



OKLAHOMA

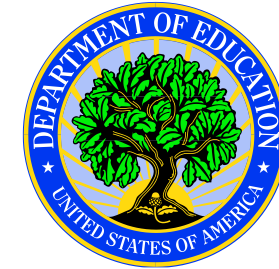
EDGE



**OKLAHOMA ESSA  
CONSOLIDATED STATE PLAN**



**Revised State Template for the  
Consolidated State Plan**  
The Elementary and Secondary Education Act of 1965, as  
amended by the Every Student Succeeds Act



**U.S. Department of Education**  
**Issued: March 2017**

OMB Number: 1810-0576  
Expiration Date: September 30, 2017

Introduction

Section 8302 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA),<sup>1</sup> requires the Secretary to establish procedures and criteria under which, after consultation with the Governor, a State educational agency (SEA) may submit a consolidated State plan designed to simplify the application requirements and reduce burden for SEAs. ESEA section 8302 also requires the Secretary to establish the descriptions, information, assurances, and other material required to be included in a consolidated State plan. Even though an SEA submits only the required information in its consolidated State plan, an SEA must still meet all ESEA requirements for each included program. In its consolidated State plan, each SEA may, but is not required to, include supplemental information such as its overall vision for improving outcomes for all students and its efforts to consult with and engage stakeholders when developing its consolidated State plan.

Completing and Submitting a Consolidated State Plan

Each SEA must address all of the requirements identified below for the programs that it chooses to include in its consolidated State plan. An SEA must use this template or a format that includes the required elements and that the State has developed working with the Council of Chief State School Officers (CCSSO).

Each SEA must submit to the U.S. Department of Education (Department) its consolidated State plan by one of the following two deadlines of the SEA’s choice:

- April 3, 2017; or
- September 18, 2017.

Any plan that is received after April 3, but on or before September 18, 2017, will be considered to be submitted on September 18, 2017. In order to ensure transparency consistent with ESEA section 1111(a)(5), the Department intends to post each State plan on the Department’s website.

Alternative Template

If an SEA does not use this template, it must:

- 1) Include the information on the Cover Sheet;
- 2) Include a table of contents or guide that clearly indicates where the SEA has addressed each requirement in its consolidated State plan;
- 3) Indicate that the SEA worked through CCSSO in developing its own template; and
- 4) Include the required information regarding equitable access to, and participation in, the programs included in its consolidated State plan as required by section 427 of the General Education Provisions Act. See Appendix B.

Individual Program State Plan

An SEA may submit an individual program State plan that meets all applicable statutory and regulatory requirements for any program that it chooses not to include in a consolidated State plan. If an SEA intends to submit an individual program plan for any program, the SEA must submit the individual program plan by one of the dates above, in concert with its consolidated State plan, if applicable.

Consultation

Under ESEA section 8540, each SEA must consult in a timely and meaningful manner with the Governor, or appropriate officials from the Governor’s office, including during the development and prior to

<sup>1</sup> Unless otherwise indicated, citations to the ESEA refer to the ESEA, as amended by the ESSA.

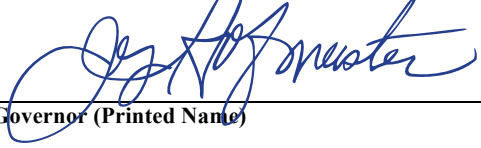
submission of its consolidated State plan to the Department. A Governor shall have 30 days prior to the SEA submitting the consolidated State plan to the Secretary to sign the consolidated State plan. If the Governor has not signed the plan within 30 days of delivery by the SEA, the SEA shall submit the plan to the Department without such signature.

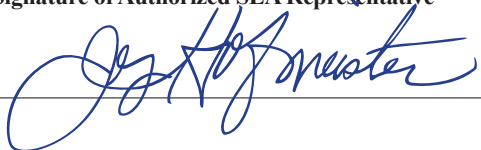
Assurances

In order to receive fiscal year (FY) 2017 ESEA funds on July 1, 2017, for the programs that may be included in a consolidated State plan, and consistent with ESEA section 8302, each SEA must also submit a comprehensive set of assurances to the Department at a date and time established by the Secretary. In the near future, the Department will publish an information collection request that details these assurances.

For Further Information: If you have any questions, please contact your Program Officer at OSS.[State]@ed.gov (e.g., [OSS.Alabama@ed.gov](mailto:OSS.Alabama@ed.gov)).

Cover Page

Contact Information and Signatures	
SEA Contact (Name and Position):  Joy Hofmeister	Telephone:  (405) 521-4885
Mailing Address:  Oklahoma Department of Education 2500 N. Lincoln Blvd. Oklahoma City, OK 73105	Email Address:  Joy.Hofmeister@sde.ok.gov
By signing this document, I assure that: To the best of my knowledge and belief, all information and data included in this plan are true and correct. The SEA will submit a comprehensive set of assurances at a date and time established by the Secretary, including the assurances in ESEA section 8304. Consistent with ESEA section 8302(b)(3), the SEA will meet the requirements of ESEA sections 1117 and 8501 regarding the participation of private school children and teachers.	
Authorized SEA Representative (Printed Name)  Joy L. Hofmeister	Telephone:  (405) 521-4885
Signature of Authorized SEA Representative 	Date:  9/15/2017
Governor (Printed Name)  Mary Fallin	Date SEA provided plan to the Governor under ESEA section 8540:  8/11/2017
Signature of Governor	Date:

Signature of Authorized SEA Representative 	Date:  6/20/2018
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Programs Included in the Consolidated State Plan

*Instructions: Indicate below by checking the appropriate box(es) which programs the SEA included in its consolidated State plan. If an SEA elected not to include one or more of the programs below in its consolidated State plan, but is eligible and wishes to receive funds under the program(s), it must submit individual program plans for those programs that meet all statutory and regulatory requirements with its consolidated State plan in a single submission.*

☒ Check this box if the SEA has included all of the following programs in its consolidated State plan.

or

If all programs are not included, check each program listed below that the SEA includes in its consolidated State plan:

- ☐ Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies
- ☐ Title I, Part C: Education of Migratory Children
- ☐ Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk
- ☐ Title II, Part A: Supporting Effective Instruction
- ☐ Title III, Part A: English Language Acquisition, Language Enhancement, and Academic Achievement
- ☐ Title IV, Part A: Student Support and Academic Enrichment Grants
- ☐ Title IV, Part B: 21st Century Community Learning Centers
- ☐ Title V, Part B, Subpart 2: Rural and Low-Income School Program
- ☐ Title VII, Subpart B of the McKinney-Vento Homeless Assistance Act: Education for Homeless Children and Youth Program (McKinney-Vento Act)

Instructions

*Each SEA must provide descriptions and other information that address each requirement listed below for the programs included in its consolidated State plan. Consistent with ESEA section 8302, the Secretary has determined that the following requirements are absolutely necessary for consideration of a consolidated State plan. An SEA may add descriptions or other information, but may not omit any of the required descriptions or information for each included program.*

COVER SHEET FOR STATE PLAN ASSURANCES

Overview

Section 8304 of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA),<sup>1</sup> provides that each State educational agency (SEA) that submits a consolidated State plan or individual program plan under the ESEA must have on file with the Secretary a single set of assurances. Each SEA must submit to the Secretary a signed set of the enclosed assurances **no later than June 2, 2017**, in order to receive Federal allocations for the following programs for fiscal year 2017:

- Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies
- Title I, Part C: Education of Migratory Children
- Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk
- Title II, Part A: Supporting Effective Instruction
- Title III, Part A: English Language Acquisition, Language Enhancement, and Academic Achievement
- Title IV, Part A: Student Support and Academic Enrichment Grants
- Title IV, Part B: 21st Century Community Learning Centers
- Title V, Part B, Subpart 2: Rural and Low-Income School Program
- Title VII, Subpart B of the McKinney-Vento Homeless Assistance Act: Education for Homeless Children and Youths


Instructions

An authorized representative of the SEA must sign the enclosed assurances and the standard forms attached in Appendix A, and demonstrate agreement by selecting the boxes provided, completing the fields below, and providing a signature in the space provided.

An SEA must submit the signed Assurance Template by emailing it to its contact in the Office of State Support at OSS.[State]@ed.gov (e.g., [OSS.Nebraska@ed.gov](mailto:OSS.Nebraska@ed.gov)) no later than June 2, 2017.

<sup>1</sup> Unless otherwise indicated, citations to the ESEA refer to the ESEA, as amended by the ESSA.

Cover Page

Contact Information and Signatures	
SEA Contact (Name and Position) Joy Hofmeister	Telephone (405) 521-4885
Mailing Address: 2500 N. Lincoln Blvd. Oklahoma City, OK 73105	Email Address: joy.hofmeister@sde.ok.gov
By signing this document, the SEA, through its authorized representative, agrees to the enclosed and attached assurances and certifications.	
Authorized SEA Representative (Printed Name) Joy Hofmeister	Telephone: (405) 521-4885
Signature of Authorized SEA Representative 	Date: 06/01/2017

Identify the Federal programs for which the SEA is applying for funds for fiscal year 2017

- ☒ Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies
- ☒ Title I, Part C: Education of Migratory Children
- ☒ Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk
- ☒ Title II, Part A: Supporting Effective Instruction
- ☒ Title III, Part A: English Language Acquisition, Language Enhancement, and Academic Achievement
- ☒ Title IV, Part A: Student Support and Academic Enrichment Grants
- ☒ Title IV, Part B: 21st Century Community Learning Centers
- ☒ Title V, Part B, Subpart 2: Rural and Low-Income School Program
- ☒ Title VII, Subpart B of the McKinney-Vento Homeless Assistance Act: Education for Homeless Children and Youths

ESEA section 8304 assurances

For each program that an SEA includes in a consolidated State plan<sup>2</sup> or for which the SEA submits an individual program plan, the SEA assures that—

- ☒ Each program will be administered in accordance with all applicable statutes, regulations, program plans, and applications;
- ☒ The control of funds provided under each program and title to property acquired with program funds will be in a public agency, an eligible private agency, institution, or organization, or an Indian Tribe, if the law authorizing the program provides for assistance to those entities; and
- ☒ The public agency, eligible private agency, institution, or organization, or Indian Tribe will administer those funds and property to the extent required by the authorizing law;
- ☒ The SEA will adopt and use proper methods of administering each such program, including—
  - 1) The enforcement of any obligations imposed by law on agencies, institutions, organizations, and other recipients responsible for carrying out each program;
  - 2) The correction of deficiencies in program operations that are identified through audits, monitoring, or evaluation; and
  - 3) The adoption of written procedures for the receipt and resolution of complaints alleging violations of law in the administration of the programs;
- ☒ The SEA will cooperate in carrying out any evaluation of each program conducted by or for the Secretary or other Federal officials;
- ☒ The SEA will use such fiscal control and fund accounting procedures as will ensure proper disbursement of, and accounting for, Federal funds paid to the State under each program;

<sup>2</sup> Under ESEA section 8302, an SEA may include the following ESEA programs in a consolidated State plan: Title I, Part A; Title I, Part C; Title I, Part D; Title II, Part A; Title III, Part A; Title IV, Part A; Title IV, Part B; Title V, Part B, Subpart 2: Rural and Low-Income School Program. Additionally, under the authority in ESEA section 8302(a)(1)(B), the Secretary has designated Title VII, Subpart B of the McKinney-Vento Homeless Assistance Act: Education for Homeless Children and Youths as a program that may be included in a consolidated State plan.

- ☒ The SEA will—
  - 1) Make reports to the Secretary as may be necessary to enable the Secretary to perform the Secretary’s duties under each program; and
  - 2) Maintain such records, provide such information to the Secretary, and afford such access to the records as the Secretary may find necessary to carry out the Secretary’s duties; and
- ☒ Before the consolidated State plan or an individual program plan was submitted to the Secretary (or will be submitted, should the State submit by September 18, 2017), the State afforded a reasonable opportunity for public comment on the plan and considered such comment.

Other Assurances

- ☒ The SEA assures that each such program will be administered in accordance with all applicable consultation requirements, including the State plan public posting requirements in ESEA section 1111(a)(8); and the State plan consultation requirements in ESEA sections 1111(a)(1)(A) for Title I, Part A; 1304(c)(3) for Title I, Part C; 2101(d)(3) for Title II, Part A; 3113(b)(2) and (b)(3)(G) for Title III, Part A; and 4203(a)(12)(A) for Title IV, Part B.
- ☒ Consistent with ESEA section 8532, the SEA certifies that it will establish and implement a statewide policy requiring that a student attending a persistently dangerous public elementary school or secondary school, including a public charter school, as determined by the State in consultation with a representative sample of local educational agencies, or who becomes a victim of a violent criminal offense, as determined by State law, while in or on the grounds of a public elementary school or secondary school that the student attends, be allowed to attend a safe public elementary school or secondary school within the local educational agency, including a public charter school.
- ☒ By submitting a State plan, consistent with 34 C.F.R. 76.104, the SEA certifies that:
  - 1) The SEA is eligible to submit the consolidated State plan or individual program plan.
  - 2) The SEA has authority under State law to perform the functions of the State under the program(s).
  - 3) The SEA legally may carry out each provision of the plan.
  - 4) All provisions of the plan are consistent with State law.
  - 5) A State officer, specified by title in the certification, has authority under State law to receive, hold, and disburse Federal funds made available under the plan.
  - 6) The State officer who submits the plan, specified by title in the certification, has authority to submit the plan.
  - 7) The SEA has adopted or otherwise formally approved the plan.
  - 8) The plan is the basis for State operation and administration of all the programs included in the plan.
- ☒ The SEA certifies and assures compliance with the following enclosed forms:
  - 1) Assurances for Non-Construction Programs (SF 424B Form).
  - 2) Disclosure of Lobbying Activities (SF LLL).
  - 3) Certification Regarding Lobbying (ED 80-0013 Form).

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ACRONYM GLOSSARY

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<b>ABCTE</b>	American Board for the Certification of Teacher Excellence
<b>AP</b>	Advanced Placement
<b>APR</b>	Annual Performance Reporting
<b>CACFP</b>	Child and Adult Care Food Programs
<b>CARTT</b>	Comprehensive Academic Resource and Training Toolkit
<b>CCLC</b>	(21st) Century Community Learning Center
<b>CCRA</b>	College- and Career-Readiness Assessment
<b>CCSSO</b>	Council of Chief State School Officers
<b>CEP</b>	Community Eligibility Provision
<b>CFR</b>	Code of Federal Regulations
<b>CSI</b>	Comprehensive Support and Improvement
<b>CSPR</b>	Consolidated State Performance Report
<b>DLM</b>	Dynamic Learning Maps
<b>EL</b>	English Learners
<b>ELA</b>	English Language Arts
<b>ELAP</b>	English Language Academic Plan
<b>ELD</b>	English Language Development
<b>ELP</b>	English Language Proficiency
<b>ELPA</b>	English Learner Proficiency Assessment
<b>ESEA</b>	Elementary and Secondary Education Act

<b>ESL</b>	English as a Second Language	<b>MDT</b>	Multi-Disciplinary Team
<b>ESSA</b>	Every Student Succeeds Act	<b>MEP</b>	Migrant Education Program
<b>FAPE</b>	Free Appropriate Public Education	<b>MicraCORE</b>	Migrant Reading Achievement: Comprehensive Online Reading Education
<b>FAY</b>	Full Academic Year	<b>MTSS</b>	Multitier System of Support
<b>GED</b>	General Equivalency Diploma	<b>NAEP</b>	National Assessment of Educational Progress
<b>GMS</b>	Grants Management System	<b>NGA</b>	National Governors’ Association
<b>HEAT</b>	Homeless Education Advisory Team	<b>NIC</b>	Network Improvement Community
<b>HLS</b>	Home Language Survey	<b>NIEER</b>	National Institute for Early Education Research
<b>HSED</b>	High School Equivalency Diploma	<b>NISL</b>	National Institute for School Leadership
<b>HumPRO</b>	Human Resources Research Organization	<b>NMAR</b>	No Measurable Academic Response
<b>IB</b>	International Baccalaureate	<b>NSFY</b>	New Skills for Youth initiative
<b>ICAP</b>	Individual Career Academic Plan	<b>NTEP</b>	Network for Transforming Educator Preparation
<b>IDEA</b>	Individuals with Disabilities Education Act	<b>OAC</b>	Oklahoma Administrative Code
<b>IEP</b>	Individualized Education Program	<b>OAS</b>	Oklahoma Academic Standards
<b>IRRC</b>	Identification and Rapid Recruitment Consortium	<b>OER</b>	Open Education Resources
<b>K W-APT</b>	Kindergarten WIDA-ACCESS Placement Test	<b>OGET</b>	Oklahoma General Education Test
<b>LEA</b>	Local Educational Agency	<b>OKDHS</b>	Oklahoma Department of Human Services
<b>LIEP</b>	Language Instruction Education Program	<b>OPTE</b>	Oklahoma Professional Teacher Examination
<b>LNHSA</b>	Locally Selected, Nationally Recognized High School Assessment	<b>OSAT</b>	Oklahoma Subject Area Test
<b>L2S</b>	Lead to Succeed	<b>OSBE</b>	Oklahoma State Board of Education



<b>OSDE</b>	Oklahoma State Department of Education	<b>SSDP</b>	State Service Delivery Plan
<b>OSDH</b>	Oklahoma State Department of Health	<b>SSIP</b>	State Systemic Improvement Plan
<b>OSTP</b>	Oklahoma School Testing Program	<b>STEM+C</b>	Science Technology Engineering Mathematics Computer Science
<b>OTISS</b>	Oklahoma Tiered Intervention System of Support	<b>TEA</b>	Tribal Education Agencies
<b>PAC</b>	Parental Advisory Council	<b>TLE</b>	Teacher Leader Effectiveness
<b>PASS</b>	Priority Academic Student Skills	<b>TSI</b>	Targeted Support and Improvement
<b>PD</b>	Professional Development	<b>USDA</b>	U.S. Department of Agriculture
<b>PFS</b>	Priority for Services	<b>USDE</b>	United States Department of Education
<b>PKST</b>	Pre-K Screening Tool	<b>W-APT</b>	WIDA-ACCESS Placement Test
<b>PL Focus</b>	Professional Learning Focus	<b>WIDA</b>	World-Class Instructional Design and Assessment
<b>Project ENGAGE</b>	Equipping a New Generation for Academic Growth & Excellence	<b>WIOA</b>	Workforce Innovation Opportunity Act
<b>RAO</b>	Regional Accreditation Officer	<b>YPQA</b>	Youth Program Quality Assessment
<b>RSA</b>	Reading Sufficiency Act	<b>YPQI</b>	Youth Program Quality Intervention
<b>SEA</b>	State Educational Agency		
<b>SFSP</b>	Summer Food Service Program		
<b>SIG</b>	School Improvement Grant		
<b>SNAP</b>	Supplemental Nutrition Assistance Program		
<b>SPDG</b>	State Personnel Development Grant		
<b>SREB</b>	Southern Regional Education Board		
<b>SSAE</b>	Student Support and Academic Enrichment		



# Vision

## **Oklahoma ESSA Consolidated State Plan**



# INTRODUCTION

Through the Every Student Succeeds Act (ESSA), the Oklahoma State Department of Education (OSDE) has reaffirmed its focus on academic success, exceptional educators and community engagement – but it also provides an opportunity to spotlight the OSDE’s commitment to an individualized approach in three areas: student learning, professional development for educators and school support.

Oklahoma is known for a pioneering, can-do spirit. That resolve is reflected in how the OSDE fulfills its mission of readying students for future success in college, career and life. There is no one-size-fits-all prescription for educating a child. While every student can learn, it is also true that every student brings his or her own unique strengths, needs, perspective, passions and aspirations to the classroom. Under State Superintendent of Public Instruction Joy Hofmeister, the OSDE recognizes that every child, teacher and individual school can be successful if provided the appropriate resources and vision.

Strong collaboration and consultation strategies are critical for a pathway to success. No one has a monopoly on good ideas, and in the creation of multiple drafts of the Oklahoma ESSA Consolidated State Plan, the OSDE sought – and will continue to seek – feedback from a diverse array of education stakeholders. The OSDE understands that effective coordination must span many arenas to ensure a robust, high-performing public education system.

This work comes in the midst of very challenging times, with Oklahoma’s public schools battered by a historic teacher shortage and great fiscal uncertainty. The state’s funding per pupil has dropped by 24.2% since 2008.<sup>1</sup> These cuts have resulted in the largest negative percentage change in the country, according to the Center on Budget and Policy Priorities. However, numerous glimmers of promise are also evident. Oklahoma students have seen recent increases in reading and science proficiency via the National Assessment of Educational Progress (NAEP), also known as the nation’s report card. The state’s average ACT exam score of 19.4 is noteworthy, considering that the state increased its participation by 29% in 2017, the largest gain in test-takers in the nation. Nearly 16,500 Oklahoma students took Advanced Placement (AP) tests in 2016, a 3.5% jump over the previous year.

On a more fundamental level, education and how to better it have taken center stage in a statewide conversation. Education’s many stakeholders – essentially, everyone interested in Oklahoma’s growth and prosperity – are engaged in a far-reaching dialogue.

The OSDE 8-Year Strategic Plan, called **Oklahoma Edge**, is built on four key pillars with supporting strategies encompassing the long-term goals and initiatives outlined in the ESSA Consolidated State Plan. Included in this overarching plan are four traits to which the OSDE is committed for the sake of ensuring equity for all students.

The ESSA Consolidated State Plan is a reflection of the OSDE 8-Year Strategic Plan, which is designed as a framework for decision-making within the department as well as with its partners in the field. As a result, the agency’s mission and efforts will become increasingly clear and transparent, and trust among Oklahoma’s education stakeholders will strengthen as all parties work toward a strong and equitable public education system.

The ultimate goal is as simple as it is critical: Every child deserves and must have the opportunity for a strong, competitive education that can lead to a productive and fulfilling life.

The OSDE 8-Year Strategic Plan follows:

1

**PILLAR 1**  
**Achieve academic success.**  
To ensure a high-quality public education, the OSDE will close the opportunity and achievement gap for each student in Oklahoma.

- STRATEGY 1.1**  
Focus on early childhood education.
- STRATEGY 1.2**  
Ensure effective implementation of the Oklahoma Academic Standards by using available data to target high-quality, aligned resources to educators.
- STRATEGY 1.3**  
Improve student equitable access to meaningful and diverse pathways that lead to careers and postsecondary opportunities.
- STRATEGY 1.4**  
Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.
- STRATEGY 1.5**  
Reduce barriers to equity and close the opportunity and achievement gap for all students.

Every child deserves and must have the opportunity for a strong, competitive education that can lead to a productive and fulfilling life.

<sup>1</sup> Michael Leachman et al., “Most States Have Cut School Funding, and Some Continue Cutting, Center on Budget and Policy Priorities,” Jan. 25, 2016, <https://www.cbpp.org/research/state-budget-and-tax/most-states-have-cut-school-funding-and-some-continue-cutting>.



**STRATEGY 1.6**

Enable Oklahoma’s students to benefit fully from digital-age teaching and learning.

**PILLAR 2**

**Build exceptional educators and schools.**

The OSDE will support the recruitment, preparation and retention of highly effective teachers and leaders.

**STRATEGY 2.1**

Reinforce the teacher pipeline by supporting teacher pre-service training, recruitment, preparation and retention.

**STRATEGY 2.2**

Provide support and professional learning to increase instructional capacity for teachers and leaders.

**STRATEGY 2.3**

Provide district and school leaders with the training and support needed to improve instruction in their schools.

**PILLAR 3**

**Create engaged communities.**

The OSDE will build external capacity to provide strong academic support through family and community engagement.

**STRATEGY 3.1**

Advocate for a strong public education system and elevate the education profession.

**STRATEGY 3.2**

Strengthen and increase family and community engagement to support student learning.

**STRATEGY 3.3**

Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

**PILLAR 4**

**Develop internal capacity.**

The OSDE will build its internal capacity to serve the field and use data to make informed decisions.

**STRATEGY 4.1**

Sustainably improve and strengthen agency capacity to fulfill its mission by sharing knowledge and best practices across all teams, developing skills and improving teamwork.

**STRATEGY 4.2**

Leverage technology systems and governance collaboration to improve access to data while protecting student information, allowing the OSDE and districts to make data-informed decisions.

**GOALS**

By 2025 the OSDE envisions several key improvements and accomplishments for the state of public education in Oklahoma.

**Score among the top 20 highest-performing states on NAEP in all subjects for fourth grade and eighth grade.**

With the notable and concerning exception of eighth-grade math, the proficiency of Oklahoma fourth- and eighth-grade students in reading and mathematics has hovered just below the national average. In the realm of science, however, Oklahoma fourth- and eighth-grade students have seen a significant

narrowing of the “achievement gap,” while the state’s Native American student population consistently scores above the national average in all subjects for fourth and eighth grades. Oklahoma is poised for much more significant progress on NAEP.

**Reduce by 50% the need for math and English language arts remediation after high school.**

Thirty-nine percent (as compared to 32% nationally) of all first-year Oklahoma college students who graduated from an Oklahoma public high school require remedial courses before earning college credit, which the Center for American Progress estimates is costing Oklahoma families \$22.2 million yearly. In math alone, the remediation rate for the same group in 2015-16 was 33.6%. It is time to employ new strategies – from adopting new, vertically aligned academic standards to ensuring access to a nationally recognized college- and career-readiness assessment – to close lingering achievement gaps. Reducing the math remediation rate by 50% will affect approximately 5,200 students annually.

**Rank among the top 10 states with the highest graduation rate for students in four-, five- and six-year cohorts.**

The state’s current four-year cohort graduation rate of 82.5% is close to the national average, but that percentage may be challenging to maintain as the OSDE ratchets up higher expectations for student achievement with new, more comprehensive academic standards. Ultimately Oklahoma wants to achieve

a 100% graduation rate, but the OSDE’s intermediate goal toward that end is 90%, which would ensure top 10 status for the four-year cohort. In doing so, Oklahoma would have to graduate at least 2,931 additional students per year based on current four-year cohort data. Including a five- and six-year cohort helps to ensure that English learners, alternative education students and our most vulnerable special education students receive the time and extra support they need to be successful transitioning beyond high school.

**Ensure that 100% of students in grades 6 through 12 develop a useful and meaningful Individual Career Academic Plan (ICAP).**

Oklahoma passed into law new graduation requirements to include an ICAP for all students beginning with pilot districts over a three-year implementation. Aligning with the OSDE’s commitment to an individualized approach to student learning, the ICAP engages students and families to develop a clear and workable pathway to postsecondary success.

Oklahoma defines “college and career ready” to mean that students graduate from high school prepared to enter and succeed in postsecondary opportunities, whether college or career. ICAPs, which would impact roughly 335,000 students annually, are a central component of equipping students for this challenge.

### Align early childhood education and learning foundations to ensure at least 75% of students are “ready to read” upon kindergarten entry.

First and foremost, the OSDE recognizes that a parent is a child’s first and best teacher. After nearly two decades of prioritizing early childhood education in Oklahoma, copious evidence points to the effectiveness of early childhood education in preparing children for lives of learning and academic success. Oklahoma will continue leveraging private and public partnerships for early learning opportunities, professional development support and strategic intervention to establish an unshakeable foundation across the multiple domains of early childhood development.

Oklahoma defines “ready to read” to mean that children have the necessary prerequisite skills needed to understand print, including meeting the needs of the whole child in cognitive, physical, social and language development areas as well as in approaches to learning.

### Increase student access to effective teachers, thereby reducing the need for emergency-certified teachers by 95%.

While a teacher shortage has affected schools nationwide, the impact has been particularly severe in Oklahoma. In 2011, the Oklahoma State Board of Education (OSBE) was asked to approve 32 emergency certifications for school districts that had exhausted efforts to hire certified teachers for certain positions. By the 2016-17 school year, the number of certificate requests had skyrocketed to 1,160 and currently shows no sign of waning.

Because a teacher may hold emergency certification in multiple subject areas, the number of certificates is larger than the number of teachers holding certification. The OSDE is grateful for the dedication and passion of emergency-certified teachers, many of whom have come from various careers and professions to share their expertise with Oklahoma’s younger generations. But that means well more than 50,000 public school students have a classroom teacher who may lack critical training. Legislative action is necessary to ensure competitive regional compensation for Oklahoma teachers, but the OSDE is committed to other efforts to expand and enhance the teacher-to-classroom pipeline, such as meaningful professional development.

## INITIATIVES

The OSDE’s commitment to an individualized approach brings a renewed clarity as the agency works to meet the needs of individual students, individual teachers and individual schools. Beyond the aforementioned aspirational goals, the OSDE is committed to the following initiatives as their collective impact accelerates overall success for Oklahoma’s students, educators and schools.

### Increase access to child nutrition by removing barriers to participation in food programs.

Recognizing that 1 in 4 Oklahoma children is food insecure and 61% of students qualify for free- and reduced-price lunch, the OSDE will actively work to improve child nutrition and learning capacity by

# Oklahoma State Department of Education 8-Year Strategic Goals

Score among the top 20 highest-performing states on NAEP in all subjects for fourth grade and eighth grade.

Reduce by 50% the need for math and English language arts remediation after high school.

Rank among the top 10 states with the highest graduation rate for students in four-, five- and six-year cohorts.

Ensure that 100% of students in grades 6 through 12 develop a useful and meaningful Individual Career Academic Plan (ICAP).

Align early childhood education and learning foundations to ensure at least 75% of students are “ready to read” upon kindergarten entry.

Increase student access to effective teachers, thereby reducing the need for emergency-certified teachers by 95%.

removing barriers to participation in school programs such as Community Eligibility Provision (CEP), Breakfast in the Classroom and Summer Feeding through the U.S. Department of Agriculture. With CEP, for example, the OSDE has set a goal to have 75% of eligible schools participating by the year 2025.

■ **Leverage out-of-school time to address students’ needs and to engage family and community.**

The OSDE will utilize the collective power of stakeholders to meet students’ academic needs through tutoring and other academic-related activities. To meet social and emotional needs – addressing at-risk indicators such as food insecurity – the OSDE will partner with family and community members.

■ **Increase identification of gifted and talented minority students.**

Equitable access to educational opportunities should be afforded to all Oklahoma students. The OSDE will heighten counselor and teacher training to identify gifted and talented students from every student group.

■ **Engage in collaborative identification and supports for students of incarcerated parents.**

One in 10 Oklahoma students has or has had an incarcerated parent. Collaborative efforts with other agencies and nonprofit organizations will bolster the OSDE’s pursuit to establish tiered intervention and mentoring for these at-risk students.

■ **Utilize a risk analysis, applying preventive measures for teachers who may become ineffective.**

The OSDE recognizes that the prevention of ineffective teaching is a proactive effort benefiting teachers and ultimately their students; therefore, the agency intends to apply a risk analysis to include multiple indicators to inform the OSDE’s professional development, retention efforts and use of resources.

■ **Promote a well-rounded education by establishing Programs of Distinction whereby schools are recognized for high-quality curricular and extracurricular programs.**

In an effort to acknowledge strengths and learning opportunities within a particular school beyond math and English language arts, the OSDE has identified specific components of a well-rounded education and a rubric to measure levels of distinction within those areas – such as world languages, social studies/civics, the fine arts, physical education/health, digital-age technology, advanced coursework opportunities and STEM+Computer Science (STEM+C).

Districts may apply for statewide recognition for Programs of Distinction, which in turn will be included on the state accountability reporting dashboard along with Oklahoma’s A-F School Report Card, educator profile, instructional calendar data, per-pupil expenditure and other information.

**EQUITY TRAITS ALIGNED TO THE OSDE 8-YEAR STRATEGIC PLAN**

These traits originate from the 10 commitments produced by *Leading for Equity: Opportunities for State Education Chiefs*, an Aspen Institute and Council of Chief State School Officers (CCSSO) collaborative document. Oklahoma chooses four of the 10 commitments on which to focus educational equity attention and capacity.<sup>2</sup>

**Measure What Matters**

**Create accountability for equity.**

The OSDE is particularly dedicated to the implementation of multiple measures of accountability for school performance and evidence-based interventions as well as transparency for public reporting.

**Start Early**

**Invest in the youngest learners.**

Oklahoma’s pronounced support of early childhood programs continues to be a priority, especially as the Oklahoma Academic Standards are now vertically aligned beginning in Pre-K, establishing a foundation for more comprehensive standards.

**Value People**

**Focus on teachers and leaders.**

In the midst of a shortage of effective Oklahoma educators, the OSDE will continue to support its Equitable Access to Excellent Educators plan strategies implemented in 2015. These strategies of meaningful professional development, leadership training and educator preparation collaboration help to build momentum toward a strong, diverse and data-informed talent pool.

**Empower Student Options**

**Ensure families have access to high-quality educational options that align to community needs.**

Regardless of their geographic location, Oklahoma students deserve access to a variety of educational choices that meet their learning needs while meeting the needs of the community.

After numerous town halls, forums, surveys and ongoing stakeholder input and feedback, the OSDE remains committed to building capacity for individual learners, teachers and school leaders. All students deserve a high-quality and competitive education that prepares them to be ready for tomorrow, ready for life. Although immediate needs and lingering challenges persist, the resolve of stakeholders remains even greater to invest in a strong public education system. If Oklahomans engage around the OSDE 8-Year Strategic Plan, then without question, Oklahoma will be on the edge of exponential growth and meaningful achievement for individual students, professional educators and schools across the state.

**STAKEHOLDER ENGAGEMENT FOR THE OKLAHOMA ESSA CONSOLIDATED STATE PLAN**

Forging solid working relationships to support the agency’s mission is reflected in the following strategies:

**STRATEGY 3.2**

Strengthen and increase family and community engagement to support student learning.

<sup>2</sup> The Aspen Education & Society Program and the Council of Chief State School Officers, “Leading for Equity: Opportunities for State Education Chiefs, Washington, D.C., 2017, <https://www.aspeninstitute.org/publications/leading-equity-opportunities-state-education-chiefs/>.



**STRATEGY 3.3**

Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

**STRATEGY 4.1**

Sustainably improve and strengthen agency capacity to fulfill its mission by sharing knowledge and best practices across all teams, developing skills and improving teamwork.

**STRATEGY 4.2**

Leverage technology systems and governance collaboration to improve access to data while protecting student information, allowing the OSDE and districts to make data-informed decisions.

The OSDE established and implemented a formal process for vetting feedback as seen in Figure 1. First, feedback was reviewed

by the appropriate OSDE division and staff. For example, a suggestion for improving a low-performing school was evaluated by the office of school support, and so on.

Next, to ensure consistency and cohesiveness in evaluating feedback, each OSDE staff member who reviewed feedback completed a form that detailed recommended items and non-recommended items with an explanation for each. Finally, the agency’s lead ESSA team reviewed the recommendations for potential inclusion in the 8-Year Strategic Plan. The OSDE committed to assess each comment for possible use.

The OSDE began obtaining early feedback prior to the first draft of the ESSA Consolidated State Plan. Initial efforts began with a series of luncheons in which attendees considered basic

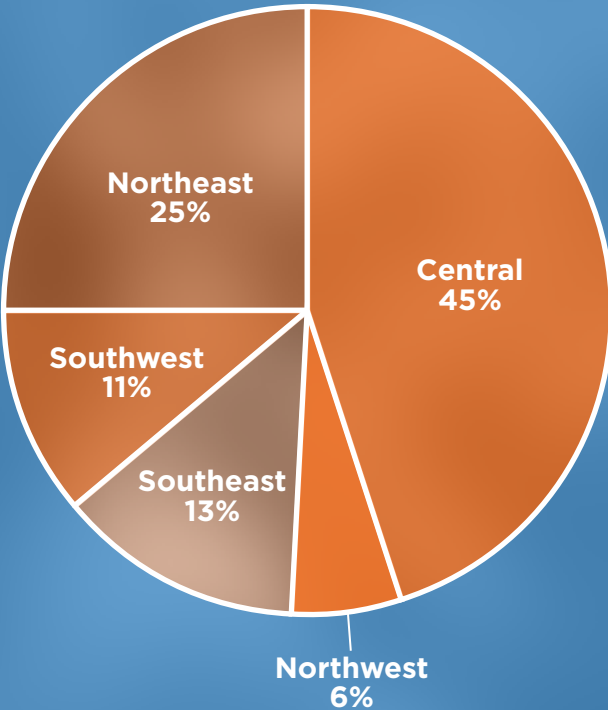
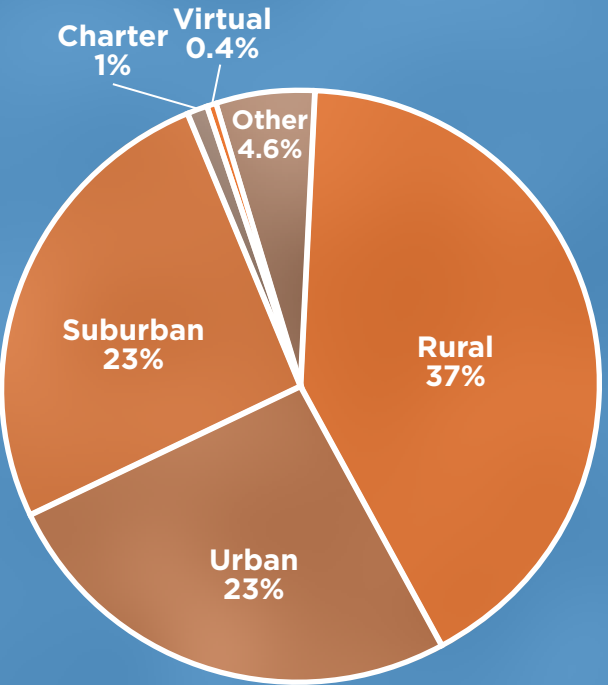
questions on the major components of the ESSA. Held in six cities and towns across the state during the agency’s 2016 EngageOK education conference, the luncheons utilized a polling platform to gather responses. A full report of the feedback can be found in Appendix 1.

Also during the 2016 EngageOK conference, stakeholders in breakout sessions utilized a polling platform to begin conversations that would shape the direction of changes to assessment and accountability. A full report of these responses can be found in Appendix 2.

The OSDE expanded its efforts for early feedback by deploying a survey in both English and Spanish. The agency distributed the 17-question survey to a range of groups – including educators, administrators, students, businesses, foster care agencies, military installations and Native tribes – in order to capture responses from all education stakeholders. A full list of those invited to complete the survey is in Appendix 3, and a full report of the survey responses can be found in Appendix 4. A representation of the more than 3,000 respondents is shown in Figure 2, which includes feedback through May 2017.

Superintendent Hofmeister has in place 13 active advisory councils from which the OSDE sought verbal feedback, including those comprised of teachers, superintendents, principals, parents, students and counselors; business, Hispanic, African American and faith-based community leaders; and those representing nonprofit/wrap-around services, foundations and education-based associations. The OSDE also solicited feedback from its Teaching and Learning Advisory, Assessment and Accountability Advisory, TLE Regional Advisory Stakeholder Groups,

**FIGURE 2:**  
**Representation of Stakeholder Feedback**



**FIGURE 1: Feedback Vetting Process**



Teacher Shortage Task Force, Committee of Practitioners, the Oklahoma Partnership for School Readiness and the Oklahoma Advisory Council on Indian Education.

After posting the ESSA Draft 1 Framework, the OSDE collected additional feedback for its plan over the course of a series of town hall meetings with Superintendent Hofmeister held in seven urban, suburban and rural locations across the state. Overall, the meetings drew 998 attendees. The agency used a set of seven questions in each location to compare perspectives across the state. While questions about challenges facing education were popular in some locations, in others meeting participants focused on attributes of a successful school and a well-rounded education for students. Evident in all the meetings were concerns about education funding and Oklahoma’s corresponding teacher shortage. Participants at all town hall locations discussed the importance of the ability to communicate and demonstrate the need for excellence in all educational endeavors for every child.

A full report of the feedback received from the town hall meetings can be found in Appendix 5.

The OSDE also released a survey alongside the ESSA Draft 1 Framework to collect specific feedback on key decision points for Draft 2. The 18-question survey required respondents to read the plan and respond in the same setting. While the second survey received fewer responses than the first, the OSDE thanks the 153 people who took the time to read and respond to the ESSA Draft 1 Framework. Responses generally mirrored those received through other means, specifically the need and desire for assistance

from the OSDE regarding the support of low-performing schools. A full report of the survey responses can be found in Appendix 6.

Contributing to the conversation about well-rounded student experiences, another intentionally focused meeting with advocates of arts education proved meaningful. Participants at this meeting emphasized access to art teachers in rural schools where one is not afforded. Partnerships between district and community in these settings is a realistic solution. Additionally, the infusion of the arts (drama, dance, music, visual and media arts) as an engagement method is an evidence-based strategy that addresses chronic absenteeism.

The work of the ESSA surrounding the topics of assessment and accountability coincided with new state legislative mandates that required the OSDE to research and provide recommendations to the Legislature for a new system of assessments, accountability and graduation requirements. To accomplish the state directive, and to support feedback efforts required by the ESSA, the OSDE assembled an Assessment and Accountability Task Force to review the latest research and collaborate with a slate of experts in developing recommendations. The specific recommendations gathered and compiled by the task force are included in Title I, Part A on accountability. A full description of the feedback can be found in the Assessment Requirements report in Appendix 7.

Recognizing that Oklahoma has among the highest number of tribal students in the nation at more than 130,000, the OSDE set out to embark upon a unique collaboration process with Oklahoma’s 39 recognized

tribal nations for its ESSA Consolidated State Plan. The OSDE presented an update on the State Plan and topics of concern to tribal communities at each of the quarterly meetings of the Oklahoma Advisory Council on Indian Education. In spring 2017, the OSDE held a specific topical convening on Indian education. Representatives from tribal associations and LEA Indian education directors shared successes within their communities that have lifted outcomes for Native students as well as provided suggestions on culturally relevant teacher training. Suggestions from the convening included reporting Indian student counts through Title VI rather than the reported count from the state and engaging students with their own heritage to successfully address early college and career readiness and promotion of Native language development and curriculum.

This collaboration led to a first-of-its-kind event where an estimated 350 individuals representing 22 tribes and 120 school districts gathered to discuss the provisions of the ESSA and encourage greater partnerships between LEAs and tribes. A priority at this convening was the common understanding that what constitutes meaningful consultation (1) occurs at the earliest possible stage, (2) is a continuous process, (3) includes open communication and coordination, (4) works off the understanding that the process is equally as important as the results and (5) outlines minimum guidelines, expectations and outcomes. A full report of the Tribal Nations and Public School Collaborative Engagement Workshop can be found in Appendix 8.

Oklahoma ESSA Consolidated State Plan Timeline


- July 15, 2016**  
ESSA Survey 1
- July 18, 2016**  
6-City EngageOK  
Conference Kickoff
- August 4, 2016**  
Assembling of Assessment &  
Accountability Task Force
- October 18, 2016**  
7-City Town Hall  
Meeting Kickoff
- November 10, 2016**  
Draft 1 Framework & Survey  
Posted for Public Comment
- April 5, 2017**  
Tribal/LEA Collaborative  
Engagement Workshop
- June 1, 2017**  
Draft 2 Posted for Public Comment
- July 10, 2017**  
Draft 3 Posted for 30-day Public  
Comment Period
- July 10, 2017**  
7-City EngageOK  
Conference Kickoff
- August 11, 2017**  
Submitted Final Plan to  
Governor for Review
- September 18, 2017**  
Submitted Final Plan to the USDE



The OSDE also created a guide for LEAs to reference as they engage in the tribal consultation requirements of section 8538 of the ESEA as amended by the ESSA. The Oklahoma Tribal Consultation Guide is in Appendix 9. The OSDE continues to facilitate and encourage LEAs to conduct meaningful consultation with tribal leadership to better serve Native students.

Upon release of the ESSA Consolidated State Plan Draft 2, Oklahoma received many comments addressing a wide variety of areas. In response, the OSDE provided additional clarification in Draft 3 and incorporated feedback received prior to July 2017. Draft 3 improvements included additional details on how Oklahoma will serve its growing EL population and distribute Title IV, Part A Student Support and Academic Enrichment (SSAE) grants. Subsequent to the posting of Draft 3, the OSDE provided the public a final opportunity for comment over a 30-day period. Also during this time, the OSDE met with its Committee of Practitioners for a final review. The OSDE finalized the plan and submitted it to the governor on Aug. 11, 2017, for review and the opportunity to lend her signature in support of the plan. Oklahoma submitted its final ESSA Consolidated State Plan to the U.S. Department of Education prior to the Sept. 18, 2017, submission date.

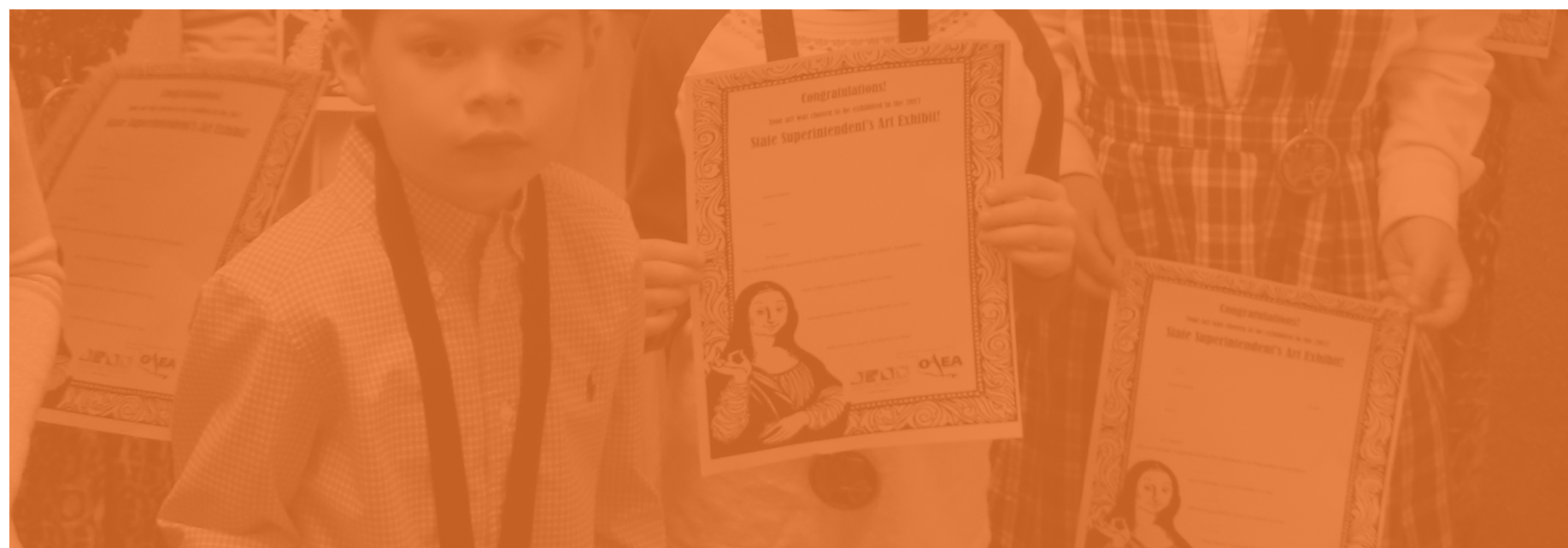
Stakeholder feedback and the OSDE’s response to that feedback is referenced at the end of each section of the ESSA Consolidated State Plan.

