the sample population which falls within one whole unit along the x axis. This means that approximately 8 percent of the sample population pictured above has a rate between 50 and 51 (the green shaded area).

Not all indicators apply to all LEAs. If this is the case, you will see 'NA' listed for that indicator's points and there will be no vertical line in the accompanying density plot. This results in a smaller denominator in the calculation, but does not count against the LEA. In the event that no results indicators apply to an LEA, the determination is based solely on compliance indicators.

You may notice that some compliance indicators (4b, 9, and 10) list 'NA' for their rate and percentile, but still have points awarded for them. This is because these compliance indicators are not calculated as a percentage, but rather are logical (true or false). Therefore, LEAs are awarded either 2 points or 0 points for those indicators.

## Results Indicators

### Indicator 1: Graduation

Indicator 1 is the percentage of youths with IEPs who graduate with a regular diploma within four years. Other forms of high school completion, including High School Equivalency Diplomas (HSEDs), certificates of completion, and regular diplomas received after four years, are not counted in the numerator. Due to data availability at the time of Federal reporting (February 1, 2018), this is a lagged indicator; this means that the source school year is 2015-16.

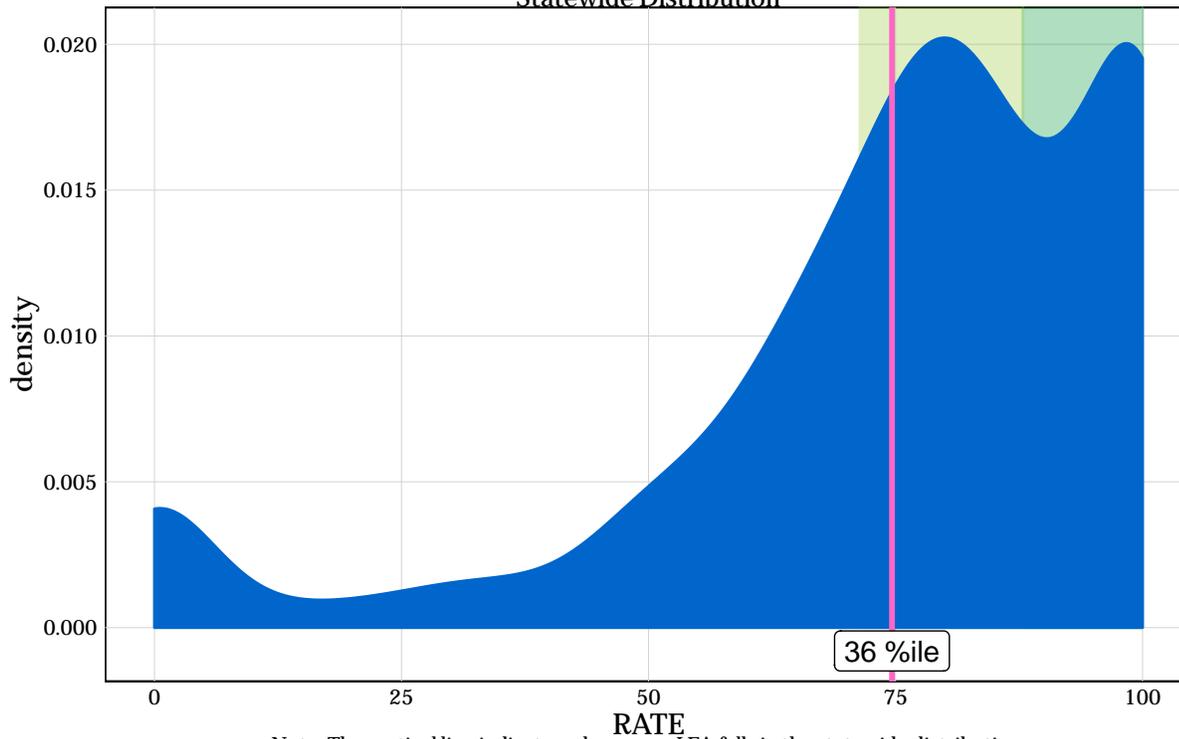
The requirements for obtaining a regular diploma in Wisconsin are the same regardless of a child's disability status. A graduate is defined as a student who has met the requirements established by a school board for a prescribed course of study.

The graduation rate for each accountable LEA is calculated as the number of youth with IEPs who graduate from high school with a regular diploma within their four-year cohort, divided by the total number of youths with IEPs enrolled in the four-year cohort.

For more information on how graduation rates are calculated, please consult DPI's [Adjusted Graduation Cohort FAQ](#).

Indicator	Indicator Cutoffs		LEA Performance		
	2 points	1 point	Rate	Percentile	Points Earned
1	87.9	71.4	74.64	36	1

### Indicator 1: Graduation Statewide Distribution



### Indicator 2: Dropouts

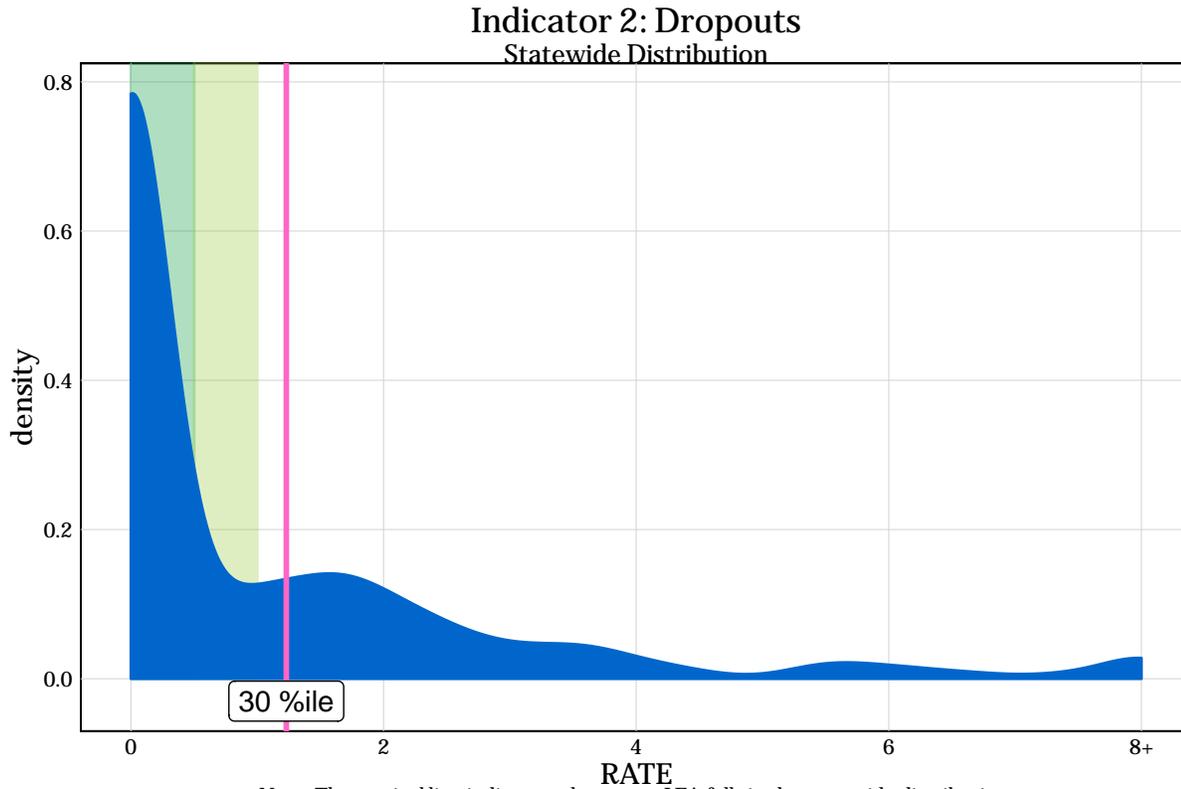
Indicator 2 is the percentage of youth with IEPs ages 14-21 who drop out of school. Due to data availability at the time of Federal reporting (February 1, 2018), this is a lagged indicator; this means that the source school year is 2015-16.

A dropout is defined as a student who was enrolled in school at some time during the previous school year, was not enrolled at the reporting time of the current school year (third Friday in September), has not graduated from high school or completed a state- or LEA-approved educational program, and does not meet any of the following exclusionary conditions:

- transfer to another LEA, private school, or state- or LEA-approved educational program;
- temporary absence due to expulsion, suspension, or school-excused illness;
- death.

The dropout rate is calculated as the number of youths with IEPs ages 14-21 who drop out of school during the given year, divided by the number of students within the same age group expected to complete the school term.

Indicator	Indicator Cutoffs		LEA Performance		
	2 points	1 point	Rate	Percentile	Points Earned
2	0.5	1	1.23	30	0



### Indicator 3b: Assessment Participation

Indicator 3b measures the participation of youth with IEPs in statewide assessments. Unlike the previous indicators, 3b is not lagged; it comes from the 2016-17 school year.

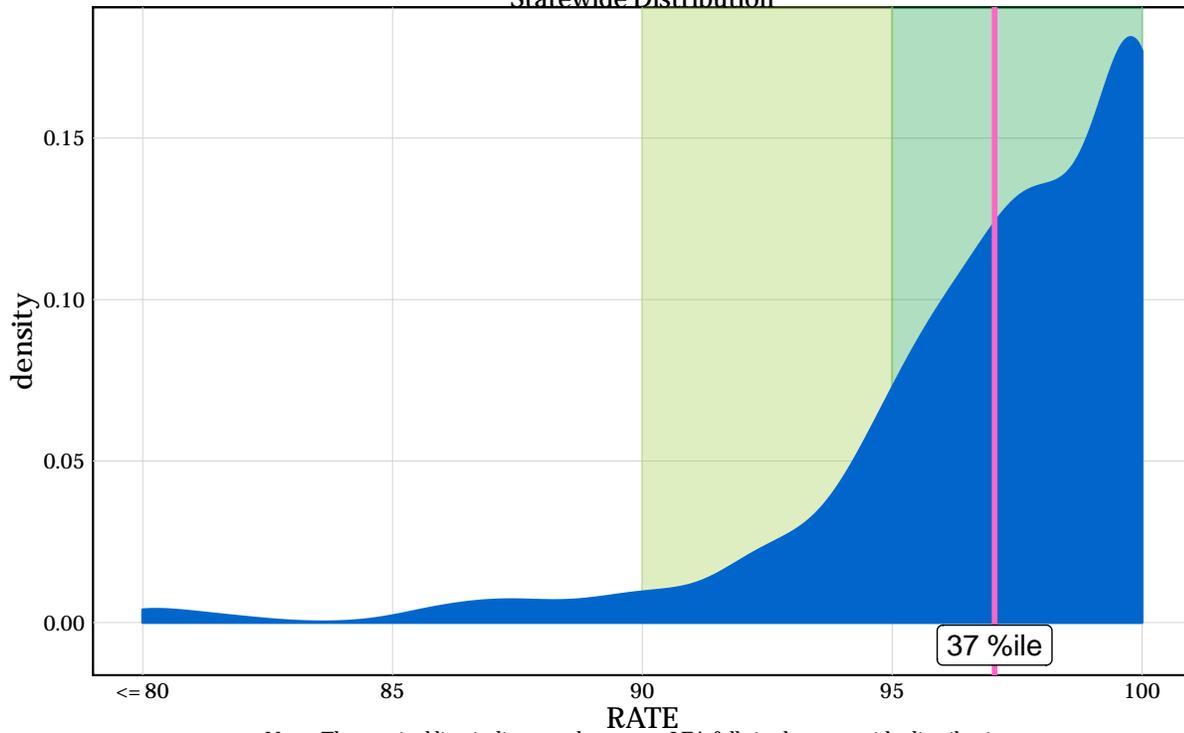
The statewide assessments included in indicator 3b are Forward, ACT, and Dynamic Learning Maps (DLM) for both Math and English / Language Arts. Each subject is tracked and reported separately.

The calculation is the number of youth with IEPs who took the assessment divided by the total number of youth with IEPs expected to take the assessment based on enrollment.

### Math Assessment Participation

Indicator	Indicator Cutoffs		LEA Performance		
	2 points	1 point	Rate	Percentile	Points Earned
3b	95	90	97.05	37	2

Indicator 3b: Math Assessment Participation  
Statewide Distribution

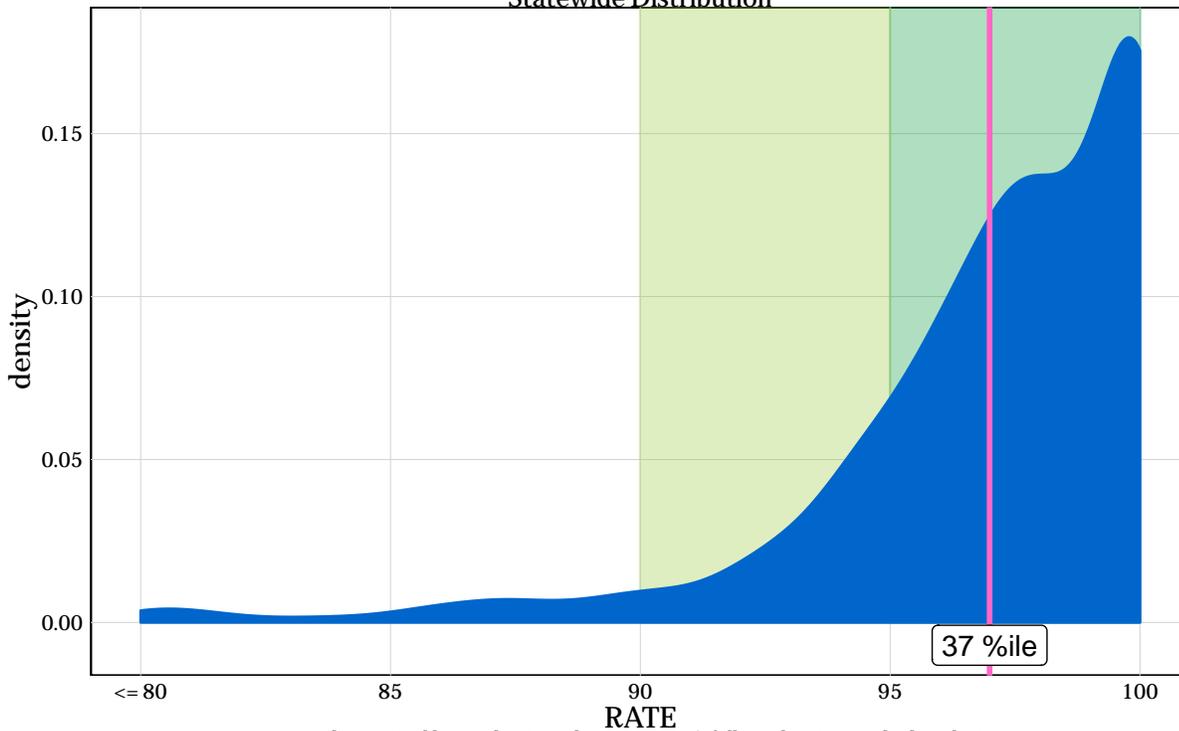


Note: The vertical line indicates where your LEA falls in the statewide distribution.

**English / Language Arts Assessment Participation**

Indicator	Indicator Cutoffs		LEA Performance		
	2 points	1 point	Rate	Percentile	Points Earned
3b	95	90	96.99	37	2

**Indicator 3b: ELA Assessment Participation**  
Statewide Distribution



Note: The vertical line indicates where your LEA falls in the statewide distribution.

**Indicator 3c: Math and Reading Proficiency**

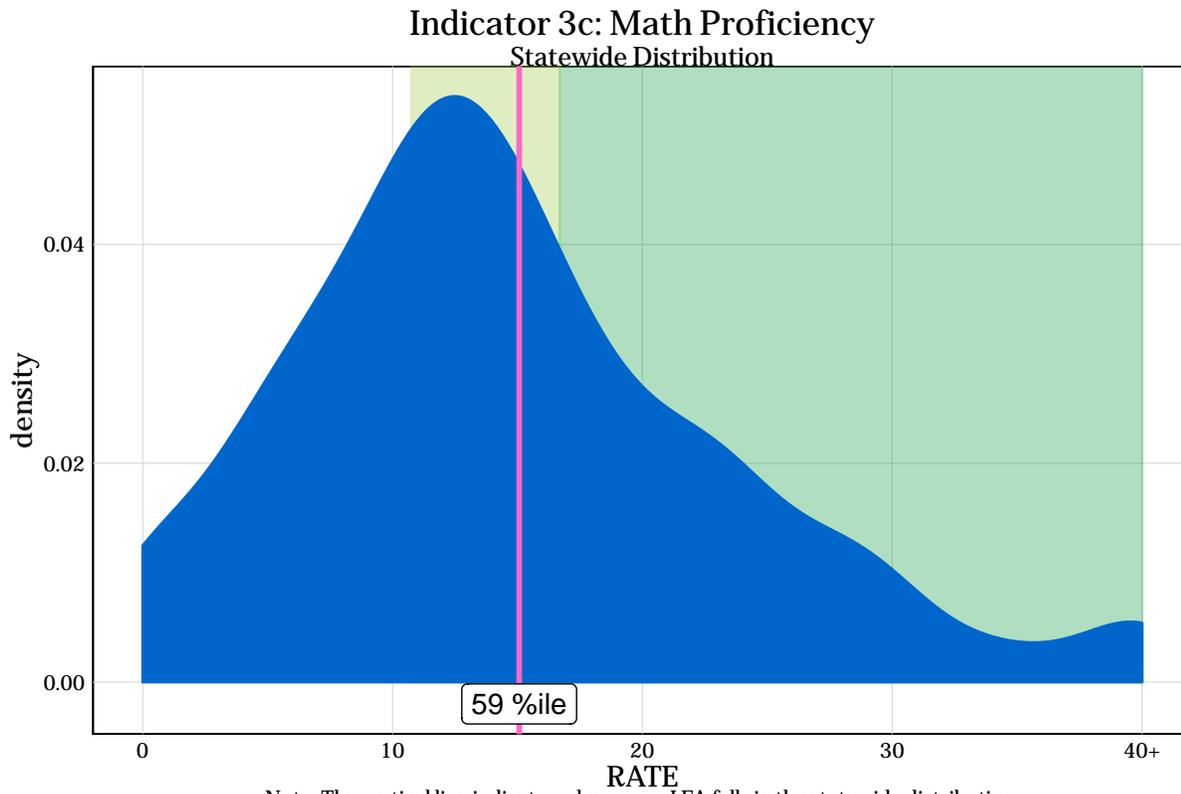
Indicator 3c measures the proficiency rates of youth with IEPs in Math and English / Language Arts through statewide assessments. Like indicator 3b, this data comes from the 2016-17 school year.

The statewide assessments included in indicator 3c are Forward, ACT, and Dynamic Learning Maps (DLM) for both Math and English / Language Arts. Each subject is tracked and reported separately.

The calculation is the number of youth with IEPs who demonstrated proficiency on their assessment divided by the total number of youth with IEPs who took the assessment.

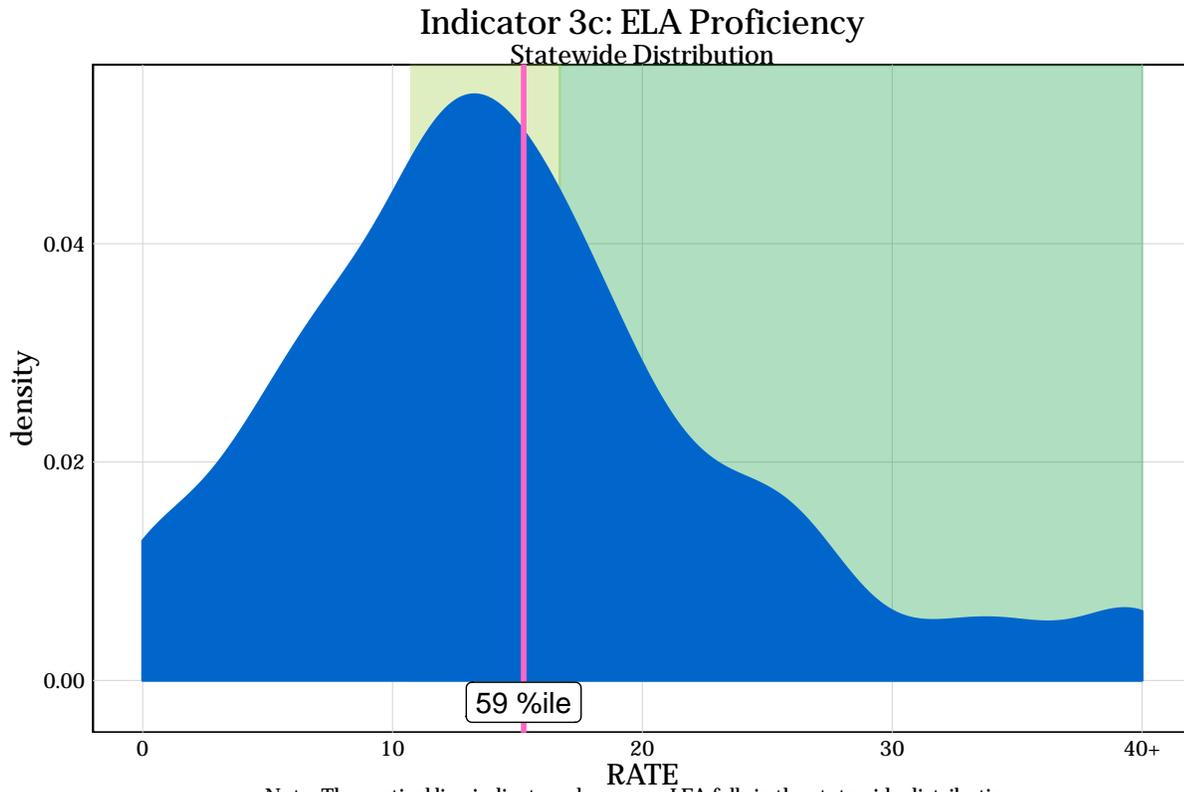
**Math Proficiency**

Indicator	Indicator Cutoffs		LEA Performance		
	2 points	1 point	Rate	Percentile	Points Earned
3c	16.7	10.76	15.07	59	1



English / Language Arts Proficiency

Indicator	Indicator Cutoffs		LEA Performance		
	2 points	1 point	Rate	Percentile	Points Earned
3c	16.7	10.76	15.25	59	1



## Compliance Indicators

### Indicator 4b: Disproportionate Discipline

Indicator 4b is a logical (True/False) indicator that looks at disproportionate discipline by race/ethnicity among students with IEPs resulting in out-of-school suspensions or expulsions for greater than 10 days. Due to data availability at the time of Federal reporting (February 1, 2018), this is a lagged indicator; this means that the source school year is 2015-16.

As it is defined in [OSEP's guidelines](#), LEAs in compliance either:

1. Are not found to have a significant discrepancy by race/ethnicity in the aforementioned disciplinary incidents among students with IEPs, by race or ethnicity; or
2. Are found to have significant discrepancy in racial disproportionality but, through a review of the LEA's policies, procedure, and practices, are determined to comply with requirements relating to the development and implementation of IEPs and "the use of positive behavioral interventions and supports, and procedural safeguards."

A "significant discrepancy" is defined in Wisconsin as LEAs with a rate of suspension or expulsion of greater than 10 days for students with IEPs within each racial/ethnic subgroup that is two standard deviations above the average statewide rate, and a minimum numerator of 2 in each race/ethnicity reporting category.

For the 2018 reporting year (using data from the 2015-16 school year) the statewide risk was 0.171% and the standard deviation was 0.656%. Thus, districts with a rate of suspension or expulsion greater than 1.484% were identified with significant discrepancy.

### Indicator 9: Disproportionate Identification in Special Education

Indicator 9 is a logical (True/False) indicator that looks at disproportionate identification of students for special education services by race/ethnicity in any disability reporting category. This indicator is not lagged, meaning that the most recent data comes from the 2016-17 school year.

