

Introduction

The Consolidated State Plan (Plan) for the Every Student Succeeds Act (ESSA) outlines how the State of Missouri will provide services to school districts and charter LEAs with the state set aside monies allowed under the law. Further, the Plan explains how the state will ensure its own compliance, as well as that of the state's LEAs, with requirements of the law. Local districts and charter schools may use their local allocation for expenditures that are considered allowable for each individual program. Finally, the reader should remember that Missouri's Plan is written to satisfy the narrow intent and purposes of the Every Student Succeeds Act. The primary statewide driver of school improvement is the Missouri School Improvement Program.

Summary of Comments:

DESE posted the Plan for ESSA on June 13, 2017. DESE opened the comment period for the plan on June 13, 2017 and it remained open until July 15, 2017.

DESE received 174 statements from the public, and will provide responses by individual federal program or Title.

Title I, Part A: Improving Basic Programs

COMMENT(S): DESE received two comments requesting that the state not use the growth model based on the state assessment in the identification of schools for comprehensive support and targeted status.

RESPONSE: A measure of academic growth or progress is a required component for the identification of schools for comprehensive support and improvement in the law. If changes are made to the growth model as a result of the current process of revising the Missouri School Improvement Program (MSIP), DESE will amend the Plan.

COMMENT(S): DESE received one comment asking that DESE provide a list of research-based interventions that have proven successful so that districts and charter schools do not have to rely on the research provided by vendors.

RESPONSE: DESE is in the process of creating a virtual platform, as indicated in Title I, Part A, which will provide districts, charter schools, teachers and leaders with training and resources to increase the use of evidence-based interventions. The state will consider developing other resources to aid districts in selecting effective practices. However, the state will not endorse vendors.

COMMENT(S): DESE received one comment regarding the incorrect use of the term Missouri Model Guidance Curriculum in the Plan.

RESPONSE: DESE agrees to make the suggested change to page 33, section 4. The revised sentence will read: MO-DESE's online content delivery system will include material from the Missouri Comprehensive School Counseling Program Curriculum that will support LEAs in providing students with effective transitions to middle and high school grades.

COMMENT(S): DESE received nine comments advocating for the inclusion of the school library media center and school library media specialist in the Plan.

RESPONSE: DESE has intentionally created a plan that allows school districts and charter schools the flexibility to make determinations about the most appropriate activities and personnel to include in their Title I plan and to improve student achievement.

COMMENT(S): DESE received one comment that suggested the inclusion of a glossary to assist readers in understanding acronyms included in the document.

RESPONSE: DESE agrees with this recommendation and will include a glossary in the Plan.

COMMENT(S): DESE received one comment about making the MAP assessments available in Spanish for Spanish-speaking learners who are newcomers to the United States.

RESPONSE: DESE carefully deliberated this issue with the workgroup assigned to review the entry and exit criteria, potential assessment and other areas of focus for English Learners. Further, consideration was given as to the policies and practices of other states when establishing the population threshold at which assessments in other languages will be developed.

COMMENT(S): DESE received one comment about the creation of a Mathematics Support Liaison Network (housed at the Regional Service Centers) to assist teachers in improving content knowledge, securing and developing instructional materials, and increasing student achievement.

RESPONSE: While DESE recognizes the benefit of this type of network, this proposal is beyond the scope of the work outlined in the plan. However, nothing would prohibit school districts and charter LEAs from engaging in this work

COMMENT(S): DESE received two comments about including a well-rounded education as an additional goal on page 6 of the Plan (DESE's strategic planning document) and the inclusion of other content areas, specifically the arts.

RESPONSE: DESE is in the process of revising its current strategic plan and may modify the Plan once the strategic plan has been approved by the state board of education.

COMMENT(S): DESE received six comments about the need to include climate and safety measures, positive disciplinary approaches and behavioral and social-emotional learning supports in addition to academic achievement, graduation rates/growth, attendance rates and English language proficiency rates in the accountability system outlined in the Plan.