The OSDE will continue to capitalize on the relationships and collaborative efforts that have been built through the ESSA stakeholder engagement process as it begins implementation of the State Plan. 

**Participants at all town hall locations discussed the importance of the ability to communicate and demonstrate the need for excellence in all educational endeavors for every child.**



# **Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)**





**A. Title I, Part A:  
Improving Basic  
Programs Operated  
by Local Educational  
Agencies (LEAs)**

According to the U.S. Department of Education (USDE), a Title I schoolwide program is a comprehensive reform strategy to upgrade the entire educational program in a Title I school in order to improve the achievement of the lowest-performing students through consolidating federal, state and local education funds to benefit all students. A Title I school with 40% or more of its students living in poverty is eligible to implement a schoolwide program. To meet the provision in the ESSA section 1114(a)(1)(B) starting with the school year 2017-18, the OSDE will allow LEAs with schools that have a poverty level less than 40% to submit a letter of intent (which will serve as a waiver request) to operate a schoolwide program.

A school that operates a schoolwide program is able to take advantage of numerous benefits, including:

- **Serving all students.** A school operating a schoolwide program does not need to identify particular students as eligible to participate (ESEA section 1114(a)(2)(A)(i)).
- **Consolidating federal, state and local funds.** A school operating a schoolwide program may consolidate federal, state and local education funds to better address the needs of all students in the school (ESEA section 1114(a)(1)(3)).

Over the past two years, the OSDE has offered workshops and professional development opportunities to encourage districts to take advantage of Title I’s schoolwide provisions to allow more funding flexibility. The agency provides a tutorial webinar and on-site training throughout the year for schools wishing to adopt a schoolwide funding strategy.

**STRATEGIES FOR OPERATING  
SCHOOLWIDE PROGRAMS**

Through webinars, trainings and conferences, the OSDE continues to encourage LEAs to operate schoolwide programs, due to several advantages:

- All students are considered Title I students and may participate in Title I programs and activities;
- Title I funds can be spent with flexibility to help schools close the opportunity gap for under-served youth;
- In addition to Title I, Part A funds, other Title funds (such as Title II, Part A, Title III, Part A and Title V, Part B) can be consolidated and used along with state and local funds to improve the entire educational program;
- Fiscal and financial barriers are eliminated, as schools are not required to maintain separate fiscal accounting documentation;
- Time distribution records are simplified, with personnel considered to be paid from one funding source;

- Programs under the grade level of the compulsory requirements of public education can be supported (such as Pre-K for 3- to 4-year-olds), to better prepare the cognitive, social, emotional and health development of all students; and
- Developmentally delayed students and students with disabilities may be served.

Despite the flexibilities schoolwide programs offer LEAs and schools when using federal funds, participating schools may still only use funds to supplement the amount that would be made available for the school from state and local sources in the absence of federal funds (ESEA sections 1114(a)(2)(B) and 1118(b)).

**LEA AND CHARTER SCHOOL  
ALLOCATION CALCULATION**

To allocate Title I funds equitably to all LEAs in Oklahoma, the OSDE follows the methodology provided by the USDE’s guidance when calculating the Title I, Part A allocations.

The USDE’s predetermined allocations are based on U.S. Census Bureau data. For LEAs under special circumstances (consolidated, annexed, charter schools, etc.), the OSDE makes adjustments allowed by the Elementary and Secondary Education Act (ESEA) to the base allocations from the USDE. For large LEAs, which serve areas with total populations of 20,000 or more, allocations are based on poverty counts. For small LEAs, which serve an area with a total population of less than 20,000, the

Over the past two years, the OSDE has offered workshops and professional development opportunities to encourage districts to take advantage of Title I’s schoolwide provisions to allow more funding flexibility.

guidance allows the OSDE to use alternative data. Oklahoma uses data from the free- and reduced-price lunch counts for ages 5-17.

The OSDE reserves 1% of the funds for SEA administrative purposes and the required 7% set-aside for school improvement. The remaining Title I, Part A funds distributed to LEAs are used to improve the academic achievement of disadvantaged students, including those who are homeless, English learners (EL), migratory, neglected and delinquent and in foster care.

LEVERAGING FEDERAL FUNDS

The OSDE continues to train LEAs on the advantages of leveraging federal funds to support improving the academic achievement of all students. One efficient method for leveraging funds is to braid funds for the ultimate goal of transforming low-performing schools into high-performing schools. This method can result in higher graduation rates, improved student and teacher attendance, reduced dropout rates and stronger parent and family engagement.

DATA SHARING

The collection, assessment and interpretation of data are crucial for determining student needs. Different types of data will provide a global image of the entire educational program in a school setting as well as allow implementation of the appropriate strategies necessary for student academic improvement. The OSDE’s student information system, called the Wave, collects student data regarding student assessment, subgroup status (such as migrant, EL, homeless, neglected or delinquent), demographic enrollment, attendance,

discipline, student academic records, student contact, etc. The intent of creating this data system includes:

- Strengthening the flow of data between the OSDE and LEAs;
- Improving data quality in the state student information system;
- Expanding data use by providing local school personnel with appropriate access to data; and
- Providing support to those who work with and rely on student data.

Having this information in a centralized data system gives educators, parents, policymakers and other leaders the opportunity to utilize federal funding equitably to meet the needs of all students.

PARENT AND FAMILY ENGAGEMENT

Through webinars, trainings, conferences, newsletters and the website, the OSDE continues to promote and encourage parent and family engagement through the following:

- The Title I advisory council (comprised of LEA representatives and community organizations) analyzes parent and family engagement best practices to share with LEAs throughout the state;
- Research by the OSDE on culture-specific strategies focuses on strengthening parent and family;

- A parent and family engagement toolkit serves as a framework for LEAs to help develop, sustain and retain parent and family engagement; and
- A comprehensive approach modeled by the OSDE assists LEAs in developing possible partnerships with parents, schools and communities to increase parent engagement.

EFFORTS TO COMBAT HUNGER

Another initiative that is an OSDE priority involves nourishment, as 1 in 4 Oklahoma children struggles with hunger. Research shows that hunger leads to decreased academic achievement in school.<sup>3</sup> Subsequently, the OSDE will encourage LEAs and aid them in pursuing all efforts to attain direct certification status (pre-qualification for free lunches based on income) for as many students as possible. These efforts will include continued collaboration with tribal nations and statewide groups to achieve easier access to free meals for their students. Efforts will continue to incorporate data from recipients of the U.S. Department of Agriculture’s (USDA’s) Food Distribution Program on Indian Reservations with data from the Supplemental Nutrition Assistance Program (SNAP).

Community Eligibility Provision (CEP), the USDA’s provision to provide free meal access to all students, will continue to be encouraged and implemented in as many LEAs and sites as applicable. CEP allows more students to eat breakfast and lunch without financial barriers. Oklahoma will focus on policies and procedures to see

significant gains in the number of districts participating in the CEP. Oklahoma’s goal is to increase participation of eligible schools providing free meal access to all students from 34% to 75% by 2025.

Repeated studies illustrate that students increase learning capabilities and maintain better behavior when they have started the day free of hunger. Schools are being encouraged to augment student participation in school breakfast through “Breakfast in the Classroom” or another alternative method to the traditional service in the cafeteria. This initiative will include not only the methods used in serving the meal but also improvement of the breakfast menus being offered. Training sessions and technical assistance efforts began in summer 2017 with presentations via statewide conferences for administrators, teachers, support staff and parents. In 2016, the OSDE served more than 35 million breakfasts in Oklahoma and, through alternative methods, seeks to increase participation 20% by 2025.

The Summer Food Service Program (SFSP) meal program will remain a priority. Among the obstacles to be overcome are Oklahoma’s demographics in many rural areas. Because many counties have few to no SFSP sites, major efforts have continued to increase the number of sponsors and sites. While Oklahoma has 677 feeding sites and 182 sponsors, the OSDE would like to see greater participation. In 2016, the number of meals served in the summer was 1,438,852. Oklahoma’s goal is to increase this number by 30% by 2025.

<sup>3</sup> Food Resource & Action Center, “Breakfast for Learning,” October 2016, <http://www.frac.org/wp-content/uploads/breakfastforlearning-1.pdf>.



To that end, the OSDE launched “Food for Thought,” a multimedia campaign aimed at raising awareness of the summer feeding programs, in late May 2017. The OSDE partnered with an array of entities – including the United Way of Central Oklahoma, Tulsa-area United Way, faith-based organizations and private-sector businesses – that pooled resources to create and distribute information about the SFSP initiative. In a year-over-year comparison, meals served increased by nearly 9% between 2016 and 2017.

The OSDE’s long-range plan is to help eligible children benefit from the dinner program provided by the USDA. Through training and by bringing awareness to the program, the OSDE expects to see participation grow statewide.

## 1. Challenging State Academic Standards and Assessments (ESEA section 1111(b)(1) and (2) and 34 CFR §§ 200.1–200.8.)<sup>4</sup>

Oklahoma is committed to creating a strong academic learning experience for all students based on rigorous standards. The OSDE intentionally and strategically encourages and supports schools as they work to align curriculum, instruction and assessments to the academic standards.

The following strategies will ensure the OSDE remains focused on an ambitious vision to champion excellence for all students:

### STRATEGY 1.1

Focus on early childhood education.

### STRATEGY 1.2

Ensure effective implementation of the Oklahoma Academic Standards by using available data to target high-quality, aligned resources to educators.

### STRATEGY 1.4

Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

### STRATEGY 1.6

Enable Oklahoma’s students to benefit fully from digital-age teaching and learning.

### STRATEGY 2.2

Provide support and professional learning to increase instructional capacity for teachers and leaders.

### STRATEGY 2.3

Provide district and school leaders with the training and support needed to improve instruction in their schools.

## CHALLENGING STATE ACADEMIC STANDARDS

In January 2016, the Oklahoma State Board of Education (OSBE) unanimously approved the final draft of new state academic standards for English language arts (ELA) and mathematics. They were adopted by the state Legislature two months later.

The OSDE launched “Food for Thought,” a multimedia campaign to raise awareness of summer feeding programs, in May 2017. In a year-over-year comparison, meals served increased by nearly 9% between 2016 and 2017.

It is important to note the historical context of Oklahoma’s journey to adopt academic standards. Under state House Bill 3399 (2014), which repealed the Common Core State Standards in Oklahoma, the OSBE was tasked with adopting a set of standards for use in schools beginning in the 2016-17 school year. As directed by state law, the drafted standards were reviewed by the Oklahoma Department of Commerce, Oklahoma Department of Career and Technology Education and the Oklahoma State Regents for Higher Education. The new Oklahoma Academic Standards (OAS) for ELA and mathematics improve on and replace the Priority Academic Student Skills (PASS) standards, which had been temporarily re-implemented by H.B. 3399 after the repeal of Common Core.

The new standards are more rigorous and offer a renewed focus on foundational

skills, including phonics, cursive writing, basic grammar and writing research papers in ELA; and counting money, standard algorithms, patterns, ratios and proportions in mathematics. This is the first time ELA and math standards in Oklahoma have included vertical progressions in Pre-K through 12th grade, which allow teachers to base lesson plans not only on where students should be performing in their grade, but also where they will be expected to go in future grades. This addition allows for interconnected instruction with fewer knowledge gaps between grades.

Moreover, the academic standards for science, which are also vertically aligned, include standards for kindergarten through grade 12. The standards are arranged by grade levels at grades K-8 and by course subject area at the high school level. The OAS for science include the integration of

<sup>4</sup> The Secretary anticipates collecting relevant information consistent with the assessment peer review process in 34 CFR § 200.2(d). An SEA need not submit any information regarding challenging State academic standards and assessments at this time.

scientific and engineering practices and crosscutting concepts with core content from physical science, life science and earth/space science. This integrated approach provides students with a coordinated and coherent understanding of the necessary skills and knowledge to be scientifically literate citizens.

Oklahoma also recognizes the need for a systematic approach to the development and implementation of rigorous and relevant computer science standards. In so doing, the state can give proper attention to computational thinking that enhances current expectations of students in the areas of computer literacy, digital citizenship and educational and informational technology. The state is working to respond to policy priorities developed by the Code.org Advocacy Coalition and already has acted to staff a dedicated computer science position.<sup>5</sup>

To ensure that the Oklahoma pathway regarding computer science is meaningful for students and responsive to unique challenges, three committees are in development: standards and curriculum, teacher certification and development, and policy and research. New standards and recommendations are expected in early 2018 to address how Oklahoma might ensure equitable access to computer science and computational thinking for all students.

Finally, Oklahoma recognizes the value of the arts to not only provide a well-rounded

education, but to also impact overall student learning and achievement. Research supports the link between arts education and student cognitive capacities and motivations to learn.<sup>6</sup>

Oklahoma has a long history of supporting the arts in education. The Oklahoma Legislature included the arts in a core curriculum mandate and required access to arts education for every student for the first time in 1990. At that time, a sequential framework of student standards for the arts through 12th grade was developed and approved. Currently, an arts course credit is required for high school graduation.

The Oklahoma Academic Fine Arts Standards for visual art and music include four strands: responding, presenting, connecting and creating/performing. In addition to the state's current standards in visual art and music, Oklahoma is in the process of creating student standards for theater arts/drama and dance and arts standards for early childhood.

The OSDE will scale its approach to standards support by building and developing standards-aligned materials, including curriculum resources, professional development and a centralized online resource destination. These standards-aligned materials and professional development will also include a framework to promote data inquiry, improved data literacy and an overall resource-rich standards experience.

### MORE RIGOROUS ASSESSMENTS

Oklahoma's new system of statewide summative assessments is aligned to the OAS. The OSDE assembled the Assessment and Accountability Task Force, led by a team of experts, to study and make recommendations to the OSDE and the OSBE. The OSBE approved a new Assessment and Accountability Plan at its Dec. 15, 2016, meeting based upon the recommendations. The OSDE then presented this plan to the state Legislature at the beginning of the legislative session in February 2017. It was subsequently approved and signed into law a month later, on March 7. The approved report can be found in its entirety in Appendix 7.

While awaiting approval of the Assessment and Accountability Plan, Oklahoma tested its new standards in the 2016-17 school year through state-developed assessments in grades 3-8 and 10 and gave districts the option for a college- and career-readiness assessment (ACT or SAT) in grade 11.

A 2017 independent alignment study of the Oklahoma Academic Standards and the new summative assessments by the Human Resources Research Organization (HumRRO) recognizes the clear alignment between OAS and the new assessments. In particular, the report indicates that "the OSTP [Oklahoma School Testing Program] math assessments generally capture breadth, depth and cognitive complexity of the OAS

Math Standards...nearly all grade level math assessments were highly to fully aligned on each of the four Webb alignment criteria."<sup>7</sup>

Among the approved recommendations was that Oklahoma adopt a commercial, off-the-shelf college-readiness assessment at the high school level. In addition to the task force recommendation, significant stakeholder input across Oklahoma supported the use of such an assessment (e.g., SAT, ACT) in lieu of state-developed high school assessments. That sentiment was expressed in town hall meetings as well as stakeholder meetings, including inter-tribal meetings. Therefore, for the 2017-18 school year and beyond, the state will keep state-developed assessments in grades 3-8 and move to a college- and career-readiness assessment in high school instead of the grade 10 assessment. In addition, the state will supplement the high school assessment with customized science and U.S. history assessments as required by federal and state law, respectively.

Oklahoma's decision to use a commercial, off-the-shelf college-readiness assessment (e.g., SAT, ACT) as the high school assessment enjoys broad support from stakeholders all over the state, responds to local district needs and is codified in state law.

Based on the responses to a request for proposals, contracts were awarded to both the SAT/College Board and the ACT to administer the state College- and Career-

<sup>7</sup> Webb's assessment alignment criteria are intended as a means for thinking about agreement among curriculum standards and assessments. The criteria are considered in this order: categorical concurrence, depth of knowledge consistency, range of knowledge correspondence and balance of representation. Webb, "Issues Related to Judging the Alignment of Curriculum Standards and Assessments," *Measurement in Education* Vol. 20, No. 1. (2007): 7–25. Banjanovic et al., "Independent Alignment Review of the Oklahoma School Testing Program (OSTP) English Language Arts, Mathematics and Science Tests" (Alexandria, VA: HumRRO, 2017).

<sup>5</sup> Code.org Advocacy Coalition, "Nine Policy Ideas to Make Computer Science Fundamental to K-12 Education," [https://code.org/files/Making\\_CS\\_Fundamental.pdf](https://code.org/files/Making_CS_Fundamental.pdf).

<sup>6</sup> R. Deasy, ed., "Critical Links: Learning in the Arts and Student Academic and Social Development," Arts Education Partnership, 2002.

Readiness Assessments (CCRA), fulfilling the accountability requirements for high school ELA and mathematics. Recognizing the importance of an option that best serves the needs of individual school districts, the OSDE will give LEAs the opportunity to choose either the SAT or ACT to meet this requirement.<sup>8</sup> Allowing this choice affirms the value of the CCRA experience for students and ensures that local districts can provide the commercial, off-the-shelf college-readiness assessment that best fits their community and student needs. The state will provide primary oversight for all contract decisions to include the scope of work for administration of both the ACT and the SAT. Oklahoma has completed a thoughtful, comprehensive approach to developing this plan, always mindful of the USDE requirements for peer review, and has worked to accomplish the proper balance between local needs and federal requirements. Oklahoma is in the process of completing a comparability study to determine how well the SAT and ACT align to the Oklahoma content standards. In addition, the state is implementing a standard-setting plan that will indicate how prepared students are for college and career.

Moreover, the College Board and ACT are working together to develop a concordance table – a technical term used to refer to a relationship between scores on assessments that measure similar constructs – scheduled for publication in June 2018. The K20 Center and the Predictive Analytics Research Team (K20- PART) at the University of Oklahoma will use its extensive data and expertise

with similar studies to identify comparable performance levels for the ELA and mathematics portions of the SAT and ACT. The result will be comparable performance levels: Advanced, Proficient, Basic and Below Basic for the SAT and ACT as well as performance-level descriptors that establish the standard for each. As part of the process, Oklahoma will use the SAT as the referent test and so meet the federal requirement in 1111(b)(2)(B)(v)(I)(bb) of the ESEA. Determining comparable scores for the ACT allows Oklahoma districts to best meet the needs of their students and communities. The OSDE does not expect any significant issues because both assessments are recognized and accepted, interchangeably, across the nation at colleges and universities.

In addition, the comparability studies of both assessments will document how well each assessment is aligned with the depth and breadth of the state’s academic content standards and how they fulfill the goal that all students are college and career ready.

The OSDE will work closely with the Oklahoma Technical Advisory Committee to address ongoing technical review of the program and to ensure that the program continues to operate in a manner consistent with established standards (e.g., ED peer review criteria) and professional practices.

Oklahoma recognizes that a robust assessment system is tied closely to students’ learning and teachers’ instructional practices by valuing and promoting local, classroom-based formative assessments that help

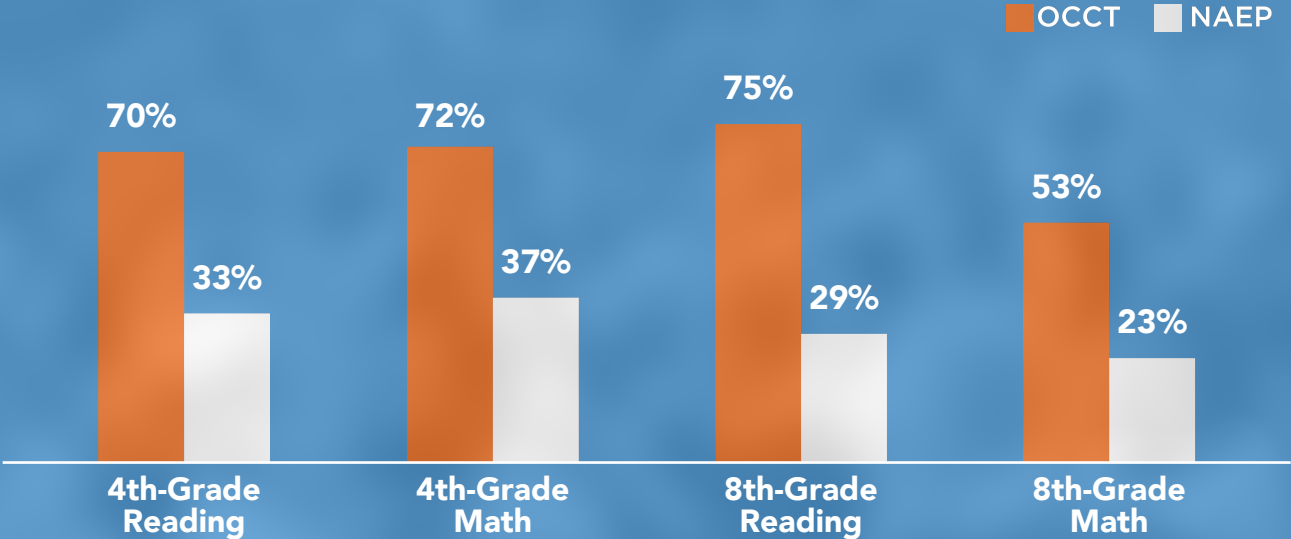
make student learning visible. At the same time, that system should provide a strong summative assessment program that fits as a component within a multifaceted state, district and school accountability system.

All districts and schools will be encouraged and given resources to use a data inquiry framework that informs decisions about programs, funding and policy. The OSDE’s expert data and assessment staff, as well as experts in data inquiry, will model effective data use, building on data inquiry workshops and coaching from the 2015-16 school year.

With respect to these requirements, in summer 2017 all statewide assessments underwent standard setting, the process of establishing cut scores to define performance levels for assessments. Establishing strong expectations for all students, the standard-setting process utilized benchmarking to nationally comparable assessments such as the

National Assessment of Educational Progress (NAEP), the ACT and the SAT as the common gauge for comparing states’ proportions of students classified within performance levels. Because it is critical that Oklahoma have national comparability in its assessments, the OSDE is intent on closing the honesty gap — the discrepancy between proficiency as defined by a state and proficiency as defined by NAEP. Figure 3 shows the comparison of Oklahoma’s proficiency in fourth- and eighth-grade reading and math in comparison to NAEP, which is also depicted in Appendix 10. Through increased rigor in statewide academic standards and assessments, Oklahoma expects to make progress toward its goal of scoring among the top 20 highest-performing states on NAEP in all subjects for fourth and eighth grade. Oklahoma is already seeing increased achievement in both fourth grade reading (see Appendix 10) and fourth and eighth grade science.

**FIGURE 3: Importance of Comparability: Comparison of Proficiency Scores, 2015**



<sup>8</sup> For the 2017-18 school year, and solely to meet the requirements of the ESEA section 1111(b)(2)(B)(v)(I)(bb), Oklahoma will use the SAT as the state assessment. Oklahoma will allow LEAs to choose the ACT, a locally selected, nationally recognized high school assessment as allowed under section 1111(b)(2)(H), in place of the SAT state assessment in reading/language arts and mathematics in high school for accountability purposes in spring 2018.



# Oklahoma recognizes that a robust assessment system is tied closely to students’ learning and teachers’ instructional practices.

Across all content areas, the OSDE’s priority has been to create clear learner expectations that help drive effective instruction and assessment to ensure all students are college and career ready. Focus on these rigorous expectations provides consistency across professional development efforts for teachers and administrators, allowing also for the identification of more productive, connected strategies that promote an equitable learning experience for all Oklahoma students.

Students with disabilities on an Individualized Education Program (IEP) must be included in all state and districtwide assessments, although how – with or without accommodations or by means of alternate assessment – is determined annually by IEP teams. The OSDE provides guidance to school districts and parents regarding assessment participation policies and the different types of assessments through

FAQs, test manuals, website information and online/in-person trainings.

Oklahoma uses the Dynamic Learning Maps (DLM) alternate assessment system to assess the science, math and ELA content knowledge of students with the most significant cognitive disabilities. The DLM system applies principles of Universal Design for Learning in the development of the assessment to factor in student population characteristics, with an emphasis on accessibility and bias considerations.

To ensure that the state does not exceed the 1% participation cap on alternate assessments and does address concerns regarding misidentification of students with significant disabilities, the OSDE will analyze all available data regarding participation rates and learner characteristics of students participating in the alternate assessment.

Moreover, such analysis and monitoring of alternate assessment participation will help the state identify school districts that need additional professional development. To increase awareness of the purpose of alternate assessments and their intended participants, Oklahoma will develop a parent/guardian training document that IEP teams can share.

The current training offered to educators will be revised to include more detailed information such as learner characteristics of students with significant cognitive disabilities as identified in recent research. The state will provide a recorded training and professional development module that can be accessed at any time. Annual in-person trainings will also be provided during the fall of each school year.

In addition, the OSDE will convene spring 2018 meetings with the Oklahoma Alternate Assessment Program Advisory Council and additional stakeholders, including parents, to examine and revise the current Criteria Checklist for Assessing Students with Disabilities on Alternate Assessments.<sup>9</sup> This revised definition will include more definitive language regarding characteristics of students with significant cognitive disabilities. Specifically, it will make clear that particular categories or English learner (EL) designations and previous low academic achievement are not used as the sole basis to determine whether a student has the most significant cognitive disabilities. The definition will take into account these students’ needs for extensive support and

instruction to achieve positive academic outcomes based on challenging grade-level academic content standards.

## 2. Eighth Grade Math Exception (ESEA section 1111(b)(2)(C) and 34 CFR § 200.5(b)(4)):

- i. Does the State administer an end-of-course mathematics assessment to meet the requirements under section 1111(b)(2)(B)(v)(I)(bb) of the ESEA?

☐ Yes ☒ No

Oklahoma has adopted a nationally recognized college- and career-readiness exam as its high school assessment provided to all Oklahoma students during their 11th-grade year, meeting the requirement of providing at least one mathematics assessment in grades 9-12 (ESEA section 1111(b)(2)(B)(v)(I)(bb)). Since the state no longer has end-of-course assessments in grades 9-12 that could be utilized for middle school students in advanced mathematics, Oklahoma is not eligible for the “exception for advanced mathematics in middle school” (ESEA section 1111(b)(2)(C)).

Oklahoma still provides access to advanced mathematics coursework in middle school and encourages the equitable placement of students into course pathways that promote completing no less than Algebra I by the end of ninth grade.

<sup>9</sup> <http://sde.ok.gov/sde/documents/2016-10-27/criteria-checklist-assessing-students-disabilities-alternate-assessments-0>.



The state’s decision not to give end-of-course math assessments has resulted in some LEAs discouraging students from taking advanced mathematics coursework in middle school in order to improve assessment scores in high school. However, students who are deemed advanced yet unable to demonstrate mastery on middle school math content risk later struggles in math and should not be placed in such advanced courses.

This stance is supported by mathematician Hung-Hsi Wu, who argues, “Mathematics is by nature hierarchical. Every step is a preparation for the next one. Learning it properly requires thorough grounding at each step, and skimming over any topics will only weaken one’s ability to tackle more complex material down the road.”<sup>10</sup>

Considering the significant increase in the rigor of Oklahoma’s middle school mathematics standards, it is beneficial for districts to inspect their practices and ensure that students who pursue the advanced track are adequately prepared for it. While many advocate for Algebra I in eighth grade, this track is worth reconsidering given that the current OAS pre-algebra standards (considered on-level for eighth grade) are increasingly identical to the previous Algebra I standards to which most Oklahomans are accustomed.

Practices promoting “ability grouping,” or putting students with similar abilities into small groups for instruction, can have a profound effect on students’ beliefs about their ability to be successful academically and will continue to produce underachievement and low participation in advanced coursework.<sup>11</sup> As a result, the OSDE will provide guidance for how schools might create a compressed sequence in middle school for advanced students so that only a minimal number of standards are skipped – given that every sixth- and seventh-grade math objective is critical to the learning trajectory. In addition, the OSDE will develop guidance so districts that do not allow students to skip middle school mathematics courses, nevertheless, give students opportunities to advance at the high school level.

**ii. If a State responds “yes” to question 2(i), does the State wish to exempt an eighth-grade student who takes the high school mathematics course associated with the end-of-course assessment from the mathematics assessment typically administered in eighth grade under section 1111(b)(2)(B)(v)(I)(aa) of the ESEA and ensure that:**

10 Hung-Hsi Wu, “To Accelerate, or Not,” *Huffington Post*, Sept. 20, 2012.  
11 Carol Corbett Burris, Jay P. Heubert and Henry M. Levin, “Accelerating Mathematics Achievement Using Heterogeneous Grouping,” *American Educational Research Journal* Vol. 43, No. 1 (2006): 103-134.  
Carol S. Dweck, “Is Math a Gift? Beliefs That Put Females at Risk,” in *Why Aren’t More Women in Science? Top Researchers Debate the Evidence*, eds. Stephen J. Ceci and Wendy M. Williams (Washington DC: American Psychological Association, 2006).  
Carol Vorderman et al., *A World Class Mathematics Education for All Our Young People* (London: the Conservative Party, 2011).

**a. The student instead takes the end-of-course mathematics assessment the State administers to high school students under section 1111(b)(2)(B)(v)(I)(bb) of the ESEA;**

Not Applicable.

**b. The student’s performance on the high school assessment is used in the year in which the student takes the assessment for purposes of measuring academic achievement under section 1111(c)(4)(B)(i) of the ESEA and participation in assessments under section 1111(c)(4)(E) of the ESEA;**

Not applicable.

**c. In high school:**

**1. The student takes a State-administered end-of-course assessment or nationally recognized high school academic assessment as defined in 34 CFR § 200.3(d) in mathematics that is more advanced than the assessment the State administers under section 1111(b)(2)(B)(v)(I)(bb) of the ESEA;**

Not applicable.

**2. The State provides for appropriate accommodations**

**consistent with 34 CFR § 200.6(b) and (f); and**

Not applicable.

**3. The student’s performance on the more advanced mathematics assessment is used for purposes of measuring academic achievement under section 1111(c)(4)(B)(i) of the ESEA and participation in assessments under section 1111(c)(4)(E) of the ESEA.**

☐ Yes ☐ No

Not applicable.

**iii. If a State responds “yes” to question 2(ii), consistent with 34 CFR § 200.5(b)(4), describe, with regard to this exception, its strategies to provide all students in the State the opportunity to be prepared for and to take advanced mathematics coursework in middle school.**

Not applicable.

**3. Native Language Assessments (ESEA section 1111(b)(2)(F) and 34 CFR § 200.6(f)(2)(ii) and (f)(4):**

**i. Provide its definition for “languages other than English that are present to a significant extent in the participating student**

**population,” and identify the specific languages that meet that definition.**

Oklahoma has determined that in order for a language other than English to be present to a significant extent in the participating student population, students speaking a given language must both qualify as English learners (ELs) and make up 5% or more of the total student population. According to Oklahoma’s student demographic data, Spanish is the main language other than English present in the total tested student population.

Based on 2015-16 data, 42,291 of Oklahoma’s English learners are Spanish speaking, which represents 6% of the total student population of approximately 692,670 students. Since Spanish-speaking students are the only group currently representing greater than 5% of the total student population, Oklahoma focused its efforts on providing oral language translations for this language. If LEAs wish to produce written translations of state content-area testing for their Spanish speakers or to provide them with interpreters during testing, the OSDE is supportive of these efforts.

Among English learners, the next three most common languages are Vietnamese, Cherokee and Marshallese, which together (2,370) represent less than 1% of Oklahoma students. If LEAs wish to produce written translations of state content-area testing for these or any other language groups that may be present to a significant extent in their district or to provide them with interpreters

during testing, the OSDE is supportive of these efforts.

**ii. Identify any existing assessments in languages other than English, and specify for which grades and content areas those assessments are available.**

For the 2016-17 Oklahoma School Testing Program (OSTP), Oklahoma offered Neutral Latin American Spanish oral language translations of its grades 3-8 and 10th grade math and science assessments, as well as for its 10th-grade U.S. history assessment. It is Oklahoma’s intention to continue to use Neutral Latin American Spanish oral language translations of its new state content-area grade 3-8 math and science assessments, as well as its 11th-grade integrated science and U.S. history assessments, all of which will be implemented in 2017-18. In addition, the OSDE may have additional options available to support English learners, conditional upon contract award of the 3-8 grade assessment program.

**iii. Indicate the languages identified in question 3(i) for which yearly student academic assessments are not available and are needed.**

Spanish.

**iv. Describe how it will make every effort to develop assessments, at a minimum, in languages other than English that are present**

**to a significant extent in the participating student population including by providing**

**a. The State’s plan and timeline for developing such assessments, including a description of how it met the requirements of 34 CFR § 200.6(f)(4);**

Spanish-speaking students are the only student group currently representing greater than 5% of the total student population in Oklahoma. Therefore, the state provides Spanish oral language translations of its content-area tests for these students.

**b. A description of the process the State used to gather meaningful input on the**

**need for assessments in languages other than English, collect and respond to public comment, and consult with educators; parents and families of English learners; students, as appropriate; and other stakeholders; and**

The OSDE meets regularly with Title III Consortium members, the Assessment and Accountability Advisory Committee and district test coordinators to discuss student needs, in particular to determine the need for assessments in languages other than English. In 2017, the state began offering oral language translation of state assessments in Neutral Latin American Spanish as a result of feedback from stakeholders and will continue to determine needs and respond as necessary.

**Based on 2015-16 data, 42,291 of Oklahoma’s English learners are Spanish speaking, which represents 6% of the total student population.**



**C. As applicable, an explanation of the reasons the State has not been able to complete the development of such assessments despite making every effort.**

While oral language translations of the state content-area tests are available for Spanish speakers, funding challenges preclude the state from providing Spanish-translated written versions of state tests at this time.

**4. Statewide Accountability System and School Support and Improvement Activities (ESEA section 1111(c) and (d)):**

In June 2016, Oklahoma began to study and develop recommendations for a new statewide assessment system and a new system of differentiated accountability. The OSDE held meetings the following month in all regions of the state: Broken Arrow, Sallisaw, Durant, Edmond, Woodward and Lawton. These meetings yielded responses to various questions addressing the desired purposes of accountability and preferred measures for it.

This regional feedback was incorporated into the discussions of the Oklahoma Assessment and Accountability Task Force (see Appendix 7 for a list of members), which deliberated over many technical, policy and practical issues associated with implementing improved assessment and accountability systems. Representing educators, parents, business and community leaders, tribal leaders and

lawmakers, the task force met four times between Aug. 4 and Nov. 9, 2016, and culminated in a set of recommendations for improvement that eventually went before the Oklahoma State Board of Education (OSBE).

The 95-member task force met with experts in assessment and accountability to consider each of the study requirements and provide feedback to improve the state's assessment and accountability systems. Two of those experts also served as the primary facilitators of the task force: Juan D'Brot, Ph.D., of the National Center on the Improvement of Educational Assessment, and Marianne Perie, Ph.D., of the University of Kansas' Achievement and Assessment Institute. At each meeting the group discussed federal and state law requirements, research and best practices in assessment and accountability development. Feedback from the task force was subsequently incorporated into the OSDE's recommendations to the OSBE on the new accountability system (the full report is in Appendix 7). The recommendations were approved by the state Legislature and governor in March 2017.

The guiding principle of Oklahoma's new accountability system is that all students can grow and all schools can improve.

Oklahoma's accountability system (Oklahoma School Report CardsA-F School Report Card) is based on a multi-measure approach, giving multiple grades for each indicator as well as a cumulative overview grade. To clarify the purpose of the system, the OSDE considered the recommendations of Robert L. Linn:<sup>12</sup>

- What results will be given to parents?
- What will be done with school-level results?
- How much emphasis should be placed on status versus improvement?

As is recommended by the Education Commission of the States' recently published report, the Oklahoma report card will be easy to find, easy to understand and include indicators essential for measuring school and district performance.<sup>13</sup>

When developing the new Oklahoma School Report Cards, the indicators, calculation and design elements were grounded in the OSDE 8-Year Strategic Plan. Specifically, the following strategies are achieved through the A-F Report Card:

**STRATEGY 1.4**

Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

**STRATEGY 2.3**

Provide district and school leaders with the training and support needed to improve instruction in their schools.

**STRATEGY 4.2**

Leverage technology systems and governance collaboration to improve access to data while protecting student information, allowing the OSDE and districts to make data-informed decisions.

<sup>12</sup> Robert L. Linn, "The Design and Evaluation of Educational Assessment and Accountability Systems," National Center for Research on Evaluation, Standards and Student Testing, April 2001.

<sup>13</sup> Kathy Christie and Marga Mikulecky, "Rating States, Grading Schools: What Parents and Experts Say States Should Consider to Make School Accountability Systems Meaningful," Education Commission of the States, May 18, 2014.

**The guiding principle of Oklahoma's new accountability system is that all students can grow and all schools can improve.**

i. **Subgroups (ESEA section 1111(c)(2)):**

- a. **List each major racial and ethnic group the State includes as a subgroup of students, consistent with ESEA section 1111(c)(2)(B).**

The subgroups Oklahoma includes for reporting purposes are as follows:

- Economically disadvantaged students;
- Students with disabilities;
- English learners (ELs); and
- Students from major racial and ethnic groups (White, Hispanic/Latino, Black/ African American, American Indian, Asian/Pacific Islander and Two or More Races).

The OSDE will also report academic performance for homeless students, students in foster care and students with a parent who is a member of the Armed Forces as required by ESEA section 1111(h)(1)(C). Eventually, the OSDE would like to include students with incarcerated parents as a separate subgroup in its reporting of student performance. It is also important to note that the OSDE will use different subgroups for the academic achievement indicator in the state's accountability system.

- b. **If applicable, describe any additional student groups of students other than the statutorily required subgroups (i.e., economically disadvantaged students, students from major racial**

**and ethnic groups, children with disabilities, and English learners) used in the Statewide accountability system.**

Not applicable.

- c. **Does the State intend to include in the English learner subgroup the results of students previously identified as English learners on the State assessments required under ESEA section 1111(b) (2) (B)(v)(I) for purposes of State accountability (ESEA section 1111(b)(3)(B))? Note that a student's results may be included in the English learner subgroup for not more than four years after the student ceases to be identified as an English learner.**

☒ **Yes**   ☐ **No**

- d. **If applicable, choose one of the following options for recently arrived English learners in the State:**

☐ **Applying the exception under ESEA section 1111(b)(3) (A)(i); or**

☒ **Applying the exception under ESEA section 1111(b)(3) (A)(ii); or**

- ☐ **Applying the exception under ESEA section 1111(b) (3)(A)(i) or under ESEA section 1111(b)(3)(A)(ii). If this option is selected, describe how the State will choose which exception applies to a recently arrived English learner.**

Oklahoma has chosen to utilize the exception provided under ESEA section 1111(b)(3)(A) (ii), which will allow the state to administer ELA and mathematics assessments to recently arrived English learners while excluding those test scores from accountability in their first year. By using the year-one test scores as a baseline, these students' scores will be included in the accountability system as part of the growth indicator in year two. Finally, in year three, test scores for recently arrived English learners will be fully incorporated into the accountability measures.

ii. **Minimum N-Size (ESEA section 1111(c)(3)(A)):**

- a. **Provide the minimum number of students that the State determines are necessary to be included to carry out the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of information by each subgroup of students for accountability purposes.**

The Assessment and Accountability Task Force discussed the benefits and limitations of policies regarding the minimum number of students (N-size) for reporting purposes. A large minimum N-size can bolster the reliability of the resulting decisions, but because it excludes certain populations from the system who do not meet the minimum sample size, it also undermines the validity of the system to meaningfully differentiate schools.

The OSDE is committed to including as many schools as appropriately possible in accountability calculations. The state's goal is to maintain the integrity of the accountability system and capture at least the same number of schools as previous iterations of the while improving the consistency and validity of identification.

The OSDE has examined historical differentiation data and has concluded that using an n-size of 10 has resulted in too much volatility in differentiating schools year over year, which undermines the validity of the system to meaningfully differentiate schools. Based on simulations using historical and current enrollment data, the OSDE has determined that an N-size of 25 meets both sensitivity and inclusion needs.

The OSDE will also be leveraging the previously approved multiple-year model to pool data across years for schools that do not meet the minimum N-size threshold. This allows for at least as many schools identified, with evidence suggesting an increased sensitivity of subgroup and school inclusion using an N-size of 25. Through the use of the

multi-year model, the state can now include a larger number of subgroups in their review for TSI and ATSI designations, as well as include a greater number of small schools that historically have not had state assessment data as an eligible indicator due to low n sizes. Thus, the OSDE has calculated that approximately an additional 1% of schools are included in the state’s system of annual meaningful differentiation using all indicators in the State’s accountability system.

The OSDE is committed to differentiating all schools. A small number of public schools are not included in its system of annual meaningful differentiation using all indicators in the State’s accountability system under section 1111(c)(4)(B). To account for these schools, the OSDE will be using the available data (e.g., chronic absenteeism, ELL progress, graduation rates, etc.) to meaningfully differentiate schools.

**b. Describe how the minimum number of students is statistically sound.**

Federal requirements restrict the N-size for accountability purposes to not more than 30; however, Oklahoma has chosen an N-size of 10 for all accountability student groups and indicators.

The N-size of 10 was determined without empirical data to test inclusivity and sensitivity goals. The system’s previous use of an N-size of 10 intended to identify the maximum number of schools. After a review of empirical evidence, it increased the volatility of school scores and resulted in a

higher than desired level of “bounce” in and out of performance levels on indicators. This, along with the argument presented by Hill and DePascale (2003), suggests a need to increase our N-size.

After examining historical and current-year data, increasing the N-size to 25 and leveraging multiple-years of pooled data, we are able to capture an increased number of schools when compared to an N-size of 10. This allows for school performance changes to be less of a statistical aberration of sampling and more of a condition of power to detect real change in performance.

Shifting to an N-size of 25, inclusive of the multi-year data, captures an additional 1% of schools when compared to the model using an N-size of 10. Thus, the increase in N-size and use of multi-year data meets both sensitivity and inclusion needs. As noted previously, the OSDE has examined empirical data and determined that the increase of 1% reflects the increase in 16 additional schools that can be included in the state’s system of annual meaningful differentiation using all indicators in the State’s accountability system, which is relevant for the smallest schools in the state.

**c. Describe how the minimum number of students was determined by the State, including how the State collaborated with teachers, principals, other school leaders, parents, and other stakeholders when determining such minimum number.**

The Oklahoma Legislature directed the OSBE to evaluate the state’s current assessment and accountability systems and make recommendations for the future. As a result, the OSDE held regional meetings across the state and convened the Oklahoma Assessment and Accountability Task Force to deliberate over the many technical, policy and practical issues, including the minimum N-size associated with implementing an approved assessment and accountability system. Those giving input included teachers, Pre-K-12 administrators, higher education representatives, career technical representatives, parents, legislators, business representatives, tribal representatives and other community members. In the Oklahoma ESSA State Plan Draft 1 Survey, stakeholders were asked to respond to the question of whether an N of 30 for accountability was reasonable. Many comments reflected the desire to see a lower N-size to ensure the maximum number of students is included in accountability. After examining empirical evidence using the most recent three years of accountability data, the state has determined that an N-size of 25 meets a sufficient threshold for consistency and the priorities of the task force to include the greatest number of students and schools in accountability. This is an increase from the system’s original N-size of 10, but leads to an increase in the number of schools eligible for accountability when factoring in the small school multi-year data model, which was previously approved. Please see sections ii.a and ii.b above for clarifications on this increase.

**d. Describe how the State ensures that the minimum number is sufficient to not reveal any personally identifiable information.<sup>14</sup>**

Personally identifiable information is protected in multiple ways. First, Oklahoma ensures that student information remains private by employing complementary suppression of the information when all students score at a certain level (for example, 100% graduation rate) or when no students score at a certain level (for example, 0% graduation rate). Oklahoma also employs complementary suppression within student groups that are mutually exclusive and exhaustive. For example, if data for one racial/ethnic group are suppressed due to not meeting the minimum N-size of 25, then the racial/ethnic group with the second-lowest N-size will be suppressed as well. Measures comprised of fewer than 25 students are not reported regardless of the result.

**e. If the State’s minimum number of students for purposes of reporting is lower than the minimum number of students for accountability purposes, provide the State’s minimum number of students for purposes of reporting.**

The OSDE believes that the specification of a minimum N for accountability should be driven by the goals of maximizing the inclusion of student groups and minimizing

<sup>14</sup> Consistent with ESEA section 1111(i), information collected or disseminated under ESEA section 1111 shall be collected and disseminated in a manner that protects the privacy of individuals consistent with section 444 of the General Education Provisions Act (20 U.S.C. 1232g, commonly known as the “Family Educational Rights and Privacy Act of 1974”). When selecting a minimum N-size for reporting, States should consult the Institute for Education Sciences report “Best Practices for Determining Subgroup Size in Accountability Systems While Protecting Personally Identifiable Student Information” to identify appropriate statistical disclosure limitation strategies for protecting student privacy.



the volatility of school determinations. Further, the OSDE believes that the specification of a minimum N for reporting is intended to support the state’s goal of providing meaningful, transparent, and actionable information to the public. Therefore, the OSDE’s minimum N for reporting is 10. This allows the state the opportunity to provide the public with as much information as possible while following internal suppression rules protecting student privacy.