LEAs in compliance either:

1. Are not found to have disproportionate identification by race/ethnicity among students receiving special education services in any disability reporting category; or
2. Are found to have disproportionate identification by race/ethnicity groups in special education and related services, but a review of the LEA's policies, procedures, and practices determined that they comply with requirements related to the identification of students with disabilities, and are therefore not resulting in inappropriate identification.

In order to be identified as having disproportionate identification in Wisconsin, the following criteria have to be met:

1. **A Weighted Risk Ratio of 2.0 or Greater:** In calculating the weighted risk ratio for over-representation, DPI uses the [Westat technical assistance guidance](#) for calculating disproportionality based on weighted risk ratio. The weighted risk ratio is the risk for a racial/ethnic group to be in special education divided by the risk for a comparison group to be in special education, weighted to the racial/ethnic demographics of the state.
2. **A Greater Risk than White Students Statewide:** Because white students have been the unit of comparison used by the National Research Council in their analysis of this issue, statewide white student risk is used as the comparison group for this second factor. For each racial group, over-representation may be considered where the risk level for the given group exceeds the state's risk level of White students in that category by at least one. This additional measure also ensures that districts will not be considered for the highest level of review where the risk for a given group is low. To ensure that white students in a district could also be identified as over-represented, district level risk is compared with state level risk for white students, in the same manner as every other racial or ethnic group.
3. **A Minimum Cell Size:** To be identified for over-representation, a racial or ethnic group must have at least ten students with disabilities in a given cell used for risk ratio analysis, and a total enrollment of 100 students in the given racial or ethnic group. A district can be identified when one racial or ethnic group has a total enrollment of 100 students, even if the other racial or ethnic groups in the district have a total enrollment of less than 100 students.
4. **Three Consecutive Years:** Acknowledging changing demographics, potential anomalies in data collection, and other factors, DPI requires districts to meet the above criteria for three consecutive years before being identified. For the 2018 reporting year, that means that the above criteria had to be met for the 2014-15, 2015-16, and 2016-17 school years.

### Indicator 10: Disproportionate Identification in Specific Reporting Categories

Indicator 10 is a logical (True/False) indicator that looks at disproportionate identification of students for special education services by race/ethnicity in specific disability reporting categories. This indicator is not lagged, meaning that the most recent data comes from the 2016-17 school year.

LEAs in compliance either:

1. Are not found to have disproportionate identification by race/ethnicity among students receiving special education services in specific disability reporting category; or
2. Are found to have disproportionate identification by race/ethnicity groups in special education and related services in specific disability reporting categories, but a review of the LEA's policies, procedures, and practices determined that they comply with requirements related to the identification of students with disabilities, and are therefore not resulting in inappropriate identification.

In order to be identified as having disproportionate identification in Wisconsin, the following criteria have to be met:

1. **A Weighted Risk Ratio of 2.0 or Greater:** In calculating the weighted risk ratio for over-representation, DPI uses the [Westat technical assistance guidance](#) for calculating disproportionality based on weighted risk ratio. The weighted risk ratio is the risk for a racial/ethnic group to be in special education divided by the risk for a comparison group to be in special education, weighted to the racial/ethnic demographics of the state.

2. **A Greater Risk than White Students Statewide:** Because white students have been the unit of comparison used by the National Research Council in their analysis of this issue, statewide white student risk is used as the comparison group for this second factor. For each racial group, over-representation may be considered where the risk level for the given group exceeds the state's risk level of White students in that category by at least one. This additional measure also ensures that districts will not be considered for the highest level of review where the risk for a given group is low. To ensure that white students in a district could also be identified as over-represented, district level risk is compared with state level risk for white students, in the same manner as every other racial or ethnic group.
3. **A Minimum Cell Size:** To be identified for over-representation, a racial or ethnic group must have at least ten students with disabilities in a given cell used for risk ratio analysis, and a total enrollment of 100 students in the given racial or ethnic group. A district can be identified when one racial or ethnic group has a total enrollment of 100 students, even if the other racial or ethnic groups in the district have a total enrollment of less than 100 students.
4. **Three Consecutive Years:** Acknowledging changing demographics, potential anomalies in data collection, and other factors, DPI requires districts to meet the above criteria for three consecutive years before being identified. For the 2018 reporting year, that means that the above criteria had to be met for the 2014-15, 2015-16, and 2016-17 school years.

### Indicator 11: Timely Evaluations

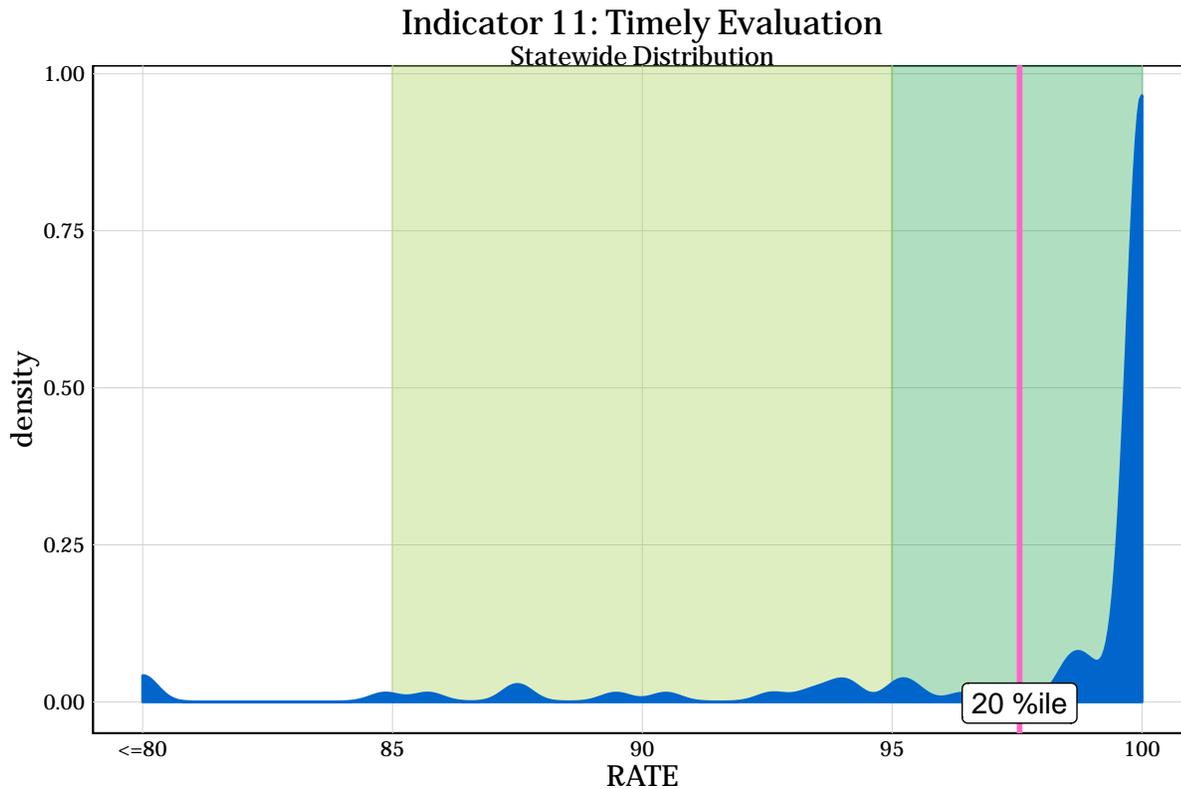
Indicator 11 measures the percent of children who were evaluated for special education services within 60 days of receiving parental consent for the initial evaluation. It is a cyclical indicator, meaning that all LEAs participate in the evaluation once every five years except Milwaukee Public Schools, which participates annually. The data provided in this report comes from the 2016-17 school year.

Indicator 11 is a report of performance on a requirement of special education law. A local educational agency (LEA) must determine if a child is a child with a disability within 60 days after the local educational agency receives parental consent for administering tests or other evaluation materials. If the IEP team determines no tests or other evaluation materials need to be administered, the LEA must complete the evaluation within 60 days of providing the parents a notice that no tests or evaluation materials will be administered.

There are three exceptions to the 60-calendar day timeline:

1. A student who transfers from one LEA to another after the 60-day timeline has begun, but prior to a determination of eligibility by the previous LEA. For the exception to apply, the LEA must have completed the evaluation within a specific time mutually agreed upon by the parent and LEA.
2. The parent repeatedly fails or refuses to make the student available for the evaluation. This is determined on a case-by-case basis, and what constitutes "repeatedly failed" or "refuses to make the student available" will vary depending on the specific circumstances in each case.
3. Students being evaluated for a specific learning disability for the first time when the timeline is extended by mutual written agreement of the parent and LEA.

Indicator	Indicator Cutoffs		LEA Performance		
	2 points	1 point	Rate	Percentile	Points Earned
11	95	85	97.55	20	2



### Indicator 12: Early Childhood Transitions

Indicator 12 measures the percent of children referred by IDEA Part C prior to age 3, are found eligible for IDEA Part B, and who have an IEP developed and implemented by their third birthdays. This is an annual indicator for all LEAs with Early Childhood programs. The data provided in this report comes from the 2016-17 school year.

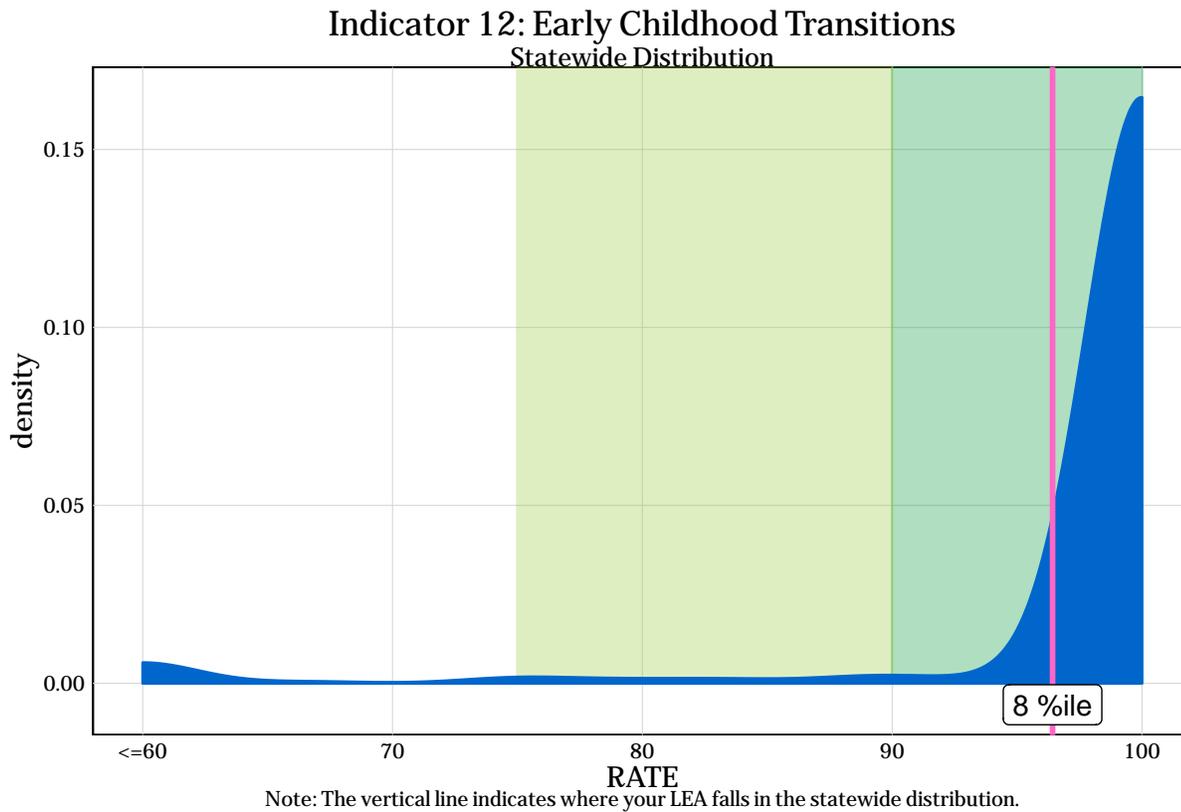
The calculation is the number of youth found eligible and have an IEP developed and implemented by their third birthdays, divided by the total number of youth referred from Part C to Part B who do not meet any of the exclusionary criteria for the denominator.

The exclusionary criteria for the denominator are as follows:

1. A referred youth was determined to not be eligible prior to their third birthday.
2. A referred youth's parent refused to provide consent, causing delays in evaluation or initial services (or to whom exceptions under 34 CFR §300.301(d) applied).

- A referred youth was determined to be eligible for early intervention services under Part C less than 90 days before their third birthday.

Indicator	Indicator Cutoffs		LEA Performance		
	2 points	1 point	Rate	Percentile	Points Earned
12	90	75	96.42	8	2



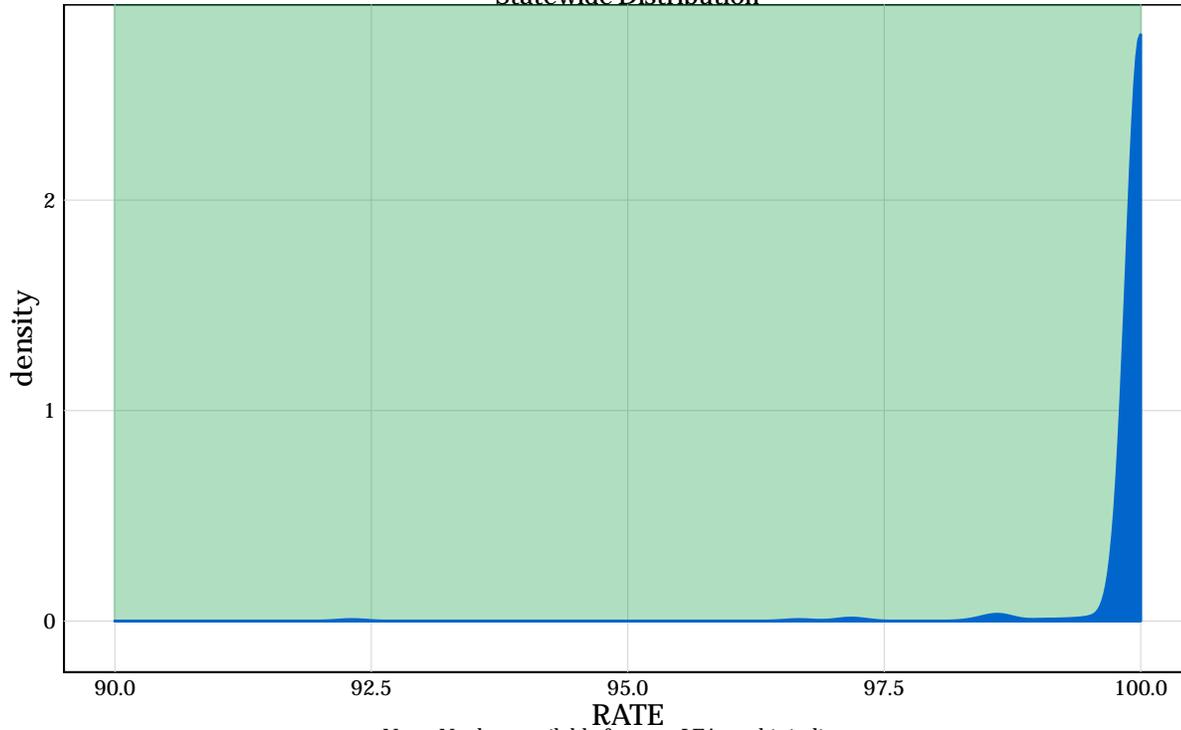
**Indicator 13: Post-Secondary Transitions**

Indicator 13 measures the percent of youth with IEPs ages 16-21 with IEPs that include appropriate and measurable post-secondary goals. These goals must be annually updated and based upon an age appropriate transition assessment and transition services (including courses of study) that will reasonably enable the student to meet those post-secondary and IEP goals. There also must be evidence that the student was invited to the IEP team meeting where transition services are to be discussed and evidence that, if appropriate, a representative of any participating agency was invited to the IEP team meeting with the prior consent of the parent or student who has reached the age of majority.

This is an annual indicator for all LEAs with students 16 or older. The data provided in this report comes from the 2016-17 school year.

Indicator	Indicator Cutoffs		LEA Performance		
	2 points	1 point	Rate	Percentile	Points Earned
13	90	75	NA	NA	NA

Indicator 13: Post Secondary Transitions  
Statewide Distribution



Note: No data available for your LEA on this indicator

## Local Stakeholder Engagement

### *Why do we need a stakeholder engagement process?*

Effective continuous improvement requires stakeholder engagement. This applies to all schools, not only those with an identification.<sup>1</sup> For stakeholder engagement to be meaningful and impactful, we must continuously reach out to and involve families and community members in ways that are systemic, collaborative, strength-based, and outcome-driven.

### *What exactly is effective stakeholder engagement?*

Effective stakeholder engagement includes the crucial components of building trust with families and community members; connecting families and community members to knowledge, information, and tools that support learning outside of school; supporting educators with time and skills to connect with stakeholders; and collaborating consistently with families and community partners – across programs, grade levels, and buildings.

### *What does an effective stakeholder engagement process look like?*

Evidence from national organizations and the US Department of Education indicate that best practices in stakeholder engagement involve four key steps, adapted from the [Reform Support Network](#):

**INFORM.** Inform key audiences about the work ahead, potential changes in key practices, expectations and systems, and in what ways stakeholders can provide input. Use a range of communications tools (digital, print, video, meetings) to provide timely, accurate, and actionable information to a wide range of stakeholders. This builds a common understanding of the shared work.

**INQUIRE.** Ask your stakeholders what their needs are, listen to feedback closely, and respond to stakeholders' questions. Create outreach strategies that feature effective feedback loops, so that stakeholders know they have been heard and understood. Ask if you've understood their input correctly. This builds trust and transparency.

**INVOLVE.** Involve key audiences with diverse perspectives in your continuous improvement work as active co-creators of policies and programs. Key audiences should

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<sup>1</sup> Schools/districts with an identification have specific requirements for stakeholder engagement. More information about these requirements is available [here](#).

always include the families of students who are most at-risk, historically marginalized, and furthest behind academically. Also routinely invite local businesses and representatives from higher education (technical colleges, universities, trade schools) into the process. This builds positive relationships.

**INSPIRE.** Effective engagement is not just listening to stakeholders but proactively enlisting them in the shared continuous improvement work. Your stakeholders will be inspired to act and be an active participant in school improvement efforts when they have help play a role in the development of policies, programs and perspectives. This creates enthusiasm.

### *What resources on stakeholder engagement are available?*

Engaging with Families (DPI)

<https://dpi.wi.gov/engaging-families>

Empowering Families and Communities (Data Quality Campaign)

<https://dataqualitycampaign.org/topic/empowering-families-and-communities/>

Educator and Stakeholder Engagement Resources (CCSSO)

<https://ccsso.org/taxonomy/term/148>

Leading by Convening (National Association of State Directors of Special Education)

<http://www.ideapartnership.org/documents/NovUploads/Blueprint%20USB/NASDSE%20Leading%20by%20Convening%20Book.pdf>

Meaningful Local Engagement Under ESSA (CCSSO)

<https://ccsso.org/resource-library/meaningful-local-engagement-under-essa>

### *Citations*

Reform Support Network. n.d. "From "Inform" to "Inspire" A Framework for Communications and Engagement." Accessed February 5, 2019.

<https://www2.ed.gov/about/inits/ed/implementation-supportunit/tech-assist/framework-communications-engagement.pdf>

## Key Points

### ESSA-IDEA Federal Accountability

Following are key points about the new federal accountability process that school districts can use internally as well as externally with families, school boards, and interested community members.

#### Overview

- In December 2018, DPI notified districts of any preliminary identifications under two major federal education laws: ESSA (Every Student Succeeds Act) and IDEA (Individuals with Disabilities Act).
- IDEA and ESSA accountability reports are issued jointly to inform and make continuous improvement efforts more streamlined across a district.
- The reports are now final and will be released publicly on March 5, 2019.

#### Key ESSA Points

##### *Intention of the Law, Purpose of the System*

- The intention of ESSA and Wisconsin's state plan under ESSA is to close achievement gaps. Specifically, our state's long-term goal is to cut the achievement gap in half in six years. As such, helping all groups of students succeed is central to the federal accountability system.
  - Districts do not receive ESSA Accountability Reports; only schools do.
  - Within the reports, the whole school (All-Students) and each student group are scored and ranked against the performance of all other public schools in the state.
  - To protect student privacy, when there are less than 20 students in a group, their performance is not scored nor reported.
- The federal ESSA accountability system is designed as a means of identifying the lowest performing schools and student groups in the state -- those most in need of support:
  - Comprehensive Support & Improvement (CSI)
  - Targeted Support & Improvement (TSI)
  - Additional Targeted Support & Improvement (ATSI).
- ESSA identifications
  - Schools identified for Comprehensive Support have overall performance (summary score) in the bottom 5% of the state and/or they have a graduation rate below 67%.

- Schools identified for Targeted Support or Additional Targeted Support have performance of one or more student groups that is in the bottom 10% (for Targeted) or 5% (for Additional Targeted) of the state. This identification allows for particular focus on improving outcomes for specific groups of students in a school.

### ***ESSA Accountability Reports***

- The embargo ends on March 5, 2019 at 12:01am, at which point the ESSA Accountability Reports and a statewide spreadsheet of identification data will be posted to this [Federal Accountability](#) page and available via the [WISEdash Public Portal](#).
- 2017-18 is the first reporting year for the ESSA Accountability Reports. DPI will produce the ESSA Accountability Reports annually. Note, while the reports are annual, Comprehensive Support (CSI) and Additional Targeted Support (ATSI) identifications occur every three years.
- These reports were designed with all school and district leaders in mind, to inform their work to develop and deepen their continuous improvement process, while addressing their specific achievement gaps and refining improvement plans.

### ***School Accountability Systems***

- With implementation of this ESSA accountability system, Wisconsin now has two school-level accountability systems: federal ESSA accountability and the state accountability report cards.
  - The federal accountability system under ESSA is a ranking system in which summary scores lead to a percentile ranking.
  - The state accountability system (the report cards) is a rating system in which the overall score places schools into one of five rating categories.
- To better understand the state and federal accountability systems, please refer to [this crosswalk](#).
- For assistance navigating the accountability data for your school/district, contact your [Accountability Trainer](#) or the [Office of Educational Accountability](#).

For a summary of the federal accountability system, please refer to the [ESSA Accountability Overview](#). For specifics on the identification process and the associated improvement requirements for identified schools, details are provided in the [state's ESSA plan](#).

## Key IDEA Points

### *Intention of the Law, Purpose of the System*

- The Individuals with Disabilities Education Act (IDEA) requires the Department of Public Instruction to determine annually if each local educational agency (LEA) meets the requirements of IDEA Part B. The criteria the department considers when making this determination of whether the LEA “meets requirements,” “needs assistance,” “needs intervention,” or “needs substantial intervention” is available [here](#).
- The purpose of the determinations is to inform LEAs of their IDEA compliance and results based on the data they submitted to DPI, and in doing so provide them with information and resources to guide their improvement planning. The data used for these determinations are certified; it is not subject to change, as it comes from the corresponding snapshots for each indicator.