RESPONSE: The Missouri School Improvement Program, which includes many of these measures in the process standards, is in the process of being reviewed and will address these types of items for state accountability purposes.

COMMENT(S): DESE received two comments about the lack of inclusion of the five-, six- and seven-year graduation rates in the identification of schools for comprehensive support and improvement.

RESPONSE: DESE values the inclusion of the five-, six- and seven-year graduation rates and will continue to utilize those in the Missouri School Improvement Program. However, ESSA requires that DESE meaningfully differentiate between schools for the purposes of identification. The complexity of using extended-year rates mitigates DESE's ability to meaningfully differentiate between groups for purposes of identification.

COMMENT(S): DESE received one comment about clarifying the requirements certification for special education teachers.

RESPONSE: An inappropriately certified teacher is one who meets one of the following criteria

- Is teaching on a provisional certificate
- Is teaching on a temporary authorization certificate
- Is lacking the necessary credential to be considered appropriately certified for at least one teaching assignment

An individual who holds a special education certificate is appropriately certificated to teach special education.

COMMENT(S): DESE received two comments about utilizing both Algebra 1 and the 8th grade Mathematics MAP to determine the accountability for an individual school.

RESPONSE: Individual 8th grade students may only take one mathematics assessment either grade level or Algebra I. LEAs will need to determine *which* assessment, the Grade Level Assessment or End-of-Course assessment, is the most appropriate measure for each individual student. For federal and state accountability purposes, DESE will combine the student achievement data for 8th grade Algebra 1 test-takers and the 8th grade mathematics grade level assessment to determine math performance.

COMMENT(S): DESE received one comment about expanding the one percent cap on the number of students who may participate in the MAP-Alternate assessment (MAP-A).

RESPONSE: No change is necessary. The one percent cap on the number of students who may participate in the MAP-A assessment is a requirement of the Every Student Succeeds Act and applies at the state level. The MAP-A is administered to students with the most significant cognitive disabilities who meet grade level and eligibility criteria that are determined by the student's Individualized Education Program (IEP) team using DESE-established eligibility criteria. If the MAP-A assessment is given to more than one percent of the total tested population (per content area), the district must provide justification for exceeding the one percent participation rule for Special Education Compliance monitoring purposes.

COMMENT(S): DESE received six comments concerning the use of the student growth model in ESSA with a clear explanation of the growth process included in the Plan.

RESPONSE: DESE has included the Missouri Growth Model Technical Documentation as Appendix D in the Plan. If changes are made to the growth model as a result of the current process of revising the MSIP, DESE will amend the Plan. Additional information on growth measures are included in the [Comprehensive Guide to the Missouri School Improvement Program](#) on pages 14 and 15.

COMMENT(S): DESE received four comments encouraging more emphasis on the provision of professional development for staff educating students with disabilities.

RESPONSE: The professional development activities provided in the virtual platform included in DESE's Plan include practices and strategies for meeting the goals of students with disabilities.

COMMENT(S): DESE received one comment suggesting adding "effective instructional practices" to the first box/last sentence of the chart on page 41.

RESPONSE: DESE agrees and will make the following revision: The training will highlight particular areas of need specific to be a first- or second- year teacher including topics such as effective instructional practices, classroom management, student engagement and motivation, professional communication and education-related law.

COMMENT(S): DESE received three comments asking for more specificity concerning professional development be added to the Plan.

RESPONSE: The passage of ESSA provides flexibility to states, districts and charter schools. As included in the Plan, school districts and charter schools may conduct a needs assessment and are given the flexibility to innovate and pursue evidence-based professional development that will have the most impact on the learning of students.

COMMENT(S): DESE received one comment requesting that DESE clarify that the Essential Principles of Effective Evaluation were adopted and implemented prior to the implementation of ESSA and that they were not created and implemented simply to comply with the provisions of ESSA.

RESPONSE: DESE agrees with this change and will modify the paragraph to read: LEAs that elect not to use the MO-DESE’s model Educator Evaluation System must align their local process to the Essential Principles of Effective Evaluation approved by the State Board of Education in Evaluation approved by the State Board of Education and effective April 30, 2014.