**iii. Establishment of Long-Term Goals (ESEA section 1111(c)(4)(A)):**

**a. Academic Achievement. (ESEA section 1111(c)(4)(A) (i)(I)(aa))**

**1. Describe the long-term goals for improved academic achievement, as measured by proficiency on the annual statewide reading/language arts and mathematics assessments, for all students and for each subgroup of students, including: (i) baseline data; (ii) the timeline for meeting the long-term goals, for which the term must be the same multi-year length of time for all students and for each subgroup of students in the State; and (iii) how the long-term goals are ambitious.**

Oklahoma has set long-term goals for all students and for each subgroup of students moving toward proficiency in grade-level standards (i.e., a scale score of 300). Specifically, by 2032 the majority of students – for all students and by subgroup – are expected to achieve proficiency in English language arts (ELA) and mathematics. Oklahoma began administering new, more rigorous assessments in 2017. As such, the state has recalibrated proficiency levels to ensure national comparability. Data from the 2017 test administration was used to establish baseline proficiency levels for all students and by subgroup. As a result of proposed system changes, which include the use of Long-Term Goals and Measures of Interim Progress as part of the Academic Achievement Indicator (as described in the next section), the OSDE has set the baseline for proficiency goals based on performance from the data available from test administrations in the spring of 2018, 2019, and 2021, where appropriate. Further, because of COVID-related disruptions in SYs 2019-2020 and 2020-2021, interim targets for each group were reset using a baseline from available and appropriate data from spring 2018, 2019, and 2021 assessment administrations with an aspiration of meeting those goals by 2032. The inclusion of multiple years of data allows us to have a more robust understanding of student performance. From the baseline, Oklahoma has set yearly proficiency goals through 2032. The rationale for these changes is described in greater detail below.

Long-term goals for students’ attainment of proficiency were originally set at 50% for all students and all subgroups by 2030. A proficiency rate of 50% would put Oklahoma

within the top 5-10% of all states. After accounting for two years of pandemic-related disruptions, Oklahoma’s long-term goals now reflect a revision in timeline due to unavailable data about student performance. In order to reach 50% proficiency by 2032, subgroup goals must increase by a minimum of 1% each year. Continuous improvement is expected for groups attaining 50% proficiency prior to 2032. Tables detailing the specific yearly goals for all students and by subgroup can be found in Appendix A.

Baseline proficiency rates for grades 3-8 were set using 2017 assessment scores. However, the goals for high school students were hypothetical, with 2018 being used to determine their appropriateness. With the changes being proposed to the state accountability system, long-term goals were set using a baseline from available and appropriate data from spring 2018, 2019, and 2021 administrations with an aspiration of meeting those goals by 2032.

Interim goals (or measurements of interim progress) have been set at ambitious but attainable steps to reward school improvement toward the long-term goal. Long-term goals and measurements of interim progress were set using the following criteria:

- By 2032, the majority of all students will be expected to achieve proficiency, indicating their readiness for the challenges of college or career (i.e., a scale score of 300); and
- The goals are far enough from the baseline such that each interim goal is both statistically significant and practically meaningful.

Because some student groups will start at

a lower baseline score, the long-term goals will require more progress from lower-performing groups in order to meet the first criteria and close the achievement gap. Continuous improvement will be expected for subgroups that reach their proficiency goal prior to 2032. As such, Oklahoma anticipates reviewing all interim goals to ensure they remain achievable and meaningful. Based on the context in which data were collected (i.e., proposed changes to the system, the loss of the 2019-2020 and 2020-2021 data), the OSDE has recalculated baselines using the three most recent years of data to establish new trajectories against long-term goals. This will ensure that the baseline is meaningful and that targets continue to be achievable yet ambitious.

Achievement gaps will be further illuminated through the use of multiple lenses to provide greater insight into the performance disparities between and among students. In addition to the goals previously described, which reflect the percentage of students attaining proficiency, the OSDE has also set individual scale score targets for students as a measurement of progress toward proficiency. The OSDE uses the term targets to refer to scale score thresholds, while the term goals represents the percentage of students meeting their specified target and/or proficiency. Targets have been set based on a student’s priority student group. While the traditional grouping used for long-term goals places a student in each applicable category, a student’s priority group is the only one in which a student is placed.

Based on stakeholder feedback regarding what had been a disproportionate

overrepresentation of some individual students within the accountability system, Oklahoma has applied a lesson learned from NCLB and is employing priority student groups in which each student is assigned to one student group based on his or her demographic most strongly correlated with academic achievement. The student group assignment is used specifically to determine an ambitious, yet attainable, scale score target for the student. The expectation for all student groups remains the same: college and career readiness as demonstrated by proficiency on grade-level standards. Still, the reality of current assessment data demonstrates that gaps remain in achievement. Use of priority grouping has two main purposes:

- To unmask historically underserved students hidden by traditional reporting methods; and
- To champion equity and improvement for all students by ensuring no student counts more than another.

Research on Oklahoma’s previous accountability system asserted that “high-scoring, affluent students in [high-performing] schools produce averages that give the appearance of school effectiveness for all, essentially masking the especially low performance of poor and minority children.”<sup>15</sup> Assignment of a scale score target based on a student’s priority student group assures that every student will receive the focus and attention he or she deserves. Previously, the methodology allowed students from particular backgrounds to be more heavily weighted in the accountability system and created a framework where meaningful differentiation significantly overlapped with the percentage

of students in poverty within a school. By contrast, priority student group targets allow each student to contribute equally to the academic indicator. This structure ensures that all students are prioritized and results in an indicator that is not disproportionately identifying high-poverty schools. Priority student groups are assigned to all students based on evidence of a statistically strong relationship to achievement in the following order:

- Students with disabilities;
- Economically disadvantaged students;
- English learners;
- Black/African American students;
- Hispanic/Latino students;
- Native American/American Indian students;
- Asian/Pacific Islander students;
- Students identifying two or more races; and
- White students.

For more information regarding the validity of this grouping, please see section 4(iv)(a). By including the progress of each priority student group toward rigorous and attainable targets, Oklahoma believes that no individual student will be masked by the performance of an aggregated group. Educators will have information to help accelerate the instruction to groups lagging behind. Low socioeconomic status will no longer be used to explain away or dismiss lower achievement. Oklahoma’s innovative accountability system was built to illuminate the academic improvement and achievement of every student, meaning all students will benefit from the information

provided by this model.

## 2. Provide the measurements of interim progress toward meeting the long-term goals for academic achievement in Appendix A.

As described in section 4(iii)(a)(1), Oklahoma has set interim goals for all students and subgroups. These measurements of interim progress can be seen in the tables in Appendix A. Additionally, Oklahoma has set interim targets toward proficiency for all students according to priority student group. Similar to the long-term goals, each priority student group has an interim target that is both statistically and meaningfully different from the previous year’s target and indicates that the student group is on track to meet Oklahoma’s long-term goal of proficiency by 2032 (i.e., a scale score of 300).

To recognize statistically significant movement between interim targets, Oklahoma has used the approximate standard error of measure for state assessment scores, which equals three scale score points, as the minimum growth required for all priority student groups with baselines below proficiency (i.e., a scale score of 300). Tables containing long-term goals and interim student targets for all students can be found in Appendix A. Continuous improvement will be expected for priority student groups that reach their target scale score of 300 prior to 2032. As such, Oklahoma anticipates reviewing all interim goals and targets annually to ensure they remain achievable and meaningful.

## 3. Describe how the long-term goals and measurements of interim progress toward the long-term goals for academic achievement take into account the improvement necessary to make significant progress in closing statewide proficiency gaps.

Oklahoma is committed to the achievement of all students and to narrowing the proficiency gap. By setting long-term proficiency goals that are consistent across subgroups, the state has reaffirmed its commitment to high expectations for all students. While setting ambitious, consistent goals for all students places a focus on gap closure, Oklahoma has gone one step further – truly illuminating and identifying specific disparities.

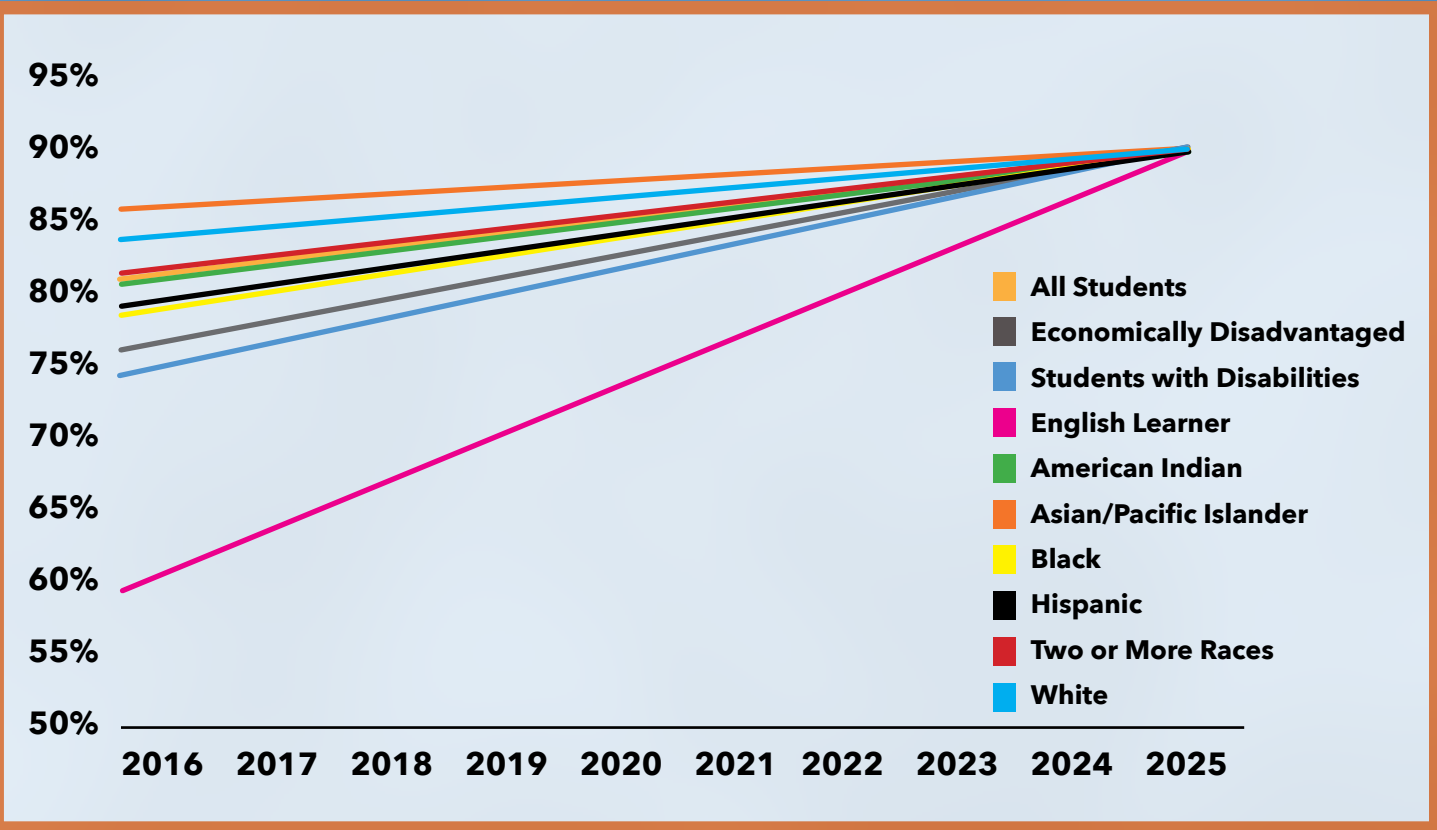
As described, Oklahoma’s traditional grouping methods have often masked trends in student performance. Overlap between subgroups led to justification of lower standards and performance (e.g., assuming that a poor-performing minority student must also be economically disadvantaged), and correlation between subgroups has led to misattributed causation, leaving increases in performance gaps unidentified. An analysis of race/ethnicity – holding all other demographics constant – reveals gaps in performance and bias that were previously hidden.

While analysis of trends at a student-group level have been at the forefront of national research on equity, Oklahoma recognizes that this information has yet to affect

<sup>15</sup> Curt M. Adams et al., “Oklahoma School Grades: Hiding ‘Poor’ Achievement: A-F Report Card,” 2013, <https://www.okpolicy.org/wp-content/uploads/2013/10/Oklahoma-A-F-Hiding-Poor-Achievement-.pdf>.

FIGURE 4: Four-Year Graduation Rate and Intermediate Goals for All Students and Each Subgroup

Student Group	Rate of Growth	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
All	0.9%	81.6%	82.6%	83.5%	84.4%	85.3%	86.3%	87.2%	88.1%	89.1%	90.0%
Economically Disadvantaged	1.6%	75.9%	77.4%	79.0%	80.6%	82.1%	83.7%	85.3%	86.9%	88.4%	90.0%
Students with Disabilities	1.7%	74.4%	76.2%	77.9%	79.6%	81.4%	83.1%	84.8%	86.5%	88.3%	90.0%
English Learner	3.6%	57.9%	61.5%	65.0%	68.6%	72.2%	75.7%	79.3%	82.9%	86.4%	90.0%
American Indian	1.0%	81.4%	82.3%	83.3%	84.3%	85.2%	86.2%	87.1%	88.1%	89.0%	90.0%
Asian/Pacific Islander	0.5%	85.9%	86.3%	86.8%	87.2%	87.7%	88.2%	88.6%	89.1%	89.5%	90.0%
Black	1.4%	77.1%	78.5%	80.0%	81.4%	82.8%	84.3%	85.7%	87.1%	88.6%	90.0%
Hispanic	1.4%	77.8%	79.1%	80.5%	81.8%	83.2%	84.6%	85.9%	87.3%	88.6%	90.0%
Two or More Races	0.9%	81.8%	82.7%	83.6%	84.6%	85.5%	86.4%	87.3%	88.2%	89.1%	90.0%
White	0.8%	83.2%	84.0%	84.7%	85.5%	86.2%	87.0%	87.7%	88.5%	89.2%	90.0%



accountability at the school, district and state levels. However, viewing achievement through multiple lenses – by priority student group and traditional subgroup – allows Oklahoma greater insight into the performance disparities between and among students. These gaps can then be leveraged into actionable initiatives to address equity in education. Creating a transparent view of achievement gaps will ensure root causes receive the attention deserved.

b. Graduation Rate. (ESEA section 1111(c)(4)(A)(i)(I)(bb))

1. Describe the long-term goals for the four-year adjusted cohort graduation rate for all students and for each subgroup of students, including: (i) baseline data; (ii) the timeline for meeting the long-term goals, for which the term must be the same multi-year length of time for all students and for each subgroup of students in the State; and (iii) how the long-term goals are ambitious.

Oklahoma’s long-term goal is to be among the top 10 states for students graduating in the four-, five- and six-year cohorts. The state could reach that goal if 90% of its students graduated. The 2016 baseline graduation rates and intermediate goals for all students and for student groups are shown in Figure 4. The timeline for meeting the long-term

goal is 2025. Intermediate goals have been determined for all students and for each student group to show the needed annual increase to meet the long-term goals.

Oklahoma’s path to an excellent education for all students includes more rigorous academic content standards, enhanced supports for struggling students and schools and a high school redesign through career pathway planning with greater family collaboration and targeted high school counseling to lead to successful graduates. Oklahoma’s current graduation rate of 81.6% should rise as the state follows this course to excellence.

As Oklahoma’s graduation rate has declined over the last three years, the OSDE is dedicated to stopping that slide and reversing course. Oklahoma’s goal to reach 90% is well above the current national average of 83.2% and has been attained by only two states.<sup>16</sup> These goals are also ambitious but realistic for each student group, with the American Indian student group goal of 90% well above the national average of 70% and the goal for the Black student group at 90% in contrast to the national average of 73%.

2. If applicable, describe the long-term goals for each extended-year adjusted cohort graduation rate, including (i) baseline data; (ii) the timeline for meeting the long-term goals, for which the term must be the same multi-year length of time for all students

16 Common Core of Data: America’s Public Schools, “Table 1. Public high school 4-year adjusted cohort graduation rate (ACGR), by race/ethnicity and selected demographics for the United States, the 50 states, and the District of Columbia: School year 2014–15,” National Center for Education Statistics, Sept. 15, 2016.



and for each subgroup of students in the State; (iii) how the long-term goals are ambitious; and (iv) how the long-term goals are more rigorous than the long-term goal set for the four-year adjusted cohort graduation rate.

Oklahoma established long-term goals for graduation rates that include five- and six-year graduates. The state will examine the baseline data and establish ambitious intermediate goals for the extended-year graduation rates. Oklahoma incorporated five-year graduation rates for the first time in the 2017-18 report card and included six-year graduation rates for the first time in the 2018-19 report card. Baseline data, including the 2018-2019 data, were used to set the five- and six-year graduation rates. At a minimum, the long-term and intermediate goals for the five-year extended cohort graduation rate will be measurably higher than those for the four-year cohort graduation rate. Likewise, the long-term and intermediate goals for the six-year extended cohort graduation rate will be measurably higher than the goals for the five-year extended cohort graduation rate. These baselines, long-term goals, and measures of interim progress are presented in Appendix A.

3. Provide the measurements of interim progress toward the long-term goals for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate in Appendix A.

Ambitious interim targets have been set for the four-year and extended-year adjusted cohort graduation rates. The targets are set for each student group so that if the targets are reached, the group will meet the long-term goal of 90% graduation rate by 2025. Similarly, targets were set for the five- and six-year adjusted cohort graduation rates for each student group (see Appendix A).

4. Describe how the long-term goals and measurements of interim progress for the four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation rate take into account the improvement necessary to make significant progress in closing statewide graduation rate gaps.

The interim targets have been determined by the progress that each student group must make to reach a 90% graduation rate in the 4-year adjusted cohort graduation rate (ACGR), and 91% graduation rates for the 5Y and 6Y ACGRs. Student groups with lower graduation rates in will have to make more progress annually to reach their target than student groups with higher graduation rates. These differences are illustrated in the trajectories identified for each student subgroup in Appendix A.

c. English Language Proficiency. (ESEA section 1111(c)(4)(A) (ii))

1. Describe the long-term goals for English learners for increases in the percentage of such students making progress in achieving English language proficiency, as measured by the statewide English language proficiency assessment including: (i) baseline data; (ii) the State-determined timeline for such students to achieve English language proficiency; and (iii) how the long-term goals are ambitious.

Through the recommendation of the Assessment and Accountability Task Force, in collaboration with Gary Cook, Ph.D., esteemed WIDA scholar, Oklahoma’s ambitious long-term goal for English learners (ELs) is to achieve a 16-point increase in the percentage of students on track to English proficiency by 2025. Using a baseline of 50% of English learners on-track to proficiency – based on 2014-15 WIDA ACCESS for ELLs 1.0 scores and a 2% rate of growth – 66% of English learners are expected to be on track to proficiency in 2025.

Students should be able to exit an English language development program within five years at most, depending on their starting point (established by their first proficiency assessment). This approach assumes that a year of learning should result in a minimum

level (e.g., one performance level) of growth on either the WIDA ACCESS for ELLs 2.0 or Alternate ACCESS, the English learner proficiency assessment (ELPA).

Each student will have a specific trajectory for growth resulting in annual English language proficiency (ELP) growth targets. The specific scale score growth target for each student will depend on the student’s grade level and proficiency level – based on the ELPA – upon entering Oklahoma public schools. Each year, the student’s ELP progress will be measured against their customized growth target for that year. It is expected that all English learners ultimately will achieve proficiency according to their trajectory relative to the grade level and ELP upon initial assessment.

For example, a third-grade student who scores a proficiency level of 1 will have five years to exit the program, while a third-grade student who enters with a proficiency level of 3 will have three years to do so. This approach, simulated in Figure 4 of Appendix A, reflects research that indicates English learners generally require four to seven years to develop academic language proficiency in English to be academically successful.<sup>17</sup>

WIDA ACCESS for ELLs 2.0 has a new level of rigor designed to ensure it is an accurate assessment of students’ ELP as it relates to their being college and career ready. The assessment recently has gone through a standard-setting adjustment that will apply to the 2017 administration. Therefore, long-term and interim goals will need to be recalculated

17 H. Gary Cook, Timothy Boals and Tod Lundburg, “Academic Achievement for English Learners: What Can We Reasonably Expect?” Phi Delta Kappan Vol. 93, No. 3 (Nov. 1, 2011): 66-69.

once new baseline data is available. The state will use a similar methodology as long-term and interim goals for academic achievement. Because these goals will be expressed as the percentage of students on track to reaching English language proficiency, two years of data will be required to establish challenging and attainable goals. With this model, the state will develop a trajectory for every student to be on track toward meeting proficiency.

English learners will be included in both the ELPA calculations and the EL student group for other accountability indicators for four years after exiting EL services. A description of how this indicator is included in the overall accountability system is included in section 4(v) of the State Plan.

2. Provide the measurements of interim progress toward the long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency in Appendix A.

Oklahoma will develop interim goals or targets that reflect the true trajectory of language development for English learners. Each year the student’s ELP progress will be measured against his or her customized growth target for that year. Interim targets will be developed based on the assumption that a year of learning should result in one scale score level of growth on the ELPA. The specific scale score growth target will depend on the student’s grade level and proficiency level – based on the ELPA – upon entering Oklahoma public schools, as demonstrated in Appendix A.

WIDA ACCESS 2.0 has new content standards and recently has gone through a standard-setting adjustment that will apply to the 2017 administration. Revised student ELP interim goals will be established once new data are available that can be used as a baseline. Oklahoma has set an ambitious goal that the percentage of students exiting the English learner program will increase at a rate of two-percent per year from 50% to 66%. This represents a 16% increase between 2017 and 2025.

iv. Indicators (ESEA section 1111(c)(4)(B))

a. Academic Achievement Indicator. Describe the Academic Achievement indicator, including a description of how the indicator (i) is based on the long-term goals; (ii) is measured by proficiency on the annual Statewide reading/language arts and mathematics assessments; (iii) annually measures academic achievement for all students and separately for each subgroup of students; and (iv) at the State’s discretion, for each public high school in the State, includes a measure of student growth, as measured by the annual Statewide reading/language arts and mathematics assessments.

ENGLISH LANGUAGE ARTS AND MATH ACADEMIC ACHIEVEMENT INDICATOR

Oklahoma is committed to supporting all students, especially those in historically underserved student groups. Oklahoma’s innovative accountability system was built to illuminate the academic improvement and achievement of every student, meaning all students will benefit from the information provided. Indicators for Oklahoma’s accountability system are listed in Figure 5.

All schools will have academic indicators for English language arts (ELA) and mathematics achievement. In grades 3-8, these indicators will be based on performance on the state assessment in the most recent school year. In high school, both ELA and mathematics achievement will be based on performance on the college- and career-ready assessments in the most recent school year. As a reminder, Oklahoma’s long-term goal is that the majority

of students attain proficiency by 2032. The OSDE established a baseline using the median score from the spring 2018, 2019, and 2021 administrations. Interim proficiency goals were set using criteria outlined in section 4(iii)(a)(1) of the State Plan, to ensure continuous improvement toward proficiency for all students and subgroups. Oklahoma will report the percentage of all students attaining proficiency by both performance level and grade level. Tables demonstrating the measurements of interim progress and long-term proficiency goals can be found in Appendix A.

The OSDE uses the term goals to represent the percentage of students meeting their specified target and/or proficiency, while the term targets refers to scale score thresholds. Targets have been set based on ambitious and achievable progress from the baseline, with the end goal of all students meeting a target indicating grade-level proficiency. Achievement targets will be measured in

FIGURE 5: Oklahoma’s A-F Report Card Indicators

Elementary & Middle School	High School
ELA Status	ELA Status
Math Status	Math Status
Science Status	Science Status
ELA Growth	Graduation Rate
Math Growth	Postsecondary Opportunities
ELPA Progress	ELPA Progress
Chronic Absenteeism	Chronic Absenteeism

terms of scale scores with a scale score of 300 representing proficiency. Schools will receive points for the academic achievement indicator based on the percentage of students reaching proficiency and the total points earned by students achieving their scale score target.

Based on stakeholder feedback regarding the over-representation of some individual students within the accountability system, Oklahoma has applied a lesson learned from NCLB and is employing priority student groups, where each student is assigned to one student group based on his or her demographic most strongly correlated with academic achievement. The expectation for all student groups remains the same: college and career readiness as demonstrated by proficiency on grade-level standards. Still, the reality of current assessment data demonstrates that gaps remain in achievement.

- Use of priority grouping has two main purposes:
- To unmask historically underserved students hidden by traditional reporting methods; and
  - To champion equity and improvement for all students by ensuring no student counts more than another.

While analysis of trends at a student-group level has been at the forefront of national research on equity, Oklahoma recognizes that this information has yet to affect accountability at the school, district and state levels. Research on Oklahoma’s

previous accountability system asserted that “high-scoring, affluent students in [high-performing] schools produce averages that give the appearance of school effectiveness for all, essentially masking the especially low performance of poor and minority children.”<sup>18</sup> In an effort to unmask the performance of all students and to ensure that no trends in student performance go unidentified, each student will be assigned only one student group for purposes of calculating points for the academic achievement indicator. As such, the incentive to focus on some students over others will be significantly decreased. Instead, all students will be a priority, regardless of proficiency.

To ensure transparency and accessibility for educators and the public, Oklahoma has chosen to focus on priority groups as the means to ensure all students contribute equally. This structure allows each student to have one academic target by subject, as opposed to multiple targets, depending on his or her demographics. By including priority student grouping in the accountability system, Oklahomans will have greater access to examine the disparities previously mastered in traditional subgrouping processes. Additionally, the OSDE will be able to leverage priority student group developments into actionable initiatives addressing equity in education.

Priority student groups are assigned to all students based on evidence of a statistically strong relationship to achievement. The student groupings used for this indicator are as follows:

- Students with disabilities;
- Economically disadvantaged students;
- English learners;
- Black/African American students;
- Hispanic/Latino students;
- Native American/American Indian students;
- Asian/Pacific Islander students;
- Students identifying two or more races; and
- White students.

To validate this grouping, the OSDE ran multiple statistical analyses using 2016-17 demographic and assessment data. Separate analyses were conducted for each grade level (3-8) for both English language arts and math. In all 12 analyses, the strongest predictor of academic achievement was whether a student had a reported disability.

Further, the U.S. Supreme Court recently held that the Individualized Education Program of a student with a disability must be “reasonably calculated to enable the child to make progress appropriate in light of the child’s circumstances.”<sup>19</sup> In its holding, the Court additionally emphasized the requirement that “every child should have the chance to meet challenging objectives.” As such, and because of the strong correlation between academic achievement and students with disabilities, Oklahoma has elected to place this grouping first.

In 11 of the 12 analyses, the second-strongest predictor was whether a student was economically disadvantaged (it was third-strongest in the 12th analysis). The groups with the next two strongest relationships were English learners and Black/African American students. Although Black/African American students had the third-strongest relationship with achievement in several of the analyses, the OSDE determined it appropriate and valid to prioritize service eligibility (i.e., EL services, IEP services or meal assistance) in achievement predictors. Furthermore, only 1.1% of the 30,722 English learners included in the analysis also identified as Black or African American, and only 1.2% of students identifying as Black or African American were also English learners. These data imply that, after accounting for students with disabilities and students who are economically disadvantaged, the remaining groups are essentially mutually exclusive. For detailed information on the statistical models, please see Appendix A.

As a reminder, this grouping methodology will be used only for purposes of calculating the points a school will receive on the academic achievement indicator. By including the progress of each priority student group toward rigorous and attainable targets, Oklahoma believes that no individual student will be masked by the performance of an aggregated group. Educators will have information to help accelerate instruction to groups lagging behind, and low socioeconomic status will no longer be used to explain away or dismiss lower achievement.

18 Curt M. Adams et al., “Oklahoma School Grades: Hiding ‘Poor’ Achievement: A-F Report Card,” 2013, <https://www.okpolicy.org/wp-content/uploads/2013/10/Oklahoma-A-F-Hiding-Poor-Achievement-.pdf>.

19 Endrew F. v. Douglas County School District RE-1, 580 U.S. \_\_\_\_ (2017)



### Academic Achievement Indicator (30 Points)

Priority Student Group Improvement Toward Expectations (15 points: 7.5 pts for ELA, 7.5 pts for math)		Performance Level Snapshot (15 points: 7.5 pts for ELA, 7.5 pts for math)	
Below Target	0 pts	Below Basic	0 pts
Above Target but not Proficient	.95 pts	Basic	.5 pts
Above Target and Proficient	1 pt	Proficient	1 pts
		Advanced	1.25 pts

The academic achievement indicator represents (1) the extent to which all students within a school are meeting their targets as determined by grade level and priority student group as they progress toward proficiency and (2) the Performance Level Snapshot of the All Students group. The OSDE uses an indexing system to assign points earned under this indicator based on the student’s target scale score. Students who meet their scale score target but are not yet proficient receive 0.95 points, whereas a proficient student would earn 1.0 point.

Total points earned under this indicator are based on the two categories named in the previous paragraph: Priority student group Improvement Toward Expectations (ITE) will contribute 7.5 points and the Performance Level Snapshot will provide 7.5 points each for ELA and math (for a total of 30 points). As a result of comprehensive empirical analyses, it was concluded that the overweighting of the priority student group portion of the academic

achievement indicator limited the system’s ability to detect improvement with sufficient sensitivity. Thus, the academic achievement indicator is being weighted across these two components to more clearly communicate expectations for overall school performance and student group performance.

For the Priority Student Group ITEs, the OSDE will award points based on the indexing system described above where points are awarded based on performance against a priority student group’s trajectory, which differs by grade and content area. Students who meet their scale score target but are not yet proficient will receive 0.95 points, whereas students who meet their target and are proficient will earn 1.0 point.

For the Performance Level Snapshot, the OSDE will award points based on the proportion of students who meet certain performance levels. Performance will be based on the percentage of students at the

performance levels of basic, proficient, and advanced and will earn .5, 1.0, and 1.25 points, respectively. Students who perform at the Below Basic level will earn 0 points.

The points earned for both priority student group ITEs performance and the Performance Level Snapshot will be summed to determine an overall score out of 15 points for ELA and 15 points math for a total possible score of 30 points for the Academic Achievement Indicator.

The school report card rubric is being revised now that all indicators have been calculated and reviewed. The indicator’s letter grade will be set using a similar norm-referenced method as when the Oklahoma School Report Cards were first implemented. For each indicator and for the overall letter grade: 0-5th percentile as F, 5th – 30th percentiles as D, 30th to 70th percentile as C, 70th to 95th as B, 95th and above an A. The Academic Achievement Indicator breakdown is presented in the table above.

Data on academic achievement will also be disaggregated and reported by subgroups using the traditional grouping methodology to compare student performance with long-term and interim goals. Here, the Hispanic/Latino subgroup would demonstrate the extent to which all Hispanic/Latino students are meeting their individual student target; noting that the target may differ by student based on his or her priority student group. To reiterate, Oklahoma is using traditional subgroups to measure and report student performance in ELA and math. Based on stakeholder feedback, and the innovation required to

support Oklahoma students equitably, each student contributes equally to this indicator based on one scale score target determined by the student’s demographic most closely aligned with academic achievement (his or her priority student group).

As a result, Oklahoma will employ an innovative approach that reports student achievement two ways: utilizing priority student groups to set ambitious, achievable, student-level targets for the academic achievement indicator (as previously described) and utilizing traditional subgroup methods for both reporting of student performance, Additional Targeted Support and Improvement (ATSI), and Targeted Support and Improvement (TSI) designations. For TSI and ATSI identification, the academic achievement of each subgroup will be calculated so that a student is represented in every group to which he or she belongs in order to identify any consistently underperforming groups of students and the lowest performing subgroups. This calculation allows Oklahoma to recognize trends both at the subgroup and student group level, to ensure that disparities and gaps are appropriately identified. Oklahoma will use both the priority student grouping and traditional subgrouping methodologies to differentiate and identify school success and improvement for all students and by subgroup.

These two methodologies provide an innovative approach that allows Oklahoma to examine student data through multiple lenses, illuminating multiple perspectives of student performance and providing a more

complete narrative, especially for traditionally underserved students. By identifying schools for TSI and ATSI through the traditional subgroups and using the priority student groups to determine measurements of interim progress, Oklahoma ensures that schools are held accountable for students from historically underserved racial/ethnic student groups.

SCIENCE ACADEMIC  
ACHIEVEMENT INDICATOR

In addition to the ELA and math academic achievement indicator, Oklahoma has included a science achievement indicator in its accountability system after strong recommendations from the Assessment and Accountability Task Force and legislation signed into law by the governor.<sup>20</sup> In 2014, Oklahoma adopted three-dimensional academic standards for science that were informed by A Framework for K-12 Science Education by the National Research Council.<sup>21</sup> As a result, the Oklahoma standards reflect a highly informed, state-based effort to improve science instruction and student outcomes in Oklahoma.

As one of the first states to adopt three-dimensional standards, Oklahoma leads nationally in collaborations to develop the next generation of assessments and instructional resources. All of Oklahoma’s state-level science assessments are three-dimensional, as required by the new standards. These dimensions are intentionally used to replicate real-world applications and

methods of science. As such, practices that are traditionally under the umbrella of ELA and mathematics are intentionally incorporated. This purposeful inclusion begins in kindergarten and progressively develops as students advance in their education through high school. Oklahoma’s science standards reinforce ELA and mathematical skills through practical application as students implement scientific practices while learning. Also factoring into this decision is the fact that five of Oklahoma’s nine primary wealth-generating ecosystems include STEM-related fields: aerospace and defense, agriculture and bioscience, energy, information services and health care.

As a result of this integration among the subjects and the state’s intense focus on developing these skills in its students, Oklahoma has gone above and beyond the requirements of law to include science in its accountability system as an additional achievement indicator.

The science achievement indicator represents the extent to which students within a school are meeting their targets determined by grade level and priority student group as they progress toward proficiency in science. The OSDE uses the same indexing system as that for ELA and math to assign points earned under this indicator based on the student’s target scale score. Students who meet their scale score target but are not yet proficient receive 0.95 points, whereas a proficient student would earn 1.0 point.

Identical to the point calculation for ELA and math achievement, points may be earned under two categories: priority student group ITE and Performance Level Snapshot of the All Students group. For high schools, Priority student group Improvement Toward Expectations (ITE) will contribute 7.5 points and the Performance Level Snapshot will provide 7.5 points each for science (for a total of 15 points). This science indicator (which is part of the School Quality, Student Success Indicator) is being weighted across these two components to more clearly communicate expectations for overall school performance and student group performance.

For the science Priority Student Group ITEs, the OSDE will award points based on an indexing system where points are awarded based on performance against a priority student group’s trajectory. For the Performance Level Snapshot, the OSDE will award points based on the proportion of

students who meet certain performance levels. This breakdown is presented in the table below.

The total points will be summed to determine an overall score out of 15 points possible for science for high schools. For elementary schools, this weight is decreased as there are a greater number of assessments available to include in the system.

As mentioned previously, science assessments are administered only once each in elementary and middle school. As such, the proportion of points possible for priority student group performance and performance of the All Student group is maintained by assigning 2.5 points possible for priority student group performance, and 2.5 points possible for performance of the All Students group. The total points will be summed to determine an overall score out of 5 possible points for science for elementary and middle schools.

20 For purposes of federal accountability, the science indicator will be an Other Academic Indicator for elementary and middle schools and a School Quality Student Success Indicator in high school.

21 A Framework for K-12 Science Education: Practices, Crosscutting Concepts and Core Ideas (Washington, DC: The National Academies Press, 2012).

Science Indicator (15 Points)

Priority Student Group Improvement Toward Expectations (7.5 pts)		Performance Level Snapshot (7.5 pts)	
Below Target	0 pts	Below Basic	0 pts
Above Target but not Proficient	.95 pts	Basic	.5 pts
Above Target and Proficient	1 pt	Proficient	1 pts
		Advanced	1.25 pts

PARTICIPATION

Oklahoma will incorporate assessment participation in its academic achievement indicator in compliance with ESEA section 1111(c)(4)(E). The numerator will be the total points earned by all full academic year (FAY) students tested. The denominator will be the greater of the following: all FAY students tested or the minimum number that represents at least 95% of all FAY students and at least 95% of each subgroup that meets the minimum N-size.

**b. Indicator for Public Elementary and Secondary Schools that are Not High Schools (Other Academic Indicator). Describe the Other Academic indicator, including how it annually measures the performance for all students and separately for each subgroup of students. If the Other Academic indicator is not a measure of student growth, the description must include a demonstration that the indicator is a valid and reliable statewide academic indicator that allows for meaningful differentiation in school performance.**

For elementary and middle schools, the other academic indicator is growth. Each student receives a growth score, which can then be averaged across schools or districts. Growth measures a student’s achievement in fourth

grade in 2018 compared to third grade in 2017, for example.

For grades 3-8 in ELA and mathematics, a score is given annually. Thus, growth can be measured at the student level between grades 3-4, 4-5, 5-6, 6-7 and 7-8. A K-5 school will have two grade levels included in the growth measure per subject, and a middle school with grades 6–8 will have three grade levels included in the growth measure.

The state will use a value table to measure growth.<sup>22</sup> Schools will be given credit for growth across the entire scale. Each achievement level will be divided in half so that growth is measured within as well as across levels. By giving credit for moving a student from a low unsatisfactory to a high unsatisfactory, this indicator will provide different information about schools than the academic achievement indicator. Background research on the value table model and sample value tables may be reviewed in Appendix 7: Assessment Requirements (pages 149-150). As outlined in Appendix 7, Oklahoma will not have data to determine the best value table for the growth measure until September 2018 because new standards and new assessments were implemented in 2017, and at least two years of data must be collected before final decisions are possible. The final value tables will be available to calculate the indicator in time to make school determinations for the 2018-19 school year and be included in the 2018 school report card.

In addition to using the growth score of

all students for the growth indicator, the OSDE will disaggregate growth data by traditional subgroups. Oklahoma believes that all students can grow and all schools can improve. Increasing student achievement for all students will require increasing achievement at faster rates for those students who are furthest behind. The state will use accountability data gathered from traditional student groups to ensure that all students are college and career ready and to close achievement gaps of historically underserved student groups.

**c. Graduation Rate. Describe the Graduation Rate indicator, including a description of (i) how the indicator is based on the long-term goals; (ii) how the indicator annually measures graduation rate for all students and separately for each subgroup of students; (iii) how the indicator is based on the four-year adjusted cohort graduation rate; (iv) if the State, at its discretion, also includes one or more extended-year adjusted cohort graduation rates, how the four-year adjusted cohort graduation rate is combined with that rate or rates within the indicator; and (v) if applicable, how the State includes in its four-year adjusted cohort graduation rate and any extended-year adjusted cohort graduation**

**rates students with the most significant cognitive disabilities assessed using an alternate assessment aligned to alternate academic achievement standards under ESEA section 1111(b) (2)(D) and awarded a State-defined alternate diploma under ESEA section 8101(23) and (25).**

The graduation rate indicator is directly connected to Oklahoma’s long-term goal to be among the top 10 states for students graduating in the four-, five- and six-year cohorts. The state could reach that goal if 90% of its students graduated. Within the accountability system, both for the A-F Report Card and for designations of Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI), the OSDE will continue to use the valid and reliable federal four-year cohort graduation rate formula. This calculation will be consistent for high schools in all districts across the state and will be disaggregated for each ESSA student group.

The four-year graduation rate is defined by the USDE in 34 CFR §200.18(b)(i)(A) and 70 O.S. §3-151.1 as “the number of students who graduate in four years with a regular high school diploma divided by the number of students who form the adjusted cohort for that graduating class” (i.e., entered high school four years earlier, adjusting for transfers in and out, émigrés and deceased students). In other words, students will be assigned to a cohort based on the year they are expected to graduate on a four-year plan.

22 David Griffith, “Touchdown, Colorado! A School Rating System That Gets the Basics Right,” Flypaper, March 29, 2017, <https://edexcellence.net/articles/touchdown-colorado-a-school-rating-system-that-gets-the-basics-right>.



For example, students entering the ninth grade in the 2013-14 school year would be assigned to the 2017 cohort.

Oklahoma significantly increased its graduation data quality beginning in 2016 and incorporated the six-year graduation improvement (i.e., extended-year ACGR) using a similar method beginning in 2019.

For example, accountability determinations released in fall 2019 used the following:

- Four-year graduation rate score using the 2018 four-year cohort graduation rate and the five- and six-year ACGRs; and
- The four-, five-, and six-year ACGRs will make up 10 points of the overall system with the four-, five-, and six-year ACGRs comprising 5, 3, and 2 points, respectively.

The graduation rate indicator is weighted across the 4-year, 5-year, and 6-year ACGRs as indicated in the table below.

**Graduation Rate Indicator Weights  
(10 points of the total High School System)**

4-year ACGR	5 points (or 50% of the indicator)
5-year ACGR	3 points (or 30% of the indicator)
6-year ACGR	2 points (or 20% of the indicator)

**d. Progress in Achieving English Language Proficiency (ELP) Indicator. Describe the Progress in Achieving ELP indicator, including the State’s definition of ELP, as measured by the State ELP assessment.**

The OSDE’s current long-term goal is to work toward yearly significant increases in the percentage of students achieving proficiency,

as measured by the state-approved English learner Proficiency Assessment (ELPA) – the WIDA ACCESS for ELLs 2.0 – and ceasing to require EL services within a maximum of five years. While currently 50% of English learners are on track to proficiency, the OSDE anticipates establishing new specific, percentage-based long-term and interim progress goals once baseline data is available.

Under Oklahoma’s definition of English language proficiency, an English learner who

is proficient in English can:

- Meet proficiency on state assessments;
- Successfully achieve in classrooms where the language of instruction is English; and
- Be on track to meet Oklahoma’s college- and career-ready standards.

In November 2017, Oklahoma convened an EL district stakeholder committee to set a new cut score for the new English language placement test, WIDA Screener, as well as a new English language proficiency band for the ELPA, ACCESS for ELLs 2.0. While Oklahoma is committed to setting challenging and ambitious standards for its English learners, these new factors warranted conducting a comparison study using data from both EL performance on OSTP assessments and on the ACCESS for ELLs 2.0 with the updated scoring standards. This comparison allowed Oklahoma to establish at what ELP level EL scores correlate to scoring proficient on state content-area assessments in percentages commensurate with non-EL grade-level peers. These comparison data helped to inform Oklahoma’s selection of both new placement criteria for the WIDA Screener and new exit criteria on the ACCESS for ELLs 2.0 assessment. This target band will inform Oklahoma’s setting of interim progress goals for attaining ELP, ensuring that they are ambitious but attainable. EL growth targets focused on English proficiency as measured by the ELP assessment will be set and based on data from the 2017-18 school year.

The ELP indicator will examine whether students have met or exceeded their

expected growth for an on-time program exit. Generally speaking, students entering at a level 1 have five years to exit level 2 four years to exit, level 3 three years to exit, and so on. Growth will be determined using scale scores.

Consistent with the methodology used for the academic achievement indicator, each English learner will have a “target” or expected growth value for the subsequent year. Should the student meet or exceed the growth required for an on-time exit, the student would earn one point. If the actual growth is less than expected, the student would receive no points under this indicator. This calculation requires redefining the expected growth target each year since it is based on both grade level and proficiency level.

The overall score on this indicator will be indexed based on the percentage of English learners earning points (by meeting/ exceeding the target or exiting services). Schools with the highest percentage of English learners earning points will receive the highest scores on this indicator.

For example, if a school has 30 enrolled English learners, and 24 students meet their growth target, the school would receive 80% of the available points (8points out of 10). The OSDE will use data from the 2017 WIDA ACCESS, coupled with the 2018 WIDA ACCESS data – which will be available in summer 2018 – to complete these calculations. Using these data will allow the OSDE to calculate the indicator in time to make school determinations for the 2018-



19 school year and be included in the 2018 school report card.

- e. School Quality or Student Success Indicator(s). Describe each School Quality or Student Success Indicator, including, for each such indicator: (i) how it allows for meaningful differentiation in school performance; (ii) that it is valid, reliable, comparable, and statewide (for the grade span(s) to which it applies); and (iii) of how each such indicator annually measures performance for all students and separately for each subgroup of students. For any School Quality or Student Success indicator that does not apply to all grade spans, the description must include the grade spans to which it does apply.**

Because absenteeism represents lost instructional time, whether excused or not, and has a strong relationship with achievement and graduation, Oklahoma will use chronic absenteeism as a School Quality Indicator. Absenteeism further serves as an early warning system relevant to all grades and considered an important metric in

accountability. Research shows that students who are chronically absent in sixth grade are much less likely to graduate high school on time, if at all.<sup>23</sup> Similarly, chronic absence in kindergarten was associated with lower academic performance in first grade.<sup>24</sup>

The Hamilton Project at the Brookings Institution released a report recommending states adopt chronic absenteeism as the “fifth indicator” of student success and school quality.<sup>25</sup> A compelling aspect of school quality is linked to building a culture around regular school attendance. School culture is a combination of many factors that are within the control of school personnel: school environment, expectations, staff attitudes toward students, communication with families and safety in the school building. The important integral component of the chronic absenteeism metric is that schools recognize that the chronic absenteeism numbers are meaningless unless they are used to drill down to individual student stories. Reviewing these student stories can then help uncover underlying causes for chronic absenteeism, like bullying, ineffective school discipline, in-school or out-of-school trauma, an undiagnosed disability or few meaningful relationships with adults at school. Identifying root causes can then begin the conversation on how to use what is within the control of the school to address these root causes and decrease the number of students chronically absent.

For all schools Oklahoma will use chronic absenteeism, defined as missing 10% or more of the school year, reflecting the general definition recognized in the Johns Hopkins University School of Education Researchers report. For example, for a student enrolled for a full academic year defined as 180 instructional days, missing 10% of the school year would result in missing 18 days, or almost a full month of instruction.

All students enrolled in school for a full academic year should be included in this indicator for that school year. The OSDE will report chronic absenteeism rates for all students and separately for each subgroup.