### *IDEA Determinations*

- When calculating the 2018 LEA determinations under IDEA, the department continued the process of gradually shifting toward equally weighting results and compliance indicators. This year, compliance indicators were weighted for 65% of a determination and results were weighted for 35%. The department uses a points-based system when making LEA determinations.
- The compliance indicators focus on racial disproportionality in special education identification and discipline, timely evaluation of students referred for special education, transition between birth-to-three programs and the LEA, post-high school transition planning for students with IEPs, correction of noncompliance with IDEA and timely and accurate data. LEA noncompliance in these areas results in zero points per area.
- The results indicators focus on rates (percentages) for students with IEPs in the areas of graduation, drop-out, mathematics, and English Language Arts participation and proficiency. An LEA’s calculated percentage for each indicator results in 0-2 points per indicator.
- LEAs that “need assistance” may not reduce their maintenance of effort obligations, unless the reduction is by less than half of the increased amount (the “50% Adjustment” rule). LEAs that “need assistance” for two or more years will be asked to engage in continuous improvement that includes a goal related to the data in the determination.

### *LEA Determination Report*

- Due to the inclusion of unredacted data, the LEA Determination Report is considered sensitive and confidential. Therefore, this document should not be shared with the public and is not subject to open records requests.
- Upon completion of the embargo period, on March 5th, 2019, redacted versions of the data used in this report will be available in DPI’s public data files, the WISEdash

Public Portal, and the Special Education Team's District Profile Application.

## **A Statewide System of Support**

DPI has worked closely with key partners across the state over the last two years to establish a statewide system of support.

### ***Supports for Continuous Improvement***

- All schools and districts should be engaged in continuous improvement work and the statewide system of support is designed for all schools, regardless of identification. This [two-minute video](#) provides more information about this approach.
- DPI and partners we have built a CESA-based [Technical Assistance Network for Improvement](#) (TA Network).
- CESAs are hosting events to support continuous improvement work in schools and districts. The events are free and available for all schools and districts, but CESAs will prioritize spots for schools and districts with federal identifications.
- Additionally, new statewide coordination of professional development - [Leading for Learning: Achieving Educational Equity](#) - will include a free, four-part learning series (formally known as WOW events) in 2019 and beyond.
- DPI worked in partnership with CESAs, the Wisconsin RtI Center, Wisconsin Association of School District Administrators (WASDA), Disproportionality Technical Assistance Network, and the Association of Wisconsin School Administrators (AWSA).

### ***Supports for Identified Schools and Districts***

- Schools with an ESSA identification of Comprehensive Support & Improvement (CSI) and districts in Needs Assistance, Year 2 for IDEA have specific requirements related to continuous improvement, and therefore are especially encouraged to engage with the TA Network on their continuous improvement efforts.
- Supports for schools with ESSA or IDEA identifications are detailed [here](#) and include:
  - Prioritization in the [TA Network](#)
  - Comprehensive Support schools (only) may apply for a [planning grant application](#) to initiate their continuous improvement work in light of their identification.



## Preliminary Joint Federal Notification Packet Resources for Continuous Improvement

We encourage you to review and share the resources on our new [Continuous Improvement](#) webpage, including the [2-minute video](#) about what these identifications will mean and the coordinated statewide system of support we're building to ensure continuous school improvement.

### Key Resources

Rubric for Effective Continuous Improvement ([draft](#))  
Diagram of the Continuous Improvement Process ([visual](#))

### Key Supports

#### Technical Assistance Network for Improvement

DPI created the new [Technical Assistance Network for Improvement \(TA Network\)](#) by consolidating and coordinating services we offer through partners at cooperative educational service agencies (CESAs) and the Wisconsin RTI Center. The TA Network now offers -- at no cost or low cost to all districts -- supports like professional learning, networking, and technical assistance. Supports are focused around our new, comprehensive rubric for continuous improvement. To get the ball rolling, district staff should contact [their CESA's designated TA Network contact](#).

#### Leading for Equity

A number of professional development opportunities previously offered separately by DPI, the Wisconsin Association of School District Administrators (WASDA), Association of Wisconsin School Administrators (AWSA), and the CESAs are now coordinated under the unified banner, *Leading for Learning: Achieving Educational Equity*. This statewide professional learning series offered for teams addresses continuous improvement, equity, educator development, and other relevant topics and builds on the Working on the Work series. Please join us June 26-28 in Madison for the kickoff to the 2019-2020 learning series.

### Key Contacts

We look forward to working with districts to understand the joint federal notification process and to implementing effective continuous improvement processes. Please reach out to DPI staff if we can be of assistance.

- For questions about ESSA accountability calculations, contact [OEA](#).
- For questions about ESSA school improvement and supports available to your district, contact [Title I](#).
- For questions about IDEA accountability calculations, school improvement and supports for students with disabilities, contact [Special Education](#).

DCODE	DISTRICT_NAME	CESA	TSI	ATSI	CSI	Determination	YearsIDed
7	Abbotsford	10	0	1	0	Meets Requirements	0
14	Adams-Friendship Area	5	0	2	0	Meets Requirements	0
63	Albany	2	0	0	0	Needs Assistance	1
147	Appleton Area	6	2	0	0	Meets Requirements	0
154	Arcadia	4	0	0	0	Needs Assistance	2
170	Ashland	12	6	0	0	Needs Assistance	1
336	Beaver Dam Unified	6	2	0	0	Meets Requirements	0
413	Beloit	2	6	1	0	Meets Requirements	0
870	Cadott Community	10	0	0	0	Needs Assistance	2
1120	Clayton	11	0	0	0	Needs Assistance	1
1134	Clinton Community	2	1	0	0	Meets Requirements	0
1141	Clintonville	8	0	0	0	Needs Assistance	2
1253	Cudahy	1	2	0	0	Meets Requirements	0
1491	Drummond Area	12	0	0	0	Needs Assistance	1
1526	Northland Pines	9	0	0	0	Needs Assistance	1
1862	Fond du Lac	6	1	0	0	Meets Requirements	0
1945	Northern Ozaukee	1	0	0	1	Meets Requirements	0
2198	Glenwood City	11	1	0	0	Meets Requirements	0
2233	Grantsburg	11	0	0	0	Needs Assistance	1
2289	Green Bay Area Public	7	28	8	1	Needs Assistance	1
2436	Hartford UHS	6	0	0	0	Needs Assistance	2
2478	Hayward Community	12	1	0	0	Meets Requirements	0
2639	Iola-Scandinavia	5	0	0	0	Needs Assistance	1
2695	Janesville	2	4	0	1	Meets Requirements	0
2793	Kenosha	1	14	3	0	Meets Requirements	0
2849	La Crosse	4	1	1	0	Meets Requirements	0
3269	Madison Metropolitan	2	32	9	1	Needs Assistance	1
3311	Marinette	8	0	0	0	Needs Assistance	1
3325	Markesan	6	0	0	0	Meets Requirements	0
3381	McFarland	2	0	0	1	Meets Requirements	0
3434	Menominee Indian	8	1	0	2	Meets Requirements	0
3500	Merrill Area	9	1	0	0	Meets Requirements	0
3549	Middleton-Cross Plains Area	2	1	1	0	Meets Requirements	0
3612	Milton	2	1	0	0	Meets Requirements	0
3619	Milwaukee	1	48	31	55	Needs Assistance	2
3647	Lakeland UHS	9	1	0	0	Needs Assistance	2
3675	Monona Grove	2	1	0	0	Meets Requirements	0
3948	New Lisbon	5	1	0	0	Meets Requirements	0
3969	Niagara	8	0	0	0	Meets Requirements	0
3976	Norris	1	0	0	0	Needs Assistance	2
4067	Oconto Unified	8	1	0	0	Needs Assistance	1
4179	Oshkosh Area	6	2	0	0	Meets Requirements	0
4186	Osseo-Fairchild	10	1	0	0	Meets Requirements	0
4375	Tri-County Area	5	1	0	0	Meets Requirements	0
4473	Plymouth Joint	7	1	0	0	Needs Assistance	1
4501	Portage Community	5	0	0	0	Meets Requirements	0

4620	Racine Unified	1	26	18	5	Needs Assistance	2
4781	Rhinelander	9	2	0	0	Meets Requirements	0
4970	D C Everest Area	9	1	0	0	Meets Requirements	0
5026	Saint Francis	1	0	0	0	Meets Requirements	0
5054	Central/Westosha UHS	2	0	0	0	Meets Requirements	0
5264	Shawano	8	1	0	0	Meets Requirements	0
5271	Sheboygan Area	7	6	1	0	Meets Requirements	0
5306	Shell Lake	11	0	0	0	Needs Assistance	1
5439	South Milwaukee	1	2	0	0	Meets Requirements	0
5656	Sun Prairie Area	2	5	1	0	Meets Requirements	0
5663	Superior	12	1	0	0	Meets Requirements	0
5757	Flambeau	10	0	0	0	Meets Requirements	0
5810	Turtle Lake	11	0	0	0	Needs Assistance	1
5817	Twin Lakes #4	2	0	0	0	Needs Assistance	1
5901	Verona Area	2	2	1	0	Meets Requirements	0
6022	Walworth J1	2	0	0	0	Meets Requirements	0
6027	Washburn	12	0	0	0	Needs Assistance	2
6125	Watertown Unified	2	1	0	0	Meets Requirements	0
6174	Waukesha	1	4	1	1	Meets Requirements	0
6216	Waupun	6	1	0	0	Meets Requirements	0
6244	Wauwatosa	1	1	0	0	Meets Requirements	0
6293	Webster	11	0	1	0	Meets Requirements	0
6300	West Allis-West Milwaukee	1	1	0	0	Meets Requirements	0
6461	Whitewater Unified	2	1	0	0	Meets Requirements	0
6685	Wisconsin Rapids	5	2	0	0	Meets Requirements	0
7000	Wisconsin Department of Corrections	NA	0	0	0	Needs Assistance	1
8105	Central City Cyberschool	1	0	0	0	Needs Assistance	1
8109	Darrell Lynn Hines Academy	1	2	0	0	Meets Requirements	0
8110	21st Century Preparatory School	1	1	0	0	Meets Requirements	0
8113	Woodlands School	1	0	0	0	Needs Assistance	1
8123	Bruce Guadalupe	1	0	0	0	Needs Assistance	1
8127	Milwaukee Collegiate Academy	1	0	0	1	Needs Assistance	1
8131	Escuela Verde	1	0	0	1	Needs Assistance	1
8132	Woodlands School East	1	0	0	0	Needs Assistance	1
8133	Rocketship Southside Community Preparator	1	1	0	0	Does Not Apply	0
8137	nited Community Center Acosta Midd	1	0	0	0	Meets Requirements	0



# Racial equity in special education

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## Background and Summary of Stakeholder Input

Internal version (individual names on p. 5, participant sign-in sheets)

September 2018

**Wisconsin Department of Public Instruction**

Tony Evers, PhD, State Superintendent

Madison, Wisconsin

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## Overview

This report provides information related to Wisconsin's current criteria for identifying racial disproportionality in special education identification, placement, and discipline. It also summarizes stakeholder input collected during the fall of 2017 as rationale for a change in Wisconsin's criteria.

This report does not include details of Wisconsin Department of Public Instruction's (DPI) protocols for annual identification, notification, and oversight of racial disproportionality in special education identification, placement, and discipline – for that, see *Wisconsin's Approach to Addressing Disproportionality in Special Education: A Blueprint for Action* (DPI, Updated 2018). This report also does not describe the full methodologies used to identify racial disproportionality in special education identification, placement, and discipline – for that, see *Methods of Assessing Racial/Ethnic Disproportionality in Special Education: A Technical Assistance Guide* (IDEA Data Center, Updated 2014). Finally, this report does not include information regarding DPI's [Disproportionality Technical Assistance Network](#), a federally-funded investment to provide technical assistance and supports to identified Local Education Agencies (LEAs).

## Background

Children of color—in Wisconsin, particularly African-American, American Indian, and Hispanic youth—are identified as students with disabilities at substantially higher rates than their peers and, once identified, placed in more restrictive settings and are disciplined more often, more severely, and for longer periods of time. It is critical to ensure that overrepresentation is not the result of misidentification, including both over- and under-identification, which can interfere with a school's ability to provide children with the appropriate educational services required by law. It is equally important to ensure that all children who are suspected of having a disability are evaluated and, as appropriate, receive needed special education and related services in the most appropriate setting and with the most appropriate behavior supports employed.

In order to address those inequities, the Individuals with Disabilities Education Act (IDEA) IDEA requires states to identify local education agencies (LEAs) with "significant disproportionality" in special education—that is, when LEAs identify, place in more restrictive settings, or discipline children from any racial or ethnic group at markedly higher rates than their peers. In a separate, but related, requirement, states are required to identify and report on LEAs with significant discrepancy in discipline (Indicator 4B) and disproportionate representation in special education (Indicator 9) and in specific disability categories (Indicator 10). For federal and state statutory and regulatory language in effect, see Appendix A.

Every year, states make 90+ calculations per LEA to analyze racial disproportionality in fifteen categories. Wisconsin identifies annually approximately forty LEAs with racial disproportionality in identification or significant discrepancy in discipline based on race; of these, six to eight LEAs have data demonstrating "significant disproportionality" in identification and/or discipline. One LEA is identified with "significant disproportionality" in placement.

All identified LEAs are required to review policies, procedures, and practices for compliance with Part B of IDEA. In addition, all LEAs conduct a needs assessment and plan for improvement. Only LEAs identified with "significant disproportionality" are required to reserve 15% of their IDEA funds for comprehensive coordinated early intervening services.

## December 2016 Federal Regulations: Significant Disproportionality

On December 12, 2016, the U.S. Department of Education (USDOE) made available to the public final regulations under Part B of IDEA, aimed at promoting equity by targeting widespread disparities in the treatment of students of color with disabilities. The regulations addressed a number of issues related to significant disproportionality in the identification, placement, and discipline of students with disabilities based on race or ethnicity. The Department also released a Dear Colleague Letter addressing racial discrimination.

The final regulations established a standard approach that States must use in determining whether significant disproportionality based on race or ethnicity is occurring in the state and in its LEAs. In 2013, the Government Accountability Office (GAO) issued a report finding that, because states currently use a wide variety of methodologies for examining their LEAs, few states take action to address significant disproportionality; in fact, as the GAO found, only two to three percent of all LEAs nationwide are identified as having significant disproportionality, and some states' methodologies for identifying LEAs for disproportionality were constructed in such a way that the GAO found LEAs would likely never be identified. Accordingly, GAO recommended that the Department require that all states adopt a standard approach to identify racial and ethnic disparities. With the December 2016 regulations, all states were required to use the same methodology to allow for more accurate comparisons within and across states.

In addition to requiring a standard methodology, the December 2016 regulations focused on disparities in the discipline of students with disabilities on the basis of race or ethnicity by requiring states to examine LEAs for significant disproportionality in their disciplinary practices. Specifically, the regulations clarified that States must address significant disproportionality in the incidence, duration, and type of disciplinary actions, including suspensions and expulsions, using the same statutory remedies required to address significant disproportionality in the identification and placement of children with disabilities.

The December 2016 regulations required LEAs to identify and address the root causes of significant disproportionality. Accordingly, the regulations clarified requirements for the review and revision of policies, practices, and procedures when significant disproportionality is found. The December 2016 regulations required LEAs to identify and address the factors contributing to significant disproportionality as part of comprehensive, coordinated early intervening services (CEIS).

In addition, the December 2016 regulations allowed new flexibilities in the use of CEIS to further help LEAs identified with large disparities in addressing the underlying causes of the disparity. Prior to these final regulations, LEAs identified as having significant disproportionality were not permitted to use their required 15 percent set aside for CEIS in order to serve students with disabilities, even if the LEA had identified racial disparities in the discipline and placement of children with disabilities. Likewise, CEIS funds could not be used to serve preschool children. With the December 2016 regulations, LEAs identified as having significant disproportionality had the flexibility to use their CEIS set aside to assist students with disabilities and preschool children with and without disabilities.

*Note: On June 29, 2018, a final rule concerning the December 2016 regulations was placed in the Federal Register. The USDOE postponed the compliance date for implementing the significant disproportionality regulations by two years, from July 1, 2018, to July 1, 2020.*

## Summary of Stakeholder Input Sessions

As required by the December 2016 federal regulations, DPI held several stakeholder input sessions across the state to learn where Wisconsinites stood as related to values surrounding racial disproportionality in special education. To ensure accessibility and participation by diverse and geographically scattered stakeholders, DPI hosted: (1) five face-to-face targeted meetings with different stakeholder groups (Stevens Point, Madison – 3, and Wisconsin Dells), (2) three virtual sessions, one which was targeted and two which were open invite and (3) ongoing web-based materials and feedback form (see Appendix B).

### Stakeholder Session Participants

DPI invited multiple stakeholder groups throughout the state of Wisconsin to participate. One virtual session was offered to Wisconsin Tribal Education Directors. Invitations for the other virtual sessions to review web-based materials and submit online feedback were disseminated in the weekly update from the Special Education Team Director, DPI's DAC Digest, WISEgrants, Disproportionality Technical Assistance Network, and email listservs. Specific invitations to review web-based materials and submit online feedback were sent to:

- Wisconsin Association of School District Administrators (Jon Bales);
- Wisconsin Association of School Business Officials (Woody Wiedenhoef);
- Wisconsin Association of School Boards (John Ashley);
- Council for Exceptional Children (Ozalle Toms);
- Association of Wisconsin School Administrators (Jim Lynch and Joe Schroeder);
- Wisconsin Council of Administrators of Special Services (Gary Myrah and John Peterson);
- Cooperative Educational Service Agency Administrators (Jesse Harness);
- State Personnel Development Grant Institution of Higher Education Professional Learning Community (Debra Ahrens, liaison);
- Identified faculty from Institutions of Higher Education (Aydin Bal, Colleen Capper, Elise Frattura, Gloria Ladson-Billings);
- Title III Network (Audrey Lesondak, liaison);
- Parent stakeholder groups including QEC, The ARC, Wisconsin Board for People with Developmental Disabilities, and Latino Alliance Applying Solutions.

The face-to-face sessions included stakeholders representing identified LEAs, technical assistance providers, parents, and LEA administration and school staff. Face to face sessions were held with the State Superintendent's Parent Advisory Council and the State Superintendent's Advisory Council on Special Education. For participant sign-in sheets, see Appendix C.

### Stakeholder Session Materials

DPI used a PowerPoint as one resource during the stakeholder sessions to facilitate a conversation about disproportionality in special education. There were two main topics of the PowerPoint discussed during the stakeholder sessions: the first, regarding general information about disproportionality in special education and data analysis, and the second, regarding what criteria Wisconsin should use going forward to identify racial disproportionality. See Appendix D for a notated version of the PowerPoint.

In addition to the PowerPoint, DPI provided a glossary of commonly used terms around disproportionality, and a data handout. See Appendix E for the glossary and data handout.

## Results and Feedback

Individuals were asked to provide feedback through a Google Form. The request for feedback was posted onto the Special Education Team website. Below is a summary of survey answers and feedback. To see the full stakeholder comments from the survey, see Appendix F.

### Risk Ratio Thresholds:

First, stakeholders were asked to provide input on the threshold at which Wisconsin will identify LEAs as having disproportionality based on race or ethnicity in special education identification, placement and/or discipline and, therefore, be required to conduct specific activities – for example, a compliance review, a needs assessment and improvement plan, reservation of IDEA funds for their multilevel system of support, and reporting on the success of CEIS implementation. In other words, the risk ratio threshold is the trigger for oversight. DPI detailed the considerations stakeholders should take into account when setting the threshold (see Appendix D, slide 10).

**69.6% of survey respondents believe that when students in a particular racial/ethnic group are 2.00 more likely than their peers to be identified in special education identification, placement, or discipline, that DPI should require the LEA to conduct a needs assessment and improvement plan.** This is consistent with Wisconsin's current threshold of 2.0 for requiring a needs assessment and improvement plan. 23.9% of respondents said a needs assessment and improvement plan should be conducted at a 2.50 risk ratio threshold and 6.5% at a 3.00 risk ratio threshold.

**56.5% of survey respondents believe that when students in a particular racial/ethnic group are 2.00 more likely than their peers to be identified in special education identification, placement, or discipline, that DPI should require the LEA to reserve 15% of their Part B IDEA funds for comprehensive coordinated early intervening services.** This is different than Wisconsin's current threshold, which is 4.0 for required use of CEIS. 19.6% of survey respondents said CEIS should be required at a 2.50 threshold, and 23.9% said required CEIS at a 3.00 threshold.

**74.2% of survey respondents want DPI to use the same risk ratio threshold for all categories of analysis** (using the same risk ratio, 2.5 for example, as the trigger to require legal action in special education identification, specific disability category areas, placement, and discipline).

### Reliable Data:

Second, stakeholders were asked to provide input into criteria Wisconsin will use to ensure reliable data. Risk ratios can produce unreliable or volatile numbers when applied to small populations – an LEA with only small numbers of children in a given racial or ethnic group or with low incidences of certain disabilities or placements, for example. That is, small changes in small populations can result in large changes in risk ratios that do not necessarily suggest systemic problems giving rise to significant disproportionality. Using minimum sample and population sizes reduces the possibility of LEAs being inappropriately identified with significant disproportionality. DPI detailed the considerations stakeholders should take into account when setting sample and population sizes (see Appendix D, slide 13).

Only 16.7% of survey respondents recommended that Wisconsin continue with its current criteria for reliable data. **82.2% of survey respondents recommended that Wisconsin adopt the criteria for**

reliable data as set forth by the U.S. Department of Education (ED), Office of Special Education Programs (OSEP).

Many respondents were concerned about specific cell sizes, especially in smaller and rural LEAs that have fewer students. A few suggested a sort of sliding scale based on enrollment numbers.

Reasonable Progress:

Third, stakeholders were asked to provide input into whether Wisconsin should exercise the flexibility offered in the December 2016 federal regulations to waive identification in cases where an LEA has exceeded the risk ratio threshold but has demonstrated reasonable progress in lowering the risk ratio for the group and category of analysis in each of the two prior consecutive years. DPI detailed the considerations stakeholders should take into account when considering the “reasonable progress” criterion (see Appendix D, slide 16).

**84.9% of respondents recommended that DPI adopt a reasonable progress standard as part of its criteria for determining disproportionality in special education identification, placement, and discipline.**

If Wisconsin were to adopt a reasonable progress standard as part of its criteria for determining disproportionality, **63.2% of respondents recommended a definition of reasonable progress as a decrease in a risk ratio of 0.25 or more for each of the two prior consecutive years.** 35.6% of respondents recommended a decrease in a risk ratio of 0.5 or more.

# Appendix A

Federal and state statutory and regulatory requirements related to racial disproportionality in special education

## Indicator 4B

### Federal Statutory Requirements

Percent of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures, or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards. 20 USC 1416(a)(3)(A); 1412(a)(22)

### Federal Regulatory Requirements

- (a) General. The SEA must examine data, including data disaggregated by race and ethnicity, to determine if significant discrepancies are occurring in the rate of long-term suspensions and expulsions of children with disabilities—
  - (1) Among LEAs in the State; or
  - (2) Compared to the rates for nondisabled children within those agencies
- (b) Review and revision of policies. If the discrepancies described in paragraph (a) of this section are occurring, the SEA must review and, if appropriate, revise (or require the affected State agency or LEA to revise) its policies, procedures, and practices relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards, to ensure that these policies, procedures, and practices comply with the Act.  
34 CFR §300.170

### State Statutory Requirements

The division of learning supports, equity and advocacy is responsible for ....

- (j) Examining data, including data disaggregated by race and ethnicity, to determine if significant discrepancies are occurring in the rate of long-term suspensions and expulsions of children with disabilities among local educational agencies or compared to such rates for nondisabled children within such agencies. If such discrepancies are occurring, the division shall review and, if appropriate, revise or require the affected local educational agency to revise its policies, procedures and practices relating to the development and implementation of individualized education programs, the use of positive behavioral interventions and supports and procedural safeguards to ensure that such policies, procedures and practices comply with this subchapter.

115.762, Wis. Stats.

### Indicator and Measure

Percent of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rate of suspensions and expulsions of greater than 10 days in a school year for children with IEPs; and (b) policies, procedures, or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards.