COMMENT(S): DESE received one comment requesting that language be included to describe the components of an effective school library program and to ensure that tools are included to measure the program.

RESPONSE: While DESE recognizes the benefit, this is beyond the scope of the work.

COMMENT(S): DESE received one comment requesting that the state add the following language to page 31, f. “MO-DESE will allow for the allocation of funding for schools that are identified by MO-DESE and receiving targeted intervention and support, for the support and implementation of a state approved urban teacher residency program”.

RESPONSE: This language is not necessary as districts have the flexibility to use funds from this title program for this purpose.

COMMENT(S): DESE received one comment that the Plan for detailed calculations of progress in achieving English Proficiency was not included in Appendix C as indicated on page 21.

RESPONSE: The data in Appendix C was used to set the proficiency levels, not the progress levels.

COMMENT(S): DESE received one comment asking for clarification about the actual target for English language proficiency.

RESPONSE: Guidance will be made available to school districts and charter schools in the fall based on the 2017 scores.

COMMENT(S): DESE received one comment asking if DESE will release guidance as to the reclassification of EL’s based on the 2017 scores.

RESPONSE: Guidance will be made available to school districts and charter schools in the fall based on the 2017 scores.

COMMENT(S): DESE received one comment about the use of the 90/90 attendance measure for determination of the non-academic measure and suggested the utilization of average daily attendance in place of the measure proposed.

RESPONSE: Chronic absenteeism, frequently defined as missing 10 percent of the days in a school year, has been identified as a cause of low academic achievement. Good attendance is a predictor of continuing success, including whether or not a student successfully finishes high school. This calculation is consistent with the calculation utilized by the state’s accountability system. Most importantly, it creates a focus on individual children and the importance of their school attendance.

COMMENT(S): DESE received one comment asking for clarification about the identification and exit of schools for Comprehensive and Targeted status.

RESPONSE: DESE believes that criteria for identifying and exiting Comprehensive and Targeted status is clearly outlined in the plan.

COMMENT(S): DESE received one comment from national advocacy organization (not located in Missouri) that requests a smaller *n*-size.

RESPONSE: School districts and charter LEAs review disaggregated data for smaller populations of students. DESE believes that for reporting purposes, an *n*-size that is smaller than 10 risks the identification of individual students, and in the case of many of Missouri’s small rural school districts, the identity of entire families. A major priority for DESE is to protect individual student and family identity.

COMMENT(S): DESE received one comment requesting that page 9, paragraph 1 be revised to read “Core-content academic standards for some, but not all, subjects underwent revision from 2014 through 2015, prior to the directive of ESSA.”

RESPONSE: DESE agrees to the recommendation and will make the change above.

COMMENT(S): DESE received one comment that asked DESE to clarify the sentence indicating that a teacher will be ineffective if “student growth targets have not been fully met” and requests that it be replaced with student learning rather than student growth or that the Department clearly indicates that state assessment growth scores are not to be used.

RESPONSE: A measure of growth must be included, either using a student learning objective or some other measure (not just state assessment). The use of student growth as it is consistent with state board of education rule.

COMMENT(S): DESE received one comment requesting DESE and the state board of education review the use of the 95% participation rate.

RESPONSE: The use of 95% participation rate is consistent with Missouri’s state accountability system. DESE will continue to use the 95% participation rate for both state and federal accountability.

COMMENT(S): DESE received one comment asking that the rubric for identifying schools be modified to include leading indicators such as ninth-graders on-track to graduate, preschool enrollment in high-quality programs, percent of low-income families enrolled in preschool, percentage of students with access to physical education as recommended by the MSIP 5 Resource Standards and the regular access to fine arts instruction for all students.

RESPONSE: DESE values the inclusion of each of these items and the role they play in an effective school program. However, they do not lend themselves to meaningfully differentiating those schools in most need of support and intervention.