The OSDE will calculate points earned under this indicator by multiplying the percentage of not chronically absent students at a site by the available points (10 points for all schools). Thus, a school with 25% of students identified as chronically absent would earn 7.5 points, whereas a school with 35% of students chronically absent would earn only 6.5 points.

This measure differentiates schools and in fact differentiates schools with much greater success than an aggregate attendance rate. Based on self-reported data from districts for the semi-annual required report to the Office of Civil Rights as reported by the Hamilton Project, 17.6% of Oklahoma schools have no students who are chronically absent. Oklahoma’s current rates of chronic absenteeism include:

- 11.7 percent overall
- 16.1 percent for high schools
- 11.7 percent for middle schools
- 9.5 percent for elementary schools

As a school quality/student access indicator for high schools, the OSDE will also use postsecondary opportunities with a focus on participation. The document, “Identifying a School Quality/Student Success Indicator for ESSA: Requirements and Considerations,” emphasizes the primary unit of measurement for a student success indicator must be the student: “Student participation in advanced coursework allows for sub-group disaggregation if defined in terms of the number/percentage of students taking advanced courses in a given school.”<sup>26</sup>

Schools will receive credit for every student completing at least one of the following:

- Advanced Placement (AP) classes;
- International Baccalaureate (IB) program;
- Dual (concurrent) enrollment in postsecondary courses;
- An approved, work-based internship or apprenticeship; and/or
- Programs leading to industry certification.

Data from the 2015-16 school year show that the percentage of students participating in one of the courses ranges from 0% to 68%, with a median of 18% and a standard deviation of 10%. Thus, there is significant

23 Baltimore Education Research Consortium, “Destination Graduation: Sixth Grade Early Warning Indicators for Baltimore City Schools: Their Prevalence and Impact,” Feb. 2011, <http://baltimore-berc.org/pdfs/SixthGradeEWIFullReport.pdf>.

24 Robert Balfanz and Vaughan Byrnes, “The Importance of Being in School: A Report on Absenteeism in the Nation’s Public Schools,” Johns Hopkins University School of Education Center for Social Organization of Schools, May 2012.

25 Diane Whitmore Schanzenbach, Lauren Bauer and Megan Mumford, “Lessons for Broadening School Accountability Under the Every Student Succeeds Act,” Brookings, Oct. 28, 2016, [https://www.brookings.edu/wp-content/uploads/2016/10/es\\_20161027\\_chronic\\_absenteeism.pdf](https://www.brookings.edu/wp-content/uploads/2016/10/es_20161027_chronic_absenteeism.pdf).

26 Erika Hall, “Identifying a School Quality/Student Success Indicator for ESSA: Requirements and Considerations,” The National Center for the Improvement of Educational Assessment, Inc./CCSSO, Jan. 2017, <http://ccsso.org/Documents/2017/ESSA/CCSSOIdentifyingSchoolQualityStudentSuccessIndicator1242017.pdf>.

variation in this metric to provide meaningful differentiation among schools. To determine the postsecondary opportunities calculation, all students will be included in the denominator. In addition to receiving a letter grade for the participation of all students in postsecondary opportunities, the OSDE will also report this metric disaggregated by all ESSA student groups.

Schools are rewarded for helping their students gain early college or career exposure. Initially, this indicator measures participation but over a three-year period will move to crediting successful outcomes in the second and third years of implementation and as programs become more available to students (e.g., move from rewarding enrollment in an AP course to rewarding the receipt of a 3 or higher score on the AP test).

- v.

**Annual Meaningful Differentiation (ESEA section 1111(c)(4)(C))**
- a.

**Describe the State’s system of annual meaningful differentiation of all public schools in the State, consistent with the requirements of section 1111(c)(4)(C) of the ESEA, including a description of (i) how the system is based on all indicators in the State’s accountability system, (ii) for all students and for each subgroup of students. Note that each state must comply with the requirements in**

**1111(c)(5) of the ESEA with respect to accountability for charter schools.**

Oklahoma’s system of annual meaningful differentiation of all public schools (including public charter schools) fulfills the requirements of the ESSA and represents a shift toward recognizing the value of multiple indicators to monitor students’ progress toward college and career readiness. The Oklahoma system is based on all indicators in the accountability system and includes all students as well as those in each student group. These indicators reflect a greater value on progress and improvement of each school and each individual child.

As described in section 4(iv), Oklahoma has incorporated multiple measures of student performance which include:

- Academic achievement;
- Growth (elementary and middle schools);
- Graduation rate (including five- and six-year graduation rate in addition to the four-year graduation rate);
- EL progress;
- Postsecondary readiness (high schools); and
- Chronic absenteeism.

Oklahoma will categorize schools by grades A through F for each indicator and will issue an overview grade of all indicators. According to research by Learning Heroes, “Parents overwhelmingly appreciate and value a summative rating, especially when it

is easily interpreted and familiar, such as an A-F letter grade... Parents find less value in subjective scales, such as “excellent” to “needs improvement.” The full report is in Appendix 11. Grades will be awarded as follows:

- “A” means schools making excellent progress;
- “B” means schools making average progress;
- “C” means schools making satisfactory progress;
- “D” means schools making less than satisfactory progress; and
- “F” means schools failing to make adequate progress.

Each of the accountability indicators has a given weight and is summed to create an index, which was determined by carefully considering the relative weight of each indicator. Summing the final numbers produces an overall score between 0-85 to deter “percent-correct” thinking.

The following is an example rubric of how scores may be converted to grades (please note that this rubric is an example, and points will be indexed in summer 2022 to define thresholds for school differentiation expectations):

A: 70–85

B: 57–69.99

C: 43–56.99

D: 30–42.99

F: < 30

If, however, schools have fewer than 25 in a given year, or 25 over a pooled most recent

three-years of data, English learners across all grades, they will not have a score for that part of the index, making their total possible points 75. The 10-point English language proficiency indicator would be removed from the index, reducing the total points possible from 85 to 75 points. An example rubric in this case (again, to be specified in summer 2022) would be as follows:

A: 60–75

B: 47–59.99

C: 38–46.99

D: 25–37.99

F: < 25

The specific rubric used to assign letter grades will be identified following the calculation of baseline data to ensure that A’s and F’s are not over-identified.

Disaggregated data on all indicators will also be reported for all students and by each student group identified in the response to section 4(i)(a) of the State Plan.

b.

**Describe the weighting of each indicator in the State’s system of annual meaningful differentiation, including how the Academic Achievement, Other Academic, Graduation Rate, and Progress in ELP indicators each receive substantial weight individually and, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate.**

**FIGURE 7:** Indicators and Weights for Elementary and Middle School Accountability Index

Indicator		Weight
1a.	Performance Level Snapshot:English Language Arts	7.5
1b.	Performance Level Snapshot: Mathematics	7.5
2a.	Improvement Toward Expectations: English Language Arts	7.5
2b.	Improvement Toward Expectations: Mathematics	7.5
3a.	Performance Level Snapshot: Science	2.5
3b.	Improvement Toward Expectations: Science	2.5
4a.	English Language Arts Growth	15
4b.	Mathematics Growth	15
5.	English Language Proficiency Progress	10
6.	Chronic Absenteeism	10

**FIGURE 8:** Indicators and Weights for High School Accountability Index

Indicator		Weight
1a.	Performance Level Snapshot: English Language Arts	7.5
1b.	Performance Level Snapshot: Mathematics	7.5
2a.	Improvement Toward Expectations: English Language Arts	7.5
2b.	Improvement Toward Expectations: Mathematics	7.5
3a.	Performance Level Snapshot: Science	7.5
3b.	Improvement Toward Expectations: Science	7.5
4.	English Language Proficiency Status	10
5.	Graduation Rate	10
6.	Chronic Absenteeism	10
7.	Postsecondary Opportunity	10

Figure 7 describes the weighting of each indicator in the state’s system of annual meaningful differentiation for elementary and middle schools.

Additionally, schools that earn an A grade but qualify for Targeted Support and Intervention (TSI) will receive a B grade on their report card.

**c. If the State uses a different methodology or methodologies for annual meaningful differentiation than the one described in 4.v.a. above for schools for which an accountability determination cannot be made (e.g., P-2 schools), describe the different methodology or methodologies, indicating the type(s) of schools to which it applies.**

While Oklahoma’s system of accountability is uniform across all schools, the state recognizes the need for sensible modifications to address the unique needs of specific populations of students, such as schools that do not have tested grades, alternative schools and schools that do not meet the minimum N-size of 25. The OSDE will engage with other states, national experts and local stakeholders to consider modifications to the accountability system for non-traditional schools.

The following models are part of OSDE’s ongoing efforts to ensure that the accountability system reflects both the goals

of the state and the state’s ability to recognize the unique contexts associated with schools that serve unique student populations. Alternative accountability models that will be utilized consist of:

- Oklahoma’s accountability model uses the Oklahoma School Testing Program (OSTP) assessments that begin in grade 3. All schools take attendance and give the English language proficiency test to students beginning in kindergarten. Under this model, the Pre-K-2 and grade-level centers can and will use their own data for EL progress and chronic absenteeism, so these schools will not necessarily receive the same letter grade as their feeder schools. For Pre-K-2 grade schools or grade-level centers (schools without a state assessment), the state may use the next tested grade level (i.e., third-grade achievement status for Pre-K-2) of the schools into which the students feed.
- Schools that do not meet the minimum number of students, 25 in a single year, may be averaged across three years so that a sufficient number of students is available. The most recent three years of data will be used to issue a revised report card during fall of 2022.

Additionally, the OSDE has made efforts to prioritize existing system operations and validity and is looking forward to exploring alternative accountability models to expand the schools that can be included in accountability to support continuous improvement efforts. The OSDE will consider the following alternative model to ensure that all schools can be included in the state’s system of annual meaningful differentiation,



including those who provide specialized services:

- Alternative schools serving entirely at-risk students may have the same indicators as traditional schools but with heavier weight for the graduation rate indicator and chronic absenteeism to incentivize such behavior.

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

The following strategies from the OSDE 8-Year Strategic Plan help to define the agency’s work in supporting low-performing schools:

**STRATEGY 1.2**  
Ensure effective implementation of the Oklahoma Academic Standards by using available data to target high-quality, aligned resources to educators.

**STRATEGY 1.4**  
Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

**STRATEGY 1.5**  
Reduce barriers to equity and close the opportunity and achievement gap for all students.

**STRATEGY 2.2**  
Provide support and professional learning to increase instructional capacity for teachers and leaders.

**STRATEGY 2.3**  
Provide district and school leaders with the training and support needed to improve instruction in their schools.

**STRATEGY 3.3**  
Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

**STRATEGY 4.1**  
Sustainably improve and strengthen agency capacity to fulfill its mission by sharing knowledge and best practices across all teams, developing skills and improving teamwork.

The OSDE office of school support’s primary purpose is to meet the needs of the lowest-achieving students by providing on-site support, resources, technical assistance and guidance to schools statewide. As part of this “boots on the ground” approach, every school with a Comprehensive Support and Improvement (CSI) designation (formerly Priority) will receive at least one site visit each quarter throughout the school year, with many sites receiving additional visits based on their need.

The OSDE’s 12-member school support team is comparatively large in terms of the size of the state, but not by size of the need. Under the ESEA Flexibility Waiver, Oklahoma had more than 600 schools designated during the 2015-16 school year. In soliciting stakeholder feedback, the OSDE found an overwhelming desire for a strong relationship among struggling schools and the agency. In fact, 78% of respondents surveyed in the OSDE’s

live polling sessions stated that the OSDE’s role in developing a local intervention plan should be one of a continual partnership with ongoing support (see Appendix 1).

To better support schools and students with multiple challenges, the OSDE will utilize CSI teams with representation from the agency’s departments of school support, special education, EL/Title III, finance, federal programs, educator effectiveness, family/ community engagement and instruction/ curriculum to support struggling schools and build leadership capacity. This model moves beyond compliance coaching for academic success.

Developing positive on-site relationships with school leaders is a priority for the agency’s school support specialists, who guide schools toward solving their own problems rather than relying on the OSDE to provide all the answers. Through a host of trainings, school support specialists help sites in leadership development, data inquiry, implementation of the Oklahoma Academic Standards and corresponding resources, accountability and state and federal law. The OSDE’s specialists must be prepared to address a variety of potential school needs as they may be the chief point of contact for the site to the agency.

To make certain that important information is consistently shared with all sites, the OSDE’s office of school support adheres to quarterly site visits with designated schools. This process will continue during the transition to new requirements under the

ESSA. School support specialists will work through a basic agenda ensuring all new information from the OSDE is reviewed, along with discussion about what is showing positive results, areas of concern and where supports are needed. A needs assessment based on the Oklahoma Nine Essential Elements of School Improvement, depicted in Figure 9, will help identify unique areas of focus for each site.

The Oklahoma Nine Essential Elements are a set of indicators proven through research to be effective as a continuous school improvement framework tool for all schools. These elements are based on research conducted by the Marzano Research Laboratory, which studied both high-achieving and low-achieving Oklahoma schools from 2009 to 2011.<sup>27</sup>

Prior to implementation of the ESSA, the Nine Essential Elements were optional for schools that did not otherwise have a needs assessment. Moving forward CSI schools will be required to complete the Nine Essential Elements Needs Assessment as part of developing their targeted school improvement plan. The Nine Essential Elements Needs Assessment Survey can be found in Appendix 12.

Although the selection of interventions and strategies is a local decision over the first three years of designation, the office of school support will provide guidance and resources to help schools select evidence-based interventions based on the criteria defined under the ESSA. In this regard, school

27 Marzano Research, “What Works in Oklahoma Schools: A Comprehensive Needs Assessment of Oklahoma Schools,” March 1, 2011.



support specialists will encourage use of the What Works Clearinghouse and Evidence for ESSA website ([www.evidenceforessa.org](http://www.evidenceforessa.org)), a rich resource of programs that result in success for students.

The term “evidence-based” means a strategy or intervention that demonstrates a statistically significant effect on improving student outcomes (ESEA section 8101(21) (A)). The levels of evidence are as follows:

- Strong evidence – demonstrated by at least one well-designed and well-implemented experimental study;
- Moderate evidence – demonstrated by at least one well-designed and well-implemented quasi-experimental study; and
- Promising evidence – demonstrated by at least one well-designed and well-implemented correlational study with statistical controls for selection bias.

A fourth level is designed for ideas that do not yet have an evidence base qualifying as one of the first three levels. This fourth level is considered evidence-building and demonstrates a rationale based on high-quality research findings or positive evaluation that an intervention is likely to improve student outcomes.

Some examples of evidence-based strategies and interventions that the office of school support has relied upon in the past include co-teaching, professional learning communities, response to intervention (RTI) and positive behavior interventions and supports (PBIS). School support specialists

may offer training in many of these strategies and professional development in areas such as the implementation of project-based learning, English learner strategies, changing the mindset as well as supports for implementing the Reading Sufficiency Act (RSA) and updates on new curriculum, standards, assessments and accountability.

Additionally, to support LEAs in the implementation of evidence-based strategies to improve student academic achievement, the OSDE will:

- Provide technical assistance to LEAs by creating a model process for the completion of the Nine Essential Elements Needs Assessment that engages stakeholders in an effort to assess root causes;
- Train and partner with LEAs and school staff to utilize the needs assessment in order to inform selected evidence-based practices;
- Develop and post a state-approved list of evidence-based interventions;
- Offer professional development on matching evidence-based best practices to locally identified needs; and
- Provide intense support and monitoring of the implementation of evidence-based practices.

An LEA seeking an intervention will need to supply evidence of selection based on the following criteria:

- Evidence that the intervention is statistically proven to make an impact on student success;

- Evidence that the intervention has been tested/implemented in similar demographic settings as the LEA; and
- Evidence that the tested intervention is more effective than standard practice.

**Comprehensive Support and Improvement Structure**

The OSDE has many opportunities to capitalize on the flexibility provided by the ESSA to maximize capacity for serving districts. Oklahoma’s low socioeconomic students often have wide-ranging needs. They may also need special education and EL supports in addition to having needs that stem from attendance at a low-performing school. Therefore, the OSDE is developing a system of cross-programmatic collaboration led by the OSDE office of school support to holistically address the needs of low-performing schools by combining state and federal funds.

To better support schools and students with multiple challenges, the OSDE will utilize CSI teams with representation from the agency’s departments of school support, special education, EL/Title III, finance, federal programs, educator effectiveness, family/ community engagement and instruction/ curriculum to support struggling schools and build leadership capacity.

In allocating school improvement dollars, the OSDE will use a formula allocation in combination with a competitive grant. These funds are intended to be used for supplemental supports to quickly help low-performing schools see significant academic improvement. LEAs may choose to work with an external provider to assist in professional development and support.

**FIGURE 9:**

**Oklahoma’s  
Nine  
Essential  
Elements**

**Academic Learning and  
Performance**

1. Curriculum
2. Classroom evaluation/  
assessment
3. Instruction

**Effective Learning  
Environment**

4. School culture
5. Student, family,  
community support
6. Professional growth,  
development, evaluation

**Collaborative Leadership**

7. Leadership
8. Organizational structure  
and resources
9. Comprehensive and  
effective planning

### External Provider

An outside professional development provider can maintain focus on improving instruction and providing support in prioritizing improvement strategies and resources to meet the needs of the lowest-achieving students. This approach enables greater opportunity for on-site coaching and building capacity for enduring gains. Whether schools use a competitive grant to bring in a national provider or formula school improvement dollars to work collaboratively with independent consultants, the improvement in the quality of education provided to students is evident and often significantly more pronounced. The LEA must rigorously review the proposal and work of the external provider each year.

Another key to the success of the office of school support is allocating school improvement funds at the site level, in contrast to many other states that do so at the LEA level. Oklahoma will continue to allocate at the site level to ensure resources and support for each school with a designation are equitable. These funds are a set-aside from the state's Title I budget and are intended to meet the needs of the lowest-achieving students. Through site visits, technical assistance and desktop monitoring, the OSDE works collaboratively with sites and districts to ensure every dollar is aligned to the Nine Essential Elements and meets the requirement of tiered evidence. Friendly reminders – such as supplement vs. supplant and maintenance of effort – are provided during site visits to assist sites in decision-making.

The office of school support will utilize the Oklahoma Student Support Framework to assist districts in implementing tiered systems of support. The OSDE understands that simply directing interventions at the school level may not result in improvement of student achievement if district policies and practices either create barriers or do not explicitly support required interventions.

The office of school support's system of support and monitoring for CSI schools, also depicted in Figure 10, includes:

- Assignment of a school support specialist;
- Needs assessment review;
- Quarterly site visits with an emphasis on the Oklahoma Nine Essential Elements and goals based on the site's needs assessment;
- Consistent communication via email, newsletter, webinars and on-site support;
- Support in the creation of a prescriptive schoolwide/school improvement plan via the Grants Management System (GMS); and
- Technical assistance regarding the application, budget and claims process throughout the year.

The office of school support uses GMS for desktop monitoring throughout the year, with each site application and budget reviewed three times before approval. The schoolwide/school improvement plan is reviewed, amended as needed and approved based on its plan to use the funds to improve the academic achievement of all students.

**FIGURE 10: Detailed School Improvement Model**

### STEP

# 1

Based on the Nine Essential Elements Needs Assessment, sites are placed in a cohort for professional development focused on academic performance, learning environment or collaborative leadership. Below are some of the initiatives the OSDE has in place to support this work.

**Academic Learning and Performance:**

- Tiered instruction
- Response to intervention

**Effective Learning Environment:**

- Professional learning communities
- Positive behavior interventions and supports
- Teacher Leader Effectiveness (TLE)

**Collaborative Leadership:**

- Lead to Succeed (L2S)
- Moving UP
- Mentorships

### STEP

# 2

Identify focus area of need and develop SMART (Specific, Measurable, Attainable, Relevant, Timely) goals for two to three areas. A template will be provided as well as support in developing these goals. Goals should include information on the evidence-based interventions being implemented at the site and be aligned to the school improvement budget to coordinate the allocation of funds.

### STEP

# 3

Planning for implementation will be supported by the OSDE CSI team through regular communication with a site as it develops an individual school improvement plan that is specific, detailed and results-oriented. The team will work collaboratively with the site to ensure that the plan is aligned with the identified SMART goals and includes ongoing monitoring and assessment.

### STEP

# 4

The OSDE CSI team will partner with the site during progress monitoring to assist in determining the fidelity of implementation and in evaluating progress. The team will work collaboratively with a site to modify and adjust the school improvement plan as needed to meet the identified SMART goals.

### STEP

# 5

Training and support will be provided in the data collection and review stage of the cycle through the offices of assessment, accountability and school support. The OSDE recommends that all sites implement components of the Assessment in Data Literacy Outreach program as well as the Oklahoma Data Inquiry Project. Site-level improvement teams will provide a presentation to the OSDE CSI team that should include an overview of data, documentation of improvements and plans for areas of improvement.



Additionally, the school support specialist will help designated schools determine how to best utilize their school improvement funding by identifying interventions and resources aligned to their needs, as determined by the needs assessment. In order for schools to see such interventions in action, specialists frequently encourage conversations between newly designated sites and sites that have seen improvement through a specific intervention. These conversations can foster peer-to-peer learning among struggling schools, which contributes to helping meet the needs of the lowest-achieving students by providing on-site support, resources, technical assistance and guidance.

**Additional Targeted Support and Improvement (ATSI) Support Structure**  
ATSI schools will receive support from a school support team who will assess the needs of the ATSI schools by subgroup and provide resources and professional development according to those needs.

Those resources and support can include:

- Quarterly regional training with an emphasis on the Oklahoma Nine Essential Elements and goals based on the site’s needs assessment;
- Consistent communication via email, newsletter, webinars and on-site support;
- Support in the creation of a prescriptive schoolwide/school improvement plan via the Grants Management System (GMS); and

- Technical assistance regarding the application, budget and claims process throughout the year.

Support for ATSI designated schools will be dependent upon funding and the capacity of the school support team. Ideally, ATSI leadership teams will use the Nine Essential Elements needs assessment and root cause analysis similar to CSI schools. If the capacity of the school support team increases, ATSI schools will be able to have the same support as CSI schools.

**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.**

Oklahoma will identify schools as Comprehensive Support and Improvement (CSI) and Additional Targeted Support and Improvement (ATSI) from among all schools in the state, not simply Title I, Part A eligible schools. At a minimum elementary and middle schools that earn an F on the Oklahoma School Report Cards will be categorized as CSI schools. For high schools the same criteria apply, but graduation rates are also a consideration. Any high school with a graduation rate of 67% or lower will be identified as needing CSI.

Oklahoma’s implementation of more rigorous standards and assessments necessitates calibrating the new A-F accountability system. It is natural and expected that assessment scores will dip; as a result, it will be harder to reach the targeted goals of the status and growth indicators of the accountability system. Therefore, in the baseline year (2017-18), the model will be calibrated so that approximately 5% of schools will receive an F and 5% will receive an A. This adjustment is necessary initially to ensure an appropriate spread of grades. Achieving an A score under the new assessments will be very challenging. As a majority of schools improve, however, the rubric will be adjusted so that an A highlights the greatest successes. After an examination of empirical findings, several revisions are being proposed to the system of Annual Meaningful Differentiation. The state will identify the next round of CSI schools in fall 2022 using data from the most recent year’s assessment (i.e., SY 2021-2022), which is when the proposed system will be first reported.

If fewer than 5% of schools receive an F, the schools in the lowest 5% of overall points for each model (e.g., high school, elementary and middle school) will be identified for comprehensive support. In the event that the aforementioned methodology results in less than 5% of Title I schools being designated as CSI, the OSDE will identify the accountability score at the fifth percentile of Title I schools and designate all Title I schools below that score as CSI.

The next year Oklahoma will identify schools for CSI will be 2022-2023, using results from SY 2021-2022. Every three years, the model will be reviewed to determine if new criteria are needed.

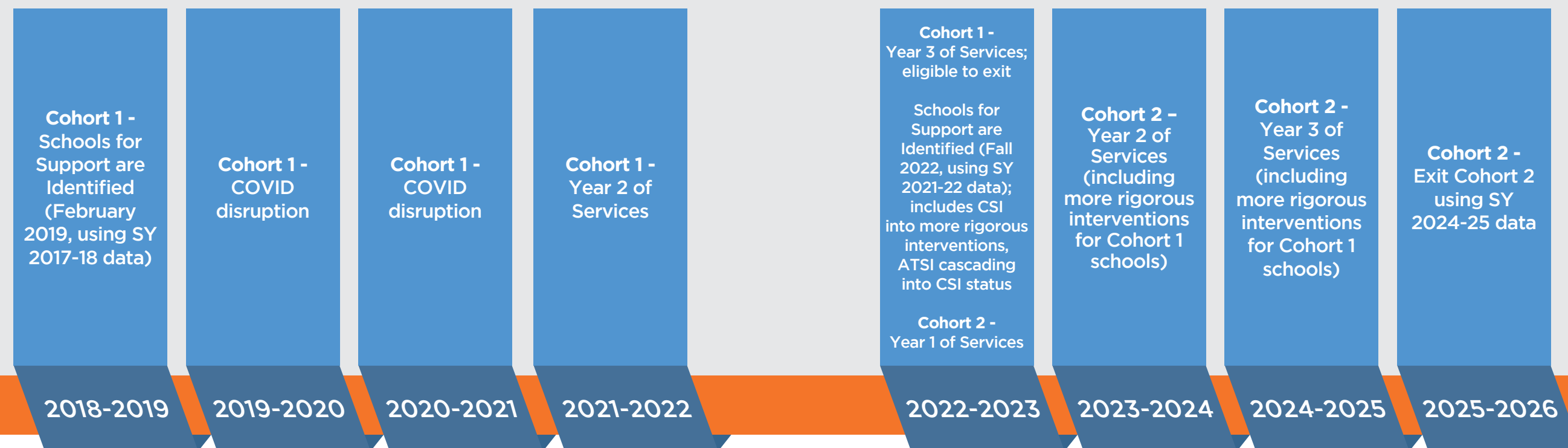
**b. Comprehensive Support and Improvement Schools. Describe the State’s methodology for identifying all public high schools in the State failing to graduate one third or more of their students for comprehensive support and improvement, including the year in which the State will first identify such schools.**

High schools with graduation rates of 67% or lower in the four-year cohort will be identified for CSI. To address the fact that Oklahoma has many rural schools with fewer than 100 total students and graduation classes as small as six students, a three-year average will be used to account for volatility in the graduation rate. The first year Oklahoma will identify schools for CSI identification for graduation rate will be 2018-19. Oklahoma will identify CSI schools in the fall of 2022 school year using school year 2021-2022 data.

**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**



**FIGURE 11: Identification Timeline**



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.

Schools that remain identified for ATSI for three consecutive years due to a lack of improvement within the same student group and that have not satisfied the statewide exit criteria will be deemed “chronically low performing” and designated CSI. The first year Oklahoma will designate chronically low performing schools as CSI is 2022-23, based on an identification of ATSI schools in fall 2022, using SY 2021-2022 data.

**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.

Schools will be assessed annually. With the current revision, schools will be identified for CSI every three years with the ability to exit the designation when they show improvement from the previous year starting in the fall of 2022, using SY 2021-2022 data.

Designations will occur every three years beginning in year 2022-2023 for the first year of cohort support under the revised system. The OSDE will re-evaluate the designation cycle at the end of 2025-2026, using 2024-2025 data to ensure the individual needs of the schools are being met. If evidence supports the need for earlier support and intervention by the OSDE, a modification to the ESSA plan will be submitted to the USDE for approval.

For sites that fail to exit CSI during the three years of support for cohort 1, the OSDE will increase the amount of support and rigor based on the needs of the individual sites. Figure 11 illustrates the timeline for identification.

**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))**

To identify schools that need Targeted Support and Improvement, Oklahoma will analyze school performance within each subgroup annually as required by the ESSA [i.e., race/ ethnicity (White, Hispanic/Latino, Black/ African American, American Indian, Asian/ Pacific Islander and Two or More Races), socioeconomic status, disability and English learners (ELs)].

Oklahoma defines sites as consistently low performing when at least one subgroup (as listed above) in a school is in the bottom 10% of that respective subgroup for three years in a row. The state will define a “consistently underperforming” subgroup as a subgroup that falls below the 10th percentile for that subgroup for three (3) consecutive years, which includes all required indicators in the system of Annual Meaningful Differentiation. Each individual subgroup will be treated as its own population. Doing so ensures that all schools must address their lowest performing subgroups, further prioritizes the OSDE’s goal that “all students can grow,” and serves as an “early warning” to sites. The first year of identification for TSI will be fall 2022 using the most recent three years of data available.

This ensures that all schools must address the lowest performing subgroups, even if certain student groups are higher performing than others. This way, all subgroups and schools are expected to prioritize continuous improvement. Furthermore, this will

prioritize every student counts because every student group regardless of performance will be eligible for targeted support and improvement, reinforcing the state’s goal of all students growing, every school counting, and every student counts. Any school that has a “consistently underperforming subgroup” will be identified for Targeted Support and Intervention (TSI).

Based on simulated analyses using previously available data (i.e., data from SY 2017-2018 and 2018-2019), 204 school sites would receive a TSI designation. ATSI schools will be identified from this pool of schools.

**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))**

Additional Targeted Support and Improvement (ATSI) schools will be identified from those schools identified for Targeted Support and Improvement (TSI). Using the list of TSI schools, any school in

which any subgroup of students, on its own, would be identified as CSI will be identified as ATSI.

The first year Oklahoma will be identified ATSI will be the first year for which three years of data will be available for TSI identification. We will identify ATSI schools in the fall of 2022 school year using school year 2021-2022 data.

For example, the OSDE will calculate points under each indicator for a given subgroup (using traditional grouping methodology, where a student is assigned to each applicable subgroup). For the Hispanic/ Latino subgroup, this calculation means the academic achievement indicator points will reflect the percentage of all Hispanic/ Latino students meeting their priority student group target combined with the percentage of proficient Hispanic/Latino students (using the methodology outlined in section 4(vi) (a)). Similarly, the academic growth indicator would reflect the average growth made by all Hispanic/Latino students. The chronic absenteeism indicator would reflect the percentage of Hispanic/ Latino students not chronically absent. This process would be utilized the system of Annual Meaningful Differentiation (AMD), which includes all required indicators. The cumulative score across the system of AMD for a particular subgroup will be compared to the 5th percentile of cumulative scores for all students using the system of AMD (I.e., the threshold used for CSI identification). Any school with a cumulative subgroup score at or below the CSI score that is also a TSI school (5th percentile for all students cumulative score) would meet criteria for

additional targeted support. In other words, the methodology for identifying schools for additional targeted support will be identical to the methodology for identifying schools for CSI for each subgroup, and selected from those schools identified as TSI.

Oklahoma will closely monitor the identification of schools for additional targeted support. As capacity to serve and support schools is of paramount importance, the OSDE will analyze and regulate the designation process to ensure effectiveness.

**g. Additional Statewide Categories of Schools. If the State chooses, at its discretion, to include additional statewide categories of schools, describe those categories.**

The OSDE intends to select the best-of-the-best A schools to receive a special recognition for excellence. Because Oklahoma has recently adopted a new accountability system, the first complete set of school grades will not be available until after the 2017- 18 school year. After the proposed revision, schools’ grades for best-of-the-best will be based on grades from SY 2021-2022. The OSDE is considering designating schools as reward schools that have no large achievement gaps and a participation rate above 95%. A reward school must also have an overall graduation rate of at least 85% with no student group falling below 75%. The OSDE, however, will not allocate Title I, Part A funds to these schools.

**vii. Annual Measurement of Achievement (ESEA section 1111(c)(4)(E)(iii)): Describe how the State factors the requirement for 95 percent student participation in statewide mathematics and reading/language arts assessments into the statewide accountability system.**

The state maintains student enrollment in a statewide student information system (the Wave). In accordance with the ESSA and to maintain a valid system of school accountability, all students who are enrolled in grades 3-8 and 11 at the time of testing are required to participate. All high school students must take the college- and career-ready assessment, as well as any enhancement items needed for science and U.S. history. Schools with participation rates for all students lower than 95% will be given a minus after their overall Oklahoma School Report Card grade. Likewise, any school that has one or more ESSA subgroups of students with less than a 95% participation rate will receive a minus after their overall report card grade. If a school has special circumstances (i.e., the degree to which the school missed the requirement, disproportionately skewed data because of small N-size student subgroups, etc.), it can petition the OSDE for a special exemption.

Figure 12 simulates how the state will take into account the 95% participation rate on the school report card. The “All Students” accountability subgroup shows 95% tested, but the “American Indian/Alaska Native”

subgroup only tested 64%. Therefore, the letter grade for this sample school would include an asterisk (\*).

**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.**

A CSI school site that does not meet the exit criteria within three years will be given additional, more rigorous interventions. Site support will begin with the first year of designation, working collaboratively with the LEA. An increase in support at the LEA level will occur when sites do not meet exit criteria in three years. Schools can exit CSI status at any time during the three-year cycle when:

- A site designated due to performing in the lowest 5% of Oklahoma schools improves the total score such that student performance is no longer in the bottom 5% of Oklahoma schools at any time during the three-year designation cycle (a school will not exit CSI status if it is no longer in the bottom 5% but its score did not improve); or

**FIGURE 12: 95% Participation Rate Simulation**

Accountability Subgroup	Participating Students	Total Students	Percent Tested
All Students	859	900	95%
Economically Disadvantaged	100	100	100%
Students with Disabilities	95	100	95%
English Learner (EL)	100	100	100%
American Indian/Alaska Native	64	100	64%
Asian/Pacific Islander	100	100	100%
Black/African American	100	100	100%
Hispanic/Latino	100	100	100%
Two or More Races	100	100	100%
White	100	100	100%

- A site designated due to graduation rates below 67% increases the school’s four-year graduation rate to be at or above 67% for high schools if the school was designated for this reason; or
- A site designated for lack of improvement in a chronically low-performing student group improves the performance of the chronically low-performing student groups such that the student group has surpassed, at any point during the three-year designation cycle, similarly situated student groups in schools in the bottom 5%.

**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.**

Annually, schools can exit ATSI designation when the underperforming student group for which they were identified demonstrates improvement that (1) brings the school out of the bottom 5% for that particular student group, and (2) that the absolute performance of that student group is higher



than the performance demonstrated during identification. This ensures that student groups that are remaining stagnant or regressing in performance are not exited simply due to the other student groups declining in performance. Because ATSI schools will have the opportunity to exit annually, the OSDE will monitor schools who are at risk for both ATSI and TSI identification and inform LEAs accordingly.

Schools identified for ATSI in spring 2019 based on data from school year 2017-2018 will be expected to meet the ATSI exit criteria by fall 2022 (not counting COVID-related disruptions in school years 2019-2020 and 2020-2021) before being identified for CSI based on not exiting ATSI status. Schools identified for ATSI in fall 2022 based on data from school year 2021-2022 will be expected to meet the ATSI exit criteria by fall 2025 before being identified for CSI based on not exiting ATSI status.

**c. More Rigorous Interventions. Describe the more rigorous interventions required for schools identified for comprehensive support and improvement that fail to meet the State’s exit criteria within a State-determined number of years consistent with section 1111(d)(3)(A)(i) (I) of the ESEA.**

Oklahoma intends to implement tailored approaches to more rigorous interventions, focusing on the needs of individual schools

instead of providing a one-size-fits-all approach to school improvement. Upon review of the needs assessment, Oklahoma may deploy any number of interventions. The OSDE’s approach to more rigorous interventions is summed up by the words of Andy Hargreaves of Boston College’s Lynch School of Education, who said, “One of the ways teachers improve is by learning from other teachers. Schools improve when they learn from other schools. Isolation is the enemy of all improvement.”<sup>28</sup>

Oklahoma is a state staunchly rooted in the ideals of local control. The OSDE respects an LEA’s right to have the opportunity to first implement local solutions in low-performing schools. The OSDE will work alongside low-performing schools with support, direction and resources in hopes that locally selected, evidence-based interventions are successful. However, should a school not exit designation status after implementing a locally selected intervention over a period of three years, the state must intervene. After a comprehensive review of a school’s needs, the OSDE may require many of the strategies that were optional during the first three years of designation – a gradual loss of local control until the school is able to exit designation status.

During the first three years of designation, a school site will have the freedom to choose an evidence-based intervention that fits its needs. After this timeframe, CSI schools will be required to adopt specific, more rigorous interventions selected by the OSDE.

In addition, decisions regarding tailored interventions will be based on state-level data and the school’s needs assessment. These interventions may include but are not limited to the following:

- Implementation of state-approved supplemental, evidence-based supports and resources (as previously discussed);
- Required professional development based on the needs assessment completed by the OSDE CSI team (as previously discussed);
- Required participation in instructional leadership development training to build capacity in curriculum/instruction; classroom evaluation/assessment; school culture; student, family and community engagement; collaborative leadership; organizational structures and resources; and comprehensive and effective planning;
- Participation in a Networked Improvement Community (NIC);
- Mandatory five-day school week equaling a minimum of 170 days (if the school’s current calendar is shorter at the time of designation)
- Implementation of a high-quality supplemental child nutrition program; or
- Amplification of the effective school librarian role to provide personalized learning environments, equitable access to resources, instructional leadership and current digital and print materials. The last five of these research-supported interventions deserve a closer look.

**INSTRUCTIONAL LEADERSHIP DEVELOPMENT TRAINING**

Development of a strong principal pipeline directly impacts every school in Oklahoma. Current parallel efforts by school districts, principal preparation programs and other separate organizations offer sporadic opportunities for leadership training. However, aligning leadership standards and professional learning supports will create a leadership pipeline to guide and ground principal recruitment, preparation, hiring, evaluation and support. Administrators who are properly trained on a continual basis in best practices and strong pedagogy can offer sound feedback and reflection for their teaching staff. In turn, this comprehensive approach strengthens the evaluation process and leads to enhanced educator growth and collaboration, which will directly affect Oklahoma’s goal of reducing by 95% its reliance on emergency-certified teachers by 2025.

28 Pasi Sahlberg, Finnish Lessons 2.0: What the World Can Learn from Educational Change in Finland (New York: Teachers College Press, 2014).

Moving UP is a 15-month professional learning program structured for new or aspiring administrators, primarily focusing on turnaround leadership competencies for CSI schools. Participants collaborate through face-to-face trainings and virtual learning sessions and receive coaching between sessions from master administrators. Subsequently, new administrators create a strong foundation built on research-based practices and Oklahoma-specific goals.

Lead to Succeed (L2S) is a 24-session cohort of experienced, district-identified principals who use curriculum from the National Institute for School Leadership to become change agents for their districts and surrounding areas. Connecting research-based practices to real school challenges, participants enhance their current expertise and strengthen their schools' learning culture. Key participants within the cohort are identified for roles as facilitators for future L2S cohorts.

NETWORKED IMPROVEMENT COMMUNITIES

As part of increasing support to struggling schools, the OSDE is considering piloting a new model of school improvement based upon an emerging field of implementation science around the Networked Improvement Community (NIC) model, which was developed and used by the Carnegie Foundation for the Advancement of Teaching.<sup>29</sup> Under the NIC model, CSI and TSI schools would be placed into cohorts to support practices to improve student achievement. With

the guidance of the OSDE and incorporation of key stakeholder groups, members of each NIC would identify particular problem areas impeding its progress, develop literature reviews on each and identify possible plans of action to support progress toward the goal.

Consistent with the NIC model, the partnership embraces variation rather than trying to “control” improvement, as is common in traditional educational research, to study how interventions might be responsive to differing conditions. Interventions can spread across the network as they are tested and refined. Moreover, the structure of the network allows a “divide and conquer” approach in which subsets of teams can address different problem areas, thereby accelerating the progress.

Cohort-based training emphasizes the collective work of representatives from multiple districts that progress through an academic program together. Cohorts are believed to help participants by providing academic and logistical support as well as building collegial relationships. In utilizing regional cohorts, urban and rural districts can benefit from the collaborative effects of these groups and share best practices across district lines, both virtually and in person.

SCHOOL CALENDAR

The 2016-17 school year marked a significant shift in school calendars. Due to lack of resources and funding uncertainty at the state level, Oklahoma saw a sharp upward trend of school districts moving

to a calendar with four instructional days per week. Ninety-seven school districts are using a four-day calendar, a dramatic jump from 49 districts in 2015-16 and 29 in 2013-14. Survey research by the Oklahoma State School Boards Association indicates another 44 districts may consider such a move in the 2017-18 school year.<sup>30</sup>

While the reasons for this shift vary widely from an expectation of financial savings to teacher recruitment, one point is certain: No evidence indicates that shortening the calendar will improve the academic achievement of students. In fact, studies examining this trend show the opposite appears to be the case. A recent article by Paul Hill, the founder of the Center on Reinventing Public Education, suggests that in an effort to save 1% of the budget, schools are slashing 20 days from the school year, potentially with a profoundly negative impact on students.<sup>31</sup>

A recent Brookings study finds that “in an environment where young rural adults already suffer from isolation and low economic opportunity, the shorter school week could exacerbate their problems.”<sup>32</sup> Research by Timothy Tharp also supports the hypothesis that once a four-day school

week calendar becomes part of the culture of a district, academic gains will begin to slide.<sup>33</sup> As this trend continues, the OSDE will closely examine the ties between school calendar and those school sites with a CSI designation. Schools on a four-day week calendar with a CSI designation may be required to change their school calendar as part of the state’s more rigorous intervention strategies.

SUPPLEMENTAL CHILD NUTRITION PROGRAM

With 1 in 4 Oklahoma children enduring food insecurity, meeting this most basic need is necessary before students can be ready to learn.<sup>34</sup> Food as an intervention is an approach that costs nothing, yet the gains are tremendous.

Positioning access to healthy, nutritious food as an academic intervention has evidence-based support. According to Kimbro and Denney, children who experience food insecurity, even over a short period of time, have significantly lower academic achievement in reading, math and science compared to those who have not experienced food insecurity.<sup>35</sup> If it is well known that food insecurity negatively impacts students’ academic performance, behavior and mental/physical health, appropriate interventions must be implemented.

29 Anthony Bryk, Louis Gomez and Alicia Grunow, “Getting Ideas into Action: Building Networked Improvement Communities in Education,” 2010, [https://www.carnegiefoundation.org/wp-content/uploads/2014/09/bryk-gomez\\_building-nics-education.pdf](https://www.carnegiefoundation.org/wp-content/uploads/2014/09/bryk-gomez_building-nics-education.pdf).  
Anthony Bryk et al., *Learning to Improve: How America’s Schools Can Get Better at Getting Better* (Cambridge, MA: Harvard Education Publishing, 2015).

30 Oklahoma State School Boards Association, “Survey: Budget Cuts Leaving Oklahoma Students Behind,” April 2, 2017.  
31 Paul Hill, “Beware the Four-Day School-Week Trap: A Shorter School Week Could Hold Students Back,” *Education Week* Vol. 36, No. 37 (July 19, 2017): 22-23.  
32 Paul T. Hill and Georgia Heyward, “A Troubling Contagion: The Rural 4-day School Week,” *Brown Center Chalkboard*, March 3, 2017, <https://www.brookings.edu/blog/brown-center-chalkboard/2017/03/03/a-troubling-contagion-the-rural-4-day-school-week/>.  
33 Timothy W. Tharp, “A Comparison of Student Achievement in Rural Schools with Four and Five Day Weeks” (Ph.D. diss., University of Montana, 2014).  
34 Erin Nolen, “Ending Hunger in Oklahoma: An Assessment of Food Insecurity and Resources in Oklahoma,” *Hunger Free Oklahoma*, April 4, 2017.  
35 R. T. Kimbro and J.T. Denney, “Transitions into Food Insecurity Associated with Behavioral Problems and Worse Overall Health Among Children,” *Health Affairs* 34 (2015): 1949-1955.

Increased participation in Community Eligibility Provision (CEP), Breakfast in the Classroom and Child and Adult Care Food Programs (CACFP) is an OSDE actionable step. There is compelling evidence of improvement of student outcomes when students eat breakfast. New advances in neuroscience show that skipping breakfast impairs cognitive function by affecting alertness, attention, memory, problem-solving and mathematical aspects of brain performance.<sup>36</sup>

Increased participation in CEP reduces lunch shaming and streamlines access to healthy nutrition. Additionally, higher participation in CEP has proven to reduce paperwork. A 2014 review of seven states showed a 13.5% per student boost in federal revenue. The same study found that CEP schools reduced paperwork by 68 minutes per child, saving the schools \$29 per student annually.<sup>37</sup>

Schools are logical, trusted places for families to access services such as the Supplemental Nutrition Assistance Program (SNAP). Direct Certifications are directly related to the number of families utilizing SNAP benefits. Raising SNAP participation rates can impact schools on the margin in qualifying for CEP.

The OSDE, in partnership with the Oklahoma Department of Human Services and Hunger Free Oklahoma, will implement the SNAP School Outreach Pilot Project. Engaging schools and families,

SNAP outreach in schools benefits the entire community. “Increasing SNAP participation by just 1% would add 1,473 people to the program, bringing in an additional \$2.25 million a year in benefits to the state,” notes Hunger-Free Oklahoma. “The money would be spent in communities generating nearly \$4 million in Oklahoma’s economy through spending and employment.”<sup>38</sup>

Aligning students with access to breakfast, lunch and afterschool meals is a worthwhile pursuit. The OSDE believes that addressing food insecurity as a rigorous intervention contributes to the advocacy of the whole child.

EFFECTIVE SCHOOL LIBRARIANS

The American Association of School Librarians identifies the effective role of school librarians as central to the improvement of schools, particularly instructional improvement. School librarians are equipped to provide personalized learning environments, equitable access to resources, instructional leadership and current print and digital materials.

d. Resource Allocation Review. Describe how the State will periodically review resource allocation to support school improvement in each LEA in the State serving a significant

number or percentage of schools identified for comprehensive or targeted support and improvement.

Oklahoma will use a combination of formula funding and competitive grants when addressing school improvement funding and allocations. Ideally, each school site with a CSI designation will receive a minimum allocation of \$50,000 (based on current budget amounts) for supplemental supports, services and resources designed to meet the needs of the lowest-performing students. In addition, schools with a TSI designation will also receive school improvement funding with the amount to be determined based on the number of CSI and TSI sites designated and the amount of funds available from the Title I, Part A 7% set-aside. Possible grant allocations, based on 2016 appropriations, are reflected in Figure 13.