Percent = (# of districts that have: (a) a significant discrepancy, by race or ethnicity, in the rates of suspensions and expulsions of greater than 10 days in a school year of children with IEPs; and (b) policies, procedures or practices that contribute to the significant discrepancy and do not comply with requirements relating to the development and implementation of IEPs, the use of positive behavioral interventions and supports, and procedural safeguards) divided by the (# of districts in the State) times 100.

*State Performance Plan 2005-2006 through 2012-2013 (Revised February 2012)*

## Indicator 9

### Federal Statutory Requirements

Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification. 20 USC 1416(a)(3)(C)

### Federal Regulatory Requirements

- (d) The State must monitor the LEAs located in the State, using quantifiable indicators in each of the following priority areas, and using such qualitative indicators as are needed to adequately measure performance in those areas:
  - (3) Disproportionate representation of racial and ethnic groups in special education and related services, to the extent the representation is the result of inappropriate identification.  
34 CFR s. 300.600

### State Statutory Requirements

None

### Indicator and Measure

Percent of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification.

Percent = (# of districts with disproportionate representation of racial and ethnic groups in special education and related services that is the result of inappropriate identification) divided by the (# of districts in the State) times 100.

## Indicator 10

### Federal Statutory Requirements

Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification. 20 USC 1416(a)(3)(C)

### Federal Regulatory Requirements

- (d) The State must monitor the LEAs located in the State, using quantifiable indicators in each of the following priority areas, and using such qualitative indicators as are needed to adequately measure performance in those areas:
  - (3) Disproportionate representation of racial and ethnic groups in special education and related services, to the extent the representation is the result of inappropriate identification.  
34 CFR s. 300.600

### State Statutory Requirements

None

### Indicator and Measure

Percent of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification.

Percent = (# of districts with disproportionate representation of racial and ethnic groups in specific disability categories that is the result of inappropriate identification) divided by the (# of districts in the State) times 100.  
*State Performance Plan 2005-2006 through 2012-2013 (Revised February 2012)*

## Significant disproportionality

### Federal Statutory Requirements

- (d) Disproportionality
  - (1) In general

Each State that receives assistance under this subchapter, and the Secretary of the Interior, shall provide  
Racial Equity in Special Education  
Background and Summary of Stakeholder Input (internal version)

for the collection and examination of data to determine if significant disproportionality based on race and ethnicity is occurring in the State and the local educational agencies of the State with respect to -

(A) the identification of children as children with disabilities, including the identification of children as children with disabilities in accordance with a particular impairment described in section 1401(3) of this title;

(B) the placement in particular educational settings of such children; and

(C) the incidence, duration, and type of disciplinary actions, including suspensions and expulsions.

(2) Review and revision of policies, practices, and procedures

In the case of a determination of significant disproportionality with respect to the identification of children as children with disabilities, or the placement in particular educational settings of such children, in accordance with paragraph (1), the State or the Secretary of the Interior, as the case may be, shall -

(A) provide for the review and, if appropriate, revision of the policies, procedures, and practices used in such identification or placement to ensure that such policies, procedures, and practices comply with the requirements of this chapter;

(B) require any local educational agency identified under paragraph (1) to reserve the maximum amount of funds under section 1413(f) of this title to provide comprehensive coordinated early intervening services to serve children in the local educational agency, particularly children in those groups that were significantly overidentified under paragraph (1); and

(C) require the local educational agency to publicly report on the revision of policies, practices, and procedures described under subparagraph (A).

20 U.S.C. 1418(d)

# Appendix B

## Screen shot of web page

WE'RE SEEKING YOUR INPUT ON RACIAL EQUITY IN SPECIAL EDUCATION

# We're Seeking Your Input on Racial Equity in Special Education

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- Clone content

## Wisconsin's criteria: racial disproportionality in special education identification, discipline, and placement

### Overview

Since the 2004 reauthorization of the federal special education law, the Individuals with Disabilities in Education Act, or IDEA, Wisconsin Department of Public Instruction has been identifying and supporting local education agencies, or LEAs – mostly districts but some charter schools, too – that have racial disproportionality in special education identification, placement, and discipline.

Wisconsin is revising our criteria related to [racial disproportionality in special education identification, discipline and placement](#). In December 2016, the U.S. Department of Education, Office of Special Education Programs released Equity in IDEA final regulations. Wisconsin's current criteria does not comply with the new regulations. Now is a good time to review and reflect on our past efforts related to racial disproportionality in special education and be intentional in moving forward that our work is consistent with the values and beliefs of our stakeholders.

Please provide your input before October 31, 2017.



### Overview

Read about [racial disproportionality in special education](#) .



### Data Sheets

Review data related to Wisconsin's criteria for racial disproportionality in special education.

- [Data Handouts](#) 
- [Information Charts](#) 
- [Glossary](#) 



### Google Form

Please submit [your comments on racial disproportionality in special education](#).

For questions about this information, contact [Courtney Reed Jenkins](#) (608) 267-9183

## Appendix C

### Participant Sign-in Sheets for face to face input sessions



### Racial disproportionality in special education: Wisconsin criteria

#### Stakeholder input session

#### Sign-in sheet

Date: October 17, 2017

Location: Wisconsin Dells, WI

Name	City
Christopher Rawlings	Delavan WI
Scott Kenozowski	Delavan WI
Kathy Ryder	Earl Claire WI
Therese Kwiatkowski	Wauwatosa WI
Jennifer Hulgendorf	TIG
Lynn Johnson	Madison, WI
Sally E. Coe	CESA 17
Jason Perry	Colby, WI
Eddie Campbell	German town, WI
Tammy Singer	German town, WI
Jennifer Stohrney	Cudahy, WI



Disproportionally Technical Assistance  
**NETWORK**  
www.TheNetworkWI.com

ADDRESSING WISCONSIN'S RACIAL DISPARITIES IN SPECIAL EDUCATION  
Funded through the Individuals with Disabilities Education Improvement Act of 2004 (IDEA)



**Racial disproportionality in special education:  
Wisconsin criteria**

**Stakeholder input session**

**Sign-in sheet**

Date: October 17, 2017

Location: Wisconsin Dells, WI

Name	City
Mildred Starks	Milwaukee
Sharri Vandehey	Racine
Barb Buffington	DeForest
Lalisha Olson	Holmen
Judy Baseman	Appleton
Jane Bleier	Appleton
Christa Macomber	Monona Grove
Scott Brown	RTI Center
Kim Eulbrandson	RTI Center
Joel Johnson	Winter
Byan Bamsik	Milwaukee
Tonia Hamester	W/Oshkosh



Disproportionality Technical Assistance  
**NETWORK**  
www.TheNetworkWI.com

**ADDRESSING WISCONSIN'S RACIAL DISPARITIES IN SPECIAL EDUCATION**  
Funded through the Individuals with Disabilities Education Improvement Act of 2004 (IDEA)



**Racial disproportionality in special education:  
Wisconsin criteria**

**Stakeholder input session**

**Sign-in sheet**

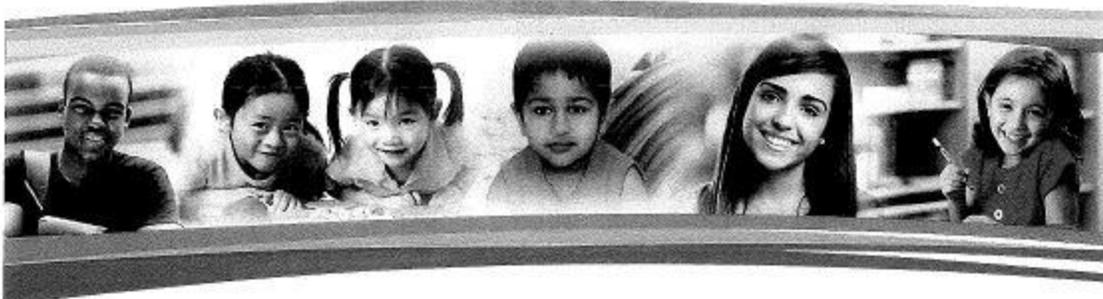
Date: September 13, 2017

Location: Madison, WI

Name	City
<i>Ivan Rana-Malokovic</i>	<i>CESA 7 Green Bay, WI</i>
<b>Stacy Gray</b>	<b>CESA 7 Green Bay WI</b>
<i>Beth Vande Hey</i>	<i>CESA 7 Green Bay, WI</i>
<i>Jim Nelson</i>	<i>CESA 3 FENNIMORE, WI</i>
<i>Meredith Biba</i>	<i>CESA 3 Fennimore, WI</i>
<i>Heather Fie</i>	<i>CESA 5, Portage WI</i>
<i>Jeanette Mendoza</i>	<i>CESA 5, Portage</i>
<i>Tammy S. Jorgensen</i>	<i>CESA 5</i>
<i>Mary Ann Hurdzick</i>	<i>CESA 6</i>
<i>Anne Pagel</i>	<i>CESA 6</i>
<i>Eric Larsen</i>	<i>CESA 6</i>
<i>Jenny Larson</i>	<i>CESA 6</i>



**ADDRESSING WISCONSIN'S RACIAL DISPARITIES IN SPECIAL EDUCATION**  
Funded through the Individuals with Disabilities Education Improvement Act of 2004 (IDEA)



**Racial disproportionality in special education:  
Wisconsin criteria**

**Stakeholder input session**

**Sign-in sheet**

Date: September 13, 2017

Location: Madison, WI

Name	City
Mia Chmiel	CESA 9
Al Betry	CESA 9
Matt Collins	CESA 9
Jana Vegliani	CESA 4
BILLY FINCH	CESA #4
Rick Johnson	CESA#4
Jen Ledin	CESA 12
ELLEN NELSON	CESA 12
JULIE JENSEN	CESA 12
Nickie Waters	CESA 10
DW-Litt	CESA 10



**ADDRESSING WISCONSIN'S RACIAL DISPARITIES IN SPECIAL EDUCATION**  
Funded through the Individuals with Disabilities Education Improvement Act of 2004 (IDEA)

Kristin Gundry	CESA 10
Mary Grem-Fuller	CESA 10
Krista Kangel	CESA 10
Connie Erickson	CESA 11
DeAnna Thompson	CESA 11
Ali Kahl	CESA 11
Cindy Antze	CESA 11
Melissa Mae	CESA 11
Darcy Budnik	CESA 1
Jim Hedrick	CESA 1
Jan Brezice	CESA 1
Wendy Anderson	CESA 1
Sue Doyle	CESA 1
May Goyl	Cesa 2
Lynne Towdot	CESA 2
Gail Anderson	CESA 2
Debra Bush	Cesa 8
Deb Wall	CESA 8



**Racial disproportionality in special education:  
Wisconsin criteria**

**Stakeholder input session**

**Sign-in sheet**

Date: September 7, 2017

Location: Stevens Point, WI

Name	City
Teri Phalin T.lli	Tomahawk
Pamela Torres	Lac du Flambeau
Julie Philipps / Lisa S	Green Bay
Juliel (Ebiere) Cole	Green Bay
Melissa Mae	Turtle Lake
Katie Of	TURTLE LAKE
Angie Balfe	Appleton
Judy Hou	Ashland
ANANDA MIZILLI	MADISON
Mary Kampa	Chippewa Falls
Paula Ferrandez	Reeshena, WI



Disproportionality Technical Assistance  
**NETWORK**  
www.TheNetworkWI.com

**ADDRESSING WISCONSIN'S RACIAL DISPARITIES IN SPECIAL EDUCATION**  
Funded through the Individuals with Disabilities Education Improvement Act of 2004 (IDEA)



**Racial disproportionality in special education:  
Wisconsin criteria**

**Stakeholder input session**

**Sign-in sheet**

Date: September 22, 2017

Location: Madison, WI

Name	City
Lynette Stansfield	Hollandale
Patty Becker	Muskego
Logi Poppe	Bean Creek
Maia Hansen	Arbor Vitae
Kim Campion	Webster
Sally Flaschberger	Waukesha
Tricia Thompson	Menomonie
Regina Floyd-Sambou	Madison / DCF



ADDRESSING WISCONSIN'S RACIAL DISPARITIES IN SPECIAL EDUCATION  
Funded through the Individuals with Disabilities Education Improvement Act of 2004 (IDEA)



**Racial disproportionality in special education:  
Wisconsin criteria**

**Stakeholder input session**

**Sign-in sheet**

Date: September 22, 2017

Location: Madison, WI

Name	City
Victoria Davis Danta	Milwaukee, WI
Deb Fattermel	DHS - Madison WI
Carla Witkowski	Owensboro Reservation
Jennifer Hims-Howell	Milwaukee, WI
Anna Moffitt	Madison, WI
Amy Stevens	Waukesha
Dana Atandare	Milwaukee
Mike Hipple	Appleton
Mackenzie Gabler	Eau Claire



**ADDRESSING WISCONSIN'S RACIAL DISPARITIES IN SPECIAL EDUCATION**  
Funded through the Individuals with Disabilities Education Improvement Act of 2004 (IDEA)



**Racial disproportionality in special education:  
Wisconsin criteria**

**Stakeholder input session**

**Sign-in sheet**

Date: September 30, 2017

Location: Madison, WI

Name	City
Julie Quigley	Germantown
Sandi Walkush	Iola
Jakelyn Karabetsos	Kenosha
Sarah Moris	Kewaskum
Mike Anton	BACINE
John Jahnke	Green Bay
Carla Pennington-Cross	Glendale
Rosalee V. Tocco	Nicolet
Holli Jacobson	EAU CLAIRE
Corinda Rainey-Moore	Madison
Dr. Qung L. Davis	MINDORO

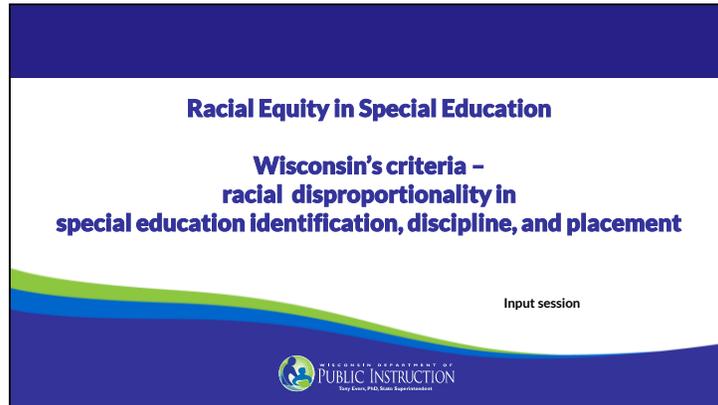


**ADDRESSING WISCONSIN'S RACIAL DISPARITIES IN SPECIAL EDUCATION**  
Funded through the Individuals with Disabilities Education Improvement Act of 2004 (IDEA)

# Appendix D

## Racial Equity in Special Education PowerPoint

Slide 1



2 min

Hello, and I'm looking forward to talking with you today regarding racial equity in special education. Specifically, I'm here to get input from you on Wisconsin's criteria related to racial disproportionality in special education identification, placement, and discipline. Since the 2004 reauthorization of the federal special education law, the Individuals with Disabilities in Education Act, or IDEA, we've been identifying and supporting local education agencies, or LEAs – mostly districts but some charter schools, too – that have racial disproportionality in special education identification, placement, and discipline. We're coming to you now, thirteen years later, because sustained focus at the federal level – advocacy, debate, a 2013 U.S. Government Accountability Office report, and revised federal regulations released in December 2016 related to significant disproportionality in special education – makes this a good time to review and reflect on our past efforts related to racial disproportionality in special education and be intentional in moving forward that our work is consistent with the values and beliefs of our stakeholders.

## Slide 2

**Agenda**

Overview, data analysis

Why should we pay attention to racial disproportionality in special education?

Risk ratio threshold, reliable data, reasonable progress

What criteria should Wisconsin use, going forward, to identify local education agencies with racial disproportionality in special education?

The slide features a dark blue header with the word "Agenda" in white. Below the header, the text "Overview, data analysis" is centered. Two callout boxes with blue and green borders and arrowheads on the right point to the following questions: "Why should we pay attention to racial disproportionality in special education?" and "What criteria should Wisconsin use, going forward, to identify local education agencies with racial disproportionality in special education?". A small globe icon is located in the bottom right corner of the slide area.

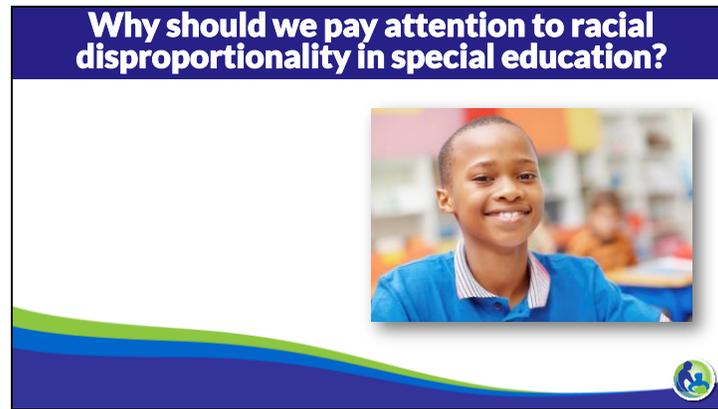
2 min

Today, we're answering two questions:

Why should we pay attention to the intersection of race and disability? - we'll set the stage for our work together by a brief overview of racial disproportionality in special education identification, placement, and discipline and by a brief review of how we currently identify districts.

Then, we'll turn to the second question which is what criteria should Wisconsin use, going forward, to identify districts with racial disproportionality in special education. We're bringing this to you because the federal government released regulations and related guidance in December 2016 which requires us, and most other states, to revise their criteria.

## Slide 3



5 min

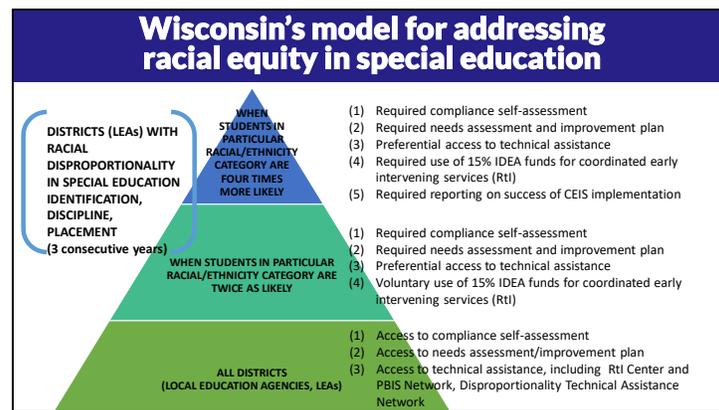
First and foremost, we pay attention to racial disproportionality in special education because we want all to students to receive the educational services and supports they need and are entitled to in an appropriate setting and with the most appropriate behavior strategies employed. In other words, we want to keep kids healthy, safe, supported, and encouraged in schools and we want to promote engaged learning to motivate all kids. (DPI 2017: *Vision*)

We also pay attention to racial disproportionality in special education because it is an important part of the discussion related to the achievement gap / opportunity gap / equity gap – in special education, like in student performance data, graduation rates, and other measures of educational engagement and achievement, we see race-based patterns of success and failure. We have an obligation to interrupt and eliminate these patterns.

Children of color—in Wisconsin, African-American, American Indian, and Hispanic youth—are identified as students with disabilities at substantially higher rates than their peers. This occurs more in disability categories that are “subjective” – other health impairment and emotional behavioral, specific learning, speech and learning, disabilities categories – and not when there is an underlying “hard” or medical diagnosis, such as deaf and hard of hearing or blind and visually impaired disabilities categories. For example, last year Black and Native students were over twice as likely as their peers to be identified as having an Emotional Behavioral Disability. (DPI 2016: child count)

Nationally, once identified, children of color are more likely to be placed outside the general education classroom and are more likely to be disciplined than their peers. In Wisconsin, our race-based patterns of discipline are similar to the national data, with Black, American Indian, and Hispanic learners with IEPs more likely to be disciplined. In Wisconsin, our data regarding placement is dissimilar to the national data, with more racial proportionality across educational environments.





Advocates, educators, and legislators have noticed and addressed racial disproportionality in IDEA for over thirty years. The roots of this work resulted in the first report of the National Research Council over thirty years ago, when the Council convened a committee that, at that time, focused primarily on defining a better set of rules for determining who needs special education, whether placement is beneficial, and when and how students would exit. Their concern was whether special education identification was operating fairly and to the benefit of students. Many of that committee's suggestions are reflected in the amendments to the Individuals with Disabilities Education Act and federal guidelines and regulations. (National Research Council, 2002: *Minority Students in Special and Gifted Education*)

The 2004 reauthorization of IDEA and related regulations regarding racial disproportionality in special education, like other areas of IDEA 2004, balanced both compliance and improvement. So, LEAs – again, these are usually districts, but we do identify some charter schools – that are identified with racial disproportionality in special education identification, discipline, and placement are required to review their policies, procedures, and practices for compliance with special education law ... and to focus on improvement and prevention in the general education setting through the voluntary and, in some cases, required use of coordinated early intervening services, known in Wisconsin as Response to Intervention, or RtI (LEAs with significant disproportionality). This first-time allowance in federal law to permit – and, sometimes, require – special education dollars in general education reflects the research and experience of educators. Most, if not all, of the root causes of racial disproportionality in special education are about what happens in general education: about the core curriculum... about too many, inconsistent, poorly structured or limited information related to interventions... about inconsistent knowledge of assessments... and about beliefs that poor students and students of color are not ready for school and that special education is the only place to support students with complex and/or complicated needs. (Fergus, 2010: *Common Causes of Racial/Ethnic Disproportionality in Special Education*)

Since 2006, our state's model for addressing racial equity in special education has balanced compliance and improvement efforts through a multi-tiered approach.

We recognized that most, if not all LEAs, have racial disproportionality – in other words, their special education identification, discipline, and placement do not match the racial/ethnic composition of their total student enrollment. We wanted to ensure that any district that analyzes their data and wants to improve can do so. As a reflection of that commitment, all LEAs have access to:

- our online self-assessment compliance tools related to racial disproportionality in special education, and
- our online, research-based needs assessment and improvement planning tools, and
- free and low-cost technical assistance that focuses on (1) strengthening school- and district-wide multilevel systems of support through the RtI Center and PBIS Network and (2) addressing racial equity in education,

including special education, through the Disproportionality Technical Assistance Network – one of two such statewide technical assistance centers that we know of in the nation.

All LEAs can elect to use 15% of their IDEA funds for coordinated early intervening services, and we have significant technical assistance and guidance to help them do so. Our encouragement and support of LEAs to use these funds shows up in our data – In Wisconsin, 108 – or about ¼ -- districts use up to 15% of their IDEA funds for their multilevel system of supports. (DPI 2017: SY 2016-17 IDEA budgets)

In our next level of supports, we focus on LEAs that have groups of students, within a particular racial/ethnic category, that are at least *twice as likely* as their general education peers to be identified as having a disability (or a specific disability) OR placed in a more restrictive environment than their special education peers OR disciplined than their special education peers. For this group of LEAs – typically about 40 a year – we:

- *Require* a special education compliance review, and
- *Require* a needs assessment and improvement plan
- Provide *preferential* access to technical assistance through the RtI Center and PBIS Network and the Disproportionality Technical Assistance Network.

These LEAs, like the other LEAs, can voluntarily use 15% of their IDEA funds for their multilevel systems of support.

