



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

RICK SNYDER
GOVERNOR

BRIAN J. WHISTON
STATE SUPERINTENDENT

May 3, 2017

The Honorable Betsy DeVos
Secretary of Education
U.S. Department of Education
400 Maryland Ave., SW
Washington, D.C. 20202

Dear Madam Secretary:

The Michigan Department of Education was notified on April 21, 2017 that additional information was required in order for Michigan's Consolidated Plan under the Every Student Succeeds Act (ESSA) to be considered complete for spring review window.

To reach its goal of becoming top 10 state for education in the next 10 years, Michigan must have aligned federal and state funded efforts. Therefore it is essential that the submission and approval of our ESSA plan not be delayed, which would set this work back by six months or more.

The attached document provides the requested additional details for the identified sections of Michigan's originally-submitted ESSA Consolidated Plan.

We note at this time that this language is submitted simply to ensure completeness of this application at the direct request of the U.S. Department of Education and over our request for exception to you (4/25/17 correspondence attached), and note that it will be modified in the future after legislative action has occurred regarding Michigan's accountability system *and* the Michigan Department of Education has been able to conduct appropriate stakeholder feedback sessions on these methodologies derived from the chosen system.

We appreciate your stated intent to allow states to lead in the implementation of ESSA and trust that the information now provided will be sufficient for review of Michigan's ESSA plan during the spring review window to allow us to do so.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian J. Whiston".

Brian J. Whiston
State Superintendent

Enclosures

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Supplemental Information to Michigan's ESSA Consolidated Plan

At this time, Michigan is submitting placeholder plans for the following areas of the consolidated State plan related to Title I, Part A:

A.4.vi. Identification of Schools – (ESEA section 1111(c)(4)(D)):

- a. *Comprehensive Support and Improvement Schools.* *Describe the State's methodology for identifying not less than the lowest-performing five percent of all schools receiving Title I, Part A funds in the State for comprehensive support and improvement, including the year in which the State will first identify such schools.*

Michigan will identify no fewer than the lowest performing five percent of our schools dependent on the option chosen through state legislative action (Option One uses an overall summative A-F label derived from a 0-100 index, Option Two uses A-F labels at the individual indicator level derived from a 0-100 index but no overall summative A-F label, and Option Three is a transparency dashboard that provides a comparison between the state value and school value for each indicator) using a methodology derived from the main accountability system that allows for accurate identification of the lowest performing five percent.

The methodology for Options One and Two are the same: The lowest performing five percent of schools is identified using the 0-100-point index derived from all six accountability system indicators (proficiency, growth, graduation rate, English language progress, school quality/student success, and assessment participation). The overall index, as described previously in this plan, is weighted based on the indicators that exist for each school. Schools missing indicators will have weights proportionally redistributed to existing indicators.

Option Three would use the following methodology: Calculate the difference between the school and state values for proficiency and growth. Schools with the largest combined differences between school and state values will be identified as the lowest performance five percent. Due to the absence of index values at the indicator and overall levels, as well as the lack of a weighting scheme, only the proficiency and growth indicators can be used to validly calculate a lowest performing five percent list.

Michigan will identify Comprehensive Support and Improvement Schools using data from the 2018-19 school year.

- b. *Comprehensive Support and Improvement Schools.* *Describe the State's methodology for identifying all public high schools in the State failing to graduate one third or more of their students for comprehensive support and improvement, including the year in which the State will first identify such schools.*

Michigan will identify all public high schools in the state failing to graduate one-third or more of its students by using the graduation component of our overall accountability system. Michigan will identify Comprehensive Support and Improvement Schools using data from the 2018-19 school year.

Supplemental Information to Michigan's ESSA Consolidated Plan

- c. Comprehensive Support and Improvement Schools. Describe the methodology by which the State identifies public schools in the State receiving Title I, Part A funds that have received additional targeted support under ESEA section 1111(d)(2)(C) (based on identification as a school in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D)) and that have not satisfied the statewide exit criteria for such schools within a State-determined number of years, including the year in which the State will first identify such schools.

Michigan will identify all public schools in the state that receive Title I, Part A funds and have a subgroup of students that, on its own, would lead to identification as a Comprehensive Support School by using the subgroup component of our overall accountability system and finding all schools with subgroups that meet the criteria of a Comprehensive Support School.

Our methodology is similar to that used to identify the lowest performing five percent of schools. For accountability system Options One and Two, 0-100-point indices are calculated for all valid subgroups. Any subgroup with an overall index value less than or equal to the highest overall index value in the lowest performing five percent of schools will identify the school containing that subgroup as a Comprehensive Support and Improvement School if after first being identified for additional targeted support, continue to have subgroups meeting the criteria discussed above after four years. For the transparency dashboard option (Option Three), subgroup values for proficiency and growth are compared between school and state values. Subgroups with combined differences that are equal to or larger than the smallest overall difference value calculated for the lowest performing five percent of schools will be identified as a Comprehensive Support and Improvement School if after four years from being first identified as receiving additional targeted support, continue to have subgroups meeting the identification criteria discussed above.

- d. Frequency of Identification. Provide, for each type of school identified for comprehensive support and improvement, the frequency with which the State will, thereafter, identify such schools. Note that these schools must be identified at least once every three years.

Michigan will identify all types of Comprehensive Support and Improvement Schools at least once every three years.

- e. Targeted Support and Improvement. Describe the State's methodology for annually identifying any school with one or more "consistently underperforming" subgroups of students, based on all indicators in the statewide system of annual meaningful differentiation, including the definition used by the State to determine consistent underperformance. (ESEA section 1111(c)(4)(C)(iii))

Michigan will annually identify any school with one or more "consistently underperforming" subgroups of students by using the statewide accountability system described elsewhere in this application, based on the performance of each subgroup over the previous three years.

Supplemental Information to Michigan's ESSA Consolidated Plan

The methodologies for Options One and Two are the same. The average 0-100 index value is calculated for the most recent three years for each subgroup at each school and for the state. Subgroups with three-year averages that are below half of the corresponding subgroup's three-year state-level average are considered underperforming.

The methodology for the transparency dashboard option (Option Three) compares the three-year average in growth and proficiency between a school's subgroup and the corresponding statewide three-year average value for the subgroup. Any school subgroup with an average of less than half of the corresponding statewide value for that subgroup is considered consistently underperforming.

- f. *Additional Targeted Support.* Describe the State's methodology for identifying schools in which any subgroup of students, on its own, would lead to identification under ESEA section 1111(c)(4)(D)(i)(I) using the State's methodology under ESEA section 1111(c)(4)(D), including the year in which the State will first identify such schools and the frequency with which the State will, thereafter, identify such schools. (ESEA section 1111(d)(2)(C)-(D))

Our methodology is similar to that used to identify the lowest performing five percent of schools. For accountability system Options One and Two, 0-100-point indices are calculated for all valid subgroups. Any subgroup with an overall index value less than or equal to the highest overall index value in the lowest performing five percent of schools will identify the school containing that subgroup as an Additional Targeted Support School.

For the transparency dashboard option (Option Three), subgroup values for proficiency and growth are compared between school and state values. Subgroups with combined differences that are equal to or larger than the smallest overall difference value calculated for the lowest performing five percent of schools will be identified as an Additional Targeted Support School.

Michigan will first identify Additional Targeted Support Schools using data from the 2018-19 school year and identify subsequent schools every three years thereafter.

A.4.viii. Continued Support for School and LEA Improvement (ESEA section 1111(d)(3)(A))

- a. *Exit Criteria for Comprehensive Support and Improvement Schools.* Describe the statewide exit criteria, established by the State, for schools identified for comprehensive support and improvement, including the number of years (not to exceed four) over which schools are expected to meet such criteria.

Exit criteria for Comprehensive Support Schools: the school no longer is identified by the system as a Comprehensive Support School in no more than four years.

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- b. Exit Criteria for Schools Receiving Additional Targeted Support. Describe the statewide exit criteria, established by the State, for schools receiving additional targeted support under ESEA section 1111(d)(2)(C), including the number of years over which schools are expected to meet such criteria.

Exit criteria for schools receiving Additional Targeted Support: the school no longer is identified by the system as needing Additional Targeted Support in no more than four years.



STATE OF MICHIGAN
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GOVERNOR

BRIAN J. WHISTON
STATE SUPERINTENDENT

April 25, 2017

The Honorable Betsy DeVos
Secretary of Education
U. S. Department of Education
400 Maryland Ave., SW
Washington, D.C. 20202

Dear Madam Secretary:

In an email from the U.S. Department of Education dated April 21, 2017, Michigan was informed that its Every Student Succeeds Act plan did not meet the "completeness" check and therefore would not be reviewed in the spring round of submissions. All of the information noted as "missing" in the plan is due to the fact that we indicate in the plan that at this time we do not wish to submit methodologies for identifying comprehensive, targeted, and additional targeted support schools, and the corresponding exit criteria for these designations. The rationale is that Michigan is still working to identify an overall accountability system for all of our schools, and this is reflected in the plan.

We need and anticipate legislative action on this topic before the close of legislative activity this summer and have been working with the Governor and legislative leadership to accomplish this by that time. It is important that Michigan has ONE plan for how it holds schools accountable—not a plan that meets federal requirements, and another to meet state requirements that is not aligned to the federal plan. Therefore, we must continue to work with the Governor, the State Board of Education, our partners in the legislature, and other stakeholders to solidify the state's overall accountability system so we then can derive those additional federally-required labels in a way that is meaningful and aligned with Michigan's goals.

A few additional points for your consideration:

- Those additional labels are not required until the 2018-2019 school year, which means there is ample time to finalize our accountability system and submit those methodologies as an amendment to our plan.
- In the spirit of ESSA, to give more control back to states, it is vitally important that Michigan lead in the development of this plan—NOT federal regulations. It also is vitally important that Michigan schools have this plan reviewed now, not in six months. We have been developing a strategic plan to be a Top 10 education state in 10 years, and moving forward on key tenets of our ESSA

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The Honorable Betsy DeVos

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plan is a major component of how we will enact that vision. To lose the six months would be highly negative for Michigan schools, particularly since we can move forward on everything else while allowing our legislature to act on accountability and then allowing us to align the federal requirements with our state goals.

At the CCSSO Legislative Conference in March, you spoke to the whole gathering and then spoke to Chiefs only, and in both settings, you encouraged states to submit their plans, even if all the details were not ironed out. You also strongly encouraged states to take the lead and use this opportunity to craft plans that support state goals. In the Chiefs Only meeting, you further encouraged us to reach out to you if we felt that we were not receiving sufficient flexibility in this process.

Therefore, I am writing to ask that you accept for review Michigan's plan as it is now, and allow us to submit those additional labels within the following 3-6 months after a) our state legislature acts and b) we are able to have subsequent stakeholder conversations on these metrics. We understand that we need to address those categories of schools and we intend to do so. To do that without alignment between state accountability/supports and federal requirements would be misdirected and create unnecessary confusion for Michigan schools and diminish the effectiveness of our plan.

Your consideration of this request to allow us to proceed in a manner that will best enable Michigan to move forward in its innovative vision is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian J. Whiston". The signature is fluid and cursive, with a horizontal line extending from the end.

Brian J. Whiston
State Superintendent