CSI schools may be eligible for additional dollars under a competitive grant. The CSI grant will consist of a required focus on one of the three major areas of the Oklahoma Nine Essential

Elements: academic learning and performance, effective learning environment or collaborative leadership. The grants would include best practices learned from the School Improvement Grant (SIG) process, including but not limited to attendance at a five-day CSI professional development academy before school begins. Such best practices may include assignment of a transformation coach, embedded professional development plan and an external professional development provider. The amount of allocation is still to be determined but likely would be a minimum of \$150,000-\$200,000 annually – depending on the size of the site – due to the number of teachers on staff and number of professional development days planned.

To ensure equity is afforded to all CSI sites, the OSDE recommends the grants be divided based on the number of students:

- 0-300 students
- 300-700 students
- 700+ students

FIGURE 13: Possible Grant Allocations

7% of Title I, Part A set-aside is \$11,277,421.47  
90 sites at \$50,000 = \$4.5 million  
31 sites at \$200,000 for subgrant

(Based on 2016 Numbers)

36 Charles E. Basch, “Breakfast and the Achievement Gap Among Urban Minority Youth,” *Journal of School Health* Vol. 81, No. 10 (2011): 635-640.  
37 Joseph Harkness et al., “Community Eligibility Provision Evaluation: Year 3 Addendum,” U.S. Department of Agriculture, Jan. 2015, <http://files.eric.ed.gov/fulltext/ED557894.pdf>.  
38 Erin Nolen, “Ending Hunger in Oklahoma: An Assessment of Food Insecurity and Resources in Oklahoma,” Hunger Free Oklahoma, April 4, 2017.



The OSDE will provide an increase in rigor and support to districts with sites that fail to exit CSI designation status within a three-year period.

To ensure that districts are allocating funds effectively, a periodic review will be integrated into the existing state processes. The school support specialist assigned to each designated school site will work with the LEA, the executive director of school support and the grant management specialist to conduct monitoring. Technical assistance will be provided during the creation of the LEA’s improvement plan and budget to support improvement.

Oklahoma allocates school improvement funds directly to school sites to ensure resources and support for each school with a designation are equitable. For districts that have multiple sites designated, the OSDE will continue to allocate directly to the site but will work with district-level officials to ensure every dollar is maximized through technical assistance and monitoring. The office of school support will work collaboratively with the office of federal programs to provide information to districts on braiding multiple funding sources to best meet the needs of their lowest achieving students and will monitor the use of these multi-source funds.

**e. Technical Assistance.**  
Describe the technical assistance the State will provide to each LEA in the State serving a significant number or percentage

**of schools identified for comprehensive or targeted support and improvement.**

Oklahoma’s technical assistance model is based on an evidence-based needs assessment – the Oklahoma Nine Essential Elements. All designated schools will first complete the needs assessment to determine the supports necessary from the state. In developing a school support plan, each school will develop goals in the areas of need and identify evidence-based interventions that are aligned to the goals. The OSDE’s office of school support will work collaboratively with the site to implement the identified intervention and support plan, which will include ongoing progress monitoring and assessment. The school support plan may be adjusted throughout the process, ensuring the site is on track to achieve its goals. Data collection and review are central to the success of the intervention, and the site will be expected to document progress toward the goals. The OSDE will also work with designated sites to ensure school improvement funding is spent appropriately and in line with the outlined goals. Figure 14 further illustrates the OSDE’s technical assistance timeline for designated schools.

**f. Additional Optional Action.**  
If applicable, describe the action the State will take to initiate additional improvement in any LEA with a significant

**number or percentage of schools that are consistently identified by the State for comprehensive support and improvement and are not meeting exit criteria established by the State or in any LEA with a significant number or percentage of schools implementing targeted support and improvement plans.**

The OSDE has not yet determined what additional actions may be taken in the event a significant number of schools in a single LEA fail to exit designated status. The OSDE will rely on data to determine if additional interventions are necessary and may submit a revised plan in the future.

**FIGURE 14:**

**Technical Assistance Timeline:**

**Beginning of 2018-19 School Year  
Release of designations**

**January – June 2019:**

**Step 1:**

**Identify local needs**

**Step 2 :**

**Select relevant, evidence-based interventions**

**Step 3:**

**Plan for implementation  
(needs assessment, planning and budget finalized by June 30)**

**July 2019 – June 2020:**

**Step 4:**

**Implementation of evidence-based intervention**

**July 2020 – June 2021:**

**Step 5:**

**Examine and reflect  
(data collection, review and revision plan)  
Step 1, 2 and 3 again**

**August – December 2021:**

**Step 4 :**

**Implementation of revised plan**

**Fall 2021:**

**New designations  
(three-year designation cycle)**

Stakeholder Recommendations

OSDE Implementation

When asked if the OSDE should consider a waiver process to allow Title I schools below 40% poverty to utilize the schoolwide funding strategy, respondents highlighted the intentional use of funds to close gaps and the aspect of equitable access.



The OSDE will allow LEAs to submit a waiver to operate a schoolwide program.

When stakeholders were asked what districts could do to successfully braid funding, responses indicated review of funding strategies, streamlining of reporting and caution of duplication of programs.



The OSDE intends to review funding and strategies on a continuous basis, to create a consolidated application to streamline reporting and to communicate that braided funding strategies allow more programs to implement funds to serve more students as opposed to a perceived duplication of services.

When asked how the OSDE should measure student progress, respondents favored benchmark assessments most and then teacher-created assessments, college/career assessments and, lastly, statewide assessments.



The OSDE is committed to providing professional development on utilizing assessment evaluation tools, using ACT/SAT to show progress toward college/career readiness and leveraging data literacy to better equip teachers on accessing and utilizing data.

When asked about N-sizes of 10 and 30, stakeholders cautioned that a large N-size would encompass at-risk large, urban, impoverished schools but inadvertently overlook small rural schools.



The OSDE originally suggested a 30 N-size in the accountability system and a 10 N-size for public reporting. However, after concern was expressed that too many students would be excluded from accountability, the agency adopted a 10 N-size. To prevent volatility for small schools, a rolling-averages approach will be used.

Stakeholder Recommendations

OSDE Implementation

When asked if achieving a state graduation rate of 90% in 10 years is a reasonable and ambitious goal, 81% of respondents were favorable. Comments from respondents focused on best practices for retention and success and additional time needed to graduate.



Recognizing the need for additional time to meet graduation requirements, five- and six-year cohort graduation rates will be calculated.

When asked what the OSDE could do to improve graduation rates for English learners, respondents said it was important to adopt guidelines encouraging districts to set programming pathways to graduation for students who enter U.S. secondary schools as newcomers. In order to be successful academically, secondary newcomers often need one or two semesters focusing solely on language acquisition prior to taking the classes needed for graduation. This route may result in English learners needing five or six years to graduate.



The OSDE will allow English learners who enter at or after the ninth grade and test as newcomers on WIDA placement testing to be included in the five- and six-year graduation cohorts. English learners who graduate in five or six years will add .85 or .50 to district graduation accountability calculations, respectively.

When asked what supports low-performing schools need from the OSDE, survey respondents noted that a partnership of continual ongoing support with the OSDE is important as schools develop their own local intervention plans. Respondents indicated that school culture, family and community support and effective leaders are the most critical factors for improving low-performing schools.



The OSDE will continue to build internal capacity to meet the needs of districts needing additional support. Oklahoma is considering a comprehensive, multitier system of support for low-performing schools not designated as CSI. The agency's ability to provide such supports will largely depend upon the amount of funding – both federally and from the state – to support these efforts. The OSDE is also evaluating new ways to engage families and the community to support LEAs.

## Stakeholder Recommendations

## OSDE Implementation

When stakeholders were asked what supports the OSDE should provide to low-performing schools, professional development was among the top three responses.



The OSDE will continue its efforts to support training for school leadership. Professional development opportunities for teachers and leaders will be grounded in evidence-based instructional strategies and support for leadership capacity. The OSDE will utilize a needs assessment approach with professional development that will appropriately connect instructional resources to school staff.

The OSDE received specific feedback linking well-equipped school librarians to pronounced school improvement.



The OSDE has incorporated access to school libraries and credentialed school librarians as part of school support grounded in Oklahoma's Nine Essential Elements. Such access may include enhanced instructional leadership, personalized learning and meaningful professional development between classroom teachers and school librarians.

## Stakeholder Recommendations

## OSDE Not Implementing

The OSDE received feedback requesting the state reconsider the use of an A-F system as the overall rating for its accountability system.



In crafting a new statewide accountability system, the state has shifted the focus from a single summative rating to a system with multiple measures and grades for each measure. A-F grades will help the state meaningfully differentiate between schools across five categories. Research supports the use of an A-F grade in clearly communicating school performance to parents and community and has proven to motivate schools in pursuing meaningful change to impact school improvement.

5

**5. Disproportionate Rates of Access to Educators (ESEA section 1111(g)(1)(B)): Describe how low-income and minority children enrolled in schools assisted under Title I, Part A are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, and the measures the SEA will use to evaluate and publicly report the progress of the SEA with respect to such description.**

An effective teacher in every classroom and an effective leader in every building are among the cornerstones of the OSDE 8-Year Strategic Plan. According to economist Eric Hanushek, effective teachers have been shown to help all kids in a class: "It's not to say that everyone is going to end up at the same level of achievement, but we could improve learning if we make sure that there's an effective teacher in each classroom."<sup>39</sup>

Strategies that support this work include:

### STRATEGY 1.4

Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

### STRATEGY 1.5

Reduce barriers to equity and close the opportunity and achievement gap for all students.

### STRATEGY 2.1

Reinforce the teacher pipeline by supporting teacher pre-service training, recruitment, preparation and retention.

### STRATEGY 2.2

Provide support and professional learning to increase instructional capacity for teachers and leaders.

### STRATEGY 3.3

Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

### STRATEGY 4.2

Leverage technology systems and governance collaboration to improve access to data while protecting student information, allowing the OSDE and districts to make data-informed decisions.

It is Oklahoma's vision that all students will have equitable access to effective educators supported through:

- Collaboration with higher education institution teacher preparation programs to ensure the production of traditionally and non-traditionally prepared school-ready teachers and leaders with the knowledge and ability to promote student learning;
- High-quality, relevant and job-embedded professional development focused on improving student learning that is

<sup>39</sup> Eric A. Hanushek, "Students First: Why an Effective Teacher Matters," Stanford University, Feb. 8, 2011, <http://hanushek.stanford.edu/opinions/students-first-why-effective-teacher-matters-q-eric-hanushek>.



consistently provided for all teachers and leaders from the induction phase to the professional phase and beyond;

- Effective teacher residency programs implemented in every Oklahoma school district to support induction-phase teachers and leaders; and
- Effective teachers assigned to every classroom and effective leaders assigned to every Oklahoma public school.

The OSDE intends to develop effective teachers through the utilization of a teacher risk assessment. It will take the approach of identifying at-risk indicators so that the OSDE can prevent teachers from becoming ineffective. The risk-analysis approach will allow better targeting of agency resources.

Those indicators might include:

- Degree in major;
- Certification type;
- Certification exam attempts and results;
- Meaningful participation in a teacher residency program;
- Meaningful and applicable professional learning (PL) Focus;
- Repetitive, unsuccessful remediation plans; and/or
- Site principal turnover (tenure of three years or fewer).

An Oklahoma teacher’s evaluation plan will emphasize professional growth and be supported by available resources. To complete their individual PL Focus plan, teachers will identify, within reason, resources that could aid in the implementation of their plan. These activities may include but are not limited to:

- Presenter-led workshops;
- Individual or faculty studies of books, scholarly articles and video productions;
- Lesson study;
- Instructional rounds;
- Peer observations;
- Committee studies to address student achievement issues;
- Work related to a specific subject area or areas associated with attaining an advanced degree or professional certification;
- Action research projects designed to improve student achievement;
- Participation in local, regional or state initiatives associated with the development or implementation of curriculum standards; and/or
- Work related to attaining National Board Certification.

Oklahoma’s definitions related to disproportionate rates of access to educators are depicted in Figure 15.

Several entities were consulted on the state definition of “ineffective,” including the Teacher Shortage Task Force, Teaching and Learning Advisory, Teacher Advisory Council, Oklahoma Association of Colleges of Education, Office of Educational Quality and Accountability, Oklahoma State Regents for Higher Education and the state’s teacher of the year and Milken award winner. These same stakeholders advised on the OSDE’s risk-analysis approach that targets potential deficits of the agency rather than deficits of individual teachers.

The OSDE will provide public reporting of progress toward equitable access to effective educators and annual calculations of disproportionate rates of access that high-poverty and high-minority students have to ineffective, out-of-field or inexperienced teachers. The OSDE will continue to produce quarterly equity bulletins and report them at the annual EngageOK summer conference. These data and information will be newly added to a public dashboard alongside school report cards as depicted in Appendix 13.

**FIGURE 15: Definitions Related to Disproportionate Access to Educators**

Term	Definition
Out-of-Field	A teacher who is issued an emergency certificate from the State Board of Education.
Inexperienced	A teacher who has three or fewer years of teaching experience
Ineffective	A measure based on a set of indicators of effectiveness including: 1) Teacher Leader Effectiveness (TLE) evaluation qualitative rating (two consecutive years of needs improvement or ineffective; 2) No progress on PL Focus for two consecutive years; and 3) Teacher absences (10% or 18 days – not including FMLA, bereavement, military, approved professional development)
Minority Student	A student who is reported as a race or ethnicity other than White
Low-Income Student	Economically disadvantaged student who is eligible for free/reduced-priced meals, according to USDA guidelines

**6. School Conditions (ESEA section 1111(g)(1)(C)): Describe how the SEA agency will support LEAs receiving assistance under Title I, Part A to improve school conditions for student learning, including through reducing: (i) incidences of bullying and harassment; (ii) the overuse of discipline practices that remove students from the classroom; and (iii) the use of aversive behavioral interventions that compromise student health and safety.**

A positive school climate is the product of a school's attention to fostering safety; promoting a supportive academic, disciplinary and physical environment; and encouraging and maintaining respectful, trusting and caring relationships throughout the school community no matter the setting – from Pre-K/elementary school to higher education. The OSDE 8-Year Strategic Plan addresses needs in these areas through the following strategies:

**STRATEGY 1.5**

Reduce barriers to equity and close the opportunity and achievement gap for all students.

**STRATEGY 2.2**

Provide support and professional learning to increase instructional capacity for teachers and leaders.

**STRATEGY 2.3**

Provide district and school leaders with the training and support needed to improve instruction in their schools.

**STRATEGY 3.2**

Strengthen and increase family and community engagement to support student learning.

**STRATEGY 4.1**

Sustainably improve and strengthen agency capacity to fulfill its mission by sharing knowledge and best practices across all teams, developing skills and improving teamwork.

**STRATEGY 4.2**

Leverage technology systems and governance collaboration to improve access to data while protecting student information, allowing the OSDE and districts to make data-informed decisions.

**i. Incidences of bullying and harassment;**

The OSDE is leading the way in providing needed training for counselors, administrators, teachers and staff members across the state. The OSDE is a connector for schools statewide to receive training and support from many different state agencies and other local and nonprofit organizations.

The OSDE counseling and prevention services department uses its many partnerships to provide avenues of support for all students in Oklahoma. The OSDE partners with various state agencies to support and serve all children. These agencies include the Department of Mental Health and Substance Abuse Services, Oklahoma School Security Institute, Oklahoma Department of Health, Department of Human Services and law

enforcement at the school, local, regional and state levels.

Additionally, the OSDE coordinated a student advisory team meeting in fall 2016 to discuss concerns about bullying and ideas to reduce it. Students suggested several approaches for improving school climate and culture such as an afterschool “safe hour” and a statewide kindness challenge.

The OSDE offers webinars so counselors and educators can provide resources across the state. Some of those session titles include: Mental Health Concerns and Your Students, Teen Dating Violence and Sexual Assault, Building Empathy in the Classroom and Beyond, Drugs and Alcohol in Schools and Bullying. Webinars and live trainings are archived on the OSDE website. Surveys at the end of each training help determine if the needs of educators are being met. The OSDE trained hundreds of educators in the 2016-17 school year, both in person and via webinar.

The OSDE also visits districts to provide trainings and supports for all students upon request. Most recently, the agency has partnered with the Oklahoma School Security Institute to provide crisis team trainings to nearly 1,000 school and law enforcement professionals.

Every school is provided the opportunity to use the Oklahoma Prevention Needs Assessment, a free tool to survey students, staff and parents at many levels. Offered through the Oklahoma Department of Mental Health and Substance Abuse

**The OSDE has partnered with the Oklahoma School Security Institute to provide crisis team trainings to nearly 1,000 school and law enforcement professionals.**

Services, it includes school culture and climate data. The OSDE makes schools aware of this service through newsletters, emails and conferences. The OSDE references the Oklahoma Prevention Needs Assessment to help determine which trainings and webinars to develop to benefit all students. The last time the survey was offered, 434 Oklahoma schools utilized it.

The OSDE also supports schools by providing information on academic advising and ensuring effective implementation of legislation that affects students and schools. Other prevention resources – including those on the topic of bullying and Title IX sexual harassment – offered by the OSDE include a free resource library for schools with more than 150 curricula, DVDs and books.

Oklahoma directs all schools to have an anti-bullying policy and requires a copy to be submitted to the OSDE accreditation office, which is responsible for ensuring that the policy is followed. When the OSDE office of prevention services receives a complaint of bullying, a detailed report is logged and provided to the OSDE’s regional accreditation officers (RAOs). Callers are also directed to make their complaints known to the school principal, district superintendent and local school board, in that order.

The OSDE often refers callers to the Oklahoma School Security Institute Tipline (1-855-337-

8300), while also making sure callers are aware of their rights and legal obligation to notify police or the Oklahoma Department of Human Services. An online reporting form for bullying reports is now available.

Schools are required to submit an incident report to the OSDE by June 20 each year that includes incidents of weapons, employee assault and bullying with and without physical injury. This report will be shared with RAOs, as well as other relevant OSDE departments. Targeted interventions can be developed after careful evaluation of the data collected in the report.

Oklahoma state law addresses and supports the work of the OSDE around bullying, harassment and intimidation.<sup>40</sup> The School Bullying Prevention Act of 2002, later updated to the School Safety and Bullying Prevention Act of 2013, requires each local school board to adopt a policy prohibiting harassment, intimidation and bullying – including bullying by online and electronic communication – by students at school and to address prevention of and education about such behavior. A model bullying policy is available on the OSDE website for schools to reference when writing their own policies.<sup>41</sup>

Moreover, state law requires each school site to establish a safe school committee composed of at least six members including teachers, parents and students. Safe school committees are tasked with making recommendations regarding student harassment, intimidation and bullying at

school, professional development for faculty and staff to reduce this behavior, methods to encourage involvement of community and students, development of individual relationships between students and staff and problem-solving teams. Although the state Legislature has temporarily suspended the requirement for safe school committees to meet, the OSDE continues to prioritize providing training and assistance to districts to address bullying.

The Oklahoma School Security Act requires all districts to add “electronic communication” and “threatening behavior” to their bullying prevention policy. Districts must establish a procedure for the investigation of all reported incidents for the purpose of determining severity and potential for future violence. Districts are also required to establish a procedure by which a school may recommend that mental health care options be provided to the student and to disclose information concerning students who have received mental health care.

## ii. The overuse of discipline practices that remove students from the classroom; and

As noted by the USDE, “High rates of suspensions in schools have been related to lower school-wide academic achievement and standardized test scores. In addition, schools and communities bear the increased direct and indirect costs associated with

grade retention and dropouts.”<sup>42</sup> The OSDE understands that well-chosen discipline alternatives can simultaneously diminish the negative outcomes of harmful discipline policies, boost student achievement, reduce student misconduct and maintain safe and orderly schools. The OSDE offers a variety of services to districts to assist with classroom management. These include comprehensive classroom management support, a strong mentoring program and a focus on individual professional learning for teachers. The agency’s counseling team, in partnership with the Department of Career and Technology Education, offers an annual conference titled For Counselors Only, with various topics including college and career strategies and student emotional and social development. Some sessions are focused on student discipline issues and crisis team training in collaboration with the Oklahoma School Security Institute.

The OSDE will assist LEAs with construction of discipline policies that combat the loss of instructional time. Considerations for LEA discipline policies come in these recommendations:

- Evaluate current discipline policies’ ability to reduce the likelihood of disparate systems and the overuse of out-of-school suspensions and expulsions;
- Require a higher standard of record-keeping and intervention before a student in elementary school is suspended or expelled;

<sup>40</sup> 70 O.S. §5-148, 6-114 and 24-100 through 24-100.5.

<sup>41</sup> <http://sde.ok.gov/sde/faqs/bullying-frequently-asked-questions#effective>.

<sup>42</sup> U.S. Department of Education, “Guiding Principles: A Resource for Improving School Climate and Discipline,” Jan. 2014, <https://www2.ed.gov/policy/gen/guid/school-discipline/guiding-principles.pdf>.





## The OSDE strives to provide the educational and counseling services necessary so that no child is unduly removed from the education environment.

- Exclude Pre-K students from out-of-school suspension and expulsion disciplinary actions; and
- Develop and implement discipline policies and practices that take into account students' developmental and individual needs (i.e., student conduct expectations should be developmentally appropriate, age-appropriate and include the consideration of special education needs, gender and sex discrimination and racial sensitivity).

Civil rights advocates note that many children have learning disabilities or histories of poverty, abuse or neglect and would benefit from additional educational and counseling services. Instead, they are often isolated, punished and pushed out. The OSDE strives to provide the educational and counseling services necessary to ensure that no child is unduly removed from the education environment.

### **iii. Use of aversive behavioral interventions that compromise student health and safety.**

The Oklahoma Tiered Intervention System of Support (OTISS) is the state's intervention model to assure success for all students by providing a framework for identifying and addressing academic and behavioral difficulties that interfere with Pre-K-12 student success. Oklahoma has identified OTISS as a framework for continuous school improvement and for providing equitable support for all students.

OTISS is based on a multitier system of support (MTSS), an education problem-solving framework of evidence-based practices in instruction, assessment and curricula alignment that addresses the needs of all students. MTSS allows educators to analyze the overall health of the educational system, implementation and outcome data sets. MTSS allows for a rapid response system to address group and individual student needs to ensure students are provided evidence-based, appropriately targeted instruction for academic, behavioral and/or socio-emotional needs.

This model was developed and is currently supported by the 2011 Oklahoma State Personnel Development Grant II (SPDG II), an evidence-based professional development grant targeting behavioral and academic concerns from the USDE. OTISS' primary goal is to improve student academic and behavioral outcomes using tiers of research-based interventions matched to the needs and levels of students. LEAs are provided universal (school-wide), targeted (small-group) and individualized behavioral interventions that focus on positive behavior supports. Although the OK SPDG II grant focuses on students with special needs, these evidence-based interventions are accessible to improve academic and behavioral outcomes for all students.

The OTISS framework uses the expertise of school professionals and parents in a proactive format that puts student needs first and bases decisions on data. The eight critical components of OTISS can be divided into two general categories: building capacity and providing systems of support.

The strength of the data collected in the OTISS process allows for better decision-making about which students need continued general education interventions – albeit with more intensity and frequency as determined through progress monitoring – and which students may qualify for intensive special education programs. The core belief of OTISS is that success results from the implementation of appropriately matched instructional supports and evidence-based practices, along with curriculum choices within a well-designed environment.

To understand how best to help a student or a group of students, data are collected from multiple sources and carefully analyzed. Analysis of curriculum and instructional practices used to support teaching academic standards is the critical first step of the problem-solving process for all students, including

those who are English learners, students with disabilities and students who are economically disadvantaged. This information is used to determine student needs and how to support learning of academic and behavioral skills. Student progress is measured frequently to determine the most effective instructional approach for students. Decisions regarding instructional practices and curriculum selection are based on student progress through the frequent data collection process. This data-informed approach is an integrated conceptual model of assessment and services incorporating general and special education efforts.

The OSDE is utilizing support structures from the SPDG II targeted for students with special needs. Combining the structure of OTISS with evidence-based practices supported and promoted through the ESSA will help create a robust structure to:

- Increase knowledge of evidence-based implementation supports for best practices; and
- Establish implementation infrastructures at the OSDE and in local school districts to support effective use of evidence-based approaches to education.

The OSDE special education services department also contracts with the Oklahoma Department of Mental Health and Substance Abuse Services to provide classroom and school support to students with complex emotional/behavioral needs utilizing the tiered system of intervention. That state agency provides guidance and support to the school's multi-disciplinary team (MDT) on procedures that foster a positive environment. Behavioral health aides are utilized to assist students in the classroom and families in the community setting. Additional supports are provided for students needing tier II supports when universal supports are not enough.

The MDT develops individualized plans for students with tier III emotional/behavioral needs. Tier III services include wrap-around behavioral services that provide a learning collaborative and an MDT to address the needs of youth most at risk for disciplinary action in the school setting. The Department of Mental Health and Substance Abuse Services develops ongoing training plans for the MDT to better equip schools with in-school behavioral interventions, classroom management models and other tier II behavior intervention supports.

Upon a district's request, professional development is also available and provided by a specialist in the OSDE's special education department.

## 7. School Transitions (ESEA section 1111(g)(1)(D)): Describe how the State will support LEAs receiving assistance under Title I, Part A in meeting the needs of students at all levels of schooling (particularly students in the middle grades and high school), including how the State will work with such LEAs to provide effective transitions of students to middle grades and high school to decrease the risk of students dropping out.

The OSDE will provide assistance to LEAs and elementary schools that are using federal funds to support the continuum of a student's education from early childhood programs to postsecondary education and careers. As the state's public education leader, Superintendent Hofmeister offers her advocacy by serving as chair of Oklahoma's Board of Career and Technology Education and as a member of the Oklahoma Partnership for School Readiness, Regional University System of Oklahoma Board, Oklahoma College Savings Plan Board, Oklahoma Board of Private Vocational Schools and the Oklahoma Advisory Council on Indian Education.

The following strategies from the OSDE 8-Year Strategic Plan help define the work of the agency in supporting transitions for all students:

### STRATEGY 1.1

Focus on early childhood education.

### STRATEGY 1.2

Ensure effective implementation of the Oklahoma Academic Standards by using available data to target high-quality, aligned resources to educators.

### STRATEGY 1.3

Improve student equitable access to meaningful and diverse pathways that lead to careers and postsecondary opportunities.

### STRATEGY 1.4

Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning and close the achievement gap.

### STRATEGY 1.5

Reduce barriers to equity and close the opportunity and achievement gap for all students.

### STRATEGY 2.2

Provide support and professional learning to increase instructional capacity for teachers and leaders.

### STRATEGY 2.3

Provide district and school leaders with the training and support needed to improve instruction in their schools.

### STRATEGY 3.2

Strengthen and increase family and community engagement to support student learning.

### STRATEGY 3.3

Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

### STRATEGY 4.2

Leverage technology systems and governance collaboration to improve access to data while protecting student information, allowing the OSDE and districts to make data-informed decisions.

## EARLY CHILDHOOD

A strong early childhood education is foundational for a path to college and career readiness. For decades, Oklahoma has been at the forefront of offering early childhood education programs, recognizing its importance in improving the health, social, emotional and cognitive outcomes for all children. The OSDE is proud of Oklahoma's leadership in this realm, with its voluntary Pre-K initiative nationally acclaimed for accessibility and quality. In the most recent NIEER (National Institute for Early Education Research) report, Oklahoma met 9 of 10 benchmarks on the Quality Standards Checklist and ranks third in providing access to Pre-K with 99% of school districts offering a Pre-K program and 74% of 4-year-olds being enrolled.<sup>43</sup> Studies have shown that students in early childhood education programs typically perform stronger academically and are less likely to be retained a grade, have disciplinary problems and drop out of high school.

Over the decades, Oklahoma schools and communities have provided strong support for early learning initiatives. The state has dynamic public-private partnerships under which 152 school districts offer Pre-K through collaborations with Head Start, child care, faith-based facilities, tribal early

43 "The State of Preschool 2016 – State Preschool Yearbook," National Institute for Early Education Research (NIEER), 2016, [http://nieer.org/wp-content/uploads/2017/05/Oklahoma\\_YB16.pdf](http://nieer.org/wp-content/uploads/2017/05/Oklahoma_YB16.pdf).

childhood centers, YMCA locations, assisted living centers, business offices, universities and CareerTech centers. The early years of a child’s life are crucial for brain development, making exposure to early language skills, numeracy skills and social interactions vital. Oklahoma’s Pre-K program is committed to providing all 4-year-olds access to developmentally appropriate classrooms so they can attain the academic and personal skills necessary for school readiness.

The expansion of Oklahoma’s Pre-K program is supported in research through collaboration with Georgetown University researchers studying longitudinal data about the effects of universal Pre-K.<sup>44</sup> The study finds that “All children benefit from Oklahoma’s public school Pre-Kindergarten regardless of socioeconomic status or ethnic background.”

The OSDE works with LEAs to leverage resources from several state and local agencies to support the continuum of early learning as children transition into Pre-K and kindergarten. At the state level, the Oklahoma Department of Human Services (OKDHS) developed Early Learning Guidelines for children ages birth through 5, which are implemented in child care facilities.<sup>45</sup> These guidelines are aligned with the Oklahoma Academic Standards for Pre-K and with the National Head Start Performance Standards, ensuring all children, regardless of experience, have the same expectations for development of early learning skills to prepare them for school.

Oklahoma has adopted academic standards that for the first time have vertical alignment from Pre-K through 12th grade to ensure continuity and that serve as foundational skills in progressions of learning. These standards intentionally begin with speaking and listening, the first ways that students engage in literacy. The OKDHS also supports a system of professional development for Oklahoma child care staff to promote best practices for children before entering school.

In an effort to support LEAs in implementing appropriate assessment systems to monitor early learning and student progress in Pre-K through third grade, the OSDE will:

- Provide school-readiness guidance for parents;
- Help LEAs determine effective assessments aligned to the Oklahoma Academic Standards;
- Develop or identify an appropriate Early Learning Inventory to determine kindergarten readiness; and
- Encourage LEAs to facilitate a smooth transition into kindergarten by offering summer learning programs for students entering kindergarten who did not participate in a public school Pre-K program.

Oklahoma has set a goal to ensure at least 75% of students are “ready to read” upon kindergarten entry. “Ready to read” means that children have the prerequisite skills

## All children benefit from Oklahoma’s public school Pre-Kindergarten regardless of socioeconomic status or ethnic background.

needed to understand print, including meeting the needs of the whole child in cognitive, physical, social and language development areas as well as in approaches to learning. The Oklahoma Academic Standards include these areas to support the skills students need to be ready to read by the time they enter kindergarten.

The OSDE will continue to provide professional development, online resources, ongoing communication and technical assistance to LEAs pertaining to best practices for early childhood. In addition, the agency will continue to collaborate with relevant stakeholders at the state and local levels on policy, resources and funding streams to support early childhood initiatives focusing on an aligned system to facilitate smooth transitions and school success.

In addition to efforts to support Pre-K and kindergarten readiness, the Oklahoma Reading Sufficiency Act (RSA) outlines guidelines LEAs should follow to ensure all students, kindergarten through grade 3, have the support structures necessary to become proficient readers.<sup>46</sup>

The guidelines include tools for screening reading deficiencies, mechanisms for progress monitoring at regular intervals and strategies for providing tiered interventions to students as needed. Oklahoma students, kindergarten through grade 3, are screened in the areas of phonemic awareness, phonics, reading fluency, vocabulary and comprehension to ensure all students are reading on grade level by third grade.

Reading sufficiency is an area of focus for Oklahoma because research shows that if

<sup>44</sup> William T. Gormley et al., “Effects of Universal Pre-K on Cognitive Development,” *Developmental Psychology* Vol. 41, No. 6 (2005): 872-884.

<sup>45</sup> “ELG and Core Competencies,” Oklahoma Department of Human Services, last updated Jan. 31, 2017, <http://www.okdhs.org/services/cc/Pages/ELGCore.aspx>.

<sup>46</sup> 70 O.S. §1210.508B.



students are still struggling with reading by grade 3, they are more likely to drop out of high school and endure adult literacy challenges. Evaluating student reading proficiency early offers an opportunity to intervene and provide remediation for those students who need additional support.

## MIDDLE SCHOOL

The OSDE recognizes that influential characteristics for student achievement are student motivation and engagement. The richness of extracurricular activities, particularly for igniting the interest and imagination of middle school students, is well researched. Risks for early school dropout span across individual, social and economic levels and often show reasonable stability from childhood to adolescence. Afterschool activities can be designed to reorganize such patterns in the form of increased student engagement in and motivation for school.<sup>47</sup>

Whether in school or out of school, student engagement can be viewed through a lens of collective trust. The relationships that exist among student and faculty and faculty and principal positively contribute to enhanced instructional capacity.<sup>48</sup>

The OSDE will continue to identify evidence-based practices and provide professional development to support effective implementation for middle school transitions. One strategy to assist students transitioning from middle school to high

school is the use of Individual Career Academic Plans (ICAPs).

An ICAP is a multi-year process that guides students as they explore career, academic and postsecondary opportunities. ICAPs are intended to be implemented through a schoolwide approach led by school counselors with expertise in career development. Through implementation of ICAPs and other reforms, including state assessments, Oklahoma intends for counselors to refocus their efforts on career and postsecondary exploration and planning for students. Schoolwide implementation, however, should be coordinated among a team of educators allowing for the student, parent and individual teacher to play key roles in selecting a path to success after high school. ICAP implementation in Oklahoma is supported by both the Oklahoma School Counselor Association (an affiliate of the American School Counselor Association) and the Oklahoma Counseling Association.

ICAPs will equip students and families with the awareness, knowledge and skills to create their own meaningful exploration of college and career opportunities. The ICAP is an evolving document that reflects students' changing passions, aptitudes, interests and growth.

When students complete an ICAP, they discover which pathways fit their unique talents and what kind of academic preparation and experiences will prepare

them for in-demand careers, some of which may not even exist when they graduate from high school.

When students complete a meaningful ICAP process, they:

- Connect the relevance of education to their future goals;
- Create secondary and postsecondary course plans to pursue their career and life goals;
- Strategically select a postsecondary pathway to align with self-defined career, college and life goals;
- Establish better communication and engagement between school and home; and
- Understand and demonstrate career exploration and career planning.

While students must begin the ICAP process in ninth grade for graduation purposes, completion of a student's first ICAP should begin in sixth grade. Oklahoma has set a goal to have all students in grades 6 through 12 complete an ICAP, thereby easing their transition from grade to grade.

Other strategies Oklahoma is deploying for middle school transition include:

- Southern Regional Education Board (SREB) transition courses for eighth-graders in English language arts and mathematics to be prepared for high school (2019-20 school year);

- Oklahoma's Promise, a college tuition scholarship for students in grades 8-10 whose families earn \$55,000 or less annually and who meet academic and conduct requirements (Oklahoma law will increase the income cap to \$60,000 in school year 2021-22);
- Summer STEM academies, sponsored by the Oklahoma State Regents for Higher Education, are open to upcoming eighth through 12th graders. Each academy explores the latest trends in math, science and technology by using fun, hands-on activities and innovative software as students experiment both in the classroom and outdoors. Many academies also include field trips to some of the state's top companies, science facilities and museums;
- The Teacher Summer Externships partners businesses with select teachers who desire to learn more about various careers in order to share this awareness with their students. These paid externships provide embedded application to the classroom and are supported by the OSDE's STEM team through virtual networking.
- Family guides in Pre-K through 12th grade will provide strategies for family engagement with their children that highlight the Oklahoma Academic Standards in a convenient, user-friendly format; and
- Lead to Succeed principal training targets middle school learning through promotion of learning organizations and teaming for instructional leadership.

<sup>47</sup> Joseph L. Mahoney, "School Extracurricular Activity Participation and Early School Dropout: A Mixed Method Study of the Role of Peer Social Networks," *Journal of Educational and Developmental Psychology* Vol. 4, No. 1 (2013).

<sup>48</sup> Curt M. Adams, "Collective Trust: A Social Indicator of Instructional Capacity," *Journal of Educational Administration* Vol. 51, No. 3 (2013).

HIGH SCHOOL

The OSDE will continue to empower school districts to make strategic spending decisions through comprehensive spending plans to address the needs of all students. Districts and schools may use the flexibility under the ESSA for expanded uses under Title I, Title II and Title IV to improve postsecondary outcomes for all students. The OSDE will provide ongoing training to districts in how to braid funding effectively to maximize all funding sources.

Oklahoma supports, promotes and collaborates on a variety of middle and high school programs to ensure students are engaged and learning a rigorous curriculum that leads to postsecondary success and eliminates the need for college remediation.

ICAPS are also an essential high school tool. ICAPs:

- Enable students to become college and career ready;
- Enable students to become aware of the relevance and utility of academic courses and out-of-school learning opportunities; and
- Encourage students to select a more rigorous academic course schedule, increase efforts to perform well academically, seek work-based learning opportunities and establish intentions to pursue postsecondary training or a degree program.

The OSDE staff will provide training to assist school counselors in implementing ICAPs.

Teams consisting of students, parents and teachers will play key roles in selecting a path to success after high school. Through available tools, students can create individual portfolios, utilize high school planning tools and explore college and career options.

Redefining the Senior Year

The OSDE has placed an emphasis on making the senior year meaningful for all students. In the 2017-18 school year, Oklahoma will pilot a College Career Math Ready course for seniors who scored between 13 and 18 on the ACT or a comparable score on the SAT. This course will save students and their families money on costly noncredit-bearing remediation courses and prepare them for entry-level college mathematics. This opportunity, combined with student ICAPs, will help Oklahoma reach its goal of reducing the need for remediation by 50% by 2025. Students will be encouraged either to start their postsecondary work early or take remediation courses to ensure they are ready for their next steps.

Redefining the senior year will also place particular focus on credit recovery, dropout prevention and a variety of personalized apprenticeships, internships and mentorships. The OSDE will provide professional development to administrators and school counselors to help them understand the importance and urgency of redefining the senior year. Figure 16 further describes the opportunities that will be available to students as schools work to bridge the transition between high school and their postsecondary plans.

The OSDE requires that school districts administer the ACT or the SAT to all students in their junior year of high school. These assessments are given at the school site and on a school day to eliminate barriers with transportation and work conflicts. These assessments help students, families and educators:

- Identify if a student is on track for being college and career ready;
- Personalize and align interventions and student services to each student’s specific academic strengths and weaknesses; and
- Provide a coherent approach to educational and career planning based on student interests, motivations and aspirations.

Concurrent Enrollment

Since its inception in 1977, the concurrent enrollment program in Oklahoma, supported through the Oklahoma State Regents for Higher Education, has allowed outstanding juniors and seniors the opportunity to earn college credit while still in high school through reduced or free tuition for these courses. In 2016-17, more than 12,500 Oklahoma students enrolled in concurrent programs and cooperative agreement credit courses generating more than 106,000 credit hours. The OSDE assists in the promotion of this program and will continue to encourage teachers, students, parents and community members to take advantage of this highly coveted opportunity.

FIGURE 16: Opportunities Under Redefining the Senior Year Initiative



### Advanced Placement

In 1997, the Oklahoma State Legislature authorized the Advanced Placement Incentive Program to increase access and success in Advanced Placement (AP). In 2016, 14,487 student AP exams received scores of 3 or higher, representing 43,461 college credits and resulting in a total potential savings of \$11,627,121 for Oklahoma students and their families. The Oklahoma State Regents for Higher Education have standardized the use of AP scores by all state system institutions to encourage students to achieve at least a score of 3. The percentage of students who have scored a 3 or higher from 2006 to 2016 rose from 9.3% to 11.7%.

The program includes professional development workshops for AP teachers, test fee assistance for economically disadvantaged students, grants to schools for new and/or existing AP programs/classes and incentive funds to help districts support and expand AP programs.

### Oklahoma's Promise State Scholarship Program

Oklahoma's Promise allows students whose families earn \$55,000 or less annually and who meet academic and conduct requirements to earn a college tuition scholarship. The OSDE assists in promoting the program to teachers, students and parents and helping students enroll in the program when they are in either eighth, ninth or 10th grade. In the 2015-16 school year, 18,210 students received Oklahoma's Promise scholarships

totaling \$65 million. The OSDE supports the program through website promotion in addition to providing information about it to students, teachers, school staff and communities. The agency also will be encouraging enrollment in Oklahoma's Promise through web-based ICAP portals.

### New Skills for Youth Initiative


The OSDE has received the New Skills for Youth (NSFY) grant from J.P. Morgan Chase. This initiative helps Oklahoma to accelerate and expand the current statewide initiative, Oklahoma Works, which is designed to increase the wealth of all Oklahomans by aligning education and training to produce a relevant workforce for Oklahoma's economy. Oklahoma Works is a coalition that includes business leaders, educational leaders and state agency partners, among others. It is fully aligned with both the federal Workforce Innovation Opportunity Act (WIOA) and a 14-state National Governors Association (NGA) Policy Academy cohort.

Oklahoma is committed to preparing middle and high school students to create a bridge to postsecondary education or career success.

The economies of our country and state are changing quickly. No longer is a high school graduate able to compete for the increasingly high-skill, high-paying jobs of the present and future. Because tomorrow's workforce will require more than a high school diploma to achieve economic success, the OSDE is committed to ensuring students' successful transition after high school. To reach this

goal, nearly 600,000 more workers will need a postsecondary degree, certificate or other high-quality credential in eight years, which will come close to meeting workforce demand projections.

An ambitious but achievable goal of the Governor's Launch Oklahoma initiative is to increase postsecondary education and training attainment from 54% to 70% of the state's residents ages 25-64 to complete a postsecondary degree, certificate or credential by 2025.

Collaboration among the OSDE, Oklahoma Works, Oklahoma's Secretary of Education and Workforce Development, the Oklahoma State Regents for Higher Education, the Oklahoma Department of Career Technology Education, the Office of Workforce Development and the Oklahoma Educated Workforce Initiative will help close the current workforce gap in wealth generating occupations. 



## Stakeholder Recommendations

## OSDE Implementation

When stakeholders were asked about the multiple indicator state definition of “ineffective,” types of teacher absences were a concern.



The OSDE clarified that collecting teacher absence data would not include absences due to the Family Medical Leave Act, bereavement, military deployment or approved professional development.

When the agency risk analysis approach was shared with stakeholders, they suggested additional indicators.



The OSDE incorporated site principal turnover as an addition to the list of possible indicators.

When asked what data are important when determining the academic success and college/ career readiness of students, several responses suggested using graduation rate data to better inform success strategies.



The OSDE will provide college- and career-readiness activities leading to improved graduation rates. Such activities include ensuring students complete an ICAP and providing college assessments (ACT, SAT) for all juniors during the school day.



# B

## **Title I, Part C: Education of Migratory Children**



## B. Title I, Part C: Education of Migratory Children

The OSDE will ensure that migrant children who move among the states are not penalized in any manner by disparities in curriculum, graduation requirements, state academic content and student academic achievement standards. The principal operational goal of the Oklahoma Migrant Education Program (MEP) is to ensure that all migrant students meet challenging academic standards so that they graduate with a high school diploma or receive a general equivalency diploma (GED) or high school equivalency diploma (HSED) that prepares them for responsible citizenship. The following strategies support the OSDE's work in this area:

### STRATEGY 1.1

Focus on early childhood education.

### STRATEGY 1.2

Ensure effective implementation of the Oklahoma Academic Standards by using available data to target high-quality, aligned resources to educators.

### STRATEGY 1.3

Improve student equitable access to meaningful and diverse pathways that lead to careers and postsecondary opportunities.

### STRATEGY 1.4

Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

### STRATEGY 1.5

Reduce barriers to equity and close the opportunity and achievement gap for all students.

### STRATEGY 2.2

Provide support and professional learning to increase instructional capacity for teachers and leaders.

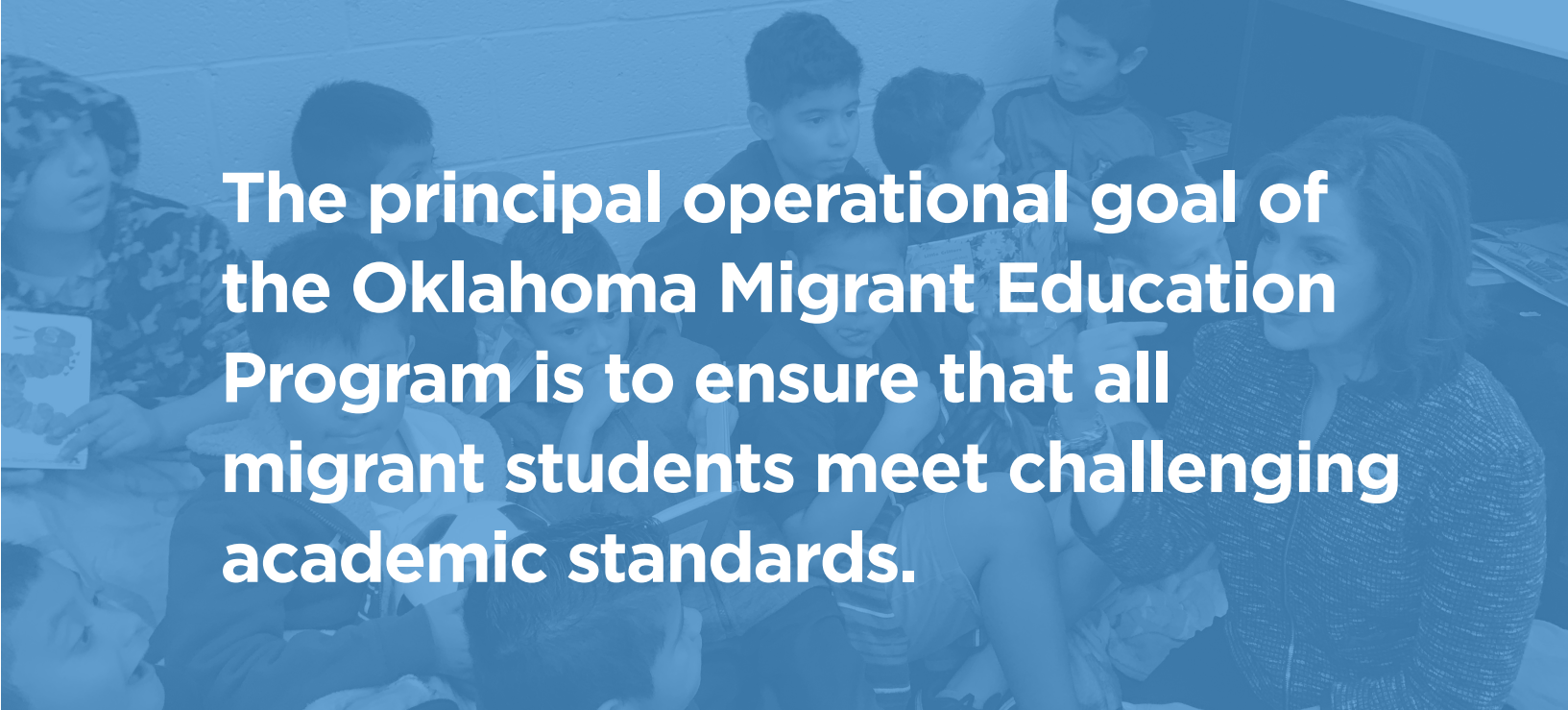
### STRATEGY 3.2

Strengthen and increase family and community engagement to support student learning.