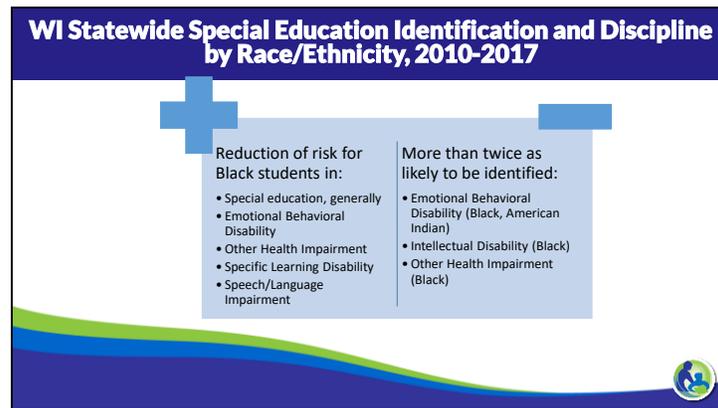
For the final group of LEAs – about six per year – we provide intensive supports because they have groups of students, within a particular racial/ethnic category, that are at least *four times as likely* as their general education peers to be identified as having a disability (or a specific disability) OR placed in a more restrictive environment than their special education peers OR disciplined than their special education peers. For this group of LEAs, which are LEAs with significant disproportionality, we:

- *Require* a special education compliance review, and
- *Require* a needs assessment and improvement plan, and
- Provide *preferential* access to technical assistance through the RtI Center and PBIS Network and the Disproportionality Technical Assistance Network, and
- *Require* the use of 15% of their IDEA funds for the multilevel system of support, with a particular focus on the groups of students that are overrepresented in their special education identification, placement, or discipline.

All LEAs that use CEIS – voluntarily or required – must report on the success of CEIS implementation. LEAs must report on the total number of children receiving CEIS and the total number of children receiving CEIS in the past two years and subsequently found eligible for special education.

I hope this time, up to now, has helped to answer the primary question we posed first, “Why should we pay attention to racial disproportionality in special education?” as well as a secondary question, “How have we paid attention to racial disproportionality in Wisconsin to date?”

Now, we are going to turn to the next primary question, “What criteria should Wisconsin use, going forward, to identify districts with racial disproportionality in special education?”



To be able to answer “What criteria should we use going forward?,” it may be helpful to review our state’s data related to racial disproportionality in special education.

Regarding racial disproportionality in special education identification using statewide data over seven years, we see bright spots in the data – three year trends for reducing the likelihood of being Black and identified as having a disability, generally, and in the following disability categories: Emotional Behavior Disability (EBD), Other Health Impairment (OHI), Specific Learning Disability (SLD), and Speech or Language Impairment (S/L). (DPI 2017: child count)

We also continue to see:

- Black students are more likely to be identified as having a disability and needing special education and related services than any other racial/ethnic group, followed closely by American Indian students.
- Black students and American Indian students continue to be more than twice as likely as their peers to be identified as having an Emotional Behavioral Disability.
- Black students continue to be at least twice as likely as their peers to be identified as having an Intellectual Disability and an Other Health Impairment.

(DPI 2017: child count)

For your information and as you move forward during today’s conversations, you do have this data as a handout in your folder.



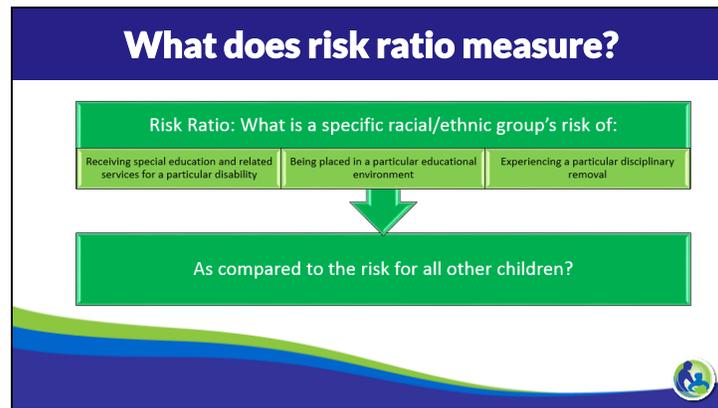
2 min

Okay, let's get into the nitty gritty. We did include a graphic organizer in the right hand side of your folder, if you would like to take notes during our following conversations.

When a state identifies LEAs as having racial disproportionality in special education identification, discipline, and placement and, therefore, requires action to address the disproportionality, the state must be assured that the criteria are robust, fair, and accurate. We're going to talk about three required aspects of our criteria to identify LEAs as having racial disproportionality in special education identification, placement, and discipline. We are going to provide an overview, highlight the considerations, and walk you through an activity related each of the following: risk ratio thresholds, reliable data, and reasonable progress. We'll pause to collect your input related to each of these aspects, too.

We have designed this portion of the input session to draw out your values and beliefs related to educational equity and special education. We are highlighting the values-based considerations that we would like your input on, and we hope that we have given you enough information to be able to thoughtfully consider and weigh in on the decision points related to the risk ratio threshold, minimum cell sizes, and reasonable progress.

As a state, we have opted to take advantage of the flexibility in IDEA to use three years of data in our identification of LEAs with racial disproportionality in special education identification, discipline and placement. The flexibility to determine significant disproportionality after three consecutive years was designed to account for volatility—small changes in data from year to year that may cause large changes in a risk ratio and cause an LEA to be identified with disproportionality. Taking into consideration up to three consecutive years of data provides us an opportunity to determine which LEAs have disproportionality on the basis of consistently elevated risk ratios, rather than what may be a single year increase.



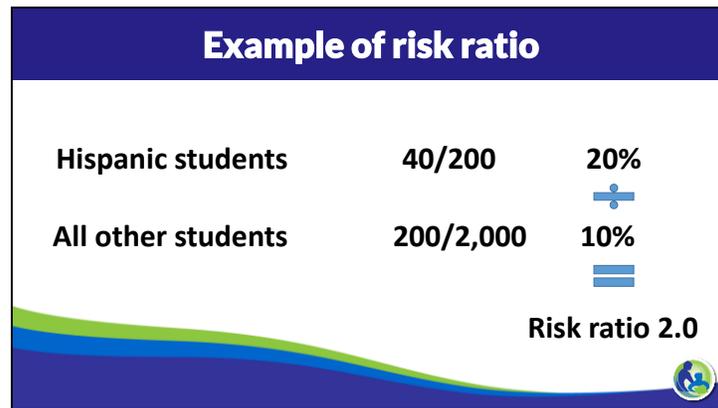
2 min

There are many different ways to measure racial disproportionality in special education identification, discipline, and placement.

A risk ratio, which is the methodology that we use to measure racial disproportionality because the federal government told us to use it, is a numerical comparison, expressed as a ratio or decimal, between the risk of a specific outcome for a specific racial or ethnic group in an LEA and the risk of that same outcome for all other children in the LEA. The comparison is made -- the risk ratio is calculated -- by dividing the risk of a particular outcome for children in one racial or ethnic group within an LEA by the risk of that same outcome for children in all other racial or ethnic groups within the LEA (the comparison group).

Related to special education identification, for example, the risk ratio answers the question, "What is a specific racial/ethnic group's risk of receiving special education and related services for a particular disability as compared to the risk for all other children?"

Currently, we add additional calculations to weight the risk ratio according to the proportions of each racial and ethnic group in the state (students with and without disabilities). While this allowed us to better standardize the calculations across districts with very different demographics, which was helpful in a state like ours, weighted risk ratios will not be used in the future because the federal government disallowed it in the final regulations.



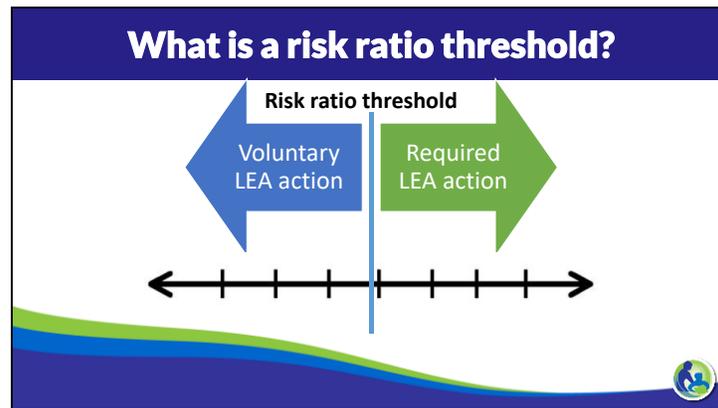
2 min

For example, if 40 out of 200 Hispanic children in an LEA are identified as children with disabilities, the risk of a Hispanic child being identified as a child with a disability in that LEA is 40/200 or 20 percent. If 200 out of all of the other 2,000 children in the LEA are identified as children with disabilities, then the risk of all other children being identified as children with disabilities is 200/2,000 or 10 percent. The risk ratio for Hispanic children in the LEA being identified as children with disabilities is 20/10, 2:1, or 2.0.

Generally, a risk ratio of 1.0 indicates that children from a given racial or ethnic group are no more or less likely than children from all other racial or ethnic groups to experience a particular outcome. A risk ratio of 2.0 indicates that one group is twice as likely as all other children to experience that outcome. A risk ratio of 3.0 indicates three times as likely, etc.

In the example here, Hispanic children are twice as likely as all other children in the LEA to be identified as children with disabilities.

(U.S. Office of Special Education Programs, 2017: *Significant Disproportionality (Equity in IDEA): Essential Questions and Answers*)

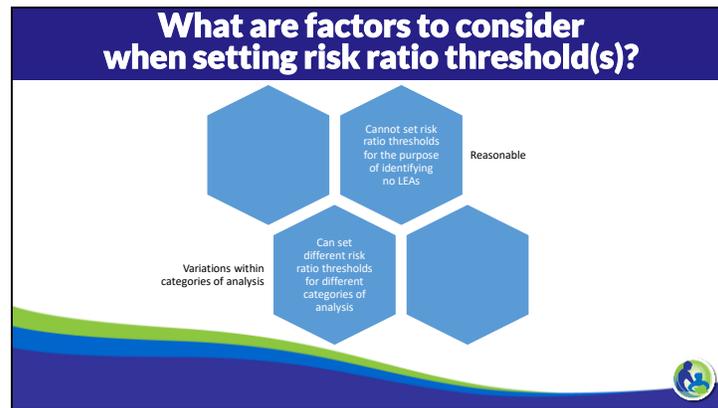


2 min

What is a risk ratio threshold? It is a threshold, determined by the State with stakeholder input, at which Wisconsin will identify LEAs as having disproportionality based on race or ethnicity in special education identification, placement, or discipline and, therefore, be required to conduct specific activities – for example, a compliance review, a needs assessment and improvement plan, reservation of IDEA funds for their multilevel system of support, and reporting on the success of CEIS implementation. In other words, it is the trigger for WDPI oversight.

For example, if a State sets a risk ratio threshold for identification of children as children with disabilities at 2.5, then, in the example from the last slide, the State would not identify the LEA as having disproportionality for Hispanic children with disabilities. There, Hispanic children were twice as likely as all other children to be identified as children with disabilities in the LEA, a risk ratio of 2.0. However, if in the same example LEA, African-American children are four times more likely than all other children to be identified as children with disabilities, the risk ratio for African-American children being identified as children with disabilities is 4.0, and would therefore result in the LEA being identified as having disproportionality in special education.

(U.S. Office of Special Education Programs, 2017: *Significant Disproportionality (Equity in IDEA): Essential Questions and Answers*)



3 min

The choice of a threshold has a dramatic impact on the number of LEAs identified within a state. For example, a threshold of 2.0 in Wisconsin would result in identifying approximately 50 LEAs with disproportionality in special education identification, discipline, or placement; compare that to the five LEAs that would be identified if we used a threshold of 4.0 for racial disproportionality in special education identification, discipline, or placement.

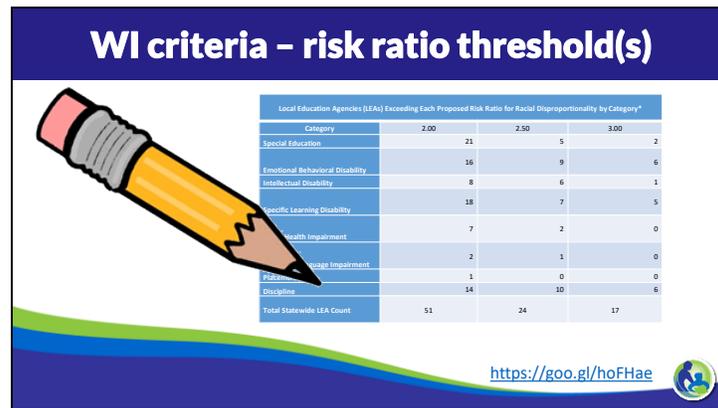
When choosing a threshold, we should consider the implications that their decisions will have in terms of data analyses and from both legal and policy standpoints. (IDEA Data Center 2014: *Methods for Assessing Racial/Ethnic Disproportionality in Special Education – A Technical Guide (Revised)*) Today, we are asking you to focus on the policy standpoint: all of the options you will review today have met the data and legal requirements in federal law. For example, we are not offering a 5.0 risk ratio threshold as an option because from a data analysis perspective, we believe it is not reasonable. As another example, we will not offer an option of different risk ratio thresholds for different racial and ethnic groups because it is unlikely to meet constitutional scrutiny.

Speaking of reasonable, this is one of the factors to consider when setting a risk ratio threshold. “Reasonable” means a sound judgment in light of all of the facts and circumstances that bear upon the choice. When choosing a risk ratio threshold, we may consider our unique characteristics, such as the racial and ethnic composition of the State and LEAs, enrollment demographics, and factors correlated with various disabilities or disability categories. We are not allowed to set risk ratio thresholds for the purpose of identifying no LEAs with disproportionality. (U.S. Office of Special Education Programs, 2017: *Significant Disproportionality (Equity in IDEA): Essential Questions and Answers*)

Another factor to consider is that we may, but are not required to, set different risk ratio thresholds in order to reasonably identify disproportionality for categories with different degrees of incidence rates, and, therefore, different degrees of disparity, such as children identified as having a disability and needing special education, on the one hand, and children placed in a regular classroom less than 40 percent of the day on the other. (See 34 C.F.R. §300.647(b)(1)(ii).) (U.S. Office of Special Education Programs, 2017: *Significant Disproportionality (Equity in IDEA): Essential Questions and Answers*)

Ultimately, we are required to set fourteen risk ratio thresholds, one for each category of analysis. The categories are in your packet.





20 min

So, let's get to it. Please look at Document 1 in your stapled packet.

In this document, we organized information related to setting risk ratio thresholds for special education identification, placement, and discipline.

For these calculations, we used constant cell sizes and three years of data.

Please take a look at the top chart, and let's walk through it together:

- The higher the risk ratio threshold for any category of analysis, the fewer LEAs identified. For example, using a risk ratio threshold of 2.0 would result in 21 LEAs identified with racial disproportionality in special education identification, while a risk ratio threshold of 3.0 would result in two LEAs identified.
- The LEA count under each proposed risk ratio threshold is duplicated within the category of analysis. This means, for example, that the two LEAs identified with racial disproportionality in special education at a risk ratio threshold of 3.0 are also included in the count under 2.5 and 2.0.
- The Total Statewide LEA count across the bottom of the chart is unduplicated. For this row, an LEA identified with racial disproportionality in the categories of EBD, ID, CD, and discipline would only count as ONE LEA for this count.

What other questions do you have about this chart?

Now, let's look at the bottom chart together. Remember, we are prohibited from setting different risk ratio thresholds for different racial/ethnic categories. In other words, we cannot set a risk ratio threshold for Black students in EBD different from a risk ratio threshold for Native students in EBD. We are sharing this chart with you so you can reflect on the policy implications, especially regarding relationships with different communities in the state, of the risk ratio thresholds we are considering.

Now, you are going to review the charts and the reflection questions in small groups, then report out to the large group one highlight/top consideration/top discussion. You'll have ten minutes in your small groups, and then I'll bring us back together.

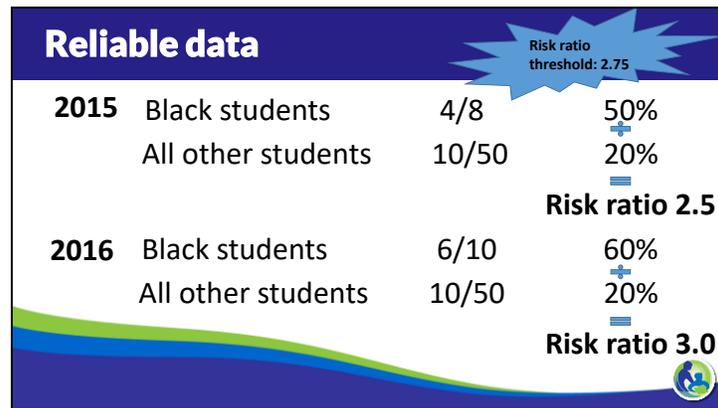
[Wait ten minutes]

Let's hear what you're one highlight/top consideration/top discussion point was. Starting here...

What questions do you have about setting thresholds for risk ratio?

Now, we invite you to give us your input, as a stakeholder, regarding the risk ratio threshold(s) you would prefer and your rationale. Please go to the Google form – the URL is on the screen and hyperlinked in the powerpoint shared with you – and complete sections 1 and 2. If the Google form format creates a barrier for your participation, then please use the handout in your packet. We'll come back together in five minutes.

*[Wait five minutes]*

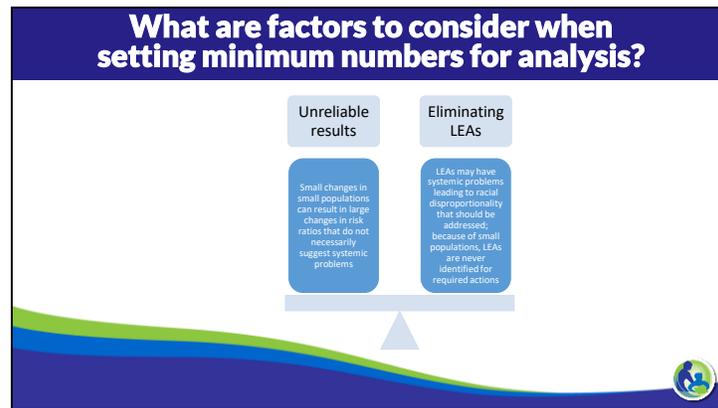


5 min

Risk ratios can produce unreliable or volatile numbers when applied to small populations - an LEA with only small numbers of children in a given racial or ethnic group or with low incidences of certain disabilities or placements, for example. That is, small changes in small populations can result in large changes in risk ratios that do not necessarily suggest systemic problems giving rise to significant disproportionality. Using minimum sample and population sizes reduces the possibility of LEAs being inappropriately identified with significant disproportionality.

For example, assume a State has set a risk ratio threshold of 2.75 for children identified as children with disabilities. In 2015, in a rural LEA, four of eight African-American children have been identified as children with disabilities, and 10 of the 50 children of all other racial or ethnic groups have been so identified. The risk for African-American children being identified as children with disabilities is 4/8 or 50 percent. The risk for children of all other racial and ethnic groups is 10/50 or 20 percent. The risk ratio, then, for African-American children identified as children with disabilities is 50/20 or 2.5.

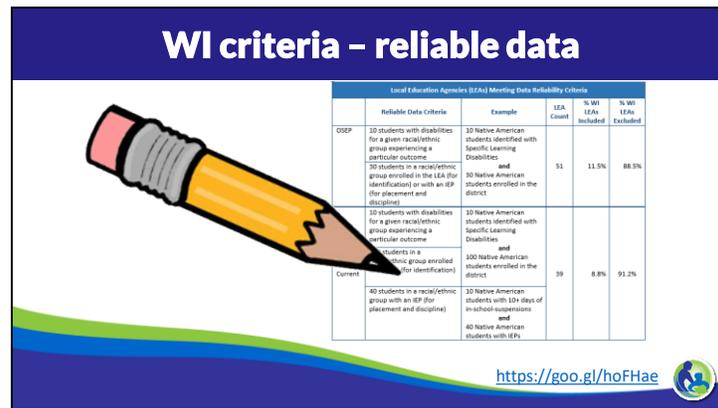
In 2016, two African-American children with disabilities moved into the LEA. That changed the risk for African-American children from 4/8 to 6/10 or 60 percent and changed the risk ratio from 50/20 to 60/20, from 2.5 to 3.0. In 2016, then, the LEA would be determined to have significant disproportionality for African-American children identified as children with disabilities, but the only change in the LEA from one year to the next was the addition of two children.



2 min

Disproportionality measures can be unreliable if the number of children included in the analysis is small. Unreliable analyses caused by small numbers in the numerator or denominator may result in districts being inappropriately identified with disproportionality. The most common method states use to address this problem is to identify a minimum number of children to be included in the analysis.

When deciding to implement minimum numbers, it is important for states to realize that there is no perfect value; any minimum number has trade-offs and limitations. On one hand, small values may produce unreliable results. On the other hand, if the state adopts a large value, many districts may be completely eliminated from the analysis, leaving no objective way to identify disproportionality in these districts. States need to balance the possibility of inappropriately identifying districts because of small populations against the possibility of eliminating so many districts that a meaningful examination of disproportionality within a state is not possible. (IDEA Data Center, 2014: *Methods for Assessing Racial/Ethnic Disproportionality in Special Education: A Technical Assistance Guide (Revised)*)



15 min

So, let's get to it. Please look at Document 2 in your handout.

In this document, we organized information related to ensuring reliable data for identifying racial disproportionality in special education identification, placement, and discipline.

Please take a look at the chart, and let's walk through it together:

Start with the top row, in which we use the cell sizes that the Office of Special Education Programs presumes to be reasonable for States, 10 in the numerator and 30 in the denominator. If we used those values, 51 (or 11.5%) of our LEAs have enough students in the numerator and denominator to have reliable enough data to also apply the risk ratio analysis. In other words, 88.5% of LEAs would be excluded if we set our criteria for reliable data with 10 in the numerator and 30 in the denominator.

As you can see in this row, ensuring reliable data in states like Wisconsin has a significant consequence...the exclusion of many of our local education agencies, which are public school districts or charter schools. This is because we have many small school districts – 440+ in Wisconsin compared to states like Nevada with eighteen school districts or Florida with sixty-seven school districts – and our school districts tend to be racially homogenous.

In the bottom row is our current criteria related to reliable data. 39 of our approximately 440 LEAs meet our current numerator of 10 and denominator of 100 for identification and 40 for placement and discipline. In other words, 91.2% of our LEAs are excluded from being identified because they do not have enough students in the numerator or denominator.

The Office for Special Education Programs allows States to set reliable data criteria *higher than 10/30*, but requires a rationale. The ultimate question for you today is whether we should set our reliable criteria consistent with 10/30 or continue with our current criteria.

What other questions do you have about this chart?

Now, you are going to review the chart and the reflection questions in small groups, then report out to the large group one highlight/top consideration/top discussion. You'll have ten minutes in your small groups, and then I'll bring us back together.

*[Wait ten minutes]*

Let's hear what you're one highlight/top consideration/top discussion point was. Starting here...

What questions do you have about setting criteria to ensure our identification data is reliable?

Now, we invite you to give us your input, as a stakeholder, regarding reliable data and your rationale. Please go to the Google form – the URL is on the screen and hyperlinked in the powerpoint shared with you – and complete section 3. In the alternative, you can continue using the handout in your packet. We'll come back together in five minutes.

*[Wait five minutes]*



5 min

Okay, we're almost there. We've covered risk ratio thresholds and reliable data criteria. We have one more aspect of our criteria to discuss.

In some cases, states are not required to identify an LEA with disproportionality, if the LEA has exceeded the risk ratio threshold but has demonstrated reasonable progress, as determined by the State, in lowering the risk ratio for the group and category of analysis in each of the two prior consecutive years. This flexibility exists so that States need not interrupt successful efforts in meaningfully reducing disproportionality.

