



December 1, 2023

Dr. Miguel Cardona, Secretary of Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

Re: Washington State's ESSA Consolidated Plan Amendment

Dear Secretary Cardona:

Please find attached Washington State's Every Student Succeeds Act (ESSA) Consolidated Plan Amendment document.

Washington state's ESSA Consolidated Plan was originally approved in January 2018 and amended in February 2020. Additionally, in June 2022, we received approval for an addendum to account for short-term changes due to extraordinary circumstances related to the pandemic.

Several circumstances have prompted revisions to the existing plan. The proposed changes are limited to those that are necessary, given:

- 1) Washington's transition to the WIDA K–12 English Language Development Standards, which included a change to the WIDA English language proficiency assessment. Because the English Language Proficiency (ELP) assessment itself changed, the measures using ELP data also needed to be updated.
- 2) A two-year shift in the timeline for long-term goals, as described and approved in the 2022 [addendum](#). The new timeline is 2029 instead of 2027.
- 3) The U.S. Department of Education (ED) conducted [ESEA Consolidated Monitoring](#) of Washington state in 2022–23. Following the monitoring, ED required some clarifications within Washington's plan.

The Washington State Office of Superintendent of Public Instruction (OSPI) seeks to minimize the number of changes to the plan in order to provide as much continuity as possible within the accountability system. Changes include:

- A. **English Language Proficiency Progress measure.** Washington now uses the WIDA K–12 English Language Development Standards and the WIDA English language proficiency assessment. As a result of changing the test itself from ELPA21 to WIDA, Washington needed a new indicator for progress that uses WIDA scores. Accompanying that change is also a new long-term goal based on the available progress data.

- B. **Long-Term Goals Timeline.** Given COVID-19 related data collection disruptions, ED allowed states flexibility on the timeline for long-term goals. OSPI shifted timing by two years (moving target dates from 2027 to 2029); this change was in the addendum that was approved by ED in June 2022.
- C. **Long-Term Goals for Extended-Year Graduation Cohorts.** ED recommended including long-term goals for the 5-, 6-, and 7-year graduation rates because the rates are included (although indirectly) in the Washington School Improvement Framework (WSIF). The goal for the 4-year graduation cohort is 90%; Washington now plans to include goals of 91%, 92%, and 93% respectively for the extended-year rates.
- D. **Educator Equity Qualifications (Ineffective Teachers).** Changes to the existing ESSA plan include:
 - a. Standardization of the definition of “ineffective” (unsatisfactory) across the teacher continuum.
 - b. Reporting requirements on the state Report Card and a standard minimum reporting size.
 - c. Adding the 2019 paraeducator fundamental course of study requirements in our plan.

The proposed changes will start in early 2024 when OSPI calculates the updated WSIF. For planning purposes, schools will be identified and notified in February 2024 of support that begins in the 2024–25 school year. Therefore, we request this proposed amendment receive consideration and approval prior to **January 8, 2024**. This condensed timeline stems from a) ED’s review during 2023 and ensuing required changes to the plan, and b) needing two years of English language proficiency data and time to do analyses and develop the progress measure.

Washington provided key stakeholders across the state with notice (see Attachment A) and a reasonable opportunity to comment on the amendment. Notice was provided by sending an email on November 17, 2023, to each local education agency (LEA) in the state and numerous stakeholder lists, encompassing over 70,000 individuals (see Attachment B). The public comment window closed on November 28, 2023.

Washington customarily provides notice and opportunity to comment to the public by posting information regarding the amendment request on the [OSPI Public Notices and Waiver Requests to the U.S. Department of Education webpage](#), and by sending an email to the Notice of Public comment distribution list. Copies of all comments that OSPI received from LEAs, stakeholders, and the public in response to this notice are attached (see Attachment C). None of the responses deemed additional changes to the amendment; but rather were comments related to education issues more generally.

If you have questions, please reach out to Dr. Michaela Miller, Deputy Superintendent, at michaela.miller@k12.wa.us.

Sincerely,



Chris Reykdal
Superintendent of
Public Instruction

Attachment A: Public Notice

Attachment B: Notice Sent to Committee, Workgroups, and Listservs

Attachment C: Public Comments Received

Public Notice for the Office of Superintendent of Public Instruction Amendment Request to U.S. Department of Education

Notice to school districts and community members of the Office of Superintendent of Public Instruction's intent to submit an amendment to Washington's Consolidated State Plan pursuant to Section 8302 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA).

The Office of Superintendent of Public Instruction (OSPI) will submit an amendment to the U.S. Department of Education (ED) to request approval of technical changes. The public comment period opens Friday, November 17th, and will close at 11:59 pm on Tuesday, November 28th. Comments may be submitted through OSPI's [public comment survey](#).

Background Information

OSPI's ESSA Consolidated Plan was originally approved in January 2018 and amended in February 2020. Additionally, in June 2022, OSPI received ED approval for an addendum to account for short-term changes due to extraordinary circumstances related to the pandemic. This current proposed amendment contains technical changes resulting from: (1) OSPI's change to the WIDA English language proficiency assessment, (2) shifts in the long-term goals timeline resulting from the pandemic, and (3) clarifications stemming from ED's Consolidated Performance Review of Washington which occurred between September 2022 and July 2023.

Questions and Answers

Why is the amendment needed?

Several circumstances have prompted revisions to the existing plan. The proposed changes are limited to those that are necessary given:

1. OSPI's transition to the WIDA K–12 English Language Development Standards, which included a change to the WIDA English language proficiency assessment. Because the ELP assessment itself changed, the measures using ELP data also needed to be updated.
2. A two-year shift in the timeline for long-term goals, as described and approved in the 2022 [addendum](#). The new timeline is 2029 instead of 2027.
3. ED conducted [ESEA Consolidated Monitoring](#) of Washington in 2022–23. Following the monitoring, ED required some clarifications within Washington's plan.

What is the timing for the changes?

The proposed changes will start early 2024 when OSPI calculates the Washington School Improvement Framework (WSIF). At that time, schools will be identified for support that begins in the 2024–25 school year.

What is being proposed to change?

OSPI seeks to minimize the number of changes to the plan in order to provide as much continuity as possible within the accountability system. Changes include:

A. **English Language Proficiency Progress measure.** Washington now uses the WIDA K–12 English Language Development Standards and the WIDA English language proficiency assessment. As a result of changing the test itself from ELPA21 to WIDA, Washington needed a new indicator for progress that uses WIDA scores. Accompanying that change is also a new long-term goal based on the available progress data.

B. **Long-Term Goals Timeline.** Given COVID-19 related data collection disruptions, ED allowed states flexibility on the timeline for long-term goals. OSPI shifted timing by two years (moving target dates from 2027 to 2029); this change was in the addendum that was approved by ED in June 2022.

C. **Long-Term Goals for Extended-Year Graduation Cohorts.** ED recommended including long-term goals for the 5, 6, and 7-year graduation rates because the rates are included (although indirectly) in the WSIF. The goal for the 4-year graduation cohort is 90%; Washington now plans to include goals of 91%, 92%, and 93% respectively for the extended-year rates.

D. **Educator Equity Qualifications (Ineffective Teachers).** Changes to the existing ESSA plan include:

- a. Standardization of the definition of “ineffective” (unsatisfactory) across the teacher continuum.
- b. Reporting requirements on the state Report Card and a standard minimum reporting size.
- c. Adding the 2019 paraeducator fundamental course of study requirements in our plan.

What is staying the same?

The general methodology and approach will remain the same. WSIF will be a combination of multiple measures, with each school receiving a score between 1–10 on the measures and rolling into an aggregate score. As noted above, OSPI is only proposing edits that were necessitated due to the change to WIDA, the approved long-term goal timeline shift, or other technical clarifications required by ED.

What is the submission plan?

OSPI is gathering public input between November 17th and November 28th. Superintendent Reykdal will then review input and determine whether to make modifications. OSPI intends to submit a completed amendment to ED by December 4th.