**1. Supporting Needs of Migratory Children (ESEA section 1304(b) (1)): Describe how, in planning, implementing, and evaluating programs and projects assisted under Title I, Part C, the State and its local operating agencies will ensure that the unique educational needs of migratory children, including preschool migratory children and migratory children who have dropped out of school, are identified and addressed through:**

**i. The full range of services that are available for migratory children from appropriate local, State, and Federal educational programs;**

In alignment with USDE eligibility requirements, the OSDE has established state requirements for identification and recruitment of migratory children, including



# The principal operational goal of the Oklahoma Migrant Education Program is to ensure that all migrant students meet challenging academic standards.

preschool-aged students and out-of-school youth. The OSDE expects all LEAs to adhere to the same eligibility requirements as follows:

1. The migrant child must be at least 3 years old and under 22 years old;
2. The migrant child has not completed high school or a GED;
3. The migrant child or family moved between school districts/states/countries within 36 months; and
4. The work obtained or sought by the parent of a migratory child, or by the child himself or herself, was temporary or seasonal relating to agriculture or fishing.

The OSDE has a state migrant recruiter to assist with the identification and recruitment process, and each of the 11 migrant LEAs has a local recruiter working continuously in their area. Recruiters rely on three types of strategies: school-based, community-based and employer-based.

Therefore, a wide range of students (i.e., preschool students, special education students, students who have dropped out, etc.) are identified and informed about the local migrant program and available services. The OSDE staff receives continuous training and then trains local recruiters and migrant staff to properly identify migrant students to ensure that necessary services are rendered to eligible migrant children and youth.

Once MEP student eligibility is determined, a Certificate of Eligibility is written and reviewed locally before being submitted to the OSDE for final review. Each certificate is maintained in the state migrant database (MIS2000) for three years to document student eligibility for this period.

To identify the needs of preschool students, including preschool migratory students, school districts may use teacher-created assessments and curriculum-based assessments in the areas of math, literacy, science and social-emotional, to name a few.



Oklahoma also has made available a “Ready for School Checklist” that provides guidance on preschool students’ school readiness. This checklist includes areas such as good health and physical well-being, social and emotional preparation, language and general knowledge.

Oklahoma addresses the needs of preschool students, including preschool migratory students, through the development of early childhood 4-year-old programs that adhere to the Oklahoma Academic Standards (OAS). These programs are partially funded through the state funding formula, which allocates funds on a per-pupil basis with additional weights to account for the age of the child, the length of the program day and additional needs of the student (e.g., economically disadvantaged, disability, etc.). Public school districts can collaborate with child-care centers, Head Start and community-based programs by placing a public school teacher in the program to provide the same services as those offered in public school locations. Subsequently, these students are considered public school enrollees. These preschool student data are included in Oklahoma reports such as the state’s Pre-K database on home language, ethnicity and migrant status.

Moreover, the OSDE works in partnership with non-public school programs such as Head Start and the Department of Human Services-accredited child-care centers to ensure academic standards and program policies are aligned statewide. In so doing, the OSDE works toward the goal of ensuring that Pre-K students, including Pre-K migratory students, are ready for school.

To identify the needs of migratory out-of-school youth, the state migrant recruiter and school district recruiters use an out-of-school youth profile assessment – an evaluation tool to help identify the child’s unique needs, which may include credit accrual, high school diploma or GED, school schedule, alternative school setting, educational goals, health/wellness, counseling services, transportation, etc. The OSDE provides continuous guidance, training and services to school districts to enhance efforts to identify the needs of out-of-school youth.

The Oklahoma State Service Delivery Plan (SSDP) was developed as a result of a comprehensive needs assessment and guides the state and LEAs as they serve migrant students, including migratory preschool-aged children and migratory children who have dropped out of school. The needs assessment utilizes data from a variety of sources:

- Migrant student data as included in the Consolidated State Performance Report (CSPR);
- The state A-F Report Card;
- Statistical information reported by the National Assessment of Educational Progress (NAEP);
- Information elicited from specifically designed surveys administered to teachers, administrators, teachers’ assistants, parents and students in all migrant programs in the state;
- Input from local parental advisory councils (PACs);

- Activities observed at the LEA level through application review, on-site monitoring, desktop monitoring and approval of claims; and
- Migrant student assessment data collected from the Oklahoma School Testing Program (OSTP) assessments.

The implementation of the State Service Delivery Plan is based on a cycle of continuous improvement. The comprehensive needs assessment identifies a wide range of services for migratory children – which is the foundation of the SSDP. Eligible migrant students throughout Oklahoma are entitled to receive supplemental support services, including preschool programs, academic home visits, extended-day and summer school classes and health referrals.

Local Migrant Education Programs (MEPs) have autonomy in implementing strategies and services and can design services that better fit their district’s needs in achieving the targeted outcomes. Utilizing a needs assessment, LEAs in Oklahoma select children with the greatest need for MEP services according to the Priority for Services (PFS) criteria. In addition, LEAs identify eligible migrant children with special needs to receive services.

Community-specific services such as Pre-K programs for all students are offered to migratory children. For migrant students who do not have access to Pre-K, free,

downloadable materials can be assembled as preschool packets. To enrich curriculum for migratory children, including preschool migratory children, LEAs offer supplemental services such as tutoring, summer school programs, evening and weekend classes, online educational resources, health and nutrition information, library resources, pamphlets and literacy materials. The LEA migrant recruiter’s activities may include home visits to support these services.

To address the educational needs of migratory children who have dropped out of school, migrant LEAs use online tools to help students improve literacy skills and increase English language acquisition, leading to a GED. Some LEAs in Oklahoma encourage their migratory out-of-school youth to participate in free online educational programs through community colleges or universities to help migratory students earn their GED. In addition, the OSDE belongs to the MiraCORE consortium (Migrant Reading Achievement: Comprehensive Online Reading Education), which works to improve interstate coordination of MEPs by sharing resources to improve literacy skills of migratory children and youth. Through its website, MiraCORE offers literacy materials to assist with instruction of migrant students ranging from Pre-K through 12th grade.<sup>49</sup>

### **iii. Joint planning among local, State, and Federal educational programs serving migratory children, including language instruction educational programs under Title III, Part A;**

<sup>49</sup> [www.migrantliteracynet.com](http://www.migrantliteracynet.com).

# Migrant children face mobility, language and cultural barriers, in addition to increased challenges in obtaining educational, health and social services.

The OSDE's joint planning process is designed to facilitate interactive communication among interagency divisions (e.g., 21st Century Community Learning Centers, office of federal programs, office of school support, office of special education services) and parental advisory councils (PACs), community stakeholders, including parents, teachers and community, tribal educational agencies and LEA representatives. Oklahoma also collaborates in MEP planning with external entities including the Oklahoma State Department of Health, Committee of Practitioners, Title I & III LEA consortia, interstate coordination, MiraCORE consortium, Kansas Identification and Recruitment team and the Identification and Rapid Recruitment Consortium (IRRC).

The joint planning committees develop a common mission and purpose for the MEP, work on crafting activities for serving migrant children and generate effective plans of action to better serve the migratory population.

In the joint planning process, the OSDE is committed to addressing the needs of all migratory children, including preschool-aged migratory children and out-of-school youth, and ensuring they receive services from all community, state and federal programs for which they are eligible. As a result, the planning process to determine necessary services for migrant students includes the following:

- Review of available academic, health and socioeconomic data;
- Coordination of professional development trainings for MEP districts; and

- Coordination of network organizations and agencies that provide resources to increase migratory services such as academic, health, legal, housing and career opportunities.

The ultimate planning goal is to coordinate local, state and federal educational programs – which include Title III language instructional programs – serving migratory children with those of multiple services from community organizations including but not limited to Integris hospital's Health Hispanic Initiative, Variety Care health centers, Oklahoma Rural Opportunities (ORO) Development Corporation, Latino Community Development Agency, Oklahoma Employment Security Commission and MetroTech Technology Center. As a result, migrant students have access to health/medical services, legal services, CareerTech classes, language services and employment opportunities as appropriate.

## **iii. The integration of services available under Title I, Part C with services provided by those other programs;**

Migrant children face mobility, language and cultural barriers, in addition to increased challenges in obtaining educational, health and social services. Migrant families are unique because of high mobility due to seasonal work. As a result, multiple programs require coordination to address their needs. The OSDE and LEAs work to maximize the integration of services for migratory children, including preschool children and migratory children who have dropped out of school, and help them be academically successful.

To ensure that the unique educational needs of migratory children, including preschool children and migratory children who have dropped out of school, are identified and addressed, the OSDE and its LEAs provide the following integration of services:

- Title I, Part A: Improving the Academic Achievement of the Disadvantaged;
- Title III, Part A: English Language Acquisition, Language Enhancement and Academic Achievement;
- Individuals with Disabilities Education Act (IDEA);
- Title IX, Part A: Homeless Education for Children and Youth;
- Summer Food Service Program (SFSP);
- Head Start services;
- Foster care services;
- Social services;
- GED programs;
- CareerTech opportunities; and
- Alternative academic programs.

## **iv. Measurable program objectives and outcomes.**

Based on the current comprehensive needs assessment, the OSDE has determined attainable measurable program objectives and outcomes.

For reading/language arts, Oklahoma’s measurable program objective is that the number of migrant students in Oklahoma who scored proficient or above on statewide assessments in reading/language arts in grades 3-12 will increase each year until the gap between migrant and non-migrant students is closed. Measurable program outcomes of this objective include:

- At least 90% of migrant students who also qualify as English learners will show an increase in their composite scaled scores and/or composite proficiency levels on the ACCESS for ELLs 2.0 proficiency test in the reporting year as compared to their scores the previous year;
- Migrant students who participate in a program to help with reading/language arts will show increased confidence in and improvements in their grades in reading/language arts from the previous year and/or the beginning of the school year to the end of the school year in which they participated in the program; and
- The percentage of migrant students scoring at the proficient level or above on the Oklahoma School Testing Program (OSTP) in reading/language arts will increase each year by 2% from the previous year.

For mathematics, Oklahoma’s measurable program objective is that the number of migrant students who score proficient or above on statewide assessments in mathematics in grades 3-12 will increase each year until the gap between migrant and

non-migrant students is closed. Measurable program outcomes of this objective include:

- Migrant students who participate in a program to help with mathematics will show improvements in their grades in mathematics from the previous year and/or the beginning of the school year to the end of the school year in which they participated in the program; and
- The percentage of migrant students scoring at the proficient level or above on the OSTP in mathematics will increase each year by 2% from the previous year.

For school readiness, Oklahoma’s measurable program objective is that the number of preschool-aged migrant children attending high-quality early childhood education programs will increase each year until all migrant children enter kindergarten with the necessary skills. Measurable annual program outcomes for this objective include:

- At least 50% of migrant children ages 3 to 5 will be enrolled in a Pre-K program;
- At least 70% of migrant children entering kindergarten will be younger than 6 years of age; and
- At least 70% of migrant children entering kindergarten will score as kindergarten-ready on an approved screening instrument that assesses the acquisition of reading skills.

For high school graduation and out-of-school youth, Oklahoma’s measurable program objective is that the number of migrant

students graduating from high school will increase each year, and identified out-of-school youth will receive services to help them obtain a GED or high school diploma. Measurable program outcomes for this objective include:

- At least 70% of migrant students in 12th grade will graduate from high school; and
- 100% of school districts with MEPs will report that they provide services to out-of-school youth, such as GED preparation assistance, flexible school schedules, alternative credit accrual options (i.e., Portable Assisted Study Sequence) and night classes.

### KEY PROGRAM STRATEGIES FOR MIGRANT STUDENTS

- Provide training to MEP and instructional staff on evidence-based strategies and differentiated instructional strategies for reading/language arts and mathematics.
- Extend instructional time through programs such as afterschool and Saturday classes, intersession classes and/or standards-based 4-6 week summer school programs.
- Ensure sufficient support services are available to facilitate participation of all migrant students.
- Provide assistance to parents and students, including:
  - Navigating the school system, including enrollment;

- Supporting parents’ role in their child’s education;
- Tutoring at home and school with flexible scheduling;
- Facilitating activities to help migrant children with reading/language arts, mathematics and English language development;
- Understanding student transcripts, progress reports, report cards and graduation requirements; and
- Preparing for parent-teacher conferences.
- Use culturally relevant materials, including materials in the students’ home language, to improve understanding of concepts;
- Hire bilingual staff to act as aides, interpreters/translators, parent liaisons or afterschool tutors;
- Create environments where parents feel empowered to advocate for their children;
- Inform parents about cognitive and linguistic early childhood development activities to help students transition to kindergarten;
- Provide opportunities for alternative credit accrual, such as the Portable Assisted Study Sequence, evening classes, flexible scheduling and online classes; and
- Coordinate services for out-of-school youth to meet education and career



goals through other means such as adult education classes, community colleges, GED preparation, life skills courses and English as a Second Language (ESL) instruction.

The state MEP will monitor progress toward achieving the measurable outcomes at the district and state levels. Each local MEP will be held accountable for the outcome measures that focus on raising student achievement regardless of the service strategies the LEA or MEP chooses. An evaluation framework will guide the state in evaluating the MEP’s effectiveness, with the goal of producing strategies that provide information on the best use of MEP funds to achieve the performance goals and outcomes detailed in the SSDP. The evaluation examines data from multiple sources, including the state migrant database (MIS2000), the CSPR, OSTP results, ACCESS for ELLs results and the statewide student information system (the Wave). Data are also obtained from surveys of parents, students, educators and MEP staff, along with interviews of MEP staff and observations.

Three questions will guide the performance of MEP sites throughout Oklahoma:

1. To what extent are programs for migrant students impacting student outcomes?
2. Are migrant programs being implemented with fidelity?

3. What changes and/or improvements need to be made to allow MEPs to achieve positive outcomes?

**2. Promote Coordination of Services (ESEA section 1304(b)(3)):**  
**Describe how the State will use Title I, Part C funds received under this part to promote interstate and intrastate coordination of services for migratory children, including how the State will provide for educational continuity through the timely transfer of pertinent school records, including information on health, when children move from one school to another, whether or not such move occurs during the regular school year.**

Oklahoma’s Migrant Education Program (MEP) uses the following data programs to track students in order to improve the continuity of education of migrant students:

- The MSIX national migrant database;
- The MIS2000 state migrant database; and
- The Wave state database for all students.

These programs help track migrant student data including credit accrual, health information, migrant eligibility criteria, test scores and other pertinent student information, and allow for easy transfer of information when a migrant student

moves to a new school district. The state’s migrant database (MIS2000) interfaces with the national migrant database (MSIX) and promotes interstate and intrastate transfer of student data for migratory children. The state database for all students (the Wave) collects migrant student data such as demographics, test scores and the October count of migrant students used for state allocation reports.

In order to enhance the continuity of timely transfer of pertinent school records, the OSDE is exploring upgrading the Wave to interface with the MIS2000. The OSDE sees the need for removing the duplicative data entry into both systems, which will increase efficiency in intrastate and interstate student data transfer.

**3. Use of Funds (ESEA section 1304(b)(4)):**  
**Describe the State’s priorities for the use of Title I, Part C funds, and how such priorities relate to the State’s assessment of needs for services in the State.**

In alignment with the ESSA section 1304(d), the Oklahoma Migrant Education Program has a Priority for Services (PFS) requirement in place. The PFS ensures priority is given to migrant children who are failing – or most at risk of failing – to meet the state’s challenging academic content standards, and students whose education has been interrupted during the regular school year.

The OSDE requires LEAs to complete a PFS form for each student who qualifies, and

maintain supporting documentation for site or desktop monitoring. The required documentation will include but is not limited to:

- A list of eligible migrant students;
- A list of students identified as PFS students;
- A list of available services;
- A list of students receiving migrant services; and
- Individual PFS for each student receiving migrant services.

Federal law mandates that each MEP must provide services first to students who qualify for PFS. The criteria for students to be designated as PFS in Oklahoma are as follows:

1. Students must meet one of the following criteria for an interruption of services during the regular school year:
  - Most current qualifying arrival date or official start date of the school year until the end of the school year;
  - Moved from one district to another due to migrant lifestyle;
  - Been absent for two or more weeks and then returned due to migrant lifestyle; or
  - Officially withdrew and has been gone for at least two weeks, then re-enrolled due to migrant lifestyle.

## Stakeholder Recommendations

## OSDE Implementation

Stakeholders expressed a need to increase instructional services for preschool-aged children of migrant and seasonal workers.

The OSDE trains school district migrant recruiters to identify and document migrant children under the age of 3 on the Certificate of Eligibility and to use migrant funds to address these children's needs. The OSDE and school district migrant staff collaborate to build partnerships with nonprofit Head Starts such as TMC (Texas Migrant Council) and NHCT (Native American Coalition of Tulsa).

Stakeholders recognize that many migrant students struggle with the transition from high school to postsecondary. Migratory students who are able to graduate often lack the financial resources to pay for college education.

The OSDE and LEA migrant program staff share knowledge of resources such as the College Assistance Migrant Program, which will pay the first year of college for migrant students. Other scholarship opportunities, including those provided by nonprofit and philanthropic entities, have been compiled into a guide. Some examples include the Hispanic College Fund, Geneseo Migrant Center and the Ayn Rand Essay Contest scholarship.

Stakeholders recognize the need to reach out-of-school youth as a Priority for Service (PFS) population. Often these students do not have any contact with local school districts, and their education has been interrupted.


The OSDE trains LEA migrant recruiters on implementing procedures to identify, document and recruit out-of-school youth. One suggestion includes noting employer and residency-based identification information on the Certificate of Eligibility to assist in identifying, documenting and recruiting out-of-school youth. The OSDE also assists LEAs in finding resources to offer out-of-school youth, including flexible programs at the local school, GED or high school equivalency classes.

2. Students must meet at least one of the following at-risk criteria according to state assessment data:

- Scored unsatisfactory or limited knowledge on English language arts/reading assessment;
- Scored unsatisfactory or limited knowledge on mathematics assessment;
- Scored unsatisfactory or limited knowledge on science assessment; or
- Scored below proficient on assessments from other states.

Other at-risk criteria:

- Student is below grade level on any K-3 reading diagnostic assessment;
- Student is classified as an English learner on WIDA Screener, Language Assessment Scales (LAS), IDEA Proficiency Test (IPT), Language Proficiency Test (LPT) or ACCESS for ELLs 2.0;
- Student is behind on accruing credits toward graduation requirements;
- Student has been placed in a class that is not age appropriate; and/or
- Student has grades indicating below average performance in math, language arts and/or science at the elementary, middle or high school level.

State assessment data must be considered first for the second criterion. If results for a migrant student are available, they must be used. If state assessment data are not available, at least two of the at-risk criteria must be met to be considered eligible for PFS. If a student is proficient on the state assessments, that student is not considered eligible for PFS even though he or she may meet the other at-risk criteria. 

Stakeholder Recommendations

OSDE Implementation

Stakeholders recognize the need to increase parental and community engagement in the planning, operation and evaluation of the Migrant Education Program (MEP). Their feedback on its effectiveness and possible improvements is essential.



The OSDE requires school districts to establish and consult with Parent Advisory Councils (PACs) – with flexible meeting times and dates – on removing attendance barriers such as travel distance and inclement weather. The OSDE also provides resources for parents to help their children during the summer and to understand the school system and resolve conflicts.

Stakeholders recognize the need to help teachers with resources in the classroom, with an emphasis on the importance of developing personalized lessons for migratory students.

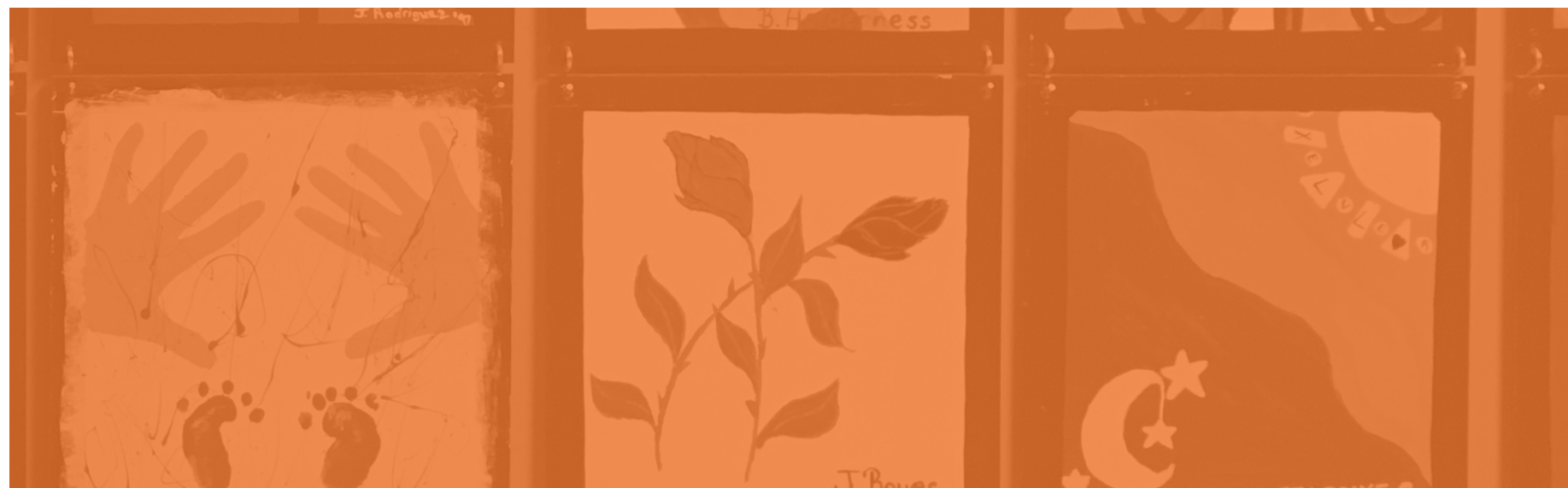


Oklahoma is a member of the Migrant Reading Achievement: Comprehensive Online Reading Education (MiraCORE) Consortium. MiraCORE created the Migrant Literacy website aimed at improving the literacy skills of migratory students and youth, teacher assessment of these students and preparation for personalized lessons.





# **Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent or At-Risk**



## C. Title I, Part D: Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk

Neglected children are students enrolled in school who are placed in facilities due to abandonment, neglect or death of parents or guardians. LEAs in Oklahoma operate 41 programs that serve 3,178 students classified as neglected.

Delinquent children are those of age 21 or younger, pre-adjudicated or adjudicated to be placed in a facility. These children attend on-site school rather than public school. LEAs in Oklahoma operate 39 juvenile detention centers that serve 2,637 students and 16 juvenile correction centers that serve 303 students. Also, two state agencies serve students who are neglected or delinquent: the Office of Juvenile Affairs, which serves 119 students, and the Department of Corrections, which serves 448 students.

At-risk children are defined as those who are susceptible to academic failure due to:

- Drug or alcohol problems;
- Pregnancy or parenthood;
- Contact with juvenile justice system;
- Falling behind one year academically;
- Membership in or affiliation with a gang; or
- Previously having dropped out of school.

There are 17 at-risk programs in Oklahoma serving 1,029 students.

In an effort to reach all students, Oklahoma commits to providing an effective education for all students, including those who are neglected, delinquent or at risk. The OSDE's strategies to support these students include the following:

### STRATEGY 1.3

Improve student equitable access to meaningful and diverse pathways that lead to careers and postsecondary opportunities.

### STRATEGY 1.4

Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

### STRATEGY 1.5

Reduce barriers to equity and close the opportunity and achievement gap for all students.

### STRATEGY 3.3

Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

## 1. Transitions Between Correctional Facilities and Local Programs (ESEA section 1414(a)(1)(B)): Provide a plan for assisting in the transition of children and youth between correctional facilities and locally operated programs.

The ability to share data among LEAs and facilities is critical to the success of programs. The OSDE has worked to provide a means

for an LEA administering the educational program to receive academic performance data from another LEA upon release of the student, should the student not return to the original LEA.

In addition, state agencies are required to set aside at least 15% of the Title I, Part D allocation to perform transition activities for neglected and delinquent students.

The OSDE's plan for assisting state agencies and LEAs in the transition of children and youth between correctional facilities and locally operated programs includes but is not limited to:

- Requiring state agencies to reserve, in the grant application, at least 15% of allocated Title I, Part D funds for activities that help students transition from eligible institutions, projects and programs into postsecondary education opportunities;
- Requiring LEAs to indicate, in the grant application, how awarded funds support the successful re-enrollment of eligible students in secondary or postsecondary schools upon exiting a neglected or delinquent facility;
- Requiring state agencies and LEAs to describe, in the grant application, strategies that ensure children and youth are re-enrolled in secondary or postsecondary education upon exit from a neglected or delinquent facility. The OSDE requires state agencies and LEAs to report the number of neglected or delinquent children that obtain a high school

diploma prior to exiting the neglected or delinquent facility in the annual neglected and delinquent report.

- Supporting credit accrual and recovery for neglected and delinquent children by providing professional development webinars on best practice strategies that increase the credit accrual or recovery;
- Providing trainings to state agencies and LEAs on how to prepare the neglected and delinquent youth for postsecondary education or career and technical training programs;
- Collaborating with community organizations as resource providers for state agencies and LEAs to help students make a successful transition to postsecondary education and/or employment;
- Facilitating collaboration among state agencies, LEAs and the tribal education agencies in Oklahoma to increase awareness of programs that help youth offenders reenter the workforce, and/or attend postsecondary education or career and technical training programs; and
- Ensuring that correctional facilities are able to meet the needs of students with disabilities and comply with the requirements of the IDEA regarding Child Find, the free appropriate public education provision (FAPE) of federal law, and the development of IEPs. The OSDE will revise existing interagency agreements to ensure the correctional facilities develop appropriate intake procedures



and coordinate effectively with LEAs to expedite the provision of special education and related services required to meet students' needs. In addition, the OSDE will develop guidance and provide technical assistance to both correctional agencies and LEAs regarding the provision of FAPE and the development of IEPs.

Another concern worthy of attention is the 1 in 10 students who has or has had an incarcerated parent. The OSDE's intent is to align a stable, caring adult with each of these at-risk students. When listing characteristics of adult mentors, the toolkit *Mentoring Children of Incarcerated Parents* notes the importance of a consistent adult presence: "What children of incarcerated parents need, above all, is stable, reliable care from adults."<sup>50</sup>

When considering at-risk factors for school success, these students must not go unidentified or unsupported. Research suggests that having one dependable adult in the life of a child whose parent is incarcerated contributes to academic success. Providing a stable adult in the lives of the 1 in 10 students requires a systemic approach to tiered intervention and mentorship programming for students.

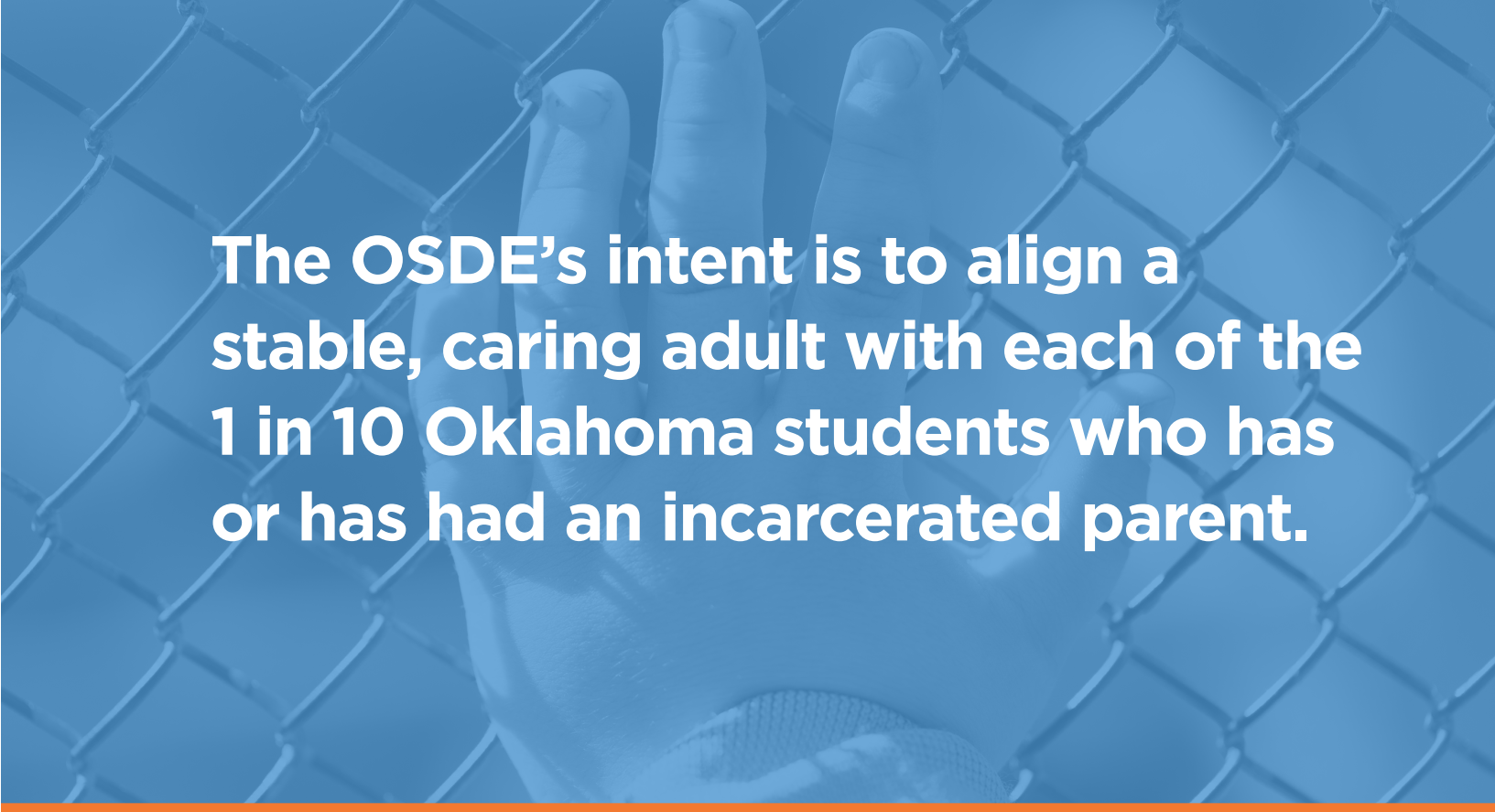
The OSDE is committed to providing specific guidance for teachers to better understand how and why parental incarceration is considered an adverse childhood experience that impacts academic success. Megan Sullivan provides a reminder of what teachers can do to promote

the same educational opportunities as they would any other child.<sup>51</sup> This simple reminder is applicable:

- Acknowledge that there may be students whose parents are in prison;
- Remember that books can be powerful;
- Conduct parent-teacher conferences creatively; and
- Teach students about children's rights.

The identification and support of kids with incarcerated parents is an Oklahoma initiative that requires partnering with other entities involved in this work, such as the Oklahoma Department of Corrections, the Oklahoma Department of Mental Health and Substance Abuse Services, the Oklahoma Commission for Children and Youth, the Oklahoma Messages Project and the Oklahoma Institute for Child Advocacy.

## 2. Program Objectives and Outcomes (ESEA section 1414(a)(2)(A)): Describe the program objectives and outcomes established by the State that will be used to assess the effectiveness of the Title I, Part D program in improving the academic, career, and technical skills of children in the program.



**The OSDE's intent is to align a stable, caring adult with each of the 1 in 10 Oklahoma students who has or has had an incarcerated parent.**

To ensure neglected and delinquent children and youth have an opportunity to participate in effective educational programs, the OSDE has established the following objectives to assess the effectiveness of the Title I, Part D program in improving the academic, career and technical skills of participating children and youth in postsecondary pursuits:

### OBJECTIVE 1

The OSDE collaborates with state agencies and LEA stakeholders to identify quantifiable indicators of academic growth, career and technical skills as they relate to program outcomes for neglected, delinquent or at-risk children and youth.

### OBJECTIVE 2

The OSDE continues to collect neglected or delinquent student data for the Consolidated State Performance Report (CSPR). LEAs provide reading and mathematics assessments of neglected or delinquent students both

before and after the course. Gathering such data can help determine the effectiveness of the educational programs.

### OBJECTIVE 3

The OSDE collaborates with state agencies and LEA stakeholders who decide to pursue a Pay for Success model, an evidence-based approach that aims to improve overall academic achievement of neglected, delinquent or at-risk children and youth. The OSDE may provide letters of support, attend meetings and offer other state-level support for state agencies and LEAs that pursue Pay for Success initiatives.

Pay for Success is an innovative approach to support private sector or philanthropic initiatives to improve the academic achievement of neglected, delinquent or at-risk children and youth. Instead of funding services regardless of the results, the government and other entities, such as

<sup>50</sup> "Mentoring Children of Incarcerated Parents: A Toolkit for Senior Corps Directors," Corporation for National & Community Service, June 2004, [https://www.nationalservice.gov/sites/default/files/resource/MCIP\\_Senior\\_Toolkit.pdf](https://www.nationalservice.gov/sites/default/files/resource/MCIP_Senior_Toolkit.pdf).

<sup>51</sup> Megan Sullivan, "Children of Incarcerated Parents and Academic Success," *Literacy & NCTE*, May 26, 2017, [blogs.ncte.org/index.php/2017/05/children-incarcerated-parents-academic-success](https://blogs.ncte.org/index.php/2017/05/children-incarcerated-parents-academic-success).



state agencies or LEAs, may enter into an agreement with these philanthropic or private investors and pay for interventions that actually achieve the agreed-upon outcomes. The USDE gives the example that “instead of paying for professional development or training simply to be provided, a community might use Pay for Success to pay only when individuals gain professional credentials, and stable employment in good jobs, and achieve positive results in their jobs. When government employs Pay for Success strategies, taxpayers no longer bear the risk of paying for services that are ineffective because resources are not expended until the services have produced a specific benefit.”<sup>52</sup>

**OBJECTIVE 4**


In order for students in neglected or delinquent facilities to have equitable access to academic, career and technical skill opportunities, the OSDE requires all state agencies and LEAs to provide students in these facilities the same rigorous curricula as to those in regular educational programs. The OSDE has established a partnership with the Oklahoma Department of Career and Technology Education (CareerTech) Office of Lifelong Learning to explore the possibility of data matching regarding the academic achievement of neglected or delinquent students who participated in educational services offered by state agencies and LEAs that administer programs for neglected or delinquent students.

**OUTCOMES**

To achieve these objectives and to determine the effectiveness of the Title I, Part D programs in improving the academic, career and technical skills of children in the program, the OSDE will:

- Use multiple nonacademic indicators for student growth, such as student engagement in academic and vocational programs, the number of students who obtained a GED, high school diploma, CareerTech certification or employment, etc.;
- Collect quantifiable academic growth data in reading and math through the CSPR, based on pre/post assessments of neglected and delinquent children and youth;
- Create a survey for neglected or delinquent facility personnel to determine the effectiveness of the educational program offered by the LEA. This survey includes questions about teacher attendance, student engagement in the program, teacher-student interaction, instructional tools, materials and best practices for program implementation, etc.;
- Collect Pay for Success model data from participating state agencies and LEAs, including identification of the program, description of the program implementation, outcomes (strengths and weaknesses) of the program, and success models shared with other state agencies and LEAs;

- Develop data collection protocols with CareerTech for career and technical skills data matching of neglected or delinquent students who participated in and successfully completed the CareerTech programs offered by state agencies and LEAs; and
- Develop and use various instruments for assessing effectiveness of the programs, such as state agency and LEA application funding requests, desktop and on-site monitoring and self-assessment reports.

At the end of the assessment process, the OSDE will make commendations or recommendations to state agencies and LEAs regarding the effectiveness of the Title I, Part D program in improving the academic, career and technical skills of children in the program. 

<sup>52</sup> “Pay for Success,” U.S. Department of Education, last modified 12/30/16, <https://www2.ed.gov/about/inits/ed/pay-for-success/index.html>.

Stakeholder Recommendations

OSDE Implementation

When asked about barriers to administering the programs for neglected and delinquent youth, stakeholders expressed concern about the early exit of neglected or delinquent children and youth from facilities. Such an early exit may not give these students enough instructional time or allow them to attain necessary credit accrual for graduation.



The OSDE provides trainings to LEAs on best practices to help neglected and delinquent students transition to the LEA, to another facility or into the workforce. Such training includes communication methods among LEAs, correctional facilities and other involved parties to address issues caused by high mobility and to ensure that appropriate educational services are provided.

It is challenging to find teachers who are certified in all subjects to teach in neglected and delinquent facilities. The OSDE is exploring solutions for more flexibility regarding the certification requirements of these teachers.



Teachers may continue to qualify in subject areas for which they are not certified through the High Objective Uniform State Standard of Evaluation (HOUSSE) only for the purposes of teaching in an alternative education program or alternative school offered by the district school board or in a residential or treatment facility located within a district. A copy of the HOUSSE form for each teacher certified in this manner must be submitted with the neglected or delinquent application for review by the OSDE.

LEAs need to access neglected or delinquent student records in a timely and efficient manner. Stakeholders said the OSDE could facilitate the transfer of records by allowing LEAs access to student information from the Wave (Oklahoma’s student information system), including any assessments that the neglected or delinquent student may have completed at the previous LEA.



The OSDE will support the transition of neglected or delinquent students from a neglected, delinquent or correctional facility to a traditional LEA by allowing student data access to the LEA administering the educational program in the facility. This access, in an effort to support continuity of instruction, will be granted for up to 90 days after students exit the educational program.

Stakeholder Recommendations

OSDE Implementation

Stakeholders suggested the OSDE partner with CareerTech to bring specialized trade skills options into facilities and to track neglected or delinquent student success after students exit the educational programs offered by LEAs and state agencies.



The OSDE is establishing a partnership with the CareerTech Office of Lifelong Learning to explore the possibility of data matching regarding the academic achievement of neglected or delinquent students who participated in educational services offered by state agencies and LEAs that administer neglected or delinquent programs.

Stakeholders suggested implementing a Pay for Success model to support academic achievement for neglected or delinquent students.



The OSDE will continue exploring the Pay for Success model, an innovative way to support private sector or philanthropic initiatives to improve the academic achievement of neglected and delinquent students. The USDE gives the example that instead of paying for professional development, a community might use Pay for Success to pay only when individuals gain professional credentials, stable employment and positive results in their jobs.

Stakeholder Recommendations

OSDE Not Implementing

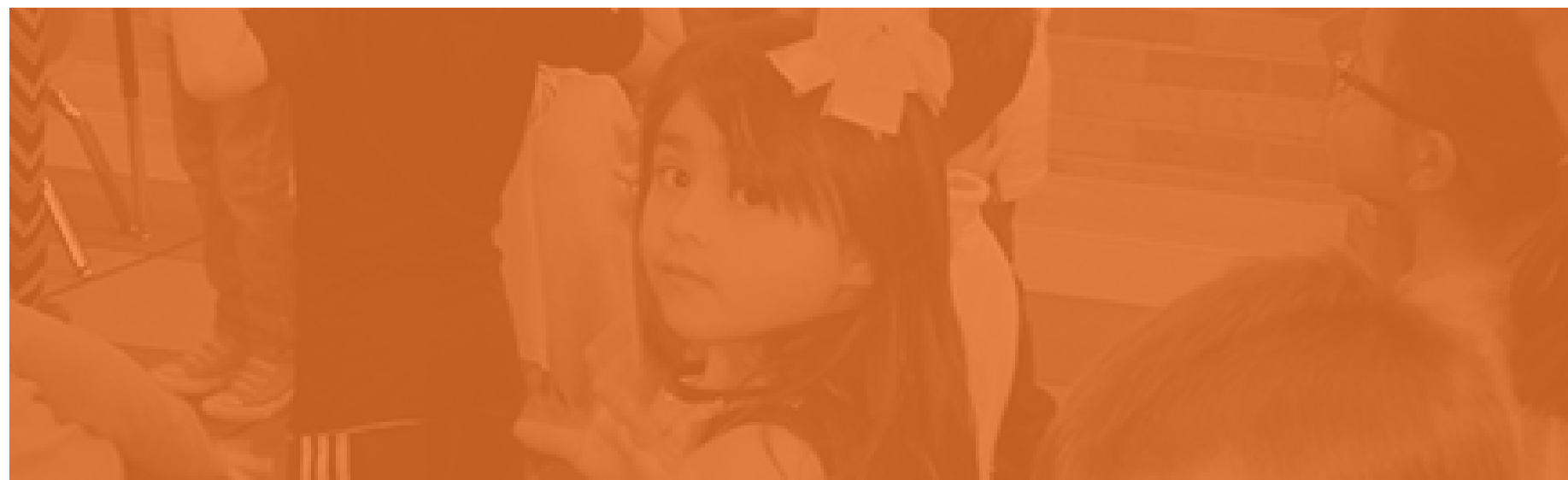
Stakeholders suggested the OSDE explore purchasing one learning management system that all neglected or delinquent programs could access in order to enable continuity of instruction.



The OSDE does not have sufficient funds to implement this purchase at the state level.



# **Title II, Part A: Supporting Effective Instruction**





## D. Title II, Part A: Supporting Effective Instruction

As part of the OSDE 8-Year Strategic Plan, the agency supports the recruitment, preparation and retention of effective teachers and leaders. Oklahoma is experiencing a critical teacher shortage that has only underscored the great need for an effective teacher in every classroom and a strong instructional leader in every school.

It cannot go unmentioned that the complete elimination of Title II, Part A funding would severely hamper the state's ability to achieve its goal of reducing its need for emergency-certified teachers. Title II, Part A dollars are critical to Oklahoma's efforts to enhance meaningful professional development offerings, provide supports to teachers in implementing rigorous academic standards and equip instructional leaders who can support teachers and ultimately increase academic achievement for all students.

Through the creation of the Teacher Shortage Task Force, the OSDE has aggressively addressed strategies to recruit, retain and reward educators. A full report of the 2016 task force's work is in Appendix 14, and an updated report of the 2017 task force's work is in Appendix 15. Strategies underway include positive communication messaging such as "Shaped My Life" and "Elevate," the OSDE's public awareness campaigns that promote the importance of teaching and emphasize the many positive aspects of public education.

Solutions related to policy implementation include 12 task force recommendations signed into law. Strategies being launched include OK-ED talks, micro-credentialing and collaborative professional development opportunities for emergency-certified teachers. Upcoming work to address the teacher shortage includes business partnerships for summer teacher externships, restructuring of the teacher-leader career ladder framework and collaborative efforts to create certification exam preparation.

The OSDE 8-Year Strategic Plan depicts the efforts of supporting excellent educators:

### STRATEGY 1.2

Ensure effective implementation of the Oklahoma Academic Standards by using available data to target high-quality, aligned resources to educators.

### STRATEGY 1.4

Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

### STRATEGY 1.6

Enable Oklahoma's students to benefit fully from digital-age teaching and learning.

### STRATEGY 2.1

Reinforce the teacher pipeline by supporting teacher pre-service training, recruitment, preparation and retention.

### STRATEGY 2.2

Provide support and professional learning to increase instructional capacity for teachers and leaders.

### STRATEGY 2.3

Provide district and school leaders with the training and support needed to improve instruction in their schools.

### STRATEGY 3.1

Advocate for a strong public education system and elevate the education profession.

## 1. Use of Funds (ESEA 2101(d)(2)(A) and (D)): Describe how the State educational agency will use Title II, Part A funds received under Title II, Part A for State-level activities described in section 2101(c), including how the activities are expected to improve student achievement.

The OSDE plans to set aside 5% of the allocated Title II, Part A funds, using 1% for administrative costs and the remainder to champion efforts that attract, prepare, develop and retain effective teachers and leaders. Though an additional 3% may be set aside for state-level activities, the OSDE will not utilize those allowable funds. During state budgetary challenges, it is important that the federal funds expected by LEAs not be disrupted.

The OSDE plans to use Title II, Part A funds for the following state-level initiatives to improve student achievement and directly support the state's goal of reducing its forced reliance on emergency-certified teachers:

- Recognize and implement Learning Forward Standards for Professional Learning to support newly implemented academic standards.<sup>53</sup> The new definition of professional development emphasizes activities that are sustained, intensive, collaborative, job-embedded, data-driven and classroom-focused. Learning Forward standards will anchor the professional development offerings from the OSDE that, in turn, will foster student achievement;
- Implement a professional learning (PL) Focus, emphasizing professional growth and ownership, as part of the state's evaluation system;
- Strengthen the teacher residency program that provides support for strong mentorship and induction programs for new teachers;
- Improve quality and effectiveness of principals and other school leaders through established Lead to Succeed and Moving UP programs (see descriptions in Appendices 16 and 17); and
- Ensure implementation of the teacher-leader career ladder, established in state law to elevate teachers who take on responsibilities of mentor, model and lead roles while receiving additional compensation.

<sup>53</sup> Learning Forward, "Definition of Professional Development," the Professional Learning Association, <https://learningforward.org/who-we-are/professional-learning-definition>.