*[Use whiteboard for example]*

As an example, a State is making a determination of significant disproportionality in school year (SY) 2018-19 and has set a risk ratio threshold of 3.0 for identification. The State has a number of small LEAs, and, over the last three years, two adjacent LEAs have the following risk ratios for Hispanic children identified as children with disabilities: School Year 2015-16 2016-17 2017-18 LEA 1 2.7 3.3 2.6 LEA 2 3.1 3.3 3.3 Without the "multi-year" flexibility, the State would have identified LEA 1 with significant disproportionality in SY 2017-18, because the risk ratio for Hispanic children identified as children with disabilities in SY 2016-17 was above 3.0. The State, however, chose to use this flexibility and require that LEAs exceed the risk ratio threshold for three consecutive years before the LEA is identified with significant disproportionality. Therefore, the State would not have identified LEA 1 with significant disproportionality for Hispanic children identified as children with disabilities in SY 2018-19, because the risk ratios for SYs 2015-16 and 2017-18 were below 3.0. But the State would have identified LEA 2 with significant disproportionality in SY 2018-19 because the risk ratios for the three prior consecutive years were all above 3.0.



3 min

What factors must a state consider when setting reasonable progress standards?

The “multi-year” flexibility must be applied separately to each of the 98 risk ratios calculated. The flexibility must be applied separately to the analysis for Hispanic students identified with other health impairments, African-American students with disabilities placed in regular classrooms less than 40 percent of the day, etc. (U.S. Office of Special Education Programs, 2017: *Significant Disproportionality (Equity in IDEA): Essential Questions and Answers*) In other words, to benefit from the reasonable progress standards, an LEA must show reasonable progress in all areas of identification. Even if an LEA benefits from the “reasonable progress” standard one year, it may not meet the standard the next year and be identified again. A result of adopting this standard could be bouncing “on” and “off” identification.

A second consideration is that the reasonable progress standard must represent a meaningful benefit to children in the LEA and is not the result of statistical noise or chance. In it’s guidance, the U.S. Department of Education used an example of a reasonable progress standard defined as a “decrease in a risk ratio of 0.25 or more for each of the two prior consecutive years.” In another example, the U.S. Department of Education used an example of a reasonable progress standard defined as a “decrease in a risk ratio of 0.5 or more for each of the two prior consecutive years.” We can assume, because the federal government used these as examples, that these two standards represent a meaningful benefit to the children in the LEA.

Threshold 2.0% & Reasonable Progress Standard .25%								
LEA	Category	Race/ Ethnicity	2014-15 risk ratio	2015-16 risk ratio	2016-17 risk ratio	2017-18 risk ratio	RPS met 2016-17?	RPS met 2017-18?
Oak	EBD	Black	5.0%	4.5%	4.0%	3.5%	Y	Y
Elm	Special Education	Hispanic	2.0%	3.0%	2.9%	2.5%	N	N
Maple	Special Education	Two or More	5.0%	4.5%	4.0%	3.5%	Y	Y
	EBD	Black	4.4%	4.1%	3.8%	3.5%	Y	Y
	Discipline	Asian	4.3%	4.0%	3.5%	3.4%	Y	N
Pine	Discipline	Hispanic	2.6%	2.2%	2.0%	1.8%	N	N/A

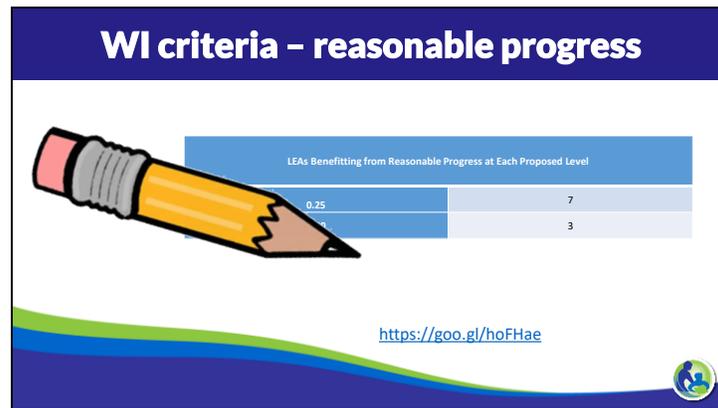
Let’s look at some scenarios for four hypothetical LEAs in a state with a risk ratio threshold set at 2.0% and a Reasonable Progress Standard (RPS) set at 0.25%.

Oak’s risk ratio has been above the threshold of 2.0% for three years, so they would normally be on a list of LEAs identified for racial disproportionality. However, because they have consistently reduced their risk ratio by .25% or more each year in their area of disproportionality, they would meet the reasonable progress standard and avoid being placed on this list.

Elm did not meet the .25% reasonable progress standard in 2016-17 because its risk ratio did not reduce for 3 consecutive years. In 2017-18, it did not meet the standard because while it did reduce its risk ratio all 3 years, these reductions were not .25% or more for 3 consecutive years.

Maple has been consistently reducing their risk ratios across all their areas of identification. In 2016-17, Maple would meet a reasonable progress standard at .25% because all areas reduced by .25% of greater for 3 consecutive years. This means they would not be on the list of LEAs identified for racial disproportionality in 2016-17. However, in 2017-18, they would be back on the list. Though all their risk ratios were still reducing, the risk ratio for Discipline among Asian students did not reduce enough in 2017-18 to meet the reasonable progress standard of at least a .25% reduction across 3 consecutive years. Because one category did not make enough progress, Maple would be identified on the list again.

Pine did not meet the reasonable progress standard in 2016-17 because it did not consistently reduce its risk ratio by .25% or more for 3 consecutive years. In 2017-18, its risk ratio dropped below the threshold of 2.0%. Because its risk ratio was no longer above the threshold for 3 consecutive years, it no longer qualified as racially disproportionate and was automatically removed from the list of identified LEAs.



15 min

So, let's get to it. Please look at Document 3 in your stapled handout.

In this document, we organized information related to setting a “reasonable progress” standard for our criteria in identifying racial disproportionality in special education identification, placement, and discipline.

Please take a look at the chart, and let's walk through it together:

- If we adopted a reasonable progress standard in line with the examples in USDOE guidance, then 3 or 7 LEAs would not be identified

What other questions do you have about this chart?

Now, you are going to review the chart and the reflection questions in small groups, then report out to the large group one highlight/top consideration/top discussion. You'll have ten minutes in your small groups, and then I'll bring us back together.

*[Wait ten minutes]*

Let's hear what you're one highlight/top consideration/top discussion point was. Starting here...

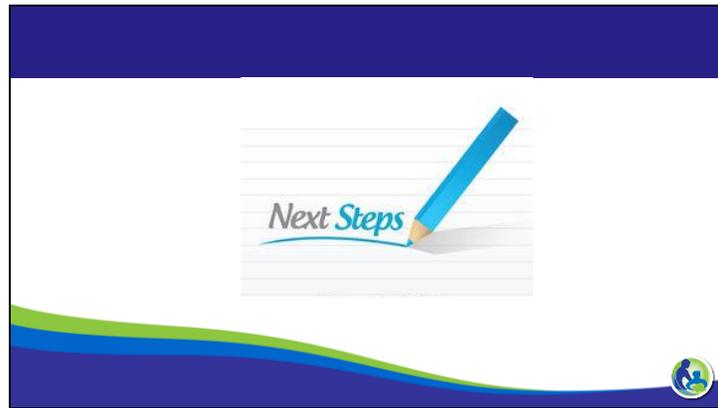
What questions do you have about setting reasonable progress standards as part of our criteria for identifying LEAs with racial disproportionality in special education identification, discipline, and placement?

Now, we invite you to give us your input, as a stakeholder, regarding the reasonable progress standard you would prefer and your rationale. Please go to the Google form – the URL is on the screen and hyperlinked in the powerpoint shared with you – and complete section 4. In the alternative, you can continue using the handout in your packet. We'll come back together in five minutes.

*[Wait five minutes]*



Slide 19



2 min

Thank you for your time today. I appreciate your thoughtful dialogue and input, and I look forward to reviewing and sharing with other staff about today's work.

Please consider sharing our request for input with others that you know: in your organization, stakeholders, families, and community organizations. You can send them a link to our webpage, which has brief webinars, data sheets, and a link to the Google form.

Have a great rest of your day.

# Appendix E

## Data sheets and glossary

### Data Sheet

Below is a summary of initial estimates of the number of local education agencies (LEAs) that would be identified under different thresholds of risk ratio in the analysis categories of special education identification, placement, and discipline. These calculations use:

- 10 students with disabilities for a given racial/ethnic group in an LEA experiencing a particular outcome (such as identification as having Autism or an in-school suspension of greater than 10 days),
- 30 students (for placement and discipline, students with disabilities) in an LEA for a racial/ethnic group,
- 3 consecutive years exceeding the risk ratio in the same area of disproportionality for a racial / ethnic group.

Local Education Agencies (LEAs) Exceeding Each Proposed Risk Ratio for Racial Disproportionality by Category*			
Category	2.00	2.50	3.00
Special Education	21	5	2
Emotional Behavioral Disability	16	9	6
Intellectual Disability	8	6	1
Specific Learning Disability	18	7	5
Other Health Impairment	7	2	0
Speech or Language Impairment	2	1	0
Placement	1	0	0
Discipline	14	10	6
<b>Total Statewide LEA Count</b>	<b>51</b>	<b>24</b>	<b>17</b>

- Why might Wisconsin want to set the risk ratio threshold at 2.00? 3.0? In between?
- Wisconsin can set the same risk ratio threshold for all categories of analysis (risk ratio threshold of 2.5 – or any other risk ratio – for Intellectual Disability, Specific Learning Disability, Placement, Discipline, etc.). What would be the benefits to doing this? What would be the drawbacks?
- Wisconsin can set different risk ratio thresholds for different categories of analysis (i.e., risk ratio threshold of 2.0 for OHI and risk ratio threshold of 2.5 for EBD). What would be the benefits to doing this? What would be the drawbacks?

Local Education Agencies (LEAs) Exceeding Each Proposed Risk Ratio for Racial Disproportionality by Race / Ethnicity*			
Category	2.00	2.50	3.00
Black or African American	36	20	15
Hispanic or Latina/o	7	1	0
American Indian or Alaska Native	10	4	2
Bi-/Multi-Racial	7	2	0
<b>Total Statewide LEA Count</b>	<b>51</b>	<b>24</b>	<b>17</b>

- When the risk ratio threshold exceeds 2.5, Wisconsin would not identify any LEA with disproportionality

in special education identification, placement, or discipline for the following racial/ethnic categories: Hispanic or Latina/o and Bi-/Multi-Racial. What do you think about this?

- What else do you notice when you look at the data by race/ethnicity?

\* Source: Child Count. Data on Identification (in Special Education or for Specific Disabilities) and Placement is from 2014-2016; data on Discipline is from 2013-2015.

## Data Reliability

Of the 444 WI local education agencies (LEAs), few meet criteria for reliable data because of small student numbers:

Local Education Agencies (LEAs) Meeting Data Reliability Criteria					
	Reliable Data Criteria	Example	LEA Count	% WI LEAs Included	% WI LEAs Excluded
OSEP	10 students with disabilities for a given racial/ethnic group experiencing a particular outcome	10 Native American students identified with Specific Learning Disabilities	51	11.5%	88.5%
	30 students in a racial/ethnic group enrolled in the LEA (for identification) or with an IEP (for placement and discipline)	30 Native American students enrolled in the district			
Current	10 students with disabilities for a given racial/ethnic group experiencing a particular outcome	10 Native American students identified with Specific Learning Disabilities	39	8.8%	91.2%
	100 students in a racial/ethnic group enrolled in the LEA (for identification)	100 Native American students enrolled in the district			
	40 students in a racial/ethnic group with an IEP (for placement and discipline)	10 Native American students with 10+ days of in-school-suspensions and 40 Native American students with IEPs			

- Why might Wisconsin want to adopt the data reliability criteria that the U.S. Department of Education, Office of Special Education Programs, considers reasonable?
- Why might Wisconsin want to continue with our current criteria for data reliability?
- Given the volatility of results based on small student numbers, how might Wisconsin address race- based patterns in special education for local education agencies (LEAs) with small populations of students?

## Reasonable Progress

States have the flexibility to not identify local education agencies (LEAs) if they are demonstrating “reasonable progress” in lowering the applicable risk ratios in each of the two prior consecutive years by a certain amount. Below is a summary of initial estimates of the number of school districts that would benefit (not be identified) under a reasonable progress levels of 0.25 and 0.50.

Local Education Agencies (LEAs) Benefitting from Reasonable Progress at Each Proposed Level (Risk ratio threshold of 2.0)	
0.25	7
0.50	3

- When LEAs met the reasonable progress standard for all areas of identification, they are not subject to the required actions for identified LEAs (i.e., needs assessment and improvement plan, compliance review, reservation of 15% IDEA funds). What might the benefits be to adopting a reasonable progress standard? What might the drawbacks be?
- Adopting a “reasonable progress” definition could result in LEAs “bouncing” in and out of identification status as LEAs with racial disproportionality in special education identification, placement, and discipline. How might this information affect your decision regarding whether Wisconsin adopts a reasonable progress standard?

## Glossary



WISCONSIN DEPARTMENT OF  
**PUBLIC INSTRUCTION**

**GLOSSARY OF TERMS<sup>1</sup>**

**Alternate Risk Ratio** means a calculation performed by dividing the risk of a particular outcome for children in one racial or ethnic group within an LEA by the risk of that outcome for children in all other racial or ethnic groups in the State.

**Comparison Group** consists of the children in all other racial or ethnic groups within an LEA or within the State, when reviewing a particular racial or ethnic group within an LEA for significant disproportionality.

**Minimum Cell Size** means the minimum number of children experiencing a particular outcome, to be used as the numerator when calculating either the risk for a particular racial or ethnic group or the risk for children in all other racial or ethnic groups.

**Minimum N-Size** means the minimum number of children enrolled in an LEA with respect to identification, and the minimum number of children with disabilities enrolled in an LEA with respect to placement and discipline, to be used as the denominator when calculating either the risk for a particular racial or ethnic group or the risk for children in all other racial or ethnic groups.

**Risk** means the likelihood of a particular outcome (identification, placement, or disciplinary removal) for a specified racial or ethnic group (or groups), calculated by dividing the number of children from a specified racial or ethnic group (or groups) experiencing that outcome by the total number of children from that racial or ethnic group (or groups) enrolled in the LEA.

**Risk Ratio** means a calculation performed by dividing the risk of a particular outcome for children in one racial or ethnic group within an LEA by the risk for children in all other racial and ethnic groups within the LEA.

**Risk Ratio Threshold** means a threshold, determined by the State, over which disproportionality based on race or ethnicity is significant under 34 C.F.R. §§300.646(a) and (b).

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<sup>1</sup> Significant Disproportionality (Equity In Idea) - Essential Questions and Answers (March, 2017). Office of Special Education Programs, Office of Special Education and Rehabilitative Services, U.S. Department of Education.

## Appendix F

### Full Stakeholder Input Survey Comments

Respondents of the stakeholder input survey were asked to explain some of their answers or give general comments. The tables below include all of the respondents' comments divided by question.

**Q:** Yes or no, please explain: I believe the Wisconsin Department of Public Instruction should use the same risk ratio threshold for all categories of analysis (a risk ratio of 2.5, for example, would be used as the trigger for required action in special education identification, specific disability category areas, placement, and discipline):

I believe that use of differing numbers would create confusion among stakeholders that aren't familiar with special education identification criteria and may require a lot of technical assistance for districts to both receive and provide.
Sp. ed. identification for EBD for example, may not be equitable due to specific to a culture/community issues that exist. Not that this isn't important to address. Let's start smaller.
It depends on factors like district size and total number of students. Also I think that 2.0 is significant and should be eventually used, but in starting this with districts it might be important to start with a smaller number of districts in the first few year.
Consistency
I would use the same standard across the board for simplicity and because it reflects values about opportunity.
I am not sure placement is an appropriate identifier and I think a better trigger would be Districts that fall into multiple categories.
I think more emphasis needs to be placed (lower risk ratio threshold) to EBD, Placement, and Discipline
I think that a unified risk ratio threshold is beneficial because as it relates to equity can help those who are assessing to identify patterns if any of racial groups. This can assist in going more in depth about the institutionalization of racism in systems and hopefully provide some insight and solutions on how to dismantle operation of the system that currently is negatively impacting students specifically those identified as disabled.
I think each category's risk ratio should be determined differently based on the level of racial disproportionately seen within that category. Risk should also not just be judged based on the student hitting certain levels of risk of markers, but judged from a standpoint of cultural, socio-economic, etc relevance (i.e for Native American students include Title VII professionals in assessment).
The funds should follow a higher risk ratio.
If we are going to punish by funding, then it should be higher (or a worse percentage) that the school is disproportional.
I actually think the risk ratio should be 1.5 as it is appalling to me that we are not able to meet the needs of non-white students.
The threshold for all race/ethnic groups should be the same. If there is a set threshold that is being used, it should be used for all. You do not want to duplicate the information, but you want to show the appropriate numbers for students of color.
Before an entity should encumber funds, there should be a significant disproportionality.
There are some districts where there is a small number of African-American and Latino students who are disproportionately placed in Special Ed, but the district may never reach the threshold level.
The 15% penalty should only happen at the higher risk ratio where it is much more evident
The 15% penalty should only happen at the higher risk ratio
The 15% penalty should be at a higher risk ratio where it is much more evident.
15% penalty should incur only after higher risk ratio is more evident
The 15% should only happened at the higher risk ratio where its is much more evident.
The first penalty should only happen at the higher risk ratio where it is much more evident
The 15% penalty should have a higher risk ratio
We suggest mirroring the ESSA and identifying school districts at the same percentage levels of the lowest 5% and 10% similar tot he ESSA plan.
Why would you use different ones?

Keeping it consistent helps provide a consistency threshold across all categories.
I believe that there should be a 'community served' element, which would allow for consideration of the service/attendance area to be an aspect of the determination of % for disproportionality. A weighted approach when considering the number of transient students who are present due to Trauma based factors could become a mitigating factor.
I'm not aware of any identifier that would be "less problematic" so it would make sense to keep this consistent.
If we truly want to change the outcomes for marginalized groups, our policies need to reflect that
I believe that every school sometime faces increases in racial/ethnic groups from year to year. You cannot hold one or two groups accountable as each student deals with different situations, such as Historical Trauma. You need to have a flat line to cover everyone instead of singling out certain groups.
I am unsure if this should be different for total special education identification. I feel 2.0 should be for all, except special ed which would be 2.5
Disproportionality in any category should be an area of concern and should be investigated.
Analyze people, policies, practices Questions: What is it about our people, practices and practices that is resulting in these inequities? Who is making decisions about the data? Policies – Who is creating the policies (all white men? middle class only?) What do the policies look like (difficult to read, huge book) We need to understand peoples' lived experiences with the policies Ask students/staff/parents questions about the policies Are they aware of what the policies are? Are there misunderstandings about that? Do teachers understand the policies and implementations of them? Practices – What are the professional learning structures in a district (are they authentic, do they allow people to problem solve around issues they are having?)
Needs in each area may be different and may require different amounts of resources
It would be helpful to be consistent.
I see a lot of ELL kids put into special education and it appears that some of their issues may be more language related than actual disability. Some smaller schools use special ed to address the language issues because they do not have a functional ELL program and this is a way to give kids extra support.
I think it needs to be the same in order to get districts to begin taking serious action.
I am not quite clear on the use and definition of risk ratio in this situation.
I think EBD should have it's own risk ratio and be more stringent than other categories.
Consistency is good.
I chose yes because all LEAs identified as having disproportionality should plan to address that disproportionality as soon and as fully as possible.
The same risk ratios allow for more meaningful comparisons between measures. In addition, just as it is unethical/illegal to have different risk ratios for different ethnic groups, it could also be questionable to assign different risk ratios for different outcomes.
I believe that the same risk ratio should be used regardless of disability area.
For continuity purposes. Additionally, why should we "allow" possible over representation in certain areas and not others?
For ease of data collection and uniformity
We should not be using superlatives of all, this should be a case by case basis. However we need a threshold that starts the trigger.
I believe that they should be the same.
In discipline and placement categories, a RR more stringent than other categories would better serve an equity agenda.

**Q: Other comments related to risk ratio threshold(s):**

I hope that districts will be given a lot of training and support in how to work with these subgroups.
My overall feedback is that by the time students are identified under IDEA, it is often too late. I realize the risk ratio is a result of a federal requirement, however my perspective is that by using a technical formula as the approach to disproportionality, a technical solution is often the result. Unfortunately, these efforts do not address the root cause of disproportionality. I would recommend efforts to reduce inequities in special education start in the core educational environment with an effort toward adaptive solutions (i.e. how we think about students and differences and what we as educators can change to prevent inequities).
Families need to have a good home life to show their children or child how behave . If a child live without a mother or a father that will hurt the child .
I think that supporting 51 school districts would be appropriate. Maybe starting by lowest 5% for the larger support and the second 5% up to 10% with a needs assessment and improvement plan.
I am concerned about the impact on small school districts if they had to use 15% of funds toward this because they are small and may not have many students of color. I am also concerned about schools not referring kids with real needs for fear of repercussions from having a high ratio. I think the 15% of funds is too much, especially for small districts.
Risk ratios seem as though an amount of disproportionality is acceptable in a district. In reality, it should be determined by looking at the percentage of the population within that district of each racial background. For example, if 5% of a district is African-American, then no more than 5% of the discipline referrals or no more than 5% of all students in SPED should be African-American. If a risk ratio of 2.0 is acceptable, then that tells the public that it is acceptable if students of color are twice as likely to be placed in SPED or given discipline referrals.
SLD is increasing for Hispanic students because we use a remediation model instead of being proactive and pre-teaching the academic language that students need in order to be successful. I think districts are just not choosing to identify African-American students because of the disproportionality issues, but we have an issue with racism that is not being addressed to a degree that shows success.
I do not think requiring districts to do a needs assessment, create a plan, or reserve money if they have a high risk ratio are effective. Outcomes for students have not changed because of this, so I don't think it is necessary to do all of this work when it doesn't change things. I also think that you need to look at districts who have smaller sizes than 100 because this still can be an area of concern. I think a different criteria and plan needs to be put in place. I think our hearts are in the right place, but it is not changing things. It is just extra work at this point.
Very small schools should be considered carefully as a year with one or two students identified can significantly skew data. In the case of very small schools, an average over time (such as 5 years) should be used to determine disproportionality.
I think the ration should based on the percentage of minorities in the district and those who are special ed. There should be a threshold rate based on the total student body, the percentage of minorities and minorities in special ed.
What we are find is that intervention leading to placement is lacking differentiation in the core which is leading to a greater disproportionality of EL students placed into intervention, without consideration of linguistic and cultural indicators. By keeping the risk ration threshold lower, we are sending a message of the importance of meeting students needs (linguistic and/or academic) in all instructional environments
I do not think we should be using this just because the federal government informed us to use it. It appears to be a great tool that should shed some light onto how race and special education is looked at in specific LEAs
I am fine with the risk ratio threshold. But I think we should only have to calculate the students that we identify in an initial evaluation. Many times, our students that transfer into the district are already identified and at that point, we feel like it is difficult to follow the process and them possibly recommend dismissal or convince parents that we want to re-evaluate the students ourselves.