COMMENT(S): DESE received one comment asking for clarification on to whether the Essential Principles of Effective Evaluation apply to teachers and/or leaders.

RESPONSE: The principles apply to the local evaluation process used to evaluate teachers **and** leaders. DESE agrees to the recommendation to clarify the language included in the Plan.

Title I, Part C: Education of Migratory Children

COMMENT(S): DESE received one comment regarding the establishment of targets for the targets established for English learners.

RESPONSE: Title I, Part C targets are based on the comprehensive needs assessment that is required by law for participation in the program and receipt of funds.

COMMENT(S): DESE received one comment about utilizing funds received under this part to provide professional development for migrant staff.

RESPONSE: Consistent with the law, school districts and charter schools may use funds allocated under this part to provide supplemental services to students as identified in the needs assessment.

COMMENT(S): DESE received one comment about using migrant funds received under this part to provide well-rounded, whole child education and to pursue innovation to support migrant children.

RESPONSE: Consistent with the law, school districts and charter schools may use funds allocated under this part to provide supplemental services to students as identified in the needs assessment.

COMMENT(S): DESE received one comment suggesting changing the focus of the survey used to measure the effectiveness of migrant strategies.

RESPONSE: The evaluation step is the last step of the complete Migrant Comprehensive Needs Assessment and Service Delivery Plan.

Title I, Part D: Neglected, Delinquent, or At-Risk

COMMENT(S): DESE received one comment that indicated that the language on page 39 be changed to ensure that neglected and delinquent youth are ensured a well-rounded education program.

RESPONSE: As outlined in the Plan, DESE requires applicants for the grant to ensure that neglected and delinquent students will be provided a comparable program to the district in which they would otherwise enroll.

COMMENT(S): DESE received one comment suggesting that the Plan should specifically ensure that students who are served in neglected and delinquent institutions are provided with special education and related services as needs, as well as how child find will be carried out.

RESPONSE: IDEA provides a protection for students who are served in neglected and delinquent institutions.

COMMENT(S): DESE received one comment indicating that school districts and charter schools should not be accountable for students placed in foster care who may have only been enrolled for one week prior to the testing window.

RESPONSE: LEAs are required to test all enrolled students unless an English learner or MAP-A exclusion applies. All scores are reported, but only those scores for students who have been enrolled for a full-academic year (FAY) in an LEA and/or school are included in calculations for accountability purposes. A FAY is defined as any student who is enrolled from the last Wednesday of September through the MAP administration, without transferring out of the LEA or school for a significant period of time and re-enrolling. A significant period of time is considered one day more than half of the eligible days between the last Wednesday in September and the test administration.

COMMENT(S): DESE received one comment asking that students with special needs be exempted from participating in the assessment system.

RESPONSE: Districts are required by federal law to assess students, regardless of the student's disability. A student with a disability may either participate in the MAP assessment or the MAP-A based on the determination made by the student's IEP team.

COMMENT(S): DESE received one comment requesting that school counselors and school psychologists be included in assisting students to make successful transitions back into general education programs.

RESPONSE: The draft Plan (page 38) has language that encompasses pupil services, including counseling, psychological, and social work services.

COMMENT(S): DESE received two comments requesting the clarification or rewording of language in the program objectives and outcomes for Title I, Part D. The recommendation is to modify the two following statements

- At-Risk Students will be prevented from dropping out of school
- Students who drop out of and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth will be provided with a support system to ensure their continued education and the involvement of their families and communities.

RESPONSE: DESE agrees to make these changes. The bullets will be revised to read:

- The LEA, with technical support from the SEA, will provide students who are at-risk with accurate information about the costs and consequences of dropping out of school
- School districts and charter schools will work with students, families and available community resources to assist students who drop out and children and youth returning from correctional facilities or institutions for neglected or delinquent children and youth to complete their high school education and, when possible, to obtain post-secondary education.

Title II, Part A: Supporting Effective Instruction

COMMENT(S): DESE received ten comments about the inclusion of librarians as school leaders and the librarians being included in the professional development provided to district leaders.