Oklahoma's emergency certification process is unlike any other certification pathway. After exhausting every option to find an appropriately certified person for an open position, a district superintendent makes request for the applicant. That superintendent must provide a letter with explanation, résumé of the applicant, official transcript, processing fee, documented proof of job posting and verification that the applicant has passed the requested subject-area test or is registered for the next available test. Once approved by the State Board of Education, the applicant must have an Oklahoma State Bureau of Investigation and Federal Bureau of Investigation fingerprint-based criminal history background check.

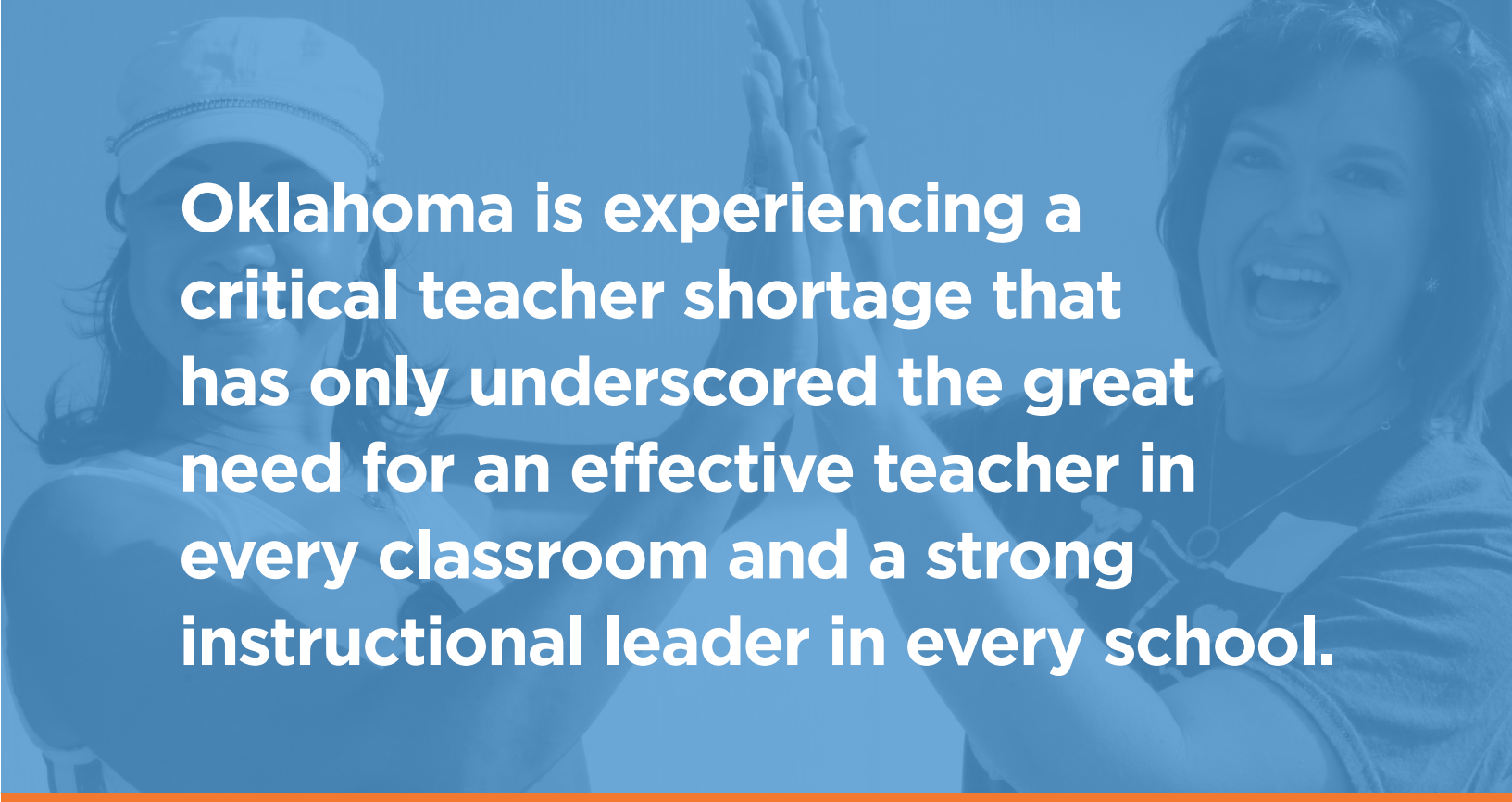
Emergency-certified applicants have varying credentials. Some already are certified in a content area and merely need to pass an additional subject-area exam. Some are competent in a subject area but lack pedagogical skill and knowledge. Many are eligible for the Alternative Placement program that has required education and competency components. In addition, Alternative Placement applicants must complete six to 18 college credit hours of professional education, or 90 to 270 clock hours of professional development. All Alternative Placement participants are required to complete college credit coursework in classroom management and pedagogical principles.

## 2. Use of Funds to Improve Equitable Access to Teachers in Title I, Part A Schools (ESEA section 2101(d)(2)(E)): If an SEA plans to use Title II, Part A funds to improve equitable access to effective teachers, consistent with ESEA section 1111(g)(1)(B), describe how such funds will be used for this purpose.

For low-income and minority students to gain greater access to effective educators, the state will extend capacity to continue implementation of the Equitable Access to Excellent Educators plan strategies:

- Meaningful professional development;
- Leadership training; and
- Partnership with educator preparation programs.

The first two of these points are state-level initiatives. Examples of meaningful professional development include statewide implementation of an annual, educator-selected PL Focus goal. A more specific state initiative is training involving Oklahoma's 39 recognized Native tribes. The third, partnership with educator preparation programs, will continue to be strengthened through recruitment and preparation of teachers. Acknowledging the decline in educator preparation enrollment, Title II, Part A funds will be utilized for recruitment and retention efforts.



Oklahoma is experiencing a critical teacher shortage that has only underscored the great need for an effective teacher in every classroom and a strong instructional leader in every school.

For the full Equitable Access to Excellent Educators plan, see Appendix 18.

## 3. System of Certification and Licensing (ESEA section 2101(d)(2)(B)): Describe the State's system of certification and licensing of teachers, principals, or other school leaders.

Oklahoma's legal definition of teacher means any person who is employed to serve as district superintendent, principal, supervisor, counselor, librarian, school nurse or classroom teacher or in any other instructional, supervisory or administrative capacity.<sup>54</sup>

The following are routes to certification for an Oklahoma teacher:

### Traditional

- **Oklahoma teacher preparation program:** This pathway requires completion of a state-approved teacher education program and the passing of state teacher certification assessments (OGET, OSAT, OPTE).<sup>55</sup>
- **Out-of-state certified teachers (reciprocity):** Teachers who have certification in another state may apply with their out-of-state certificate and receive a two-year provisional certificate. After one year of employment in Oklahoma, they may apply for standard certification.
- **Out-of-country certified teachers:** Teachers coming to Oklahoma from another country must have their

<sup>54</sup> 70 O.S. §1-116.

<sup>55</sup> Glossary of certification test acronyms: OGET=Oklahoma General Education Test, OSAT=Oklahoma Subject Area Test, OPTE=Oklahoma Professional Teacher Examination.

credentials evaluated and translated by a state-approved entity. To qualify for certification, applicants must fulfill the following requirements: a bachelor's degree equivalent, valid out-of-country credential and/or statement of good standing from the proper licensing authority of their country, verification of two years' experience in the previous five years, recommendation by a school administrator or education official, criminal history record check and affirmation of competence in spoken and written English. Those who qualify receive a two-year provisional certificate. After one year of employment in Oklahoma, they may apply for standard certification.

#### Non-traditional

- **Alternative certification program:** Individuals with at least a bachelor's degree in a subject other than professional teacher education must meet the prerequisite of a bachelor's degree with a minimum number of college credits or work experience in the available teaching field. Upon passing the OGET and the OSAT, they will receive three years of certification to complete the OPTE and any assigned professional education coursework (e.g., college credit courses in both classroom management and pedagogical principles).
- **Paraprofessionals to Teachers:** Individuals with at least a bachelor's degree and teacher assistant experience who want to teach elementary, early childhood or special education must have a college grade point average of 2.5 and one year of experience as a paraprofessional or a teacher assistant in early childhood, elementary or special

education. Applicants must pass the OGET, OSAT and OPTE in the area of their expertise, at which time they will be issued a one-year provisional certification that can be renewed twice. By the end of their third year of teaching, individuals must have completed 12 hours of assigned coursework to receive a standard teaching certificate.

- **Teach for America:** These individuals with at least a bachelor's degree must be recommended for certification by completing certification requirements of the national Teach for America organization. They receive an initial two-year teaching credential and must meet testing and any other Teach for America requirements to move to a five-year standard certificate.
- **American Board (ABCTE):** These individuals are recommended for certification by completing ABCTE certification requirements. Applicants submit verification of ABCTE certification and are issued a one-year non-renewable certification and must complete the ABCTE mentorship program before receiving a five-year standard certificate.
- **Non-traditional special education (boot camp):** Upon permission of the boot camp provider, individuals attend 150 clock hours of workshops needed to receive a provisional special education certificate. They must have a bachelor's degree and must submit a completion certificate and recommendation from the boot camp provider to be eligible to apply for a one-year provisional certificate. The

certificate can be renewed two times if the individual earns six credit hours of coursework each year. Once a college or university verifies completion of a non-traditional special education program, that individual may apply for a standard certificate.

- **Troops to Teachers:** Veterans with at least a bachelor's degree in a subject other than teacher education must have a bachelor's degree with a college major or work experience in the available teaching field. They must pass the OGET and OSAT to qualify for three years of certification. Within that timeframe, they must complete the OPTE and any assigned professional education coursework to receive a standard certificate.
- **4-year-olds and younger:** These individuals must have at least a bachelor's degree and five years of Head Start experience, hold a child development associate credential and pass the OGET and Early Childhood OSAT to receive a standard certificate.

An individual who wants to be certified as a school administrator in Oklahoma must pursue one of the following routes:

- Complete a state-approved program in Oklahoma and take the appropriately aligned test;
- Provide a copy of a state-issued administration certification from another state;

- If an individual has completed an approved out-of-state certification program but did not acquire certification, he or she may provide verification of the program's completion and pass the appropriately aligned test; or
- Establish a plan of study with an Oklahoma university, take the appropriate test and receive a three-year alternative administration certificate (see Appendix 19).

**4. Improving Skills of Educators (ESEA section 2101(d)(2)(J)):** Describe how the SEA will improve the skills of teachers, principals, or other school leaders in order to enable them to identify students with specific learning needs, particularly children with disabilities, English learners, students who are gifted and talented, and students with low literacy levels, and provide instruction based on the needs of such students.

The various offices of the OSDE – including curriculum and instruction, special education and educator effectiveness – contribute to professional development delivered in an array of formats, such as live workshops, webinars and “PD on Your Plan.”

Resources are continuously being vetted and updated on the OSDE website for access by educators. Specific vetting of open education resources (OER) is underway, as Oklahoma is part of the USDE's #GoOpen campaign. This



initiative encourages states, school districts and educators to use openly licensed educational materials that promote high-quality content, increase equity, save money and empower teachers. Additionally, the OSDE works to ensure educators are aware of professional development requirements in state and federal law and available resources by publishing an annual guide. The required professional development guide for 2017-18 can be found in Appendix 20.

The OSDE is developing a professional development online module system for special education to enhance the ability of teachers to provide effective instruction for students with disabilities. This system will help educators understand how best to support students with disabilities and comply with the requirements of the Individuals with Disabilities Education Act (IDEA).

The OSDE supports these goals specifically for children with disabilities and students with low literacy levels through the implementation of the State Systemic Improvement Plan (SSIP). The special education services division has identified early childhood literacy as its target improvement area and is working to implement six strategies to reach its targeted goal. Several of the strategies focus on professional learning, with goals that emphasize improving the skills of educators to:

- Enhance the literacy skills of students in grades Pre-K through third grade; and
- Implement Individualized Education Programs (IEPs) for students with disabilities in all classrooms.

Both special education and general education teachers are included in all professional learning opportunities through the SSIP.

To address the academic needs of English learners, the OSDE will provide specialized instructional training to include best practices for meaningful content-area instruction, shared strategies for challenging linguistic and cognitive development and focused academic standards and assessments training. A valuable resource available to teachers, principals and other school leaders is the Comprehensive Academic Resource and Training Toolkit (CARTT), which is an online portal of resources.

School districts are required to ensure gifted and talented coordinators and teachers working with gifted students have training. The OSDE supports this requirement by offering a variety of professional learning opportunities, including the summer EngageOK conference, EncycloMedia and the Oklahoma Association for the Gifted, Creative and Talented (OAGCT), all of which offer webinars that are recorded for future viewing. The OSDE is also designing online PD modules to support teachers working with gifted students, the first of which is characteristics of gifted and talented.

In order to address low literacy rates in the state, the OSDE relies on the research findings of the state's Reading Sufficiency Act (RSA). Recent findings point to educators' use of instructional strategies considered best practices, interventions with efficacy and access to reading services and supports as having the greatest impact for struggling readers. Additional research is likely to focus on specific programs that meet student needs and allow for equitable access. Language

Essentials for the Teachers of Reading and Spelling (LETRS) provides robust literacy professional development to educators with a focus on educators' understanding of language structures, students' learning paths to reading and writing and the reasons that some children fail to learn. The OSDE hosts several opportunities for LETRS training throughout the year.

The OSDE is poised to align the state's Teacher Leader Effectiveness (TLE) evaluation system to newly defined professional development that emphasizes sustained, intensive, collaborative, job-embedded, data-driven and classroom-focused educator capacity-building. The evaluation system is rich in professional growth and requires annual growth goals from every educator through individual PL Focus plans. Through professional consultation following observation, those growth goals can be tailored to specific student needs.

It is imperative that the state expand administrator-focused professional learning experiences. Two such programs currently offered are Lead to Succeed (L2S) and Moving UP. A 24-session, intensive series of training, L2S is grounded in curriculum from the National Institute for School Leadership (NISL). Two cohorts of Oklahoma principals and assistant principals have been trained to serve as change agents in their respective schools, with a third cohort to begin in September 2017. Moving UP focuses on equipping assistant and novice principals with skills and supports to assist the transition to head administrator.


**The evaluation system is rich in professional growth and requires annual growth goals from every educator through individual PL Focus plans.**

5. **Data and Consultation (ESEA section 2101(d)(2)(K)):** Describe how the State will use data and ongoing consultation as described in ESEA section 2101(d)(3) to continually update and improve the activities supported under Title II, Part A.

A feature of the OSDE’s state longitudinal data system is the foundation of an educator dashboard to help educators make instructional decisions about their students. In addition, the dashboard will serve as a source of indicators for educator professional growth. The OSDE will provide training to teachers and administrators on how to utilize the dashboard data to make informed instructional decisions. Updating and continuous improvement of Title II, Part A activities will be guided by ongoing consultation with critical stakeholders. These stakeholders include teachers, principals, other school leaders, paraprofessionals, specialized instructional support personnel, charter school leaders, parents, students, tribal representatives, community partners and other organizations or partners with relevant and demonstrated expertise in programs and activities aligning with Title II, Part A.

6. **Teacher Preparation (ESEA section 2101(d)(2)(M)):** Describe the actions the State may take to improve preparation programs and strengthen support for teachers, principals, or other school leaders based on the needs of the State, as identified by the SEA.

Multiple partnerships for recruiting, preparing and retaining educators have formed in an effort to address the severe teacher shortage in Oklahoma. The OSDE’s partnership with educator preparation programs in the state as well as collaboration with the Office of Educational Quality and Accountability and the Oklahoma State Regents for Higher Education are targeting quality preparation.<sup>56</sup>

One such effort is the work through the Network for Transforming Educator Preparation (NTEP), a pilot project delivering college-credit coursework in classroom management and pedagogy to 83 emergency-certified teachers.<sup>57</sup> Another NTEP product is the creation of a data mapping and sharing initiative that informs educator preparation programs of the success their graduates have in the classroom. A more narrowly focused effort is culturally relevant teaching made available to pre-service teachers in educator preparation programs and continued to in-service educators once hired in Oklahoma school districts. 

<sup>56</sup> OEQA: The Office of Educational Quality and Accountability supports high-level student performance by ensuring quality evidence-based educator preparation, improving school efficiency and effectiveness from Pre-K through higher education and providing comprehensive statistical information for all stakeholders.

<sup>57</sup> NTEP: Sponsored by the Council of Chief State School Officers (CCSSO), NTEP emphasizes readiness for teaching and leading.

Stakeholder Recommendations

OSDE Implementation







# E

**Title III, Part A,  
Subpart 1:**

**English Language  
Acquisition  
and Language  
Enhancement**





E. Title III, Part A, Subpart 1:  
English Language  
Acquisition and Language  
Enhancement

The English learner (EL) population in Oklahoma continues to rise, having increased by nearly 10,000 students in fewer than five years. Additionally, more than 180 languages are spoken in the homes of Oklahoma’s schoolchildren. Other than English, the languages most spoken in Oklahoma in order of use are Spanish/Castilian, Vietnamese, Cherokee, Marshallese, Burmese, Hmong, Zomi, Arabic and Chinese. With these challenges in mind, the following strategies are in place to support Oklahoma’s English learner population:

**STRATEGY 1.2**  
Ensure effective implementation of the Oklahoma Academic Standards by using available data to target high-quality, aligned resources to educators.

**STRATEGY 1.3**  
Improve student equitable access to meaningful and diverse pathways that lead to careers and postsecondary opportunities.

**STRATEGY 1.4**  
Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

**STRATEGY 1.5**  
Reduce barriers to equity and close the opportunity and achievement gaps for all students.

**STRATEGY 1.6**  
Enable Oklahoma’s students to benefit fully from digital-age teaching and learning.

**STRATEGY 2.2**  
Provide support and professional learning to increase instructional capacity for teachers and leaders.

**STRATEGY 3.2**  
Strengthen and increase family and community engagement to support student learning.

**STRATEGY 3.3**  
Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

1. **Entrance and Exit Procedures (ESEA section 3113(b)(2)):**  
Describe how the SEA will establish and implement, with timely and meaningful consultation with LEAs representing the geographic diversity of the State, standardized, statewide entrance and exit procedures, including an assurance that all students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State.

ENGLISH LEARNER ENTRY  
PROCEDURES

All students enrolled in a public school in Oklahoma are required to have a home language survey (HLS) completed by the parent or guardian and kept on file by the students’ attending district. The HLS poses three questions about a student’s specific linguistic history:

1. What is the dominant language most often spoken by the student?
2. What is the language routinely spoken in the home, regardless of the language spoken by the student?
3. What language was first learned by the student?

Students whose HLS responses indicate a language other than English on one or more of the three questions should be placement-tested to determine possible need for EL

services. For clarification, while the HLS can assist in identifying those students who may need EL services, it has no bearing on EL status. In order to receive EL services, a student must qualify by taking a placement assessment. Oklahoma currently uses a suite of assessments offered by WIDA. Regardless of responses on the HLS, however, a district is not precluded from assessing a student for placement who may have language barriers and be in need of linguistic support. In these instances, teacher referral and other indicators may be used to initiate placement testing.

The placement tests used are the WIDA Screener, Pre-K Screening Tool (PKST), Kindergarten WIDA-ACCESS Placement Test (K W-APT) or WIDA MODEL adaptive placement assessment. The placement test used is dependent upon the student’s grade level and the current school year semester.

If the student is enrolled at the beginning of the school year, the placement assessment should be given no later than 30 days after enrollment. A student who enrolls at any point after the beginning of the school year should be placement tested within two weeks but not more than 15 days from the date of enrollment. To meet this requirement, the OSDE requires LEAs to sign assurances in the online Grants Management System (GMS).

**Placement testing for Pre-K students:**  
Qualifying Pre-K students take the PKST, an OSDE-created 10-question oral language screener. Students who score 7 or more out of 10 possible points are not considered English learners for the purpose of Title III federal funding, nor are they eligible for EL services

The English learner population in Oklahoma continues to rise; more than 180 languages are spoken in the homes of Oklahoma’s schoolchildren.

during Pre-K. Students who score 6 or fewer out of 10 possible points are considered English learners for the purpose of Title III federal funding and are eligible for EL services. However, all Pre-K students must be screened again in their kindergarten year with the Kindergarten W-APT. The PKST serves as a source of early oral language ability monitoring until students are old enough to be placement tested with the Kindergarten W-APT.

**Placement testing for kindergarten students and first-semester first-graders:** Qualifying kindergartners take only the oral portion (speaking and listening) of the Kindergarten W-APT or Kindergarten MODEL, while first-semester first-graders are administered all four domains of the Kindergarten W-APT or Kindergarten MODEL. At this time, the Kindergarten W-APT and Kindergarten MODEL have not been updated to the new scoring standards shared by the WIDA Screener, Kindergarten ACCESS and ACCESS for ELLs 2.0. Subsequently, all scores on the Kindergarten W-APT and Kindergarten MODEL currently qualify kindergartners and first-semester first-graders for services. Kindergartners and first-semester first-graders also qualify as English learners for the purpose of Title III federal funding.

WIDA is developing a Kindergarten Screener, which will share the updated scoring standards and has an estimated release date of fall 2019. At that time, the WIDA Screener's automatic exit composite score of 4.8 or above or an equivalent score will also be applied to the WIDA Screener for kindergartners and first-semester first-graders. Kindergartners or first-semester first-graders with disabilities

that preclude them from taking all domains of the Kindergarten Screener will need to score 4.8 or above on all domains taken or equivalent scores in order to test as non-EL.

**Placement testing for second-semester first-graders through 12th-graders:** Qualifying students in the second semester of first grade through grade 12 take the appropriate grade level cluster of the WIDA Screener. The WIDA Screener, which is replacing the WIDA-ACCESS Placement Test (W-APT), will be implemented statewide for the first time beginning in 2017-18.

In fall 2017, a district stakeholder committee working in conjunction with the OSDE established a new single cut score for the WIDA Screener. This cut score will go into effect in spring 2018. Students scoring a composite score of 4.8 or above will be considered non-EL and will not enter EL services. Students scoring 4.7 or below will be considered English learners and be coded, served and proficiency-tested as such if/until they test as English proficient.

The WIDA Screener is locally scored by LEA personnel. Local scoring serves as a counterbalance to Oklahoma's plan to utilize a committee to determine the ACCESS for ELLs 2.0 exit criteria for English learners who score within the new proficiency band. Having a single cut score on the WIDA Screener creates a more expedient placement-testing process, ensuring that students tested for potential EL status are identified and served in a timely fashion.

**Waiver of EL services:** Even if a student's score on the Kindergarten W-APT or WIDA

Screener qualifies him or her for EL services, the parent or guardian may choose to waive those services. Each LEA must provide a formal waiver of services for parents or guardians who wish to exempt their children and retain copies of signed waivers. Students whose parents or guardians waive services may not:

- Be enrolled in courses designed specifically for English learners;
- Be pulled out for other EL classes, services or tutoring; or
- Otherwise be active participants in an LEA's EL programming.

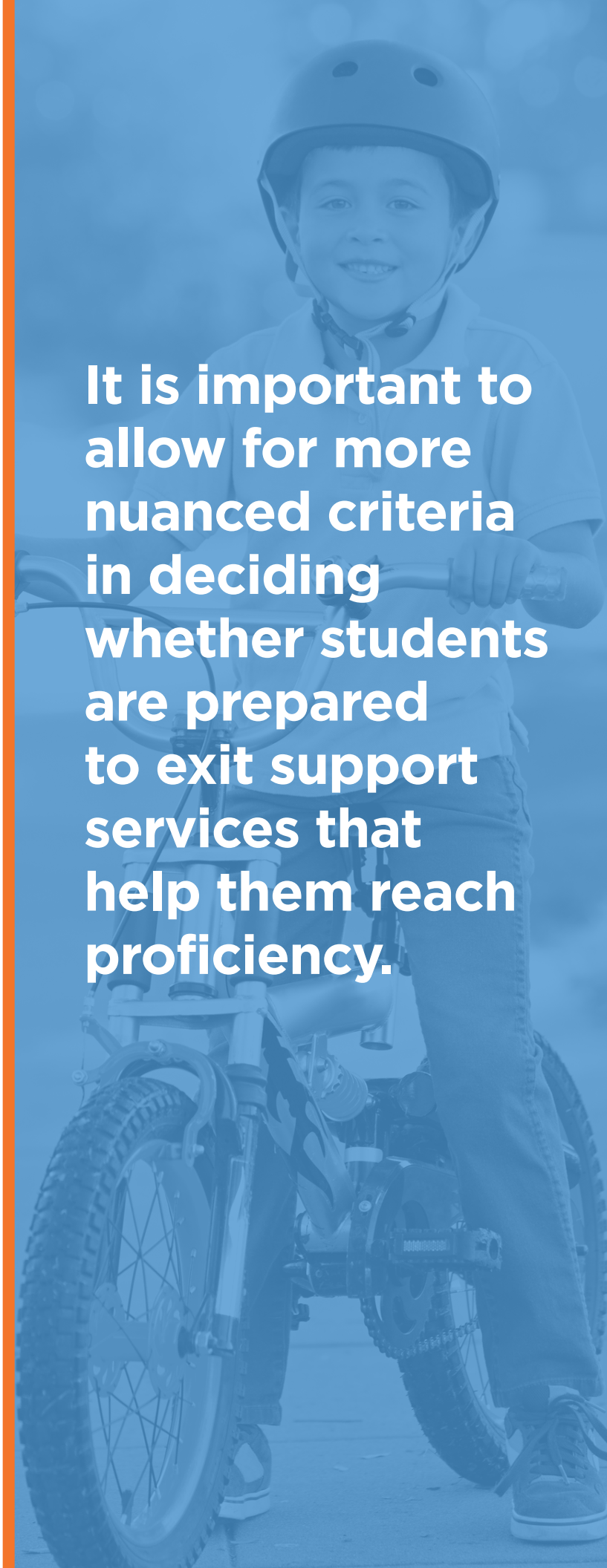
However, students whose parents or guardians waive EL services are not:

- Exempted from designation as ELs;
- Exempted from state bilingual counts or federal Title III counts; or
- Exempted from annual proficiency testing.

## ENGLISH LEARNER EXIT PROCEDURES

In fall 2017, the district stakeholder committee, working in conjunction with the OSDE, also set new exit criteria for Kindergarten ACCESS, ACCESS for ELLs 2.0 and Alternate ACCESS for ELLs. This criteria will go into effect in spring 2018.

**Exit criteria for Pre-K English learners:** Pre-K students do not take a spring proficiency assessment and therefore are not eligible to exit EL services.



**It is important to allow for more nuanced criteria in deciding whether students are prepared to exit support services that help them reach proficiency.**



**Exit criteria for kindergarten English learners:** Kindergarten students will exit EL services by testing as proficient in all four language domains on the Kindergarten ACCESS at the end of kindergarten or by testing as proficient on the ACCESS for ELLs 2.0 at the end of first grade. LEAs determine whether kindergartners take all four domains of the Kindergarten ACCESS or only the oral portion. If only the oral portion is taken, kindergartners will not have an opportunity to test as proficient until spring of their first-grade year, at which time they will take all four domains of ACCESS for ELLs 2.0. The exit criteria for Kindergarten ACCESS is the same as that listed for ACCESS for ELLs 2.0.

**Automatic exit for grades K-12:** English learners in grades K-12 with a composite score of 4.8 or above on the Kindergarten ACCESS or ACCESS for ELLs 2.0 will automatically be reclassified as English proficient and exited from EL services.

**Exit criteria for grades 3-12 English learners:** English learners in grades 3-12 whose composite scores are above 4.7 on the ACCESS for ELLs 2.0 will automatically be exited from EL services, while English learners scoring below 4.3 will not be eligible for reclassification and exit. English learners whose composite scores fall into an ELP band of 4.3-4.7 will be potentially eligible for reclassification and exit based on the decision of a district-level academic team using state-level criteria. To be reclassified as English proficient and exit EL services, a student must:

- Meet the criteria set forth by the rubric; and
- Be recommended for reclassification and exit by an EL representative.
- When applicable, the student’s IEP team should participate in the district-level academic team decision on whether to retain or exit the student from EL services.

Under Oklahoma’s definition of English language proficiency, an English learner who is proficient in English can:

- Meet proficiency on state assessments;
- Successfully achieve in classrooms where the language of instruction is English; and
- Be on track to meet Oklahoma’s college- and career-ready standards.

Since these are ambitious criteria, it is important to allow for additional, more nuanced criteria in deciding whether students falling within the English language proficiency bands for these assessments are prepared to exit support services that help them meet these challenging proficiency criteria.

**Alternate ACCESS for ELLs eligibility criteria:** To be eligible for the alternate assessment, students must:

- Have severe cognitive disabilities;

- Take the alternate assessment for their state content-area assessment; and
- Have been identified by their IEP team as meeting the requirements for Alternate ACCESS for ELLs testing set by the WIDA consortium.

**Automatic exit criteria for grades 1-12 (Alternate ACCESS for ELLs):** English learners in grades 1-12 with a composite score of P2 for two consecutive test years will automatically be reclassified as English proficient and exited from EL services.

**Exit criteria for grades 3-12 English learners (Alternate ACCESS for ELLs):** English learners in grades 3-12 scoring below A3 will not be eligible for exiting EL services, while English learners scoring above P1 for two consecutive test years will be exited automatically from EL services. English learners with a composite score within the ELP band of A3-P1 for two consecutive test years will potentially be eligible for reclassification as English proficient and exiting EL services based on the decision of a district-level academic team. To be reclassified and exit services, the team must determine that the student met the criteria set forth by the rubric, and the student must receive a recommendation from an EL representative. The student’s IEP team must also recommend reclassification.

**Alternate exit criteria for grades 1-12 (Alternate ACCESS for ELLs):** English learners in grades 1-12 who are eligible for the Alternate ACCESS for ELLs and whose

composite scores do not progress, even incrementally, for three consecutive test years will be eligible to exit if the EL representative and IEP team agree that the student should be reclassified and exited from EL services. This structure is to ensure that English learners with severe cognitive disabilities are not retained in EL services past the point at which it meets their unique needs.

**Consecutive Test Years:** For all of the above scenarios, test scores from consecutive years must be used in the determination to exit a student. Test scores will be considered non-consecutive if testing did not take place due to the following circumstances:

- The student spent extended time away from U.S. schools, which included the testing period;
- The student was absent during the entire testing period, including make-up dates;
- The student was not enrolled in school during the testing period; or
- The student was enrolled in a state that is not a member of the WIDA consortium and as a result did not take Alternate ACCESS for ELLs.

**No Measurable Academic Response criteria:** In addition, Oklahoma will establish criteria to allow students with severe cognitive disabilities who qualify to take the Alternate ACCESS for ELLs to be evaluated by a district-level team, including the IEP team, for potential classification as having No Measurable Academic Response (NMAR).



# Oklahoma’s definition of English language proficiency is ambitious, requiring students to be on track to meet Oklahoma’s college- and career-ready standards.

ACCESS for ELLs 2.0 and Alternate ACCESS. These English language proficiency domain bands will be used only for English learners with disabilities that preclude them from taking one or more domains of the WIDA Screener, WIDA MODEL, Kindergarten ACCESS, ACCESS for ELLs 2.0 or Alternate ACCESS for ELLs. At this time, WIDA has not established a means of calculating scores for students who cannot take all four domains (speaking, listening, reading and writing) preventing English learners with disabilities from exiting EL services. English learners who potentially could exit services as a result of setting proficiency domain bands include but are not limited to those who are blind, deaf and/or those who communicate using only sign language.

taken will not be eligible for reclassification and exit. English learners scoring in an ELP band of 4.3-4.7 on all domains taken will be potentially eligible for reclassification and exit based on the decision of a district-level academic team using state-level criteria. To be reclassified as English proficient and exit EL services, a student must:

- Meet the criteria set forth by the rubric; and
- Be recommended for reclassification and exit by an EL representative.

When applicable, the student’s IEP team should participate in the district-level academic team decision on whether to retain or exit the student from EL services.

**Automatic exit criteria for English learners who cannot take all domains (WIDA Screener, WIDA MODEL, Kindergarten ACCESS and ACCESS for ELLs 2.0):**

Students who are not able to take all four domains due to a disability will be considered non-EL and will not enter EL services if they score 4.8 or above on all domains taken. Students scoring 4.7 or below on any domain taken will be considered English learners and be coded, served and proficiency-tested as such if/until they test as English proficient.

**Exit criteria for English learners in grades 3-12 who cannot take all domains (ACCESS for ELLs 2.0):** English learners in grades 3-12 scoring above 4.7 on all domains taken on the ACCESS for ELLs 2.0 will automatically be exited from EL services, while English learners scoring below 4.3 on any domain

**Automatic exit criteria for English learners in grades 1-12 who cannot take all domains (Alternate ACCESS for ELLs 2.0):** English learners in grades 1-12 scoring P2 on all domains taken for two consecutive test years will automatically be reclassified as English proficient and exited from EL services.

**Exit criteria for English learners in grades 3-12 who cannot take all domains (Alternate ACCESS For ELLs):** English learners in grades 3-12 scoring below A3 on any domain taken will not be eligible for exiting EL services, while English learners scoring above P1 on all domains taken for two consecutive test years will automatically be exited from EL services. English learners scoring within the ELP band of A3-P1 on all domains taken for two consecutive

The criteria for this classification is as follows:

- The student is unable to demonstrate any observable reaction to a specific stimulus;
- The student exhibits only startle responses;
- The student tracks or fixates on objects at random and not for a purpose;
- The student moves or responds only to internal stimuli; and
- The student vocalizes intermittently regardless of changes in environment.

To classify a student as NMAR, the student’s academic team must agree that he or she meets all five of the criteria. The decision to classify a potential English learner as having NMAR must be revisited at the beginning of

each academic year by the student’s IEP team.

These criteria will prevent students classified as NMAR from being subjected to environments and testing situations that may cause undue stress. Additionally, districts will not be penalized in the accountability system because NMAR students are failing to progress in reaching English proficiency. Students who qualify for NMAR status should not be coded, counted, served or tested as English learners in any year in which they are deemed to meet NMAR criteria.

**Placement and exit criteria for English learners with disabilities who cannot take all ELPA domains:** In 2017-18, the district stakeholder committee will help determine English language proficiency bands for each individual domain of the WIDA Screener, WIDA MODEL, Kindergarten ACCESS,

test years will potentially be eligible for reclassification as English proficient and exiting EL services based on the decision of a district-level academic team. In order to be reclassified and exit services, the team must determine that the student met the criteria set forth by the rubric, and the student must receive a recommendation from an EL representative. The student's IEP team must also recommend reclassification.

**Alternate exit criteria for English learners in grades 1-12 (Alternate ACCESS for ELLs):** English learners in grades 1-12 who are eligible for the Alternate ACCESS for ELLs and whose scores on all domains taken do not progress, even incrementally, for three consecutive test years will be eligible to exit if the EL representative and IEP team agree that the student should be reclassified and exited from EL services. This structure is to ensure that English learners with severe cognitive disabilities are not retained in EL services past the point at which it meets their unique needs.

**Monitored English learners:** All English learners who have tested as proficient on the Kindergarten ACCESS, ACCESS for ELLs 2.0 or Alternate ACCESS for ELLs are exited from active EL services and are no longer eligible to be counted for Title III federal funding. However, these students must be monitored for four years (or until high school graduation, whichever comes first) after testing as proficient. Monitored students qualify to exit their monitored EL designation and all services and accommodations of the EL program at the end of the four years. During that four-year

monitoring period, the OSDE requires LEAs to establish various forms of communication among parents, teachers and students (e.g., written communication, online data systems, conferences, etc.) to ensure that parents are informed about students' academic progress and need for services and interventions.

**State testing accommodations for monitored English learners:** If monitored English learners who have exited EL services score as proficient or advanced on state content-area testing in the same year they test as proficient on the ACCESS for ELLs 2.0 or Alternate ACCESS for ELLs, no accommodations will be provided on state assessments the following year or in subsequent years.

By contrast, if monitored English learners do not score proficient or advanced on state content-area testing but test as proficient on the ACCESS for ELLs 2.0, state testing accommodations will still be made available the following year. Accommodations will be offered again in the second year of monitoring if the student still does not test as proficient or advanced.

If monitored English learners score as proficient in the first monitored year while receiving accommodations on state content-area testing, the decision of whether to extend or discontinue accommodations for an additional year will be made by a district academic team using the state-determined criteria. No monitored student will be eligible for state testing accommodations after the first two years of the monitoring period.

This provisional extension of state EL testing accommodations for the first two years of the four-year monitoring period is based on the accepted language acquisition theory that acquiring English language proficiency takes students an average of four to seven years. While Oklahoma is setting ambitious targets for its English learners with a five-year timeline to proficiency, the provisional extension of state testing accommodations during the first two years of the monitoring period acknowledges that previously classified students may take an additional year or two to solidify their English proficiency skills, particularly as cumulative content-area information and tasks mount.

**Reclassification of monitored English learners:** In the event that a monitored student does not score proficient on state content-area testing during the first two years of the four-year monitoring periods, he or she may become eligible for reclassification as an English learner. This potential reclassification will be determined based upon three criteria:

- Failure to achieve proficiency on state content-area testing for two consecutive years following the student testing as proficient on the Kindergarten ACCESS, ACCESS For ELLs 2.0 or Alternate ACCESS for ELLs and exiting from EL services;
- District academic team evaluation of additional academic criteria – to be determined in 2017-18 by the OSDE working in conjunction with the district stakeholder committee – and, if the decision is made to retest; and

- Testing as needing EL services when a WIDA placement test is administered.

**Transfer of EL records:** When an English learner or monitored English learner transfers districts, LEAs must ensure that the following documents are included in the transfer of student records:

- Home language survey;
- English Language Academic Plan (ELAP), if a current EL student; and
- Monitoring documents, if applicable.

**District stakeholder team input:** The OSDE is in frequent collaboration with two statewide Title III, Part A consortia. These groups are comprised of LEAs representing the geographic and cultural diversity of Oklahoma. The Central Oklahoma Title III consortium meets monthly during the school year to discuss issues in EL education, while the Northeast Oklahoma Title III consortium meets three to four times annually.

Both consortia are valuable collaboratives focused on fostering state and local resources and partnerships. Along with other district EL stakeholders, members of both consortia will be included on task forces in 2017-18 as the OSDE determines EL services. Discussion regarding placement and exit procedures for English learners is ongoing and a standing topic within the consortia.



## 2. SEA Support for English learner Progress (ESEA section 3113(b)(6)): Describe how the SEA will assist eligible entities in meeting:

### i. The State-designed long-term goals established under ESEA section 1111(c)(4)(A)(ii), including measurements of interim progress towards meeting such goals, based on the State's English language proficiency assessments under ESEA section 1111(b)(2)(G); and

Oklahoma's ambitious long-term goal for the English learner graduation rate is 90% by 2025. This goal requires a growth rate of 3.6% annually, higher than that of any other student group.

Tools and forms to provide information and guide EL processes and procedures will be developed or updated as needed and shared with districts. The OSDE will also offer professional development designed to aid districts in the following:

- Transitioning to new state content-area testing;
- Understanding state testing accommodations for English learners;
- Transitioning from the W-APT to the WIDA Screener;
- Understanding the updated scoring standards for ACCESS for ELLs 2.0;

- Using appropriate programming, instructional strategies and academic supports to prepare English learners for state content-area testing and ELPA testing; and
- Understanding changes to policies and guidance under ESSA regarding EL accountability, state content-area testing and ELPA testing, once established.

The OSDE is continually working to streamline the processes related to both the administrative and instructional needs of English learners. When fully implemented, the following strategies will better support the work of local administrators and educators to ensure English learners receive the educational supports necessary for EL progress toward growth on both interim and long-term state goals.

1. The OSDE assists LEAs in developing and implementing district-level Language Instruction Education Programs (LIEPs). Any district that has enrolled students who qualify as English learners must complete and submit an LIEP. LIEPs outline the specific programming provided by LEAs to help English learners overcome language barriers and succeed academically.
2. The OSDE assists LEAs in identification, placement and development of student English Language Academic Plans (ELAPs). Proper identification and placement of English learners based on their English language proficiency level helps students work diligently toward meeting the challenging state academic

standards, thereby advancing toward the long-term goal. The OSDE hosts a series of webinars to address the basic requirements and responsibilities of new EL testing coordinators and program directors; the administrative components of EL education, including the English learner identification processes packet, proper student information coding of English learners in local student information systems and the development of student ELAPs.

3. The OSDE, in conjunction with the state English language proficiency assessment (ELPA) provider, WIDA, offers training opportunities for successful implementation of the state ELP assessment, which will lead to proper student placement. Within the scope of the contract, the state receives the option of selecting various professional development opportunities reflecting both assessment administration and instructional aspects of EL education. The state works to allocate available professional development to address

both of these areas. The state partners with WIDA for professional development focusing specifically on successful implementation of the EL placement and proficiency assessments due to the relative complexity of the ELPA process and the ongoing need for training among less-experienced staff working with EL assessment at the local level. Professional development is also provided for supports for greater efficacy in EL instruction. The OSDE approves training after collaboration with the state consortium of EL directors in order to identify how those areas of greatest need can best be addressed.

4. The OSDE intends to enhance capacity to provide EL instructional support to teachers, offering specific content-area instructional resources. To better address the academic needs of English learners in Oklahoma, and to help them work toward meeting the state's long-term and interim goals, tailored training will be provided to the individual needs of an LEA by:

Oklahoma's ambitious long-term goal for the English learner graduation rate is 90% by 2025. This goal requires a growth rate of 3.6% annually, which is higher than that of any other student group.



- Directly assisting classroom teachers in adopting best practices to provide meaningful content-area instruction to English learners;
- Recognizing the 3.6% growth rate required to meet the state’s long-term goal for graduation by resourcing well-equipped EL instructors who understand the state’s rigorous academic standards and the accompanying assessments as well as the ability to connect English learners to career pathways that are meaningful to both students and the community; and
- Sharing strategies on challenging linguistic and cognitive development of English learners to help them reach their full academic potential.

### ii. The challenging State academic standards.

The OSDE’s priority is to ensure that English learners and immigrant students are provided effective and equitable instructional programs designed to assist them in meeting challenging state academic standards. In assisting LEAs to meet these standards, Oklahoma expects to see significant progress toward its long-term goals for EL academic achievement and graduation rate.

In response to LEA requests for additional learning opportunities regarding their English learner and immigrant populations, the OSDE office of federal programs hosts an annual state EL academy at the

beginning of each school year to educate and inform LEA staff about best practices in serving these students. The ultimate goals are to create greater understanding of what constitutes an EL and immigrant program at the LEA level and to foster greater communication and collaboration between the OSDE and the LEAs and among LEAs themselves.

The focus of the EL academy will be on providing:

- Instructional strategies for all teachers – regardless of grade level or content area – on working with English learners to improve their language acquisition and academic achievement, particularly addressing the ambitious graduation rate goal of 90% by 2025;
- Strategies for all school leaders (including counselors, principals and superintendents) on meeting the academic, social and emotional needs of English learners;
- Strategies for parent and family engagement that will help English learners to not only reach fluency in English but to also increase student retention and graduation; and
- Increased teacher awareness of the cultural and linguistic wealth English learners bring into the classroom.

The EL academy will also address guidance regarding the expenditure of Title III, Part A funds, meeting federal requirements and accessing funds through the state GMS.

**Figure 17: Eight Modules of CARTT for English Learners**



The OSDE will also create a series of webinars that addresses issues regarding state English learners and immigrant students. To reach LEA staff unable to attend the EL academy, the office of federal programs will create informational webinars outlining the major components of EL and immigrant education. Initially, the webinar series will address and discuss the 2017-18 Home Language Survey. Subsequent webinars will include but not be limited to the Bilingual Count Verification and English Learner Identification Processes packet, proper student information coding of English learners, and a discussion of the responsibilities of new EL testing coordinators and program directors.

In addition, the office of federal programs will release an annual survey in which LEAs can suggest additional webinar topics. As with the state EL academy meeting, the goal is to better support successful EL and immigrant services at the LEA level by providing guidance on how those local

programs should appear and by addressing deficiencies in knowledge as they are identified.

The OSDE also provides administrative support that indirectly impacts EL performance on challenging state academic standards. Administrative support comes primarily through events such as the EngageOK summer conference and the Joint Federal Programs Summit. These annual events provide the opportunity to train administrative staff regarding updates to federal policy related to EL instruction and operation of state-level systems and to gather feedback to address specific, district-level concerns. These events also allow district and site-level staff to interact directly with state program-area experts, clarifying the expectations and requirements of federal law and the mechanisms in place at the state level that allow the expenditure of supplemental Title III, Part A federal funds.

In addition to the professional development opportunities described above, the OSDE maintains a robust online portal of resources for state educators unable to take advantage of face-to-face training sessions. Both the Comprehensive Academic Resource and Training Toolkit (CARTT), shown in Figure 17 and the Title III, Part A section of the OSDE website contain resources for educators to use to inform and supplement EL instruction, procedures and guidance.

The OSDE has community partners, such as the Oklahoma Foundation for Excellence, to extend support to English learners by equipping EL teachers with the necessary knowledge and skills to effectively instruct English learners. This foundation has provided professional development support to teachers and is considering additional creative means for high-quality professional learning, including a focus on graduation rates.

In addition, in 2015 the OSDE served as the SEA partner to the University of Central Oklahoma (UCO) in applying for a national professional development grant through the U.S. Department of Education’s Office of English Language Acquisition. The following year, UCO was awarded a five-year, \$2.5 million grant. That grant provides funding for Project ENGAGE (Equipping a New Generation for Academic Growth and Excellence) and will support professional development for Oklahoma City-area educators of English learners, with an objective to increase the number and quality of teachers who serve

English learners. Project ENGAGE aims to improve instructional services for English learners – particularly for those in low-income, high-poverty schools – and to provide professional learning for teachers working in dual language programs. Project administrators estimate that approximately 4,500 pre-service and 10,746 in-service teachers will take part.