Public Notice Sent to – Committees, Workgroups, and Other Stakeholder Lists

1. Association of Washington School Principals
2. Commission on Hispanic Affairs (CHA)
3. Educational Opportunity Gap Oversight and Accountability Committee (EOGOAC)
4. Educational Service District Superintendents
5. Every Student Succeeds Acts (ESSA)
6. Governor's Office
7. Governor's Office of Indian Affairs (GOIA)
8. Learning Assistance Program (LAP)
9. Migrant and Multilingual Education
10. Notice of Public Comment
11. Office of Minority and Women's Business Enterprises (OMWBE)
12. School District Assessment Coordinators (DACs)
13. School District Communicators
14. School District Curriculum Leaders
15. School District Superintendents
16. Special Education Data
17. Special Education Directors
18. Special Education Updates
19. State Testing
20. The Washington State Board of Education
21. Title I, Part A
22. WA State Commission on African American Affairs (CAAA)
23. WA State Commission on Asian Pacific American Affairs (CAPAA)
24. Washington Association of School Administrators
25. Washington Education Association
26. Washington State House of Education Committee Chair
27. Washington State School Directors' Association
28. Washington State Senate Education Committee Chair

Public Comments Received

1. Name and/or Organization (optional)



ResponseID	Response
4	Jane Doe
6	Sultan High School
7	Nicholas French /Ocosta Schools
9	Chloe Simmons, Woodland School District
14	Constitutional Speakers Forum, St. Maries ,Idaho State
21	WA CAPAA (Commission on Asian Pacific American Affair)
22	Amy Carder, Bellingham Public Schools

ResponseID Response

4 Test, test, test

7 The email I received was the first time I was aware of these goals. I support the revisions, but I am surprised that this is not shared publicly and repeatedly with schools.

14 All federal, state, and county law, regulations, rules, codes of ethics and Oaths of office to the American constitution shall uphold men and women's life, liberty and pursuit of happiness (the right to hold private ones property, including ones children)

15 This does nothing to improve the real problems with successful learning in schools. But it's a great way to use funding instead for the new hoops that teachers and schools will have to jump through

16 Teacher Ineffectiveness. It is wonderful that you are trying to quantify what teacher ineffectiveness it, however you are missing the larger picture. By having multiple Evaluation systems available to districts, you are automatically comparing apples to oranges. OSPI needs to standardize to one accepted evaluation system that is comprehensive, yet flexible enough to be used by districts that operate online only and Alternative Learning Experience Programs. The other issue is that administrators, are human beings, and teachers are stuck with whomever is assigned to evaluate them. I've worked in 2 schools in our district and seen different administrators hold vastly different expectations for teachers, although they were all supposedly using the same evaluation system: one holding teachers to produce evidence for all measures and documenting all routines, expecting written lesson plans, etc; while another used basically the same pass/fail system we had before TPEP. I spend years being marked down because I read the novels and short stories to my high school students, My evaluator demanded that I make them read to increase rigor. She would not understand that the reading is access, rigor happens in the assignments and activities that we do with the reading. I knew reading aloud gives everyone equal access to the story, including those who read a much lower grade level and English Language Learners. After I became GLADD certified, I also learned that reading aloud to students was one of the few ways that you can take a student whose amygdala is in fight or flight mode, and shift them into a mental space where they can learn. If I still worked at that school, I would still be marked down on my evaluations for reading aloud to students To summarize: 1 Statewide Evaluation System: that is researched and vetted by Teachers, that is comprehensive, yet flexible enough to work in Alternative Learning Environments. 2. Strict OSPI training, and continued training for all administrative staff who evaluate teachers. (Most of our administrative staff were never teachers, so how can they accurately judge what is happening in a classroom?) 3. A provision that requires admin to cover for, or pay for a substitute teacher, so that teachers can observe and learn from other teachers, within or outside their current work assignment, at least twice during each school year. 4. An appeals process that is not handled within the district to protect teachers from personal issues being used by administrators as reprisals against an individual through bad evaluations 5 An evaluation system for Administrator, at all levels, that includes/requires/utilizes input from those who work for that individual. As with all administrative/managerial evaluations across industries, these currently tend to play out as part of the "good ole boy's club" I agree that we need effective, reflective, loving teachers at all levels of education. Make these changes, and you will see much more accurate evaluations. This will allow OSPI to be better able to root out those who are ineffective.