RESPONSE: Local districts have the authority to decide what professional development opportunities are appropriate for staff members.

COMMENT(S): DESE received eight comments related to the provision of professional development or support for teachers who are certified to provide mathematics instruction.

RESPONSE: DESE believes it is a local decision whether to use Title II, Part A funds to focus on reading and/or mathematics. Nothing in the Plan prevents a district from utilizing Title II, Part A funds for mathematics efforts.

COMMENT(S): DESE received one comment about specific references to mathematics and other content areas, specifically mathematics. The commenter asked about the professional development and opportunities for teacher learning and the mechanisms in place to encourage students to study in specific shortage areas.

RESPONSE: After conducting an analysis of the data, the state identified the provision of advanced course offerings in mathematics and science to be a critical need. DESE has included additional language related to the need to offer these opportunities to our students in Title IV, Part A. Local school districts and charter LEAs may utilize a portion of the funds received from Title II, A and Title IV.A to provide professional development and learning opportunities to improve instruction in various content areas. As indicated in the Plan, DESE believes that the use of Title IV state set-aside funds to provide advanced coursework is critical for our students' future success.

COMMENT(S): DESE received five comments encouraging the use of Title II, Part A funding for family and community engagement, Social/Emotional Learning, cultural competency, behavioral health, and recognizing implicit bias.

RESPONSE: Nothing in Title II, Part A would prohibit a school district or charter school from utilizing their Title II allocation for the purposes of providing high-quality, personalized professional development that is evidenced-based for teachers and instructional leaders that is focused on improving teaching and student learning and achievement in the areas indicated above.

COMMENT(S): DESE received four comments encouraging DESE to place more emphasis on providing supports and providing professional development with those teachers educating students with disabilities.

RESPONSE: The Department’s virtual platform described in the Plan (Title II, Part A) is intended to provide resources to teachers of students regardless of ability. The effective strategies and resources provided in the virtual platform will be aligned with the principles of Universal Design for Learning (UDL) will provide rich resources for meeting the goals of students with disabilities.

COMMENT(S): DESE received one comment suggesting adding “effective instructional practices” to the first box/last sentence of the chart on page 41.

RESPONSE: DESE agrees to this revision. The sentence will now read: The training will highlight particular areas of need specific to being a first or second year teacher including topics such as effective instructional practices, classroom management, student engagement and motivation, professional communication, and education related law.

COMMENT(S): DESE received six comments encouraging utilizing Title II, Part A funding for family and community engagement, Social/Emotional Learning, cultural competency, behavioral health, and recognizing implicit bias.

RESPONSE: A school district or charter school may utilize their Title II, Part A funds to provide professional development to staff members based on the allowable uses under Title II, Part A.

Title III, Part A: English Language Acquisition

COMMENT(S): DESE received one comment about the entrance and exit procedures for Title III, Part A, Subpart 1, English Language Acquisition and Enhancement. This comment requested that DESE consider making changes for consistency purposes.

RESPONSE AND EXPLANATION FOR CHANGE: DESE agrees with this comment and will make the changes to the entrance and exit criteria on page 47.

COMMENT(S): DESE received two comments that the questions included in the entry and exit procedures were different than those included in DESE’s sample enrollment form.

RESPONSE AND EXPLANATION FOR CHANGE: DESE agrees with this comment and will modify the questions in the Plan to be consistent with the sample enrollment form.

COMMENT(S): DESE received one comment about the inclusion of World Languages in Title III, Part A.

RESPONSE: Title III, Part A’s purpose is to ensure that English learners, including immigrant children and youth, attain English Proficiency and develop high levels of academic achievement in English.