**3. Monitoring and Technical Assistance (ESEA section 3113(b)(8)): Describe:**

**i. How the SEA will monitor the progress of each eligible entity receiving a Title III, Part A subgrant in helping English learners achieve English proficiency; and**


Oklahoma monitors all LEAs in the state, including Title III, Part A subgrantees, in their ability to transition English learners toward English language proficiency through student scores on both the Oklahoma School Testing Program (OSTP) state content assessments and the state ELPA. These scores are then factored into the state accountability system to identify those schools in need of additional assistance. LEAs are required to provide EL services to those students who qualify. These students, while classified as English learners, still participate in OSTP as non-EL students, although English learner scores are not counted for site accountability for the first two years of enrollment in the United States.

**ii. The steps the SEA will take to further assist eligible entities if the strategies funded under Title III, Part A are not effective, such as providing technical assistance and modifying such strategies.**

The OSDE provides further assistance to LEAs serving English learners, including Title III, Part A subgrantees when current strategies are determined to be insufficient based on state assessment data.

Schools identified for targeted support and improvement (TSI) will receive supplemental funding and will be required to complete a Nine Essential Elements Needs Assessment as part of developing a TSI plan. This plan will require sites to identify evidence-based strategies and interventions focused on the needs of the lowest-performing English learners. TSI schools will be provided technical assistance and support by the OSDE office of school support throughout the designation cycle with an increase in support for sites that do not meet exit criteria after the first year. Sites with a TSI designation that do not meet exit criteria over a three-year period will receive a comprehensive support and improvement (CSI) designation.

Schools identified for CSI are those whose English learners’ performance levels are in the bottom 5% in the state in ELA and/or math based on the OSTP and who do not demonstrate a statistically significant positive growth trajectory in either or both of these subject areas (depending

upon which subject-area metric initially determined their designation) over a three-year period. If EL performance is identified as a factor in CSI designation, a percentage of the first-year supplemental assistance money received by the site should be used to implement an intervention targeted at EL growth as part of a consistent schoolwide plan of improvement required to be completed for every year the school maintains the designation. Schools receiving a CSI designation are provided specific growth targets calculated by the state that reflect those student groups in need of intervention. These schools continue to receive the individualized evidence-based intensive supports and interventions until their growth targets are met and they are no longer classified as CSI schools. 

Stakeholder Recommendations

OSDE Implementation

When asked how the OSDE can help teachers and leaders serve English learners, respondents emphasized the need for direct services to students and families through engagement.



The OSDE will champion wrap-around services and purposeful two-way communication to best equip English learners for success in school and beyond.

When asked how the OSDE could improve equity for English learners, stakeholders indicated that ELPA exit criteria be set for both English learners with severe cognitive disabilities who take the Alternate ACCESS for ELLs and for English learners with disabilities that preclude them from taking all four domains of the ACCESS for ELLs 2.0. Often English learners with disabilities are retained in EL programs indefinitely due to a lack of exit guidance. Additionally, stakeholders expressed that they believe the assessment of some students with the most severe cognitive disabilities was inappropriate because it was not producing any measurable academic response.



The OSDE will work with stakeholders to set English language proficiency bands for both groups of English learners with disabilities, ensuring that the exit criteria are rigorous but equitable. The OSDE will adopt guidelines to allow districts to evaluate English learners with severe cognitive disabilities for No Measurable Academic Response (NMAR) status on a yearly basis. Students with NMAR status will be exempted from Alternate ACCESS testing for a given year if they are found to be unable to respond meaningfully in any language. Finally, the OSDE will adopt exit criteria and guidelines for English learners who take the Alternate ACCESS for ELLs, have not increased their proficiency level for three consecutive years and have IEP and EL teams who feel they have reached their language achievement threshold.

When asked about equity concerns related to English learner placement testing, respondents suggested that students who indicate that they speak a language other than English “less often” on the HLS and have proficient or advanced state content-area test scores or NRT Reading scores above the 35th percentile no longer be exempt from placement testing. Respondents felt that content-area test scores were not a reliable indicator and that students influenced by another language may not necessarily need language services.

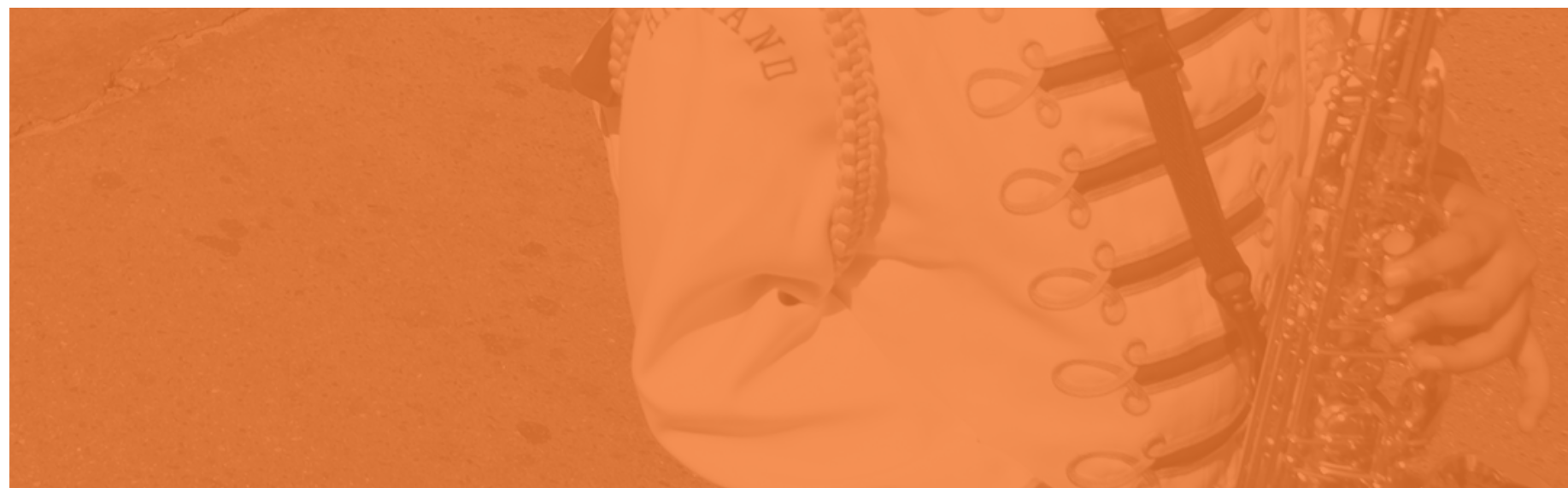


The OSDE will implement new guidelines directing that all students whose HLS indicates a language other than English on any one of the three primary HLS questions should be placement-tested for EL services. The OSDE will create and distribute additional guidance to support districts in interpreting HLS and making decisions regarding EL placement testing and services.





# **Title IV, Part A: Student Support and Academic Enrichment Grants**



## F. Title IV, Part A: Student Support and Academic Enrichment Grants

The OSDE recognizes that a holistic approach to the Student Support and Academic Enrichment (SSAE) grants is necessary to effectively improve students' academic achievement by improving the capacity of LEAs, schools and local communities to:

- Provide all students with access to a well-rounded education;
- Improve school conditions for student learning; and
- Improve the use of technology in order to improve the academic achievement and digital literacy of all students.

The funds available under this title are well aligned to the following components of the OSDE 8-Year Strategic Plan:

### STRATEGY 1.1

Focus on early childhood education.

### STRATEGY 1.3

Improve student equitable access to meaningful and diverse pathways that lead to careers and postsecondary opportunities.

### STRATEGY 1.5

Reduce barriers to equity and close the opportunity and achievement gap for all students.

### STRATEGY 1.6

Enable Oklahoma's students to benefit fully from digital-age teaching and learning.

### STRATEGY 2.3

Provide district and school leaders with the training and support needed to improve instruction in their schools.

### STRATEGY 3.2

Strengthen and increase family and community engagement to support student learning.

### STRATEGY 3.3

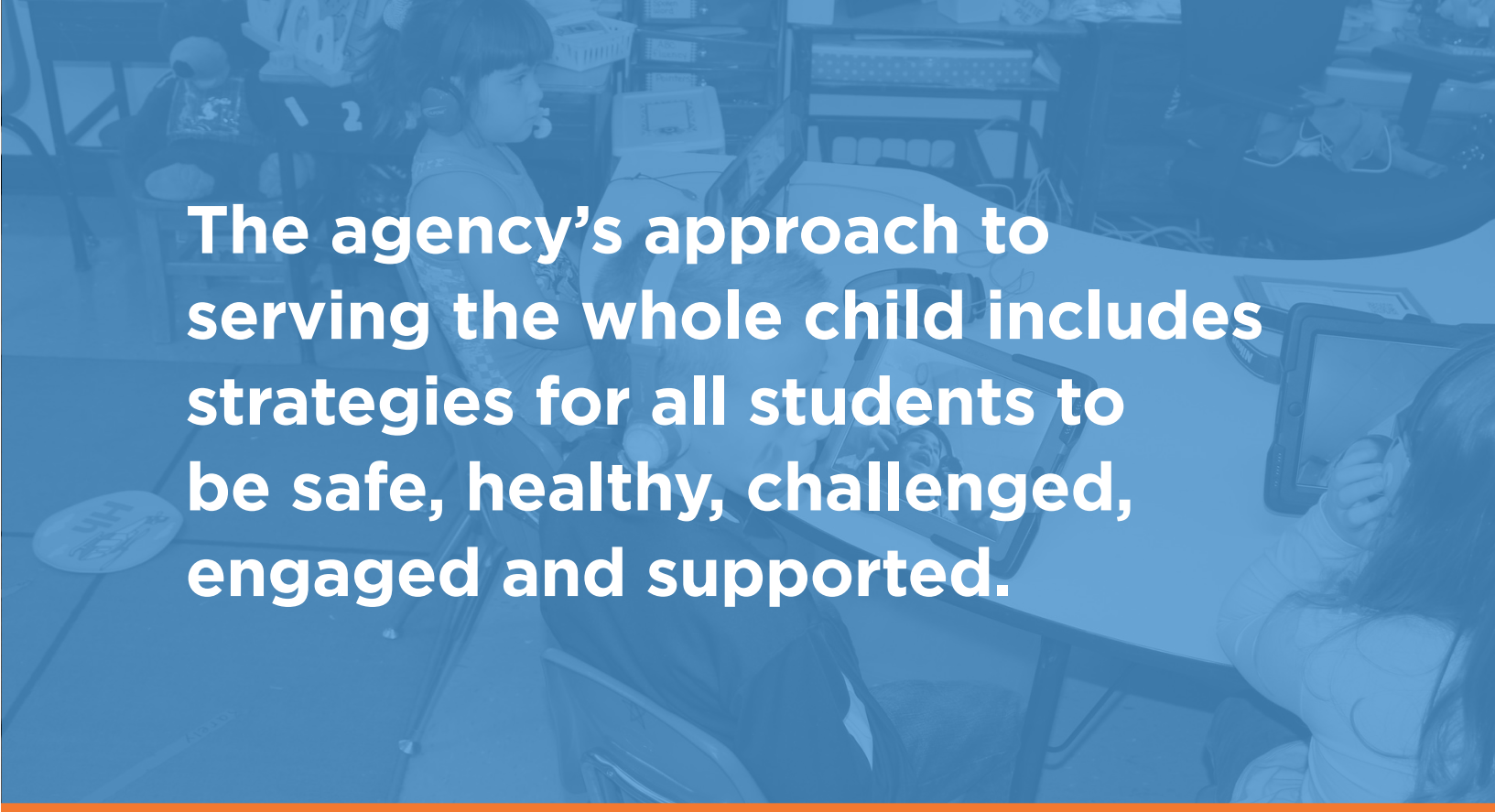
Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

### STRATEGY 4.2

Leverage technology systems and governance collaboration to improve access to data while protecting student information, allowing the OSDE and districts to make data-informed decisions.

To leverage these title funds to enhance the current work in Oklahoma, state activities must be designed to build a shared understanding of the complex system that helps to serve the whole child. Monitoring, technical assistance and training must be built in a manner that creates support structures to:

- Improve capacity;
- Identify and eliminate barriers to the coordination and integration of programs; and



The agency's approach to serving the whole child includes strategies for all students to be safe, healthy, challenged, engaged and supported.

- Increase the cooperation of funding streams and resources across agencies, schools and community-based services and programs.

As the OSDE is committed to the pursuit of leveraging out-of-school time, utilizing the collective power of stakeholders will be critical to ensure success in meeting students' academic, social and emotional needs. The OSDE believes that the Whole Child Tenets provide a meaningful perspective that helps to orient the work of the agency and the funds received under this title.<sup>58</sup> The agency's approach to serving the whole child is based on the Association of Supervision and Curriculum Development and Centers for Disease Control's Whole Child, Whole School, Whole Community model that includes the following strategies for all students to be safe, healthy, challenged, engaged and supported:

- Each student enters school healthy and learns about and practices a healthy lifestyle;
- Each student learns in an environment that is physically and emotionally safe for students and adults;
- Each student is actively engaged in learning and connected to the school and broader community;
- Each student has access to personalized learning and is supported by qualified, caring adults; and
- Each student is challenged academically and prepared for success in college or further study and for employment and participation in a global environment.

<sup>58</sup> "Whole Child Tenets," Association of Supervision and Curriculum Development, [www.ascd.org/whole-child.aspx](http://www.ascd.org/whole-child.aspx).



# 1

## **1. Use of Funds (ESEA section 4103(c)(2)(A)): Describe how the SEA will use funds received under Title IV, Part A, Subpart 1 for State-level activities.**

Building strategies to serve the whole child provides the right opportunity to coordinate federal funds with state and local dollars at the agency and LEA level. To address varying needs of all students, funds across the titles of ESEA can be braided with funding streams from other agencies for a more comprehensive approach. One element not subject to braiding is Title VI: Indian Education Formula Grant Funding, which is considered isolated funding targeting cultural and academic support for Native students.

Braiding is a funding and resource allocation strategy that taps into existing categorical funding to support unified initiatives in a manner as flexible and integrated as possible. Unlike blended funding, braided funding streams remain visible and are used in common to produce greater strength, efficiency and/or effectiveness. This approach allows closer tracking of resources for accountability to state and federal administrators, which in turn contributes to the initiatives' long-term sustainability.

The OSDE envisions partnering with all programs in relationship with the ESSA to foster collaboration and coordination – including within the OSDE and outside agencies – to braid funding to educate the whole child. The agency has created a

committee with representatives from the Oklahoma Department of Rehabilitation Services, Oklahoma State Department of Health, Oklahoma Department of Human Services, Oklahoma Department of Mental Health and Substance Abuse Services, Oklahoma Department of Career and Technology Education and the Oklahoma Office of Workforce Development to identify possible funding streams for collaboration that guide students to become productive within the Oklahoma workforce.

Research has consistently demonstrated the value of spending time in enrichment activities and courses for developing critical thinking, problem-solving, teamwork, creativity and communication skills. In the arts, for example, research has shown that integration of arts programming can increase academic achievement and narrow or eliminate the achievement gap among students.<sup>59</sup> Increasingly, these skills are developed during time away from school, emphasizing the importance of the OSDE initiative of leveraging out-of-school time and the collective power of stakeholders.

Additionally, the OSDE is actively seeking funds to implement an Oklahoma Young Scholars program, capturing research and best practices for identifying and nurturing gifted potential in all populations through a focus on talent development. This effort stems from a need to better identify gifted and talented students in underrepresented populations in Oklahoma such as Native American, Hispanic and African American. A key goal within this program is

nurturing gifted potential so that students are prepared to engage in challenging subject matter and rigorous courses in elementary, middle, high school and beyond. An additional goal includes quality gifted education professional development for Oklahoma teachers.

The OSDE plans to take advantage of the opportunity to transfer its Title IV set-aside funds (4%) to Title II, Part A to support efforts to remedy the state's ongoing and historic teacher shortage. However, the state will also pursue efforts in Title IV, Part A key areas that have little to no cost to the state.

For example, Oklahoma will develop a process for defining, identifying and supporting Programs of Distinction. These structures will be designed with the intent to encourage LEAs to focus on well-rounded educational efforts for students instead of a continuing exclusive focus on English language arts, mathematics and science driven by state testing and accountability.

The OSDE – in cooperation with LEAs and relevant agencies and organizations – will develop Program of Distinction rubrics that meaningfully incorporate activities supporting well-rounded educational opportunities. Borrowing an example from similar programs in other states – such as the PEP Award for world language programs in Pennsylvania<sup>60</sup> – these rubrics will include a set of indicators providing LEAs the ability to submit evidence that, in turn, allows for statewide public recognition through the state accountability reporting dashboard.

The state plans to begin with rubrics for the following areas: world languages, social studies/civics, the fine arts, physical education/health, digital-age technology, advanced coursework and Science Technology Engineering Mathematics and Computer Science (STEM+C). Potential model rubrics are reflected in Appendices 21 and 22.

All LEAs will have the opportunity to submit evidence to the OSDE every three years to demonstrate their level of distinction: bronze, silver or gold. Allowing LEAs the opportunity to submit evidence on their locally developed programs also strengthens school choice by providing Oklahoma families with additional and important information as they make decisions about the education best for their child.

Under its well-rounded activities, the state is also piloting the creation of Networked Improvement Communities (NICs) to help create more targeted support to districts that pursue improvements in common indicators. The OSDE will bring together relevant agencies, organizations and expertise to help LEAs and consortia consider how to reduce duplications of effort while leveraging wise and promising practices. These working groups will produce research practice partnership briefs to help communicate innovative approaches in their respective areas.

The OSDE will regularly gather participating LEAs and consortia (both virtually and in person) to share practice-based evidence that shows promise statewide to positively impact the identified indicators.

<sup>59</sup> Willona M. Sloan, "Making Content Connections Through Arts Integration," *Education Update/ASCD* Vol. 51, No. 3 (2009).

<sup>60</sup> "2017 PEP Rubric," Pennsylvania State Modern Language Association (PSMLA), <http://www.psmla.net/pep-awards>.



# Research has shown that integration of arts programming can increase academic achievement and narrow or eliminate the achievement gap among students.

Oklahoma's commitment to enrichment of the whole child encompasses an array of other approaches. The OSDE has partnered with the Oklahoma School Security Institute and the Department of Mental Health and Substance Abuse to offer Crisis Team Trainings to schools across Oklahoma. In 2016-17, the partnership offered 11 day-long training sessions in five regions of Oklahoma. As a result, nearly 1,000 administrators, counselors, school resource officers, nurses, teachers and other staff members received training that enables schools to have a safer response to various emergency crises. These same entities are committed to offering the training again in the 2017-18 school year.

After the OSDE held a Student Advisory Council meeting on bullying in January 2017, it was clear that participating students, staff and parents believed students could make a meaningful difference through a movement of kindness across Oklahoma to improve school climate, strengthen mental health and reduce bullying. The Oklahoma Kindness Project was born as a result. Through the project, schools will be encouraged to participate in a variety of initiatives incorporating different academic curricula. For example, students could participate in kindness-related art projects or study the kind acts of others that changed the world (e.g., the civil rights movement) as a social studies element.

Another statewide initiative that the OSDE offers is training to identify and meet the needs of at-risk students, students with

mental illness or those who have experienced trauma. These trainings are offered through in-person and webinar formats for all educators, who also have the option of requesting training at their school sites. These trainings are a prime example of educating the whole child by addressing challenges that could prevent learning in the classroom.

Finally, the OSDE will provide guidance and collaborative opportunities to promote the effective use of technology that increases the likelihood of preparing all Oklahoma students for the future workforce. Specifically, the agency will support districts in vetting digital resources and aligning their curriculum to close equity gaps. In efforts to build capacity both in computer science and open instructional materials, the OSDE encourages schools and districts creating and curating instructional materials to make use of the exciting #GoOpen campaign, of which Oklahoma is a partner state.

## 2. Awarding Subgrants (ESEA section 4103(c)(2)(B)): Describe how the SEA will ensure that awards made to LEAs under Title IV, Part A, Subpart 1 are in amounts that are consistent with ESEA section 4105(a)(2).

For Fiscal Year 2018, Oklahoma will take advantage of the opportunity to administer SSAE grants through a competitive grant process. Due to the small portion of funds available, the OSDE believes funds can be more effectively used through targeted allocations of significant amounts. The OSDE will award 50% of its competitive grants to

LEAs for programs providing access and opportunities for a well-rounded education for all students. Of the remaining half, 30% will be dedicated to create healthy and safe school environments for student learning, while 20% will be for access to personalized learning experiences supported by technology and professional development for the effective use of data and technology. (Of the grants awarded for the use of technology, there will be a limitation that no more than 25% of funds may be used for purchasing technology infrastructure, including devices, equipment and software applications.)

Because Oklahoma will award Title IV, Part A funds on a competitive basis, LEAs that receive these funds in FY18 will not be allowed to transfer funds out of Title IV, Part A nor transfer funds from Title II, Part A into Title IV, Part A. These transferability restrictions are also applicable to those LEAs that are not the recipients of the Title IV, Part A competitive grant in FY18. The OSDE will award LEAs these competitive grants in amounts not less than \$10,000.

FY18 grants for well-rounded education will be targeted to LEA applications that describe how they will start new, or improve upon, Programs of Distinction based upon the rubrics created by the OSDE. The agency will encourage LEAs to make application aligning with well-rounded efforts in world languages, social studies/civics, the fine arts, physical education/health, advanced coursework, digital-age technology or STEM+C. In an effort to better engage students in Oklahoma's rich cultural history, LEAs are encouraged to consider culturally

relevant curriculum and teacher training as part of their well-rounded educational offerings, including but not limited to Native American history and language development. Preference will be given to LEAs whose applications highlight culturally relevant practices as part of advancing Programs of Distinction.

FY18 grants for improving school conditions will be targeted to LEA applications that implement school-based counseling services that meet the identified social and emotional needs of their student populations. LEAs would base their approach on data-informed contexts that may target bullying prevention or childhood obesity risks, for example. All applications would be required to integrate systems of family support as a critical influencer of program success.

Additionally, LEAs could make application for district and school awareness efforts related to Title IX's sex and gender discrimination protection and compliance. The OSDE is prepared to assist LEAs with selection of district Title IX coordinators, reporting processes, communication to all individuals in the education community and design and implementation of climate surveys.

Through the Oklahoma Connect & Learn Initiative, the OSDE works with EducationSuperHighway and other organizations to ensure that all Oklahoma districts have sufficient broadband Internet connections to all their schools. Funded through the federal E-Rate program, the initiative helps ensure the broadband and

wireless infrastructure necessary to provide all teachers and students access to digital-age teaching and learning.

That said, Oklahoma will award FY18 competitive grants to LEAs to encourage the effective use of technology in the following ways:

- Provide high-quality professional development for educators on methods of using technology to personalize learning for all students;
- Promote evidence-based practices in the effective use of technology to improve the academic achievement and digital literacy of all students; and
- Encourage the use of Open Educational Resources (OER) by teachers to enhance teaching practices and to engage students with more flexible and modern learning resources.

A possible grant application could also target blended learning by piloting hybrid programs that combine face-to-face instruction with online digital media learning – utilization of a robust student engagement component being critical to program success.

In anticipation that additional funds might be available in Title IV, Part A in coming years, the OSDE is likely to administer the SSAE grants to districts in the state as a formula grant, and all districts will be incorporated in the formula calculations. The formula will be applied in the same proportion as the districts' preceding

## CHOICE, CHARTERS AND A WELL-ROUNDED EDUCATION

Oklahoma's school accountability system will include development of a public-facing dashboard that, in part, indicates the extent to which LEAs are providing students with a well-rounded education. The dashboard is intended to help families and communities recognize the high quality of a school's well-rounded education or identify areas that lack sufficient support. Further, the well-rounded education information on the dashboard will augment transparency and showcase school strengths. The OSDE wants families and local school boards to have high-quality information about schools so they can make the best educational decisions for their children.

On the continuum of school choice, the Oklahoma Charter Schools Act enables any traditional public school to convert all or part of an existing school such that it has access to the flexibilities afforded a public charter school. With this opportunity, conversion schools may drive innovation and the replication for which charter schools were originally created.

As an additional means to student access to a well-rounded education, the OSDE will work with LEAs interested in piloting micro-charters, a form of conversion school. For situations where students might not otherwise have access to advanced coursework or credit recovery programs, a teacher, student and micro-charter could be available for a single classroom. The OSDE encourages this locally driven choice, whether through online courses, personalized learning, the provision of professional development to teachers and/or reimbursement of course fees to students who might not otherwise have access.

If charters are to be a part of providing access for families to diverse and well-rounded educational programs, the state must partner with and support authorizers' capacity. The OSDE believes it is important to demand elevated accountability for public charters and their authorizers. As a result, in 2016 the OSBE adopted the National Alliance for Charter School Authorizers' tenets for principles and standards in quality authorizing.

With this action, Oklahoma affirms its commitment to demanding high standards for public charter schools while protecting the interests of students and families. The standards and principles require authorizers to engage in chartering as a means to foster high-quality public schools that meet identified needs, prioritize a commitment to excellence in education and commit resources to protect student rights; inform intervention, revocation and renewal decisions; and provide annual public reports on school performance.

With the principles and standards in place, the OSDE has begun providing technical support and assistance to existing charter authorizers. The OSDE has created a charter school application review policy and rubric, as well as an inventory of pre-opening requirements (Appendix 23) to help ensure that the startup public charter is high quality from the application design to the provision of instructional services. Adhering to its mission and commitment to all students being provided with a well-rounded education, the OSDE envisions expanding these partnerships by braiding support services from experienced authorizers and high-quality existing public charters with new and inexperienced authorizers and startup public charter schools.



fiscal year’s Title I, Part A allocations. If the SEA does not have sufficient funds to make allocations to any LEAs in an amount equal to the minimum of \$10,000, then it must ratably reduce the LEA allocations as required by section 4105(b) of the ESEA. All district allocations will be reduced proportionately to funds that are available. Ratable reduction ensures that all districts will receive allocations of some amount.

The SSAE grant funds can be used in conjunction with other titles within the ESSA to support interventions, activities or services. It is important to note that SSAE funds may be used only to supplement, not supplant, non-federal funds.

Districts that receive an allocation of \$30,000 or more must complete a needs assessment once every three years to analyze:

- Access to, and opportunities for, a well-rounded education for all students;
- School conditions for student learning to create a healthy and safe school environment; and
- Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.

Once needs have been identified, districts

- in partnership with stakeholders
- will select relevant evidence-based activities likely to work in the local


context. The OSDE will provide a model needs assessment to districts and, when appropriate, offer assistance in completing it. The agency will also maintain a list of evidence-based resources on its website and create a list of evidence-based practices within Oklahoma districts.

Under a scenario in which Title IV, Part A grants are administered as formula grants, the state will give guidance to LEAs that receive an allocation of \$30,000 or more on acceptable expenditures in the required three areas:

- No less than 20% of funds must be spent on activities to support “well-rounded” education. Based on the areas first identified under the ESSA’s references to well-rounded educational opportunities and input from various stakeholder groups, the state has identified the following seven areas of curriculum as the focus:

- Improving access to world languages and the fine arts;
- Strengthening instruction in social studies/civics;
- Implementing programs that support a healthy, active lifestyle (e.g., physical education/health);
- Supporting effective use of technology in teaching and learning (e.g., digital literacy);

- Promoting access to accelerated learning opportunities such as Advanced Placement (AP); and
- Providing programming to improve instruction and student engagement in Science, Technology, Engineering and Mathematics and Computer Science (STEM+C).

- No less than 20% of funds must be spent on activities to support “safe and healthy” students. This support could include programs and activities such as social and emotional learning, comprehensive mental health awareness training, school-based counseling, violence prevention, bullying prevention, physical education and integrated systems of student and family support.
- A portion of funds should support effective use of technology. This could include increased personalized learning experiences, building technological capacity and infrastructure, carrying out blended learning projects and professional development in using data and technology to improve instruction. There will be a limitation that no more than 15% of funds may be used for purchasing technology infrastructure, including devices, equipment and software applications. 



Stakeholder Recommendations

OSDE Implementation

When asked what the OSDE, school districts, tribes and community-based organizations can do to support a learning environment to better prepare diverse learners (i.e., English learners, children with disabilities, migratory children, American Indian and homeless children) for college and careers, the following themes emerged:

- Funding
- Professional development
- Whole student emphasis
- Academic rigor
- College- and career-ready focus
- Family and community engagement



The OSDE recognizes that the successful support of all students is contingent upon whole student emphasis that includes social services, life-skills access and social and emotional support, including safe environments. Oklahoma makes a commitment to academic rigor that is defined by intense student engagement and technology-infused facilitation. One-on-one instruction will be effectively utilized when appropriate for success of all students. Access to college and career pathways will be afforded to all students, including access to early advisement, mentoring and internship opportunities. Family and community engagement will be a continued focus by way of purposeful, two-way communication, promotion of after-school programming and enlistment of other state agencies for contribution to overall success of all students.

When asked what is missing in Oklahoma schools that students need to receive a well-rounded education, responses targeted the arts, social skill development, technology implementation and bilingual education.



The OSDE will promote and recognize Programs of Distinction found in individual schools. Programs that will be recognized include but are not limited to the arts, STEM+C, health and world languages. Schools that achieve a level of distinction will be publicly recognized on a dashboard for their outstanding programs and will serve as models for other schools seeking to improve their well-rounded education.

Stakeholder Recommendations

OSDE Not Implementing

A considerable number of comments were made regarding funding for class-size reduction, time for professional development, resources and teacher pay.



These are all initiatives that require state, and not federal, funding.



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



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

The OSDE recognizes that students have academic, social and emotional needs beyond the traditional school day that dramatically impact their ability to learn. Additionally, a strong body of evidence indicates family and community engagement is essential for student success.<sup>61</sup> As a key initiative in this plan, the OSDE, through its office of family and community engagement/21st Century Community Learning Centers (CCLC), will:

- Work collaboratively to leverage the collective power of stakeholders to address tutoring, food insecurity, academic-related activities and engagement of families and communities;
- Work through OSDE's cross-functional teams to ensure communication and collaboration with stakeholders; and
- Assist students attending high-poverty, low-performing schools to succeed academically by providing 21st CCLC grants for services to students and their families during out-of-school hours.

Funds received under the 21st CCLC program will be used to provide programs focused on helping students meet state and local standards in core academic subjects, such

as reading and mathematics; offer students a broad array of enrichment activities that complement students' regular academic program, such as chess clubs; and offer literacy and other education services to the families of participating children and youth.

The following strategies of support are from the OSDE 8-Year Strategic Plan.

### STRATEGY 1.2

Ensure effective implementation of the Oklahoma Academic Standards by using available data to target high-quality, aligned resources to educators.

### STRATEGY 1.3

Improve student equitable access to meaningful and diverse pathways that lead to careers and postsecondary opportunities.

### STRATEGY 1.5

Reduce barriers to equity and close the opportunity and achievement gap for all students.

### STRATEGY 3.2

Strengthen and increase family and community engagement to support student learning.

### STRATEGY 3.3

Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

## 1. Use of Funds (ESEA section 4203(a)(2)): Describe how the SEA will use funds received under the 21st Century Community Learning Centers program, including funds reserved for State-level activities.

Oklahoma currently has 59 awarded 21st CCLC grantees operating at 101 sites and serving more than 13,500 students. Awarded through a competitive application process, grantees receive no less than \$50,000 annually for a period of three years with an option for an additional two years, provided performance measures are met.

As permitted by the ESSA, the OSDE will reserve no less than 93% of the funds to support direct services through a competitive subgrant process. These funds will support new and sustain current subgrants.

Two percent of funds will be allocated for administration of the competitive application and peer-review process, including capacity-building and technical assistance to applicants and community partners. These administrative functions primarily will be implemented by the OSDE 21st CCLC staff and support a contract for an online grants-management system (GMS). The 21st CCLC application, peer review, budget, claims, Annual Performance Reporting (APR) and monitoring processes will be administered through this system.

The remaining 5% will be allocated to support periodic, comprehensive evaluation using an evidence-based afterschool improvement process; provide technical assistance driven by data; and design state activities for high-quality programming.

## PERFORMANCE EVALUATION

The 21st CCLC evaluation process consists of four parts:

- Youth program quality intervention (YPQI);
- Surveys of parents, youth, staff and leaders;
- APR data collection and continuation reporting; and
- Program monitoring.

The continuous quality-improvement process for 21st CCLC grantees and sites is based on the YPQI. In Oklahoma 21st CCLC, the continuous quality-improvement process consists of the following elements:

- Performance data: Team-based program self-assessment of instructional quality using the Youth Program Quality Assessment (YPQA) and collection of data for grantee and site-level leading indicator reports (selected sites receive on-site visits by trained external raters using the YPQA);
- Improvement planning: Team-based improvement planning with performance data;
- Technical assistance coaching: All grantees receive technical assistance support throughout the continuous improvement process from the evaluation contractor. First-year site supervisors receive coaching for implementation of the continuous quality-improvement sequence;

<sup>61</sup> Karen L. Mapp and Paul J. Kuttner, "Partners in Education: A Dual Capacity-Building Framework for Family-School Partnerships," U.S. Department of Education and SEDL, 2013, <https://www2.ed.gov/documents/family-community/partners-education.pdf>. Heather Weiss, M. Elena Lopez and Heidi Rosenberg, "Beyond Random Acts: Family, School and Community Engagement as an Integral Part of Education Reform," (Cambridge, MA: Harvard Family Research Project, 2010).



- Aligned professional development in youth work methods: Afterschool teachers receive training to build instructional skills identified in the performance data; and
- Instructional coaching: Site supervisors are trained to deliver strengths-based coaching on staff instruction using selected rubrics from the YPQA as the work to implement skills learned in professional development.

The leading indicators element of the 21st CCLC evaluation is based on a multi-level theory of change extending from the policy context to the experiences of individual children. In the Oklahoma 21st CCLC system, the leading indicators describe five primary domains of program functioning and are designed to reflect aggregate performance across all of Oklahoma's 21st CCLC grantees. Additionally, each grantee and site annually will receive an individual report with statewide normative comparisons for each of 15 indicators. The five domains and 15 indicators are:

### 1. Organizational Context

- Indicator 1.1. Staffing Model: Capacity, Experience and Expertise, Job Satisfaction
- Indicator 1.2. Continuous Improvement: Continuous Quality Improvement, Horizontal Communication, Vertical Communication

- Indicator 1.3. Youth Governance: Youth Voice and Governance
- Indicator 1.4. Enrollment Policy: Access and Eligibility, Targeting Academic Risk, Recruitment and Retention

### 2. Instructional Context

- Indicator 2.1. Academic Press: Academic Planning, Homework and Learning, Time on Academics
- Indicator 2.2. Engaging Instruction: Youth Engagement and Belonging, Growth and Mastery Goals, Instructional Quality (Safety, Supportive Environment, Interaction, Agency, Academic Alignment, STEM+C)

### 3. External Relationships

- Indicator 3.1. System Norms: Accountability, Collaboration
- Indicator 3.2. Family Engagement: Parent Communication
- Indicator 3.3. School Alignment: Student Data, School Day Content
- Indicator 3.4. Community Resources: Community Engagement, Partners

### 4. Program Outcomes: Student

- Indicator 4.1. Socio-emotional Development: Social Competencies Self Report

- Indicator 4.2. Academic Efficacy: Work Habits, Reading/English Efficacy, Math Efficacy Self Report
- Indicator 4.3. Academic Outcomes: Proficiency on State Achievement Test, Math Grades, Language Arts Grades
- Indicator 4.4. School Day Behavioral Reports

### 5. Program Outcomes: Family

- Indicator 5.1. Parent Satisfaction: Confidence in Care, Convenience of Care, Family-School Connection

The creation of grantee and site reports across the five domains and 15 indicators will provide an opportunity to identify areas of performance of both strengths and improvement. This is a continuous improvement process for regular examination of performance, growth in staff practices and overall program quality.

Each site will be responsible for completing an annual self-assessment and a plan of improvement utilizing data gleaned from that self-assessment. The site is then responsible for reporting that information on a web-based reporting site. Subgrantees will have an external assessment of their program at least twice during their grant cycle. External assessors will be using the same tool or tools the subgrantee used for the self-assessment. After the external assessment report is received, the subgrantee compares it with the self-assessment before writing the plan of improvement. All state evaluation findings will be available to the public on the OSDE website.

**21st CCLC funds provide programs to support core academic subjects, enrichment activities that complement academics and other education services for families of participating children and youth.**

## 2. Awarding Subgrants (ESEA section 4203(a)(4)): Describe the procedures and criteria the SEA will use for reviewing applications and awarding 21st Century Community Learning Centers funds to eligible entities on a competitive basis, which shall include procedures and criteria that take into consideration the likelihood that a proposed community learning center will help participating students meet the challenging State academic standards and any local academic standards.

The OSDE 21st CCLC will distribute Title IV, Part B funds utilizing an online GMS developed and managed in coordination with all OSDE federal education programs. Awards will be issued on a competitive basis as funds are available.

Public notification for a competitive application process and a call for peer reviewers will be conducted. The OSDE will allocate 21st CCLC administrative funds to support the peer-review process. Funds may be used for stipends to attract an adequate number of high-quality reviewers. The OSDE will prepare selected reviewers through print materials and online training and maintain a roster of peer reviewers from previous years.

All 21st CCLC applicants will complete a competitive application during the request-for-proposal process. The application will be developed in consultation with community,

faith-based, tribal, youth development and education partners. Applications will be peer reviewed and scored on a rubric that follows the grant application and is contained within the GMS. Each application will be reviewed by a minimum of three peer reviewers.

Within the rubric, points will be awarded based on the applicant's ability to demonstrate program need, a comprehensive program design including community partnerships, reasonable and necessary program expenditures outlined in a resource management plan and competitive priorities. Awards will be made of sufficient size and scope, with consideration to geographic distribution to support high-quality, effective programs.

Programming will be developed and carried out in active collaboration with the schools that participating students attend and in alignment with challenging state academic standards. A number of assurances will be provided by the applicant:

- Students who primarily attend schools eligible for schoolwide programs under section 1114 and the families of such students will be targeted for services;
- Funds will be used to supplement, not supplant, other federal, state and local public funds;
- Notice will be given to the community of an intent to submit an application and the application will be available for public review after submission;

- External organizations, if available, will be identified and partnered within the community;
- Safe and accessible facilities will be provided;
- A plan for safe transportation will be provided; and
- Consultation with private schools and tribes will be conducted during the application process.


Notice of appeals will be available for all applicants not awarded.

Under the ESSA, the OSDE will utilize a competitive process to make awards to eligible entities that serve:

- Students who primarily attend schools implementing comprehensive or targeted support and improvement activities under section 1111(d) of the ESSA; or
- Students attending other schools determined by the LEA to be in need of intervention and support; and
- Families of students in the aforementioned categories.

Programs will target students who primarily attend schools eligible to operate schoolwide programs under section 1114 of the ESSA and the families of eligible students in section 4204(b)(2)(F).

Training and technical assistance for potential applicants will be provided throughout the year. Materials and guidance are available through the OSDE 21st CCLC website by phone and in person.<sup>62</sup> Step-by-step guides are available to assist eligible applicant organizations from needs assessment to community partnership development and then through application submission. Potential applicants are invited to participate in grantee training, as space is available, to assist them in preparing and understanding federal grant management.

Subgrantees will be required to submit regular claims and reports to verify that expenditures and activities align with the program's purpose and the approved scope of work. Performance data and performance measures will be reported and reviewed and on-site monitoring conducted based on a risk analysis. 

<sup>62</sup> <http://sde.ok.gov/sde/21cclc>.

Stakeholder Recommendations

OSDE Implementation

When Title IV, Part B stakeholders (878 program leaders and staff) were asked if participating in the quality improvement system was a good use of time and a good fit for their job, 82% of respondents agreed.



The OSDE will continue to support the “assess, plan and improve” model of continuous quality improvement for all Title IV, Part B subgrantees, providing training, technical assistance and coaching to program leaders and staff.

When Title IV, Part B stakeholders (3,180 parents and families) were asked if the afterschool program helped them get to know the school and school-day teachers better, 82% of respondents agreed and reported that their children’s learning benefited from the program. Additionally, 88% believed the afterschool staff were well informed about their children’s learning success and challenges in school.



Through the continuous quality improvement model, the OSDE will align professional development and technical assistance coaching to build the instructional skills of program leaders in supporting family and community engagement as a key strategy for improving student success.

When Title IV, Part B stakeholders (2,691 young people) were asked if they received homework assistance, completed homework and learned things in afterschool that helped them in school, 75% of the youth reported that they do.



The OSDE will continue to encourage youth voice and choice in Title IV, Part B programming and to build youth engagement to support student academic success. Training and technical assistance on such topics as asset building, planning and reflection, building community and active learning will be offered during the improvement phase of the continuous quality improvement model.

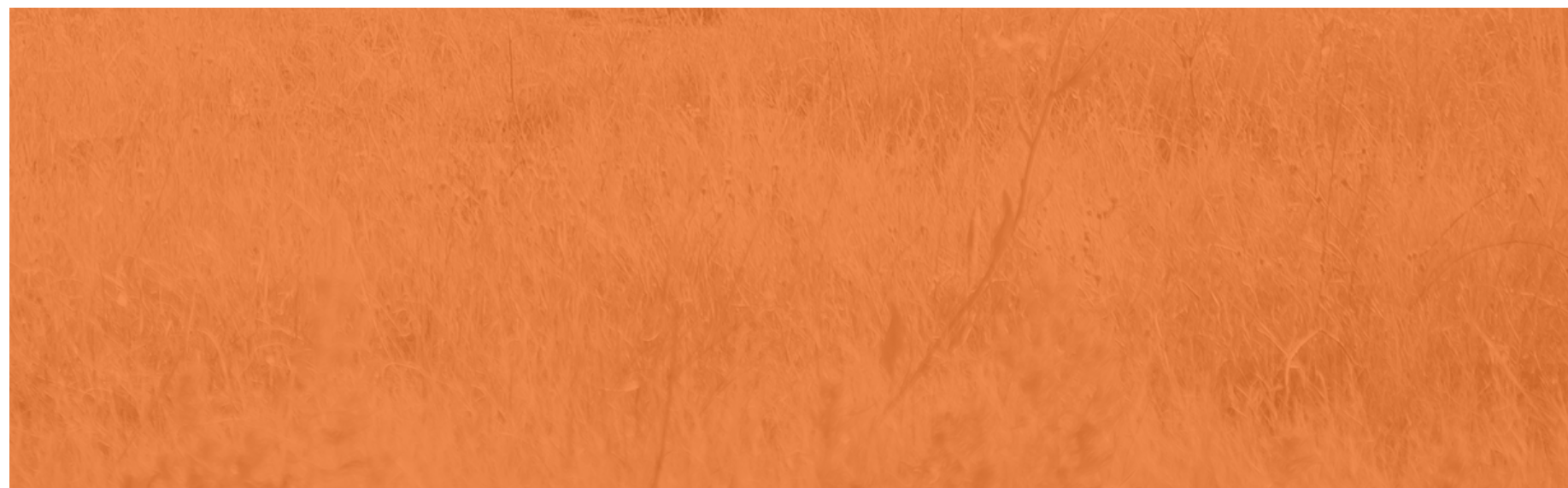
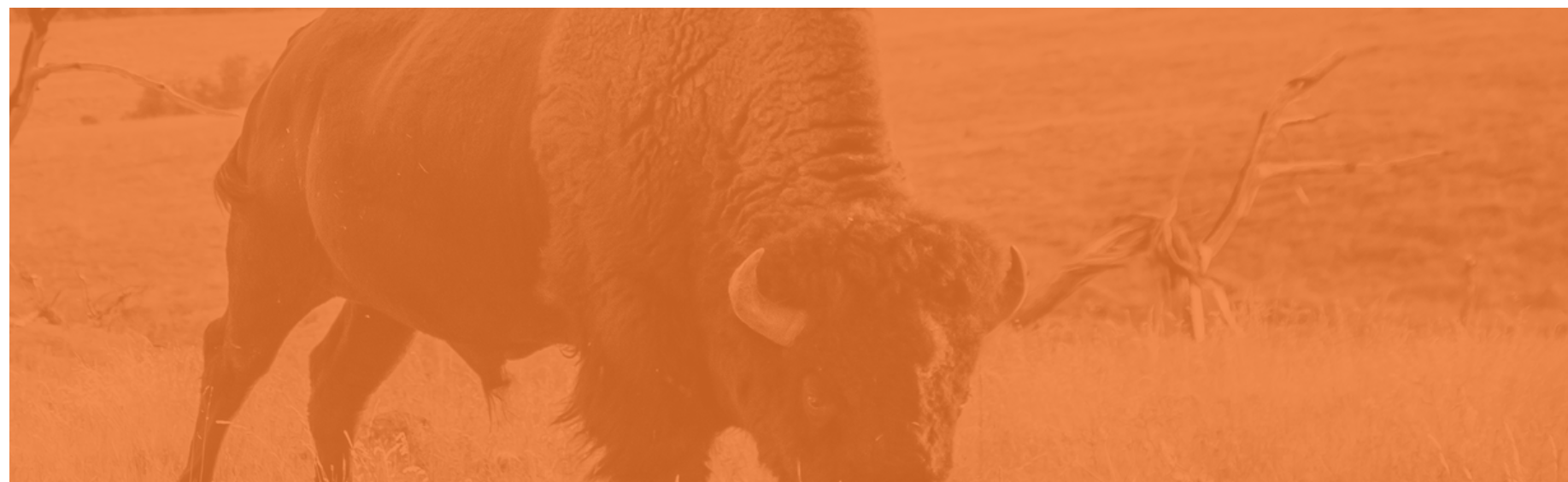




# HE

**Title V, Part B,  
Subpart 2:**

## **Rural and Low- Income School Program**



## H. Title V, Part B, Subpart 2: Rural and Low-Income School Program

Approximately 25% of Oklahoma’s LEAs are rural and low income. The secluded location of these LEAs creates barriers in hiring and retaining qualified teachers, attending professional development (PD) opportunities, accessing limited community resources and more, all of which has a great impact on student academic achievement. To overcome these challenges, the OSDE will focus on the following strategies:

### STRATEGY 1.1

Focus on early childhood education.

### STRATEGY 1.2

Ensure effective implementation of the Oklahoma Academic Standards by using available data to target high-quality, aligned resources to educators.

### STRATEGY 1.4

Enable educators to meaningfully use data from a high-quality assessment and accountability system to increase student learning.

### STRATEGY 2.2

Provide support and professional learning to increase instructional capacity for teