WY June Resubmission

| **Original Feedback to WDE** | **New evidence (request text or summary)** | **WDE Take-away** |
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| 1. Please provide additional information on the steps that the Wyoming Department of Education (WDE) took to **meaningfully engage teachers and their representatives** and diverse stakeholders and communities and describe how WDE will continue to meaningfully engage teachers and their representatives and diverse stakeholders and communities as it continues to develop and implement ESEA flexibility. *Consultation Questions 1 and 2.*
 | Various pp. 9-15. | OK for substance.See edits and comments for accuracy and organization. |
| PRINCIPLE 2 |  |  |
| 1. Providing meaningful professional development and other supports to prepare teachers to teach **all students, particularly English learners, students with disabilities, and low-achieving students**, to ensure that all students have access to the Common Core State Standards (CCSS). *See 1.B., Part B.*
 | Specific outreach efforts will focus on planning and instruction around the CCSS for EL [and SWD] instructors. (pp. 26-27) | Provide plan for ongoing professional development for ELs and SWDs during 2013-2014 school year.Provide materials related to STAR Camp and School Improvement conference related to ELs and SWDs.Describe how SPDG might address this, if relevant and in what LEAs. |
| 1. Conducting strategically-timed workshops and ongoing training for sustained CCSS implementation support in 2013−2014 and beyond, including for all teachers of special populations noted above. *See 1.B., Part A.*
 | No additional activities added to plan, for general education or special populations teachers. | Provide plan for ongoing events. Working drafts? Timeline of the working group to make these decisions? Etc.?Provide guidance forwarded to LEAs regarding transition to CCSS.Provide handouts, actual presentation from trainings and/or agendas, past and future (draft).Describe the School Improvement Conference and STAR Camp in more detail. Describe past events in more detail. Agendas, who attended, etc. Train-the-trainer? |
| 1. Providing professional development and supports to **prepare principals** to provide strong, supportive instructional leadership based on the new standards. *See 1.B., Part A.*
 | This feedback will be used over the summer to further design professional development opportunities for district administrators, including principals. (p. 25) | Provide substantive plan to include principal training, particularly considering they were not targets audience of Phase I and Phase II workshops. |
| 1. Developing and disseminating a high-quality model for instructional materials aligned with CCSS. *See 1.B., Part A.*
 | However, the aforementioned teams [standards and assessment teams and EL and SWD reps that are working on professional development plan] will work together to develop sample instructional materials to share with districts. (p. 27) | Provide plan to develop the model. |
| 1. Working with Wyoming’s institutions of higher education to better prepare incoming teachers and principals for the transition to CCSS, including teachers of special populations noted above. *See 1.B., Part A.*
 | There are significant activities occurring around the transition to the Common Core State Standards. Instructional practice, teacher evaluation systems, development of assessments aligned with the common core, and the **preparation of school leaders to support CCSS and College and Career Ready graduates are included in this transitional work**. (p. 28)Formal collaboration with IHE described regarding creation of formative assessment of CCSS learning measures for purposes of determining whether high school graduates are college and career ready. (p. 29) | Highly recommend demonstrate initiation of formal collaboration with its IHE to embed CCSS into teacher preparation at collegiate level. |
| PRINCIPLE 2 |  |  |
| 1. Provide additional information on WDE’s plan and timeline for piloting and determining the weightings of school performance indicators and criteria for overall school performance levels in the State’s new school accountability system under the Wyoming Accountability in Education Act for implementation in the 2014−2015 school year, particularly how it will ensure that graduation rate will contribute significantly to overall school performance score. *See 2.A.i., 2.A.i.a. and 2.A.ii, Option B.*
 | The Advisory Committee to the Select Committee on School Accountability will recommend initial weight and index values in a process that will be completed by the end of July at the latest. (p. 79) | OK. In event of approval, condition would be placed regarding appropriateness of weightings, especially regarding 4-year cohort graduation rate. |
| 1. Describe WDE’s strategy to communicate to teachers, parents, and other stakeholders about the new accountability systems given the size of the State and complex nature of some elements of the system (*e.g.,* matrices to determine overall school performance level). *See 2.A.i.a.*
 | Communication to Teachers, Parents and other Stakeholders section at pp. 70-71. | OK. |
| 1. Address concerns regarding the sub-indicators within the graduation rate index and their weightings, including removing certificates of completion and continued enrollment sub-indicat**o**rs. *See 2.A.i. and 2.A.i.a.*
 | The graduation *index* is not a graduation *rate.* The graduation index is designed to provide a more complete picture of the nature and extent to which students are attaining prioritized high school outcomes. For this reason the graduation index will be vetted with the advisory committee and professional judgment panel with the same components included in the initial proposal. If these stakeholder groups of the advisory committee or the professional judgment panel feel certificates of completion and continued enrollment should be removed from the index, they would be removed.The inclusion of the certificate of completion is for the approximately 1% of students who are the most cognitively disabled. The individual education plan teams for these students have determined that alternate education standards and alternate assessments are appropriate for these students. By statute, these students are not eligible for regular diplomas. The certificate of completion is proposed as a method for recognizing that these students have accomplished the successful completion of their educational program. Including this in the graduation index gives schools that have programs for these students recognition for their efforts in helping these students to successfully complete their educational program.The inclusion of continued enrollment in the graduation index for students who did not graduate after four years is intended to encourage schools to remain in contact with these students and to continue engaging them in making progress toward graduation. If these students are not in school eventual graduation is an unlikely outcome. We understand that Louisiana had a graduation index approved that included successful GED completion. This allowance shows that something other than high school graduation has been approved for a waiver. Given this, Wyoming is requesting that USED provide a rationale for the request that Wyoming change its proposed graduation index, particularly since the Wyoming index will be used for state accountability only and not for any federal accountability purpose. (p. 70-71) | Remove certificates of completion and continued enrollment sub-indicators.Demonstrate how WY will ensure that 4-year cohort graduation rate accounts for at least 17% of overall school rating, in equivalent context of matrices.In event of approval, condition would be placed regarding final weighting of 4-year cohort graduation rate. |
| 1. Indicate how the 95 percent participation requirement for assessments will be included in the accountability system to maintain strong accountability for assessing all students.  *See 2.B.*
 | When a school’s participation rate falls below 95%, the school will be considered “unscoreable” and will be assigned to the “does not meet expectations” category. In addition, when students are non-participants they will be counted in the lowest performance level category for the purpose of school performance rating. (p. 60) | OK. |
| 1. Clarify the definition and use of the combined subgroup of non-proficient students, particularly within the context of the “equity” indicator and participation rate calculations. *See 2.A.i.b.*
 | **Consolidated Subgroup.** When a school has growth measures, a consolidated subgroup consisting of all students who were below proficient during the previous year on the state test in math and/or reading will be used in the measurement of equity. Because the previous year’s test performance defines this group, educators will know who is in this group at the beginning of each new school year. This will permit educators to be strategic about planning to improve outcomes for students in this subgroup. When a school does not have growth measures, the school will typically not have prior year achievement scores for use in the identification of a consolidated subgroup. The consolidated subgroup at these schools will consist of those students who performed below proficient on the current year’s test in math and/or reading. (p. 60) | OK. See edits/comments re: distinguishing b/w “ESEA subgroup” and “consolidated subgroup” throughout request though. |
| 1. Provide additional information on how WDE will differentiate interventions and support for priority, focus, and other Title I schools to ensure that interventions are targeted based on the needs of the school and students. *See 2.E.iii. and 2.F.ii.*
 | Attachment 17 addresses priority and focus schools.Various pp. 104-107 for priority schools. Focus schools 111-113. Other Title I Schools pp. 118-120. | Clarify if Att. 17 describes interventions beyond transitional year or not for priority and focus schools.Throughout request, remove reference to execution of turnaround principles in focus schools and Other Title I schools (interventions are only to address their reasons for identification).Move text that is repeated in all 3 school sections to general 2.A. (description of 10 indicators, etc.). |
| 1. Provide additional information regarding the qualifications and membership of the Professional Judgment Panel. *See 2.A.i.a.*
 | “Likely” that a special pops rep will be added (p. 74) | OK for now.Provide follow-up upon resubmissions associated with conditions and/or Principle 3. |
| 1. Address concerns that the self-assessment required in all schools not “exceeding expectations” might not represent an improvement in WDE’s existing improvement process. *See 2.D.iii.*
 | * SA around 20 indicators At. 17 p. 456 (priority schools must address in narrative form)
* “Assessment of specific leading and lagging indicators from the Effective Practices Inventory, external evaluations, designation of high reliability learning organization based on level of implementation and research-based resource allocation are improvements to exsiting improvmen tprocesses in WY” (p. 469)
* Self-assessment + overall score inform improvement plan decision-making
 | OK. |
| 1. Demonstrate that WDE has identified the required number of focus schools using its proposed method that meet the definition of focus schools in ESEA flexibility.
 | Updated methodology to remove identification of “all students” as a subgroup (pp. 110-111)School lists pp. 114-115 | OK. |
| 1. Describe the interventions in priority schools that are aligned with all of the turnaround principles and how these interventions will be delivered in a high-quality manner, including specific interventions for English Learners, students with disabilities, and low-achieving students for three years. *See 2.A.i.b., 2.D.iii.b. and 2.D.v.*
 | Attachment 17 and pp. 104-107 priority schools.TEXT to reconcile:* “ if [schools] believe they are already effective in a given area [indicator], they will upload evidenc e of effectiveness into Indistar.” (p. 453) [implies interventions may be ‘appealed’ by schools]
* “Priority schools will begin by assessing needs and gaterhing evidence [around planning for improvement, school learning climate, instructional guidance and program coherence and student engagement indicators] (p. 458) [may imply phase-in of turnaround principles across years]
* “….tailor support…to one or more turnaround principles”, p. 471 [should be all TPs for priority schools, concurrently, beginning in Year 1 of 3-year implementation cycle]
* “suggested interventions will be to improve learning climate, make changes in instructional practice, make changes in curriculum and/or make changes in factors that impact student engagement” (p. 471) [this appears to narrow range of potential interventions]
* Priority schools have both an individualized improvement plan and a continuous improvement process, the latter which includes planning for CI, school learning climate, instructional guidance and program coherence and “student engagement with various subgroups as the key enabler” (p. 471)
* Self-Assessment allows for indications by school “fully implemented”, “needs improvement”, “not a priority” (p. 477) [implies push-back on prescribed interventions]
* Request text regarding 10 indicators (distinguish between transitional and beyond periods)
 | Clearly and consistently articulate the interventions aligned to Flexibility turnaround principles, including timeline for review and termination of principals in summer preceding implementation school year and specific teacher retention requirements (p. 454 cross-walk does not address these in enough detail).Clearly state that all turnaround principles will be implemented in non-SIG priority schools concurrently in Year 1 of implementation (i.e., schools do not have flexibility to demonstrate that they are already addressing a turnaround principle).Clarify description of how WDE will ensure that the final interventions in school improvement plans will meet ESEA flex requirements for alignment with turnaround principles (see inserted text, p. 106).Align and organize text in request and Attachment 17.Expand on connection between resource planning programs and interventions, in request body. How do they differ and or how are they connected. Provide page numbers or other mapping to the between crosswalk page and main indicator descriptions. |
| 1. Describe the steps WDE will take to ensure meaningful consequences for priority and focus schools that do not make progress after full implementation of interventions. *See 2.D.iii.*
 | Expansion of number of indicators across which priority and focus schools are to be evaluated if no progress towards exiting after 2 years, based upon analysis and documentation of progress along initial indicators. (Att. 17, p.533) | OK. |
| 1. Strengthen the proposed exit criteria for priority and focus schools to ensure that they will result in significant progress in improving overall student achievement. *2.D.v. and 2.E.iv.*
 | Priority schoolsIn order to exit Priority school status, low-achieving schools or schools with less than 60% of students graduating, must:1. High schools identified as Priority schools based on graduation rate will be exited from Priority school status when the school no longer meets the definition of a Priority school and must increase their graduation rate to reduce the percent of students not graduating by 25% over a period of three years.
2. Low-achieving schools will be exited from Priority school status when the school no longer meets the definition of a Priority school and has reduced the number of non-proficient students by 25% over a period of three years. (p. 109)

Focus schoolsIn order to exit Focus school status, low-achieving schools or schools with less than 60% of students graduating, must:1. High schools identified as Focus schools based on graduation rate will be exited from Focus school status when the school no longer meets the definition of a Focus school and must increase their graduation rate to reduce the percent of students not graduating by 25% over a period of three years.
2. Low-achieving schools will be exited from Focus school status when the school no longer meets the definition of a Focus school and has reduced the number of non-proficient students by 25% over a period of three years. (p. 113)
 | OK. |
| 1. Describe the interventions in focus schools and how these interventions will be delivered in a high-quality manner, **including interventions for English Learners, students with disabilities, and low-achieving students**. *See 2.E.iii.*
 | Att. 17 (see particularly “Student Engagement with Subgroups” p.48 for interventions re: SWDs and ELs), various pp. 111-113 | Clarify how WDE will ensure that the final interventions in school improvement plans will meet ESEA flex requirements for alignment with reasons for identification as focus school. |
| 1. Describe the process WDE will use to ensure that all focus schools implement interventions beginning first semester of the 2013−2014 school year. *See 2.E.iii.*
 | * Implementation chart pp. 109-110
* 4 more coaches specifically to support focus schools by 1st semester 13-14 (p. 532)
 | OK. |
| 1. Please provide more information as to how WDE will differentiate among other Title I schools and provide incentives and supports to these schools based on WDE’s new AMOs, graduation rates targets, and other measures to address the needs of all students, including English Learners, students with disabilities, and low-achieving students. *See 2.F.i and 2.F.ii.*
 | * Att. 17, p. 523
 | Rework this section to focus on 2 components:1. Beginning in 2013-2014 all Title I schools that miss any ESEA subgroup proficiency AMO or graduation rate target (based on 2012-2013 data or lagging data for grad rates, as defined by accountability workbooks, including participation rates) is identified for and has appropriate interventions in 2013-2014
2. Beginning in 2014-2015, WAEA system implemented that identifies and drive interventions for all schools not “exceeding standards” (refer to description in 2.A.)

Be sure that even schools that “exceed standards” are included in #1.Clarify role of coaches/liaisons in ensuring that proper interventions are selected and/or other mechanism for ensuring proper interventions (LEA, WDE review, etc.)Provide timeline for identification of schools, communication to LEAs/schools regarding policy and identification, implementation.Remove text regarding “turnaround principles”, reserve for discussion of priority schools.In the event of approval, condition may be placed regarding finalizing overall system for other Title I schools. |
| 1. Describe how WDE will build capacity in and hold LEAs accountable for improving school and student performance. *See 2.G.*
 | * LEAs and superintendent approve SIPs for schools that are “not meeting expectations” (OT1)—[not for Priority and Focus?]—At. 17 p. 459 footnote
* LEA responsibilities embedded as indicators at p. 510
* LEA accreditation scores subsume school performance scores (p. 524)
* District Consultants work with coaches/liaisons (p. 530)
* Indistar workshops
 | OK. |
| 1. Provide additional information on steps WDE is taking to ensure effective support for and monitoring of implementation of interventions (e.g., resources mobilized to ensure manageable caseloads for intervention coaches and liaisons, status of online implementation milestone tracking systems, etc.). *See 2.G.*
 | * Using Indistar for Priority and Focus schools only (At. 17 p. 456)?
* Coaches will provide online monitoring and coaching via Indistar of the 20 indicators for Priority schools (focus schools no?)
* Coaches provide assistance for resourcing plans p. 461 At. 17 (“the Resourcing Plan Template is available from WDE”—please provide, p. 461)
* 3 coaches for about 27 schools (priority + focus)—see duties pp. 527-529--“at least 3 and probably 4 more will be hired by beginning of 13-14” (p. 530)
* LEA provides majority of support for…improvement efforts (p. 524)—is coach providing all training and TA to them on this?
 | Clarify annual monitoring of “Other Title I schools” .Describe any professional development around actual implementation of interventions (only support appears to be guidance of coaches/liaisons). |
| 1. Describe the process in place for the rigorous review and approval of any external providers used by WDE and its LEAs to support the implementation of interventions in priority and focus schools.
 | Att 17. p. 531 | OK |
| 1. Describe how WDE will provide funds under section 1003(a) of the Elementary and Secondary Education Act of 1965, as amended, to priority and focus schools, instead of to schools in “improvement” status.
 | Funding for the implementation of the turnaround principles in Priority and Focus schools will be provided through either Title I funds WDE will require that districts with Priority and Focus schools set aside, or with Title I 1003(a) funds a school might receive, which are available through a competitive grant process. All Priority and/or Focus schools will be required to implement the turnaround principles discussed above to address the reason for their identification. (p. 124) | OK |
| **Principle 3** |
| 1. Provide a high-quality plan for the adoption of teacher and principal evaluation guidelines by the end of the 2012−2013 school year, including key milestones or activities, a detailed timeline, party or parties responsible, evidence, resources and significant obstacles. *See 3.A.i., Option A.i.*
 | Timeline provided pp. 131-135 for finalizing guidelines by “Spring 2015”. “It is reasonable to expect districts to include that component [mentoring and professional development] in their evaluation systems with or without the requirement from the state, although the requirement will undoubtedly be included in the Rules that must be written and implemented not later than July 1, 2015 for leaders and July 1, 2016 for teachers”. (p. 129)As Wyoming is moving into a more comprehensive and coherent accountability and evaluation system, it has become apparent that the tracking and monitoring processes will need to be expanded in order to ensure fidelity. A process for tracking and monitoring **professional learning around the evaluation systems**, required evaluation training, and piloting of both components and whole systems will be developed as development and approval of the systems is accomplished in early fall 2013. (p. 138) | Provide introduction to 3.A. that:* frames WY’s “pilot” year as “first year of implementation” and that all references to “pilot” refer to first year of implementation according ED requirements.
* Frames legislation as guidelines (check Option B at 3.A.)
* describes what factors of evaluation system may be adjusted as a result of pilot (purpose is to ensure that ED requirements wouldn’t be circumvented as result of pilots).
* Refers to and provides context for draft “framework” (formally submit framework as request attachment).

Provide Attachment 11 (evidence of passage of legislation).In each requirements’ section of text, clarify that/how in pilot year ED requirements will be met (match the level of detail of the requirement).In event of approval, condition may be placed regarding requirement of using evaluation system to inform professional development in all LEAs and/or approval of final guidelines. |
| 1. Describe how the teacher and principal evaluation guidelines will ensure the use of multiple valid measures in determining performance levels, including as a significant factor data on **student growth for all students in tested and non-tested grades and subjects** (including for English Learners and students with disabilities). *See 3.A.i, Option A.i.*
 | The data that will be collected will be artifacts relating to the goal, observations of practice, and measures of student performance. Other data may be included on an individual basis. Measures of student performance will be included in every (including teachers of English Learners and students with disabilities) teacher’s evaluation. Those measures **may include** the results of the State test in Reading/Language Arts and Mathematics, Student Learning Objectives, and Student Growth Percentiles. (p. 129) | Provide clear statement in body of request (not “may include”) that in 2015-16 growth in all grades and subjects, including untested, will be component of teacher evaluation systems, per legislation and that framework provides working proposals for measurement design (give page numbers). |
| 1. Describe how all teachers and principals in all LEAs **will receive ratings** based on teacher and principal evaluation systems that meet the requirements of ESEA flexibility during the 2015−2016 school year. *See 3.A.i, Option A.i.*
 | An effectiveness rating will be determined for all teachers in the 2015-2016 year, and will be communicated and discussed with them by their building principals, **but it will not go on their personnel records** (p. 126). | Provide clarification and/or additional information on uses of rating in 2015-2016:1. Whether teachers receive documentation of their rating.
2. Whether teachers receiving rating in 2015-16 under previous evaluation system.
3. Where/how ratings records will be maintained if not in personnel file.
 |
| 1. Describe how WDE will ensure the sufficient **involvement of teachers and principals in the development of these guidelines**, including teachers of English learners and students with disabilities. *See 3.A.i., Option A.ii.*
 | pp. 135-136 gives info on inclusion of teacher stakeholders in state process but no EL or SWD stakeholders.p. 137 2nd par. omits ELs and SWD teachers. | Integrate representation of ELs and SWDs teachers. |
| 1. Describe WDE’s **process for reviewing and approving an LEA’s teacher and principal evaluation and support systems** to ensure that they are consistent with the SEA’s guidelines and will result in the successful implementation of such systems, and ensuring that these systems include teachers of English learners and students with disabilities.
 | The WDE has developed and implemented a process for the submission, review, and approval of districts’ evaluation systems for all certified personnel. Included in the process is a submission template aligned with the requirements detailed in Chapter 29 Rules for Certified Personnel Evaluation Systems (see <http://soswy.state.wy.us/Rules/>). Additionally, a rubric for scoring those submissions has been developed and utilized. A team of ten (10) or more WDE personnel with background and work assignments related to teacher and leader quality are trained to review the submitted systems utilizing the scoring rubric. At least three individuals review each district submission, and more if the three do not arrive at scoring consensus. With the development and adoption of the teacher and leader evaluation systems aligned with legislation and the Federal requirements for approval of the flexibility waiver request, the WDE **will be making adjustments to its submission template as well as its scoring rubric.** Additionally, peer review is in the discussion for inclusion in the approval process. (pp. 137-138)Every district is annually required to sign assurances that it is evaluating teachers according to the law. | Create high-quality plan for process aligned to new requirements for resubmission as part of 3.B., particularly with regard to new components of system(e.g., validation of student growth measures).Provide documentation/guidance regarding existing system and/or how it may be altered for new system, what body would do that according to what timeline?Clarify LEA options with regard to using state model and/or adopting its own system. |
| 1. Describe WDE’s process for ensuring that an LEA develops, adopts, pilots and implements its teacher and principal evaluation and support systems, with the involvement of all teacher and principals, including teachers of English learners and students with disabilities. *See 3.B.*
 | Districts’ submission of their evaluation systems must include a list of the stakeholders and their roles or assignments, involved in the development of the system. Chapter 29, Section 6 (a) requires the inclusion of “A list of members of the committee that was used to develop and/or adopt the Evaluation System. The list contains appropriate representation of Stakeholders.” WDE reviewers/scorers check the submitted list for the participation of teachers of **students with disabilities, Title I teachers, ESL teachers**, and other stakeholders. (pp. 137-138)As Wyoming is moving into a more comprehensive and coherent accountability and evaluation system, it has become apparent that the tracking and monitoring processes will need to be expanded in order to ensure fidelity. A process for tracking and monitoring professional learning around the evaluation systems, required evaluation training, and piloting of both components and whole systems will be developed as development and approval of the systems is accomplished in early fall 2013. (137-138)Other support for development, adoption, and implementation of evaluation systems will undoubtedly be needed and provided; that support will likely be a combination of face-to-face focus groups, virtual presentations and conferences, and written guidance and support information. (137-138)Wyoming Education Association representatives met with several Wyoming Department of Education (WDE) personnel on June 10, 2013 and provided input relative to this request. With respect to teacher and leader evaluation, the organization was generally pleased with the teacher framework in its current state of development. Their only suggestion was that there **is a requirement that those being evaluated, as well as their evaluators, be trained in the evaluation process**. (See Attachment 2)  | Create a high-quality plan for ensuring implementation in LEAs.Include plans for alignment of rubrics/template with new ED requirements.Describe how early piloting results (2013-2014 etc.) will inform implementation going forward.Address evaluator training in plans for submission as part of 3.B. at same time as guidelines including info on who will be doing evaluations (don’t need it with next resubmission).OK on EL/SWD piece. |
| 1. Describe WDE’s plan **for providing adequate guidance and other technical assistance to LEAs, including the use of a model evaluation framework,** in developing and implementing teacher and principal evaluation and support systems according to the required timelines. *See 3.A.i, Option A.i. and 3.B.*
 | Furthermore, the **State Model** includes the use of multiple measures of each domain for every educator in order to improve the validity of the evaluation decision. The Advisory Committee has recommended that each domain be equally weighted in the overall evaluation; piloting in various districts and the subsequent data analysis will provide information that will determine the actual weight of each of the various domains. (p. 129) | Create a high-quality plan (timeline, milestones for decisions, etc.) for submission as part of 3.B. at same time as guidelines (don’t need it with next resubmission).Clarify LEA options with regard to using state model and/or adopting its own system. |