Title IV, Part A: Student Support and Academic Achievement

COMMENT(S): DESE received 32 total comments regarding the narrow focus on advanced mathematics and science coursework and advocate/suggest broadening the use of the funds provided in this program to other areas

- hiring more teachers of the arts
- including more general counseling services in schools
- including more services to improve safe and supportive school climates
- including more services to improve the social and emotional supports for students
- utilizing UDL and improving inclusion in regular instruction for students with disabilities
- utilizing funds to improve access to all subjects, including world languages
- utilizing funds to improve school libraries and their role providing technology/personalized learning for students
- creating a Mathematics Support Liaison Network

RESPONSE: DESE agrees that all of the areas listed above are of value. However, the state's set aside portion of Title IV, Part A is less than \$300,000. After conducting an analysis of the statewide course completion data, the state identified the provision of advanced course offerings in mathematics and science to be a critical need. Local school districts and charter LEAs may utilize a portion of the funds received from Title IV.A for allowable activities. As indicated in the Plan, DESE believes that the use of state set-aside funds to provide advanced coursework is critical for our students' future success.

Title IV, Part B: 21st Century Community Learning Centers

COMMENT(S): DESE received one comment about opening the grant structure beyond school settings.

RESPONSE: The grant structure already allows non-profit organizations to participate.

COMMENT(S): DESE received one comment about adding a mathematics support liaison network.

RESPONSE: While DESE recognizes the benefit, this is beyond the scope of the work.

COMMENT(S): DESE received one comment about the narrow scope of the approach to 21st Century Community Learning Centers.

RESPONSE(S): DESE has aligned this grant program to support the attainment of the rigorous academic goals outlined in Title I, Part A.

COMMENT(S): DESE received one comment regarding the attendance goal being unrealistically high for programs that want to participate the 21st Century Community Learning Centers.

RESPONSE: At the present time, there are 30 programs serving high school students. Research has shown that attendance does matter in afterschool programs. The more often a student participates in a high quality afterschool program, the more likely the afterschool program will have a positive impact on the student's academic achievement and college-and career-readiness skills. The federal reporting requirements are based on students that attend at least 30 or more days of an afterschool program. While we understand that high school students have more afterschool activities available that might compete with the 21st CCLC program, the current objective is used to identify programs that might need additional support or technical assistance in the area of program attendance. If these goals are modified, DESE will amend the Plan as necessary.

Title V. Part B: Rural and Low Income Program

COMMENT(S): DESE received one comment about the inclusion of equal access to effective library programs in Title V, Part B.

RESPONSE: The Title V, Part B Program is designed to assist schools that are small and unable to successfully compete for competitive grants. Local districts may utilize the funds for this program to supplement the work being done in other federal programs.

Title VII, Subpart B: Education for Homeless Children and Youth

COMMENT(S): DESE received four comments in favor of modifying the language “Assistance from Counselors” to school counselors and other support personnel to ensure that a broad team of staff members work to ensure that students are graduation ready.

RESPONSE AND EXPLANATION OF CHANGE: DESE agrees that districts routinely utilize other staff to (school psychologists, social workers, etc.) to meet the needs of students, including those who are homeless. DESE will make the proposed change.

COMMENT(S): DESE received one comment related to the dispute resolution process for Title VII, Subpart B: Education for Homeless Children and Youth outlined in the Plan. The proposed changes recommend removing the superintendent and school board from the resolution process, as well as removing the proposed timeline.

RESPONSE: The recommended timelines outlined for dispute resolution in the Plan fulfill the Elementary and Secondary Education Act as Amended by the Every Student Succeeds Act’s requirement for timely consultation. The process and timelines for dispute resolution outlined in the Plan are consistent with statute and constitute a recommended process.

COMMENT(S): DESE received one comment requesting clarification and guidance about the Secretary of State’s “Safe at Home” program designed to protect those who are victims of domestic abuse or similar situations.

RESPONSE: Enrollment in the program does not immediately indicate that the student is homeless. School districts and charter schools should work with the Secretary of State’s office to confirm family participation in the program.

COMMENT(S): DESE received one comment regarding the immunization of preschool students who have been identified as homeless. The comment requested that the statutory language or regulatory language be modified to address the immunization of preschool students.

RESPONSE: DESE considers preschool students enrolled in a public school to meet the definition of student in this section.

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