After completing a detailed file review and disproportionality assessment there should be no 15% requirement if all eligibility determinations are appropriate
After analysis of disproportionality and all eligibility determinations are appropriate, no penalty should be assigned
If a self assessment has been completed and the outcome is that all students are appropriately placed there should not be a penalty.
When detailed examination of cause to disproportionality is found to be founded - 15% penalty and detailed examination should not occur for 3 more years.
After completing a detailed file review and disproportionality assessment there should be some leeway.
After completing a deep file review and needs assessment, if all placements are appropriate then there should be no penalty percentage.
After deciding that a student's placement is appropriate, those student's should not be counted in future data pulls.
Cell Size should be a factor that is considered
We often start with a dominant narrative and then work to confirm or disconfirm what we know already What don't we know? Example 1: Which subgroups do we need more information about? Our scores say that our Asian population has high achievement scores on average, but are there groups of students within that are struggling? To do this, we need to disaggregate data. Expand types and units of analysis We tend to ONLY analyze students (student outcomes – ODR's, suspensions, attendance, achievement scores, sp. ed. rates) What about data from parents, community, students? (we have BoQ, SIR and Climate data from formal surveys, but no informal data) Need to use both qualitative and quantitative data Example: One school has a higher mean score than the other, but it also has a much larger range of scores, which tells there may be more issues with equity at that school (high mean score in itself is not necessarily better) Ask questions about outliers and who these kids are (if a majority of these are students of a particular group, then we need to look at this further)
I feel the risk ratio should be set to 1.5 or 2.0.
It is a challenge for districts that are very mobile that we are often help accountable for students who were identified by other districts and not identified by us. If we believe the student was incorrectly identified then we attempt to do a reeval as quickly as possible, but the parent often refuses to consent as they do not want to give up the services in place. It would be helpful if in the new data collection systems, districts could be held accountable for the students they refer verses the ones identified by others.
Perhaps you should also look at Econ. Status, race/ethnicity and ELL status (Lau level) as well.
Continue with the statewide trainings and share "success models" or Districts who have experienced success in changing perceptions and behavior.
Identifying LEAs at a lower risk ratio compels them to address problems while they might be more manageable. Assuming the repercussions of being identified are that positive action is taken, then identifying LEAs at a lower risk ratio is more proactive.
In addition to analyzing risk of a specific racial groups, there should also be an analysis across all non-majority groups as compared to the dominant racial group.
These are not acceptable risk ratio thresholds -- they should be 1:1.
Because our Native population both in LEA's and the state is low, it will be difficult to assess no matter what methods or thresholds are implemented

**Q: Do you recommend Wisconsin continue with its current criteria for reliable data? If yes, please explain why:**

I really pick moving to a smaller cell size, however perhaps a sliding or graduated approach that does consider small communities and the unique issues that may exist.
I think there should be some type of sliding scale, that identifies under criteria of the current standards, but identifies and puts on watch districts under the OSEP standards.
I'm so scared if we change to United States Ed, it won't work in Wisconsin because we have so many different school districts
I recommend whichever criteria produces the most reliable data.
Small districts can not be given a "free pass" to be disproportional just because they are small.
I do not agree
I am not sure.
I do not fully understand the USDE/OSEP guidelines on "reliable data"
Many times, State data tracking is not up to date on best practices. Adopting some, a majority, but not all, criteria by the US Department of Education may prevent this
Reliable data means real numbers
Don't set minimum sample and population sizes.
Seems fair and consistent.
To be honest, I would trust the regulations set by the state of Wisconsin over the Federal Regulations because Wisconsin has consistently shown to be a leader in the nation in education and I know that the program Wisconsin has in place, when explained to the LEA and school districts, is a good system to keep using.
I am not sure that the US criteria would be appropriate either. As an educator that works with American Indian students in a rural setting I have been frustrated at the lack of attention that our consistently disproportionate number of students receiving special education services has gotten. Our district, like many other rural districts that serve American Indian populations, has such small numbers that we will never be able to break that threshold that will identify us as having an issue to work on. I STRONGLY urge the WI DPI to lower the minimum sample size so that small schools can be identified as disproportionate and start the work to rectify the situation.
Keep criteria local, personal and immediate: Make sure people feel empowered and believe they can contribute something, and that we all want to hear what everyone has to say Example: Send an invite and let people know the topic and that you are interested in their perceptions and perspectives Example: Have one on one conversations with others from different groups ahead of time - here are the issues we are struggling with, what do you think about...?
Wisconsin has done a good job of assuring accuracy in it's approach for reliable data
The State would be better able to identify the unique make up of each district and use that as a part of their evaluation/calculation.
I think the current criteria is appropriate for our "racially homogenous" districts
Set the bar at the lowest possible threshold to identify the problem sooner than later
Adopt US OSEP criteria in order to include more LEAs in analysis.
Given Wisconsin's small school districts and their general racial homogeneity, too many school districts are being excluded from being identified because they do not have enough students in the numerator or denominator, as demonstrated by the slide on page 14 of the input session document.
These data are not reliable. They do not address systemic issues and causes. The equation is flawed, simplistic, and discriminatory.
This will allow the school district more flexibility to work with the Department of Public Instruction on a corrective action plan.
We need to focus on our geographic area however we need to do a better
It is working.

**Q:** Should the Wisconsin Department of Public Instruction adopt a reasonable progress standard as part of its criteria for determining disproportionality in special education identification, placement, and discipline? Please explain:

It just makes sense.
The numbers vary too much to make this very reliable
it just makes sense
I would choose the .25 improvement in progress.
Recognizes those LEAs making progress toward the standard.
Just like school report cards, proficiency and progress are both meaningful.
Often the types of philosophical changes truly need to address inequities take time to see the result of.
It must be understood that the change will be slow and measured over times.
There is a fear that school districts may start to remove students with a true need just to meet the reasonable progress standard.
By adopting a reasonable progress standard it gives support to those districts that are moving in the right direction and could be a motivator in helping said district to reach the goal of eliminating disproportionality.
It needs to be noticed that in this most fair pf an unfair process, due to the difference between the size of districts in our state, that when they are making progress it is significant.
As the district progresses, there may still be a significant impact and the current students and the support should be ongoing until the district no longer struggles with disproportionality.
Yes, only if by "reasonable progress" that refers to progress amongst all students, not just white, i.e. the eliminated districts show minimal racial disproportionality.
It would be an accountability measure.
We all need to be working to get better.
A reasonable progress standard makes sense if looking at longitudinal data to eliminate small fluctuations year to year due to small enrollment in certain populations. It needs to be viewed through the lens of equity and decreasing the gap over time.
I believe that identified districts could show progress in order to not be identified.
If a district has found an effective way to reduce disproportionality in special education identification, placement, and/or discipline, they should be able to focus their resources on sustaining their effective work.
I guess, yes. That being said, I think the entire way we do it is flawed. Has anything changed since we require states to do this. We should look at the root cause of over identification. Is it because we do not have assessment tools or guidance from the state for English learners and learning disability? Is it because we don't have great ways to assess students who are black for EBD? Is it because we don't have accurate assessment tools or because we don't have accurate ways to identify these students with exclusionary protocols. We need to focus more on the why is this happening? Then provide professional development to these districts in a way that works for them and free or charge. We should not require people to do an assessment and create a plan...it is just busy work and not changing things (is my guess anyway).
Our focus should be on continuous improvement. Identifying LEAs who are making progress could have negative consequences for the district/its reputation.
Accountability. Having a progress standard will hold the state and local districts accountable.
This could off set the issue of the smaller districts getting identified when there is no actual systemic issue.
Allows for growth towards target
What is reasonable? I think the state should have something that all LEAs are meeting so that they know that they are actually meeting that "reasonable progress." What is reasonable to one may not be reasonable to the other.
Attainment of the goal is obviously the first and most important measure; however growth data within all of our greatest areas of need tells a story that should not be left out of the equation.
Acknowledges that systemic change is a significant effort and encourages progress.

I believe that districts that create plans may take 2-3 years to see significant results. It helps districts if DPI could establish what reasonable progress so that districts that traditionally have been identified are not identified while they are making reasonable progress.
I think growth and improved trend lines should be recognized.
This looks at growth and improvement in the considerations. The progress could be tied to the 15% requirement being waived.
If progress is being made, maybe the 15% requirement isn't necessary
There should be a look at the growth and improvement. The progress could be tied to the 15% requirement.
Recognizes that improvements are occurring or identifies when changes need to occur
If you are making progress then should not be penalized. The progress could be tied to the 15% requirement.
This looks at growth and improvement in the considerations. The progress could be ties to the 15% requirement being waived
It is motivating and recognizes that change is a process that takes multiple years.
Too many District may have to set aside the 15% set aside for the IDEA funds. If Districts are making efforts to reduce the disproportionality and can show progress than they should not be required to tie up funding that can have greater impacts in other areas for students.
This will allow DPI to account for different situations such as a small sample size.
Too artificial
Again, this provide a consistent measure across the state and country.
This continues to be a struggle and we are working diligently to ensure appropriate placement. It becomes an issue with our students who transfer into our district with services already provided.
Once a district is identified, it will take time for the numbers to be impacted, so this measurement should be based on their progress towards that change, rather than the years it may take for the numbers to reflect equity.
Growth model in a trauma informed system has to accept the understandings that come with trauma. Until the Judicial system and the juvenile placement systems can address the needs that match the numbers, small steps and reasonable expectations need to be developed.
Needed so districts can assess progress in a common way
I believe that once the district is told they no longer have to be expected to have a plan they will digress. I think each LEA needs to decrease the dispro to a level of expectation set by the state and and then maintain that level for 2-3 years to demonstrate the efforts are embedded in their practice and sustainable over time.
To date, I don't believe we have enough districts that have made meaningful and significant progress in closing some of these gaps and a reasonable progress measure might be too preliminary. At this point, it would be great to see districts get below the threshold and stay there. Also, the requirements (CEIS and needs assessment), aren't so restrictive that the work of the district couldn't continue. I would think these would be helpful supports.
Populations change and progress is hard to track when you might not have the same students year to year.
I believe schools should be able to show progress, but I am worried that not having the identification will open the door to complacency and checking it off.
Last year we were recognized as being high in disproportionality in Special Education, even though our school district is 99% Native American. It was explained to me that we had too many students in pullout and not in inclusion. We have made significant changes to the way we are teaching our special education students and I think DPI would see progress in our work.
Reasonable progress is very vague and with smaller districts these numbers will fluctuate often.
It is the moment of necessary and "reasonable progress" should mean NOW. Celebrate success and Interrupt what is not effective.
I believe we should follow what the majority of states are to keep the standards consistent.
If oversight has been demonstrated and progress towards lowering the risk ratio a LEA should be able to develop a plan to continue with the work.
This would allow schools to make attainable goals and follow through

We use progress monitoring in all areas. This should be no different
It appears from the presentation that WI LEAs have been favorably progressing
Some schools may never be able to meet benchmark but if they are making progress, they should be encouraged to keep doing good work
However, I have issues with "progress" . From year to year the population of a subcategory can change, and many of my referrals for spec. ed. are generated by parents, not teaching staff. So no matter how much I support teachers, parents/guardians who feel a special ed. label is appropriate to support their child will make referrals and provide data to support qualification. It seems that parent education is a factor, and then the issue of students transferring in with a label from another district.
By having an reasonable progress standard, school districts will be able to self-monitor themselves as well.
Important to watch for progress
If the state feels the district is implementing with positive intent, showing better data, and also engaged in changing their behavior/climate.....it should be taken into consideration.
This allows us t make data driven decisions that can inform us about needed supports(zones of proximal development)
While reasonable progress is very good, schools that demonstrate disproportionality need to continue planning and devoting resources until they no longer meet the criteria, not just until they are "not as bad."
This answer is Yes - with safeguards. A reasonable progress standard would allow Wisconsin to demonstrate progress by raising the rate for the comparison group. Safeguards must be in place to ensure that the risk ratio is reduced only by reducing the risk for the minority group in question, not by increasing it for the comparison group.
<p>According to the Leadership Conference on Civil Rights (letter dated May 16, 2016), “Risk ratios are wholly inappropriate measures of progress whenever the concern is that the underlying risk levels of segregation or disciplinary exclusion are unacceptably high. This is especially the case for racial/ethnic groups in a district. Increasing the risk level for restrictive placement or discipline for the comparison groups, which would reduce the risk ratio but not the overall exclusion of students from the classroom, should never be considered progress. One pre-requisite for progress must be that the group with the highest risk level must see a reduction in its risk level before any reduced ratio could be considered progress.</p> <p>“For example, if 60 percent of Black students and 20 percent of all non-Black students with disabilities were suspended for less than 10 days in year one, and that changed to 60 percent and 30 percent in the next year, the risk ratio would decline from 3.0 in year one to 2.0 in year two with absolutely no improvement to the high exclusion rates experienced by the disproportionately disciplined Black students. Therefore, while we support the concept of crediting districts for progress, it is only appropriate if the Department specifically requires that progress entail a decrease in the risk of the highest group. Similarly, progress should never be credited against an otherwise disproportionate district if progress is based on an increase in risk to the comparison group. Our recommendation of a reduction requirement, however, does not mitigate the very serious problem that real progress can be overlooked if ratios are still used as the primary measure of progress. For example, if the suspension rates changed from 60/20 in year one (ratio of 3.0) to 10/2 (ratio of 5.0) the second year, Black students would have experienced a 50 point reduction in their discipline risk, and all others an 18 point reduction. Given the harms from disciplinary exclusion, most would agree that progress was made for all students. The reduction for Black students in this example would have been over 3 times that of the ‘all other’ group. In this example the risk difference (racial gap) would have narrowed from a 40 point gap to an 8 point gap. However, the risk ratio for Black students in this example rose from 3.0 to 5.0. The district dramatically reduced the suspension rate of the highest suspended group, and narrowed the racial difference, but it should not be credited with making any progress given the strong negative effect on Black students.</p> <p>“This problem of progress using ratios applies equally to reducing disproportionality in restrictiveness of placement. Regarding disproportionality in identification, using risk ratios to measure progress is similarly</p>

<p>flawed assuming our recommendations to use national comparisons have ensured that the disproportionately identified group is well above the national average. Because changes to the size of risk ratios can be driven entirely by changes in risk levels of the comparison group, ratios are poor measures of progress for the over-represented group. Thus, if states are permitted to give credit to districts for making progress, reductions to the highest group and a narrowing of the risk difference should be the required elements.”</p>
<p>I think that LEAs should continue to be identified even if they are showing reasonable progress.</p>
<p>Of course, there should be a reasonable progress standard. But determining "progress" by relying on a single ratio is problematic.</p>
<p>Progress in these areas often take time and larger systemic changes.</p>
<p>There should always be criteria to measure progress....progress is a grey area, so standards could help describe the progress being made.</p>
<p>It will allow the state to examine more closely whether the interventions LEA's used helped reduce risk of disproportionality for replication for other LEA's and determine whether utilizing IDEA Part B funds benefitted the goal of reducing disproportionate rates (cost/benefit)</p>
<p>How can we not and underserved miseducated and misplace these students. They deserve better.</p>
<p>Reasonable progress will indicate that the district is aware of the problem and actively addressing the concern. Change takes time and does not happen overnight.</p>

**Q: Other comments related to “reasonable progress” standards:**

.25 reduction each year for the original number so it totals a .5 at the end of two years. (2)
I would say higher, statistically significant.
See above comment. I do not want to sound negative, but want to get my point across. That being said, I really do appreciate the work DPI is trying to do to help decrease this problem. I just think that we need to brainstorm better ways to do it.
reasonable progress to me is demonstrating focused efforts to target the reduction of disproportionality.
.25 for each year for the original number so it totals a .5 by the end of 2 years
.25 each year - to show progress - with .5 improvement from original year
It should be .25 each year. so it totals a .5 at the end of 2 years
If a district is making progress they should not need to make the 15% set-aside.
Cell size needs to be negated
I do not like this idea. But I may need to hear other perspectives I am unaware of if I am standing on an island of my own in this belief.
Can the data analysts see if 0.25 is really reasonable progress
Reflective Analysis Matrix Teacher quality and distribution Discipline Policies and procedures Curriculum and Instruction Special Education ELL Contribution Approach Teams of students and staff conduct community inquiries within the school boundaries to map community resources... (College students help) History/Culture Communications/Politics Where do people come together to communicate with one another? Talk with members of a Community Advisory Council or church members that serve community ; Talk with alumni 3) Protective Services (police and fire) 4) Environmental/Economic Noise, pollution, are people recycling 5) Health and Social Services (mental health services access) Findings are shared with students, teachers and community partners Students and/or staff go into the community and do a walk through/drive through (i.e. eat at restaurant in the area) - look at types of stores, street activity, housing and zoning Need to use more than just information from the internet
Due to changing economic policies I believe it is important that WI maintain high their high standards to prevent disproportionality
I think of how we create SMART goals--something that's reasonable, achievable and measurable.
Schools making reasonable progress could be given funding or other incentives to assist them in their efforts that are working, but eliminating them from requirements to address disproportionality sends the wrong message.
adopting reasonable progress standards statewide will provide uniformity and assure best practices will be used to benefit all children. LEA's should be clear in what interventions were used that improved disproportionality and what interventions were used that did not improve disproportionate rates in order to address other possible factors related to disproportionality.

**Q: General comments:**

IDEA dispro identification criteria should not mirror ESSA
There are so many variables in all of this. One is the small size of some districts, and the other is how long it takes to make change in districts, etc.
I want to make sure that schools receive ongoing support throughout the year to help teachers meet the needs of all of their students.
In the survey, I didn't understand what the USDE's definition of reliable data was so that question was hard to answer.
Again, I would promote efforts be directed toward the core educational environment, to include reflective teaching practices, and consultation/collaboration among all educators to best meet the needs of all students within the core environment. In addition, I would recommend professional development around implicit bias, systemic racism, and how individual experiences shape interactions with others be offered and promoted in other venues that would garner more core academic educator participation such as WASDA, AWSA, etc. To truly effect change, more efforts need to occur prior to identification for special education.
It start at home has supports for parents like a family psychologist free to them , have a person who will do FBA, and someone who have a behavior disability that could talk to parents so they could talk to someone who has been there .
I'm interested in how we can train our professionals and staff up so that they can view through of lens of racial equity. Something like a 12 steps program os sorts that can be utilized across the state to really help substantially reduce disparities and diproportionality of students.
I think this is a good way to bring up the conversation and to have a meaningful discussion at school districts to be sure they aren't pver identifying. However, it will be seen as punitive for schools so some type of reward for progress makes sense. Also there should be an appeals process for schools that might have extenuating circumstances so that small districts don't get penalized unfairly and something in place so that schools don't underidentify in order to meet the ratios.
As an employee at Menominee Indian High School, in a district that is frequently flagged for disproportionality, I feel there needs to be modified criteria or exceptions to the disproportionality requirements; when 99.6% of your students are Native; then most of the students identified as having a disability will be Native. Same with discipline and placement. I believe it should be compared to your own population not the state/national average in decisions when practical.
In looking at disproportionality among students of color identified as SPED and receiving discipline referrals, it is also important to look at the training provided to staff and the community regarding cultural proficiency. It will be vital for instructional staff to be trained in the idea of culture and cultural differences. Too often, we have the expectations that students will come into our classrooms knowing the expectations in a school. Often those expectations are based on the cultural norms of the dominant culture. These norms may be different than the norms in a student's particular culture or family. It is also important to note that because these norms are different, it does not mean they are wrong. Understanding the norms within cultures will help educators to understand student behaviors and reduce discipline referrals. Districts ultimately need to look at their population overall. The percentage of students of color, a certain ethnicity or gender receiving office referrals or being referred for special education services should not be in excess of the overall percentage of the student population of that group within a district or school.
I struggle with thinking that because we have small subgroup populations that we can say with certainty that we don't have a problem with how we relate to and identify students who need extra assistance. I question whether it is the curriculum or the teaching that is not meeting the students where they are and then guiding them to where we want them to be. Unfortunately, I think education has gotten to the place of not being relevant to the needs for society today as we're still trying to create the manufacturing society which doesn't exist. So we often have very rigid ideas of where and what we think students should know instead of staying current with the needs of today.
Thanks for providing me the opportunity to provide feedback.

<p>Many efforts fail at the school level due to the administrator and teachers making decisions not to follow policies they feel run counter to their beliefs and their narrow experiences in their school buildings. Therefore, in order to make counter, this, disproportionality progress should be placed on their evaluations for promotion and salary increase. Teachers and administrators should be held accountable for the lack of use of RTI and other interventions before a student is placed in special education. Special education has been used as a dumping ground for minority students who teachers and administrators do not want to deal with.</p>
<p>Students that move into a district that were previously identified should not count against the LEA for the first year of enrollment.</p>
<p>I am curious with how the department will determine an appropriate sample size. I feel like a district like DeForest has less than 10% students that are in a minority ethnic group and so a few numbers could sway or risk ratio to for DeForest to be identified as disproportional. This is frustrating as I feel like I'd like to see that number for the students that were initially identified in DeForest versus those that have transferred into the district already identified.</p>
<p>This is a difficult set of data to influence dramatically in one year. Growth seems to be an appropriate way to monitor our progress.</p>
<p>A DPI support could be coming into districts and assisting them in file reviews/determining some thresholds relating to eligibility and exclusionary factors- Support for districts transitioning student and resources to reg education settings</p>
<p>Help determine thresholds related to exclusionary factors.</p>
<p>A DPI support could be coming into districts and assisting them in the file review.</p>
<p>The exclusionary factors need to be better clarified and defined. Schools need support with this. If they don't qualify spec ed then schools need support in serving these students in the regular education environment.</p>
<p>A DPI support could come into districts &amp; assisting them in file review/ determining some thresholds relating to eligibility and exclusionary factors. May be beneficial</p>
<p>Clarify the thresholds of exclusionary factors, such as environmental, cultural and economic. You should have resources to help districts transition students into reg ed settings with new supports.</p>
<p>If DPI chooses to use a reasonable progress standard, then we would want to see a change in the risk ration of .25 or more for two prior years.</p>
<p>You need to allow for circumstances in each district that impede there progress and not rely on a rigid formula.</p>
<p>If an LEA has a problem with disproportionality, why would we think they have the capacity to do an effective needs assessment and improvement plan?</p>
<p>In the district I am in, we have been previously identified as having disproportional numbers based on race for identifying students for special education and discipline. However, many of the students we receive have trauma, poverty, transiency - we need better criteria at the state level to determine if a student achieving below grade level is due to a disability or other factors contributing to poor academic achievement (ie. identifying trauma rather than disability, these can present similar on evaluation testing such as the KTEA3). OHI seems to be the new LD, acting as an umbrella that will allow any student to qualify under it. We need stricter qualifiers for evaluating for special education.</p> <p>Additionally, many students experiencing trauma, poverty, transiency, and parents struggling with drug addiction and or incarceration present socially maladjusted or inappropriate behaviors triggering school staff to believe there is need for discipline or a special education referral. Often these students are acting out in ways that cause harm to themselves or others leaving administrators battling with the desire to help the students or keep all others safe and answer to school boards and upset communities when families discover that swearing, violence, and lack of respect for others is occurring on a daily basis in the schools. I have grave concern for the future as the opioid and heroin epidemic result in parentless students, students having experienced narcotic addiction in utero , and students living with addicted parents increases. Our school districts need to work with the state, and cities to proactively prepare for and remedy the desperate situation.</p>
<p>I believe that student mobility (# of school moves) should be tracked in or alongside of this data.</p>

Current practice results in avoiding providing help to students in minority groups out of fear of becoming identified for disproportionality. This practice is an end around unreasonable expectations, and lacks vision and understanding as to the dramatic changes in our children's lives--changes that 13 years ago were unimaginable.
Provide support in the transition
The children identified as dispro need this monitoring to hold up the vision to educate each and every child.
Though it will be easier for districts to monitor their own data without the weighted risk ratio, it would be great if we could get annual data reported even if we are not identified as disproportionate. This would allow districts to be more proactive and attentive to their systems.
As I said earlier, we were recognized last year as a school that had a high rate of racial disproportionality in special education, but our student population is 99% Native American. This does not make sense. Maybe the name needs to be changed so it isn't as misleading.
Social Justice in education requires critical collaborative inquiry Requires more than just redistribution; need recognition We need to redress the inequities in our system, but often do this without having full recognition of what the issues are Analyze people, policies, practices We tend to ONLY analyze students (student outcomes) Why Critical? Need to understand what issues we have around power and privilege, and what things are in place that reinforce privilege and power
The percentages of ethnic groups within the school district. Transfers from other school districts of students already identified with special needs. How much parental involvement is there?
Some staff don't want to improve disproportionality in special education. How will the state identify and handle the teachers or staff who work to ensure students of color don't succeed in their education. Is there a removal process?
I appreciate the information provided to respond to this survey, I am sorry I was not able to attend the gathering event in order to hear other people's comments and opinions
As a district who has been identified as disproportionate in the past, I find this issue challenging. I do not have teaching staff that unfairly target groups of students, and the general atmosphere of my diverse district is a sense of belonging and acceptance. My referrals are mostly generated by parents/guardians resulting from a doctor or therapist visit, or a response to poor grades. Some believe special ed. is just extra help, despite the numerous conversations we have with parents regarding the seriousness. We also have transfer in students that distort our numbers. This is a hard topic to discuss with my hard working, empathetic teachers. It leaves them feeling uncomfortable and cautious about ever considering a referral for a child of color. I am not sure the intervening steps that DPI or other groups have offered to lower identification have been successful. I have participated in at least 2 conferences, and as a person of color, I was offended and uncomfortable about making it clear we were different rather than bring us together. This year was an improvement.
Create a channel for teachers/school staff members to ask questions, voice concerns, provide feedback.
I would have preferred to do this in a group setting instead of on my own. The sharing piece is important when looking at the pros and cons, as well as clarification of some pieces
It would be great if the department would actually visit our schools, interview staff, feel the culture and climate, and offer assistance if necessary.
Disproportionality indicates institutional racism and reflects differing conditions that reinforce the achievement gap. Criteria that are weighed to determine whether schools should be addressing the issue should be as stringent as possible. Where misidentification is the result of small numbers, LEAs should have the opportunity to demonstrate this by providing justification for their numbers.
Analysis of Asian and Pacific Island and also trend data should also be included as part of the analysis so that there is a way to examine changes in specific districts over time.
The Arc Wisconsin requests that the Department require districts to determine whether there is significant disproportionality with respect to students who are placed in homebound or hospital settings, as well as correctional settings. According to the Consortium for Citizens with Disabilities Education Task Force (letter dated May 16, 2016): "...Advocates and attorneys working in the field are noticing an increasing number of students with disabilities being placed on homebound/tutoring programs (and other forms of informal removal) due to unaddressed or insufficiently addressed disability related behaviors in school. Included within this are

students who are moved to homebound without an effort to provide supplementary aides and services in less restrictive settings. These placements often consist of a child placed out of school at the district's request, who meets with a school provided tutor (who may or may not be a certified teacher) in the home or a neutral setting in the community outside of school for one or two hours per day. The child typically does not receive the related services in his or her IEP and other critical IEP services and remains at home the majority of the school day. As homebound placement marks the extreme end of the LRE continuum, a homebound placement based on unaddressed behavior raises a realistic concern about a potential LRE violation. Additionally, there are FAPE and equity concerns related to these placements.

