# CDE ESSA State Plan Draft – Public Comment Period

Since February 2016, CDE has had the opportunity to listen to different groups of stakeholders and their ideas about what should be included in each section of Colorado's ESSA state plan. As part of the public comment process, CDE is now seeking input regarding the first draft of that plan. CDE has set-up a survey for the public to comment. The comments received will be compiled and included with Colorado’s state plan submission and incorporated into a draft of CDE’s final draft as appropriate. Final submission deadline: March 13, 2017, at 5 pm.

Over the past year, DPS has provided ongoing feedback to CDE, USDE and other key groups. Fortunately many of our top concerns have been addressed (Supplement not Supplant, not reserving the optional 3% withholding, flexibility in turnaround models and state supports, other accountability requirements, etc).

# Denver Public Schools strategy

In late summer 2016 we formed a DPS ESSA review committee comprised of a cross-functional group of experts across the district to review state recommendations and compile feedback for CDE. This group has also attended CDE community input sessions as well as participated in an advocacy convening hosted CEI, CASE, CASB, CEA and other partners. Additionally, DPS has had representation on all of the CDE ESSA Hub committees to contribute to the development of the state plan and share DPS recommendations.

With the release of the final CDE ESSA Plan draft, the our ESSA team has reached out to department subject matter experts in the district to review and comment on the proposed state plan. In addition, we added a notice in the weekly newsletter informing DPS staff that they may comment directly to CDE should they want to.

Below please find a summary of the ESSA team feedback and the key issues.

# [Long Term Goals](http://www.cde.state.co.us/fedprograms/essastateplandraftsection1)

Not Applicable. This was a general overview of the process that CDE implemented

[**Consultation and Performance Management**](http://www.cde.state.co.us/fedprograms/essastateplandraftsection2)– ARE (Accountability, Research, & Evaluation)

[**Academic Assessments**](http://www.cde.state.co.us/fedprograms/essastateplandraftsection3)– ARE (Accountability, Research, & Evaluation)

[**Accountability, Support, and Improvement for Schools**](http://www.cde.state.co.us/fedprograms/essastateplandraftsection4)– ARE (Accountability, Research, & Evaluation) and Organizational Excellence and Tiered School Support

Accountability System

“As a member of the Accountability Spoke Committee, a member of the Technical Advisor Panel, and an attendee of multiple ESSA meetings hosted by CDE, I was extensively involved in the development and review of all components within this segment of the state proposal. I am confident all aspects are aligned with the best interests of DPS.”

State Support and improvement for Low-Performing Schools

The exit criteria describe that CSI schools will exit after 3 years, but there isn’t clarity about what constitutes year 1, or how long the exploration phase could last. Our assumption and advocacy is that the first year of identification, exploration and strategy and support matching constitute a Planning Year,

and that year 1 will begin the school year following identification. Also it is burdensome and complex for schools to have multiple improvement plans and we recommend that the state expand the existing UIP tool to accommodate the monitoring of CSI implementation plans.

For TSI schools, a root cause analysis of the performance of subgroups may point to improvements needed across the school. TSI funds should be used to target the performance challenges identified by the analysis, with a clear link to improved outcomes for underperforming subgroups.

[**Supporting Excellent Educators**](http://www.cde.state.co.us/fedprograms/essastateplandraftsection5)– Human Resources and Professional Learning Overall themes across stakeholder review are:

1. Naming career pathways more clearly as a key human capital strategy
2. Place emphasis on teacher preparation programs as key lever related to educator pipeline for highest-need subject areas and allocate funds to support innovative/promising practices in teacher preparation
3. Call out diversity and language diversity as specific priorities for teacher recruitment
4. More directly name importance of quality and measurable teacher PD

In response to a recent BOE conversation regarding the definition of “in-field” for the ESSA state plan. While we don't want to limit the number of credits IHEs can dedicate to teacher preparation, as a district, we don't want to bear the burden of state requirements set at 36. Would prefer the 24.

[**Supporting All Students**](http://www.cde.state.co.us/fedprograms/essastateplandraftsection6) **–** ESSA Title Programs

The landscape of migrant families has changed drastically in DPS since the migrant education service plan was updated in 2012. This school year almost half of the students we serve are refugee status along with migrant. These precious families have increased needs, increased time needed to support them and challenges as they acclimate to school. These families need support on an ongoing basis from referrals for mental health to IEP advocacy (especially for families that don't speak the language or understand the process). Adding the additional component of being a refugee creates even more of a climate that needs trust, time, understanding and patience. Our district provides this intricately to the approximate 100 migrant middle and high school students we serve. We hope this can be provided to our (approximate 100) elementary students as well as we see this new political landscape requires caring and experienced migrant district staff to walk alongside our teachers and schools. The FII (Fidelity Implementation Index) has been used as a monitoring visit. These best practices seem to fall heavy on our district since we are used as a best practice model. This can create challenges for our one mentor to field calls for support, requested training of new staff and various requests to support metro area families. A suggestion would be to create a manual with the FII (if that has not been previously done)