"The increase in these placements may be due to the fact that LEAs are now under greater scrutiny for their rates of disciplinary removals. Due in large part to the Department's leadership in this area, high levels of suspension and expulsion are noticed now, rightfully, in a manner they had not been previously. As a result, some LEAs may remove students they might once have suspended or expelled to other settings, including homebound. Similarly, these students may be sent home from school repeatedly, or placed on shortened school days. We believe based on our case work experience that this may have a greater impact on low income families and students of color. As such, we firmly support including students on homebound in the risk ratio calculation if their numbers exceed 10. Within the homebound data collection, there will be students who are on homebound or hospital services for other reasons, such as medical fragility. However, the purpose of this analysis is only to identify potential areas of concern for further investigation, and not to rule out every possible false positive. Given the seriousness of the possibility that students are being deprived of appropriate placements and due process protections, the minimal risk of a false positive is worthwhile.

"As data on the school to prison pipeline has demonstrated, some students with disabilities are disproportionately 'placed' into the juvenile justice system by the overuse and/or inappropriate use of school based arrest and juvenile justice referrals, and that students from particular protected classes may be placed into the juvenile justice system at higher rates. Due to this risk, it is not correct to say that an LEA has little control over this type of placement. While the juvenile court is an intervening factor, some LEAs 'place' more students into this system than others. If an LEA has more than 10 students placed in a correctional facility's educational program, it should be included in the risk ratio analysis for the same reasons as any other program. As mentioned above, a finding of significant disproportionality is not determinative of a violation rather it is intended to invite future investigation. As such, students with disabilities in correctional settings should be included in the risk ratio analysis."

Rethink the data -- we need deeper understanding, which the ratio does not provide. -- Fund preservice teacher education programs to help with the issue.

DPI should look at data and documentation from smaller school districts to determine impact on changes being considered and the districts demographics.

That males are doing poorly in our schools are override tified etc need to be looked at. Why are our schools not serving these boys, why has there been such a decline in male achievement and rise in males in special education?

Schools choose to try to fix numbers not looking at the nature of the issue, you (DPI) do a great job, but try to have schools do better for kids not ratios or the Department. Love to comment further

This rule addresses significant disproportionality for the limited purpose of triggering "interventions" for districts that meet the criteria. The communications on this have not made it clear, for those who might be unaware, that there is a difference between "significant disproportionality" for CEIS purposes and disproportionality due to misidentification, and that there is also a problem of underidentification of students of color in particular eligibility categories. Future communications and guidance should make these distinctions clear, and efforts should be made to protect students from the incentives for districts to misidentify or underidentify students of color in order to "game" the numbers.

This survey was hard to understand. You need a simpler more narrative survey. I am an educated teacher with a MA in Spec. ED. and mother of two special needs children and Still this was a way too complicated survey to fill out. Get out of DPI Madison and come out into our rural communities in our rural Native and Latino/a communities and do some personal interviews, town meetings, ask for REAL parent stakeholder input!!!

Explain to us what your asking...maybe in our languages..Spanish? You need Spec. ED TEACHERS OF COLOR, in BILINGUAL TEACHERS, TEACHERS WHO UNDERSTAND US, OUR WAYS, LANGUAGES, WAY BEFORE YOU ASSESS, TEST OUR KIDS...MAKE DECISIONS. WHO ARE THE PEOPLE IN POWER REALLY PROTECTING OUR CHILDREN OF COLOR WITH SPECIAL NEEDS RIGHTS. IT IS EXHAUSTING IN OUR RURAL COMMUNITIES. I HAVE A PARENT OF A CHILD IN MPS, MILWAUKEE WITH SPECIAL NEEDS AND IN RURAL WISCONSIN. YOU DO NOT HAVE HIGHLY QUALIFIED SPEC ED TEACHERS, BILINGUAL SPEC ED TEACHERS OR DIRECTORS OF SPEC ED, ADMINISTRATORS WHO REALLY UNDERSTAND, INCLUDES WI DPI. Lack of understanding of Indian Country. Complex issues for Latino/as in rural regions. Many Natives are both Native and Latino/a, Mexican...Discipline, and being pushed out by Adm & Staff, scarey for our Kids. Many of us do not feel safe with our kids in public schools, but, education is our right. System fails our kids!!! Explicit & implicit. You all in DPI need to get out of your office. Do not just send your Native or Latino Consultant. Send out highly trained in Spec. ED, culture, law, language. Policy. Who is advocating for our kids, parents? Come out and explain this survey. Town hall meetings, break it down. Not just an email!!!! Feel disappointed at all levels. We are not serving African American or Native kids with special needs in WISC!! Child Mental Health. The survey made no sense to me.

Disproportionality data for Native American children will be the least reliable since their population is the lowest; using the alternative method will still be questionable as state numbers are also low and there is no control in self identification. These factors have always been an issue and will always continue to be a limitation to data collection of Native American students, therefore, some districts will be deemed disproportionate when in fact they are not and others will not make the radar when they should. Not only will this skew the results, it could lead to inequitable funding and or inaccessible interventions necessary to appropriately address disproportionality among NA students. When this is the case, the effort to collect qualitative data is necessary and should be required.

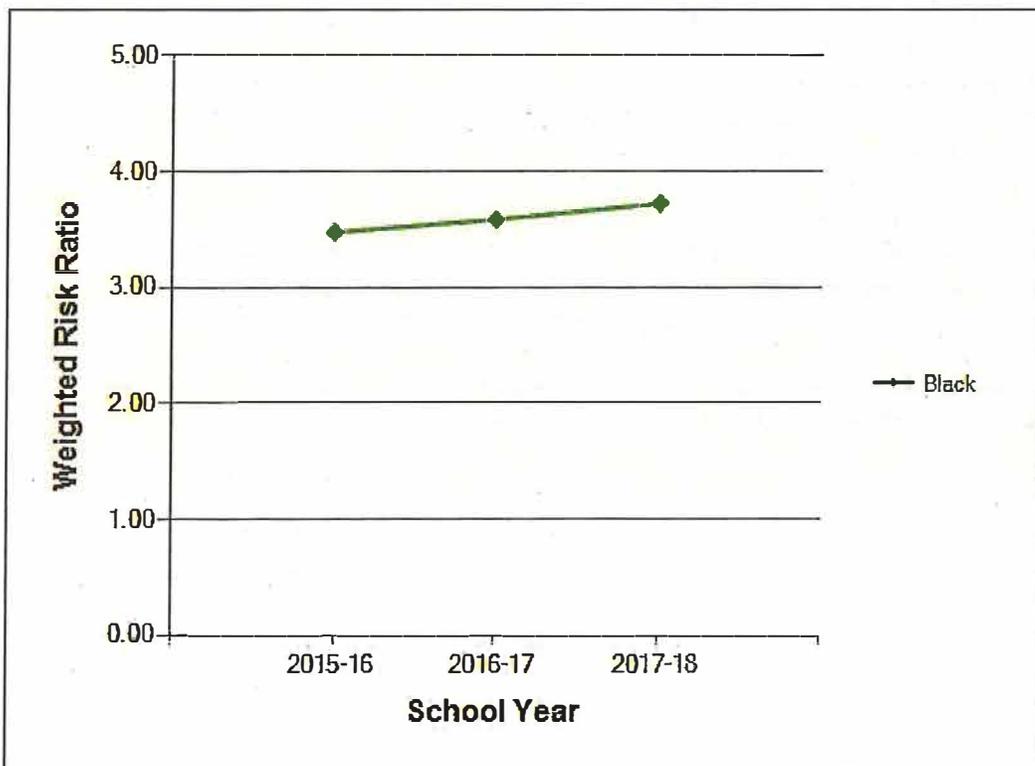


Based on data reported by your local education agency (LEA) through the Individual Student Enrollment System (ISES) and/or WISEdata for the three most recent years of child count and enrollment data, there is disproportionate over-representation of Black or African American students identified as having an other health impairment. This year in your LEA, Black or African American students were 3.72 times more likely than all other students statewide to be identified as having an other health impairment.

**Data profile**

# Milwaukee Collegiate Academy

Likelihood to be identified as having an Other Health Impairment (2015-16 to 2017-18)



**How is an LEA identified with disproportionality in specific disability categories?**

Under the Individuals with Disabilities Education Act (IDEA), the Wisconsin Department of Public Instruction is required annually to apply criteria to LEA-submitted data and identify LEAs with disproportionate racial over-representation in specific disability categories.

**Wisconsin's Criteria**

For three consecutive years, LEA data meet these criteria:

- Minimum of 10 students within the disability category for a given race/ethnicity; minimum of 100 students (total enrollment) for given race/ethnicity
- Risk for racial/ethnic group greater than or equal to 1% above statewide risk for white students in the disability category
- Weighted risk ratio of 2.0 or greater for racial/ethnic group for the disability category (compared to all other students within the LEA)

<http://dpi.wi.gov/sped/about/state-performance-plan/indicators/9-10-disproportionality>



## Additional Data to Explore

1. Proficiency and growth data, disaggregated by race/ethnicity, for students in general education using local assessment information or WISEdash (<http://dpi.wi.gov/wisedash/districts>)
2. If your LEA is not implementing a Response to Intervention framework, then review Wisconsin's RtI Center *Implementation Tool* (<http://www.wisconsinrticenter.org/administrators/getting-started.html>)
3. Review building-level data to identify grade(s) in which initial evaluations are higher than in other grades
4. Review re-evaluation data
5. Review LEA procedures and practices for review of records when students transfer into the LEA with an IEP

## Resources

- Disproportionality Technical Assistance Network | [www.TheNetworkWI.com](http://www.TheNetworkWI.com)
- Innovations in Equity/ May 7 - 9, 2019/Green Bay, WI
- Promoting Excellence for All | <http://dpi.wi.gov/excforall>
- Midwest and Plains Equity Assistance Center | <https://greatlakesequity.org/map-eac>
- American Indian Studies Program | <http://dpi.wi.gov/amind>
- Minority Student Achievement Network | <http://msan.wceruw.org/>
- Wisconsin Indian Education Association | <http://www.wiea.org/>
- Technical Assistance Center on Disproportionality at the Metropolitan Center for Research on Equity and the Transformation of Schools [http://steinhardt.nyu.edu/metrocenter/center/technical\\_assistance/program/disproportionality](http://steinhardt.nyu.edu/metrocenter/center/technical_assistance/program/disproportionality)
- Racial Disparity in Special Education: A District Profile Workbook | <http://dpi.wi.gov/sped/about/state-performance-plan/indicators/9-10-disproportionality>
- Wisconsin RtI Center | <http://www.wisconsinrticenter.org/> Culturally Responsive Classroom Practices
- OHI Eligibility Guide | <http://dpi.wi.gov/sped/program/other-health-impairment>



# RDA: Procedural Compliance Self-Assessment Report

**Statewide  
School Year: 2018-2019  
Draft and Locked Reports Included**

## IEP/Evaluation - Area Compliance Summary

Noncompliant Records	Sample Size	IEP/Evaluation Area Compliance Rate
1062	1838	42.22 %

### Evaluations - Section Compliance Summary

Noncompliant Records	Sample Size	Evaluations Section Compliance Rate
157	1838	91.46 %

#### IEP-EVAL-1

At the IEP team meeting to determine whether the student is a student with a disability, the IEP team reviewed information provided by the student's parents. 34 CFR §300.305(a)(1)(i); Wis. Stat. §115.782(2)(b)1

Noncompliant Records	Sample Size	EVAL-1 Compliance Rate
24	1838	98.69 %

#### IEP-EVAL-2

At the IEP team meeting to determine whether the student is a student with a disability, the IEP team reviewed previous interventions and the effects of those interventions. Wis. Stat. § 115.782(2)(b)1 Independent charter schools, authorized under Wis. Stat. 118.40(2)(r and (x)), are not required to complete this item.

Noncompliant Records	Sample Size	EVAL-2 Compliance Rate
96	1838	94.78 %

#### IEP-EVAL-3

The IEP team documented information about the student's current reading achievement. 34 CFR §300.305(a)(2), §300.306(c), §300.311[if SLD]; Wis. Stats §115.782(2)(b)2, §115.782(3)(b); Wis. Admin. Code PI 11.35 (1-2)

Noncompliant Records	Sample Size	EVAL-3 Compliance Rate
63	1838	96.57 %

### IEP - Section Compliance Summary

Noncompliant Records	Sample Size	IEP Section Compliance Rate
1027	1838	44.12 %

#### IEP-1

The IEP team meeting to develop or review and revise the IEP included a regular education teacher of the student. 34 CFR § 300.321(a); Wis. Stats. § 115.78(1m)

Noncompliant Records	Sample Size	IEP-1 Compliance Rate
26	1838	98.59 %

#### IEP-2

In developing the student's IEP, the IEP team considered the strengths of the child and the concerns of the parents for enhancing the student's education. 34 CFR §300.324(a)(i) and (ii); Wis. Stat. §115.787 (3)(a)

Noncompliant Records	Sample Size	IEP-2 Compliance Rate
33	1838	98.20 %

#### IEP-3

The IEP includes a statement of the student's present levels of academic achievement and functional performance. 34 CFR § 300.320 (a) (1); Wis. Stat. §115.787(2)(a)

Noncompliant Records	Sample Size	IEP-3 Compliance Rate
385	1838	79.05 %

#### IEP-4

The IEP team must, in the case of a student whose behavior impedes his or her learning or that of others, consider the use of positive behavioral interventions and supports and other strategies to address that behavior. 34 CFR §300.324(a)(2)(i); Wis. Stat. §115.787(3)(b)(1)

Noncompliant Records	Sample Size	IEP-4 Compliance Rate
96	1838	94.78 %

**IEP-5**

The IEP team must consider whether the student needs assistive technology devices and services. 34 CFR §300.324(a)(2)(v); Wis. Stat. §115.787(3)(b)(5)

Noncompliant Records	Sample Size	IEP-5 Compliance Rate
60	1838	96.74 %

**IEP-6**

The student's IEP includes a description of how the student's disability affects his or her involvement and progress in the general education curriculum and environment, including how the disability affects reading. For preschool children, describe how the disability affects participation in age-appropriate activities, including language development, communication and/or early literacy. 34 CFR §300.320(a)(1)(i)

Noncompliant Records	Sample Size	IEP-6 Compliance Rate
247	1838	86.56 %

**IEP-7**

The IEP includes a statement of the student's disability-related needs. 34 CFR §300.320(a)(2)(i)(A) Wis. Stat. §115.787 (2)(b)

Noncompliant Records	Sample Size	IEP-7 Compliance Rate
260	1838	85.85 %

**IEP-8**

If the student has a disability-related need affecting reading, the IEP includes one or more annual goals designed to enable the student to be involved in the general education curriculum and progress toward grade level reading achievement, or for preschool children, to participate in age appropriate activities and progress toward early literacy standards. 34 CFR §300.320(a)(2); Wis. Stat. §115.787(2)(b); 71 Fed. Reg. 46662 (Aug. 14, 2006)

Noncompliant Records	Sample Size	IEP-8 Compliance Rate
110	1838	94.02 %

**IEP-9**

If the student has a disability-related need affecting reading, each annual goal designed to enable the student to be involved in the general education curriculum and progress toward grade level reading achievement, or for preschool children, to participate in age appropriate activities and progress toward early literacy standards, contains a baseline from which progress can be measured. 34 CFR §300.320(a)(2); Wis. Stat. §115.787(2)(b); 71 Fed. Reg. 46662 (Aug. 14, 2006).

Noncompliant Records	Sample Size	IEP-9 Compliance Rate
171	1838	90.70 %

**IEP-10**

If the student has a disability-related need affecting reading, each annual goal designed to enable the student to be involved in the general education curriculum and progress toward grade level reading achievement, or for preschool children, to participate in age appropriate activities, and progress toward early literacy standards includes a measurable level of attainment. 34 CFR §300.320(a)(2); Wis. Stat. §115.787(2)(b); 71 Fed. Reg. 46662 (Aug. 14, 2006).

Noncompliant Records	Sample Size	IEP-10 Compliance Rate
175	1838	90.48 %

**IEP-11**

If the student has a disability-related need affecting reading, each annual goal designed to enable the student to be involved in the general education curriculum and progress toward grade level reading achievement, or for preschool children, to participate in age appropriate activities and progress toward early literacy standards includes a statement of how the student's progress toward achieving the goal will be measured. 34 CFR §300.320(a)(3)(i); Wis. Stat. §115.787(2)(h); 71 Fed. Reg. 46662 (Aug. 14, 2006).

Noncompliant Records	Sample Size	IEP-11 Compliance Rate
138	1838	92.49 %

**IEP-12**

If the student has a disability-related need affecting reading, the IEP must include special education services to address the need. 34 CFR §300.320 (a)(4); Wis. Stat. §115.787(2)(c)

Noncompliant Records	Sample Size	IEP-12 Compliance Rate
105	1838	94.29 %

**IEP-13**

If the student has a disability-related need affecting reading, the statement of supplementary aids and services designed to address the need must be stated in a manner appropriate to the service and must include anticipated frequency, including the amount. 34 CFR §300.320(a)(4), §300.320(a)(7); Wis. Stat. §115.787(2)(c)&(f)

Noncompliant Records	Sample Size	IEP-13 Compliance Rate
197	1838	89.28 %

**IEP-14**

If the student has a disability -related need affecting reading, the statement of specially designed instruction to address the need must include anticipated frequency, including the amount. 34 CFR §300.320(a)(4), §300.320(a)(7); Wis. Stat. §115.787(2)(c)&(f)

Noncompliant Records	Sample Size	IEP-14 Compliance Rate
113	1838	93.85 %

**IEP-15**

If the student has a disability-related need affecting reading, the statement of related services must include anticipated frequency, including the amount. 34 CFR §300.320(a)(4), §300.320(a)(7); Wis. Stat. §115.787(2)(c)&(f)

Noncompliant Records	Sample Size	IEP-15 Compliance Rate
57	1838	96.90 %

**IEP-16**

The IEP describes the extent, if any, to which the student will not participate with non-disabled students in the regular education environment. 34 CFR 300.320 (a)(5), §300.114 (a)(2), § 300.116; Wis. Stat. § 115.787(2)(d)

Noncompliant Records	Sample Size	IEP-16 Compliance Rate
307	1838	83.30 %

**IEP-17**

The IEP team must meet to review the student's IEP periodically, but not less than once per year, to determine whether the annual goals for the student are being achieved and to revise the IEP as appropriate to address any lack of expected progress toward the annual goals and in the general education curriculum. 34 CFR §300.324(b); Wis. Stat. §115.787(4)

Noncompliant Records	Sample Size	IEP-17 Compliance Rate
77	1838	95.81 %

**IEP-18**

The IEP team must consider whether the student needs individual appropriate accommodations necessary to measure the academic achievement and functional performance on state and districtwide assessments. 34 CFR 300.320(6)(i); Wis. Stat. §115.787(2)(e)

Noncompliant Records	Sample Size	IEP-18 Compliance Rate
132	1838	92.82 %

## Implementation - Area Compliance Summary

Noncompliant Records	Sample Size	Implementation Area Compliance Rate
123	495	75.15 %

**IMP-1**

The LEA ensures the specially designed instruction listed in the IEP is provided as described 34 CFR §300.323(a), 300.323 (c)(2); Wis. Stat. §115.787(1)

Noncompliant Records	Sample Size	IMP-1 Compliance Rate
37	495	92.53 %

**IMP-2**

The LEA ensures the supplementary aids and services listed in the IEP are provided as described. 34 CFR §300.323(a), 300.323 (c)(2); Wis. Stat. §115.787(1)

Noncompliant Records	Sample Size	IMP-2 Compliance Rate
31	495	93.74 %

**IMP-3**

In the case of a student whose behavior impedes his or her learning or that of others, the positive behavioral interventions and supports and other strategies to address that behavior were implemented as described in the student's IEP. 34 CFR §300.323(a), 300.323 (c)(2); Wis. Stat. §115.787(1)

Noncompliant Records	Sample Size	IMP-3 Compliance Rate
14	495	97.17 %

**IMP-4**

Periodic reports are provided to the parents as specified in the IEP on the progress the student is making toward meeting each goal. 34 CFR §300.320 (a) (3)(ii), §300.323(a); Wis. Stat. §115.787(1), §115.787 (2)(h)2.

Noncompliant Records	Sample Size	IMP-4 Compliance Rate
75	495	84.85 %

**IMP-5**

The LEA ensures the individual appropriate accommodations that are necessary to measure the academic achievement and functional performance on statewide assessments are made available as described in the IEP. 34 CFR § 300.323(a), 34 CFR §300.320(6)(i); Wis. Stat. §115.787(1) and (2)(e)

Noncompliant Records	Sample Size	IMP-5 Compliance Rate
2	495	99.60 %

## Discipline - Area Compliance Summary

Noncompliant Records	Sample Size	Discipline Area Compliance Rate
49	83	40.96 %

### DISC-1

The LEA properly counted each type of disciplinary removal in the same academic year that constitutes a disciplinary removal under IDEA. 34 CFR §300.530, 34 CFR §300.536

Noncompliant Records	Sample Size	DISC-1 Compliance Rate
0	83	100.00 %

### DISC-2

After the 10th cumulative school day of removal in the same school year, the LEA provided services during any subsequent removals. 34 CFR §300.530(b)(2), §300.530 (d)

Noncompliant Records	Sample Size	DISC-2 Compliance Rate
49	83	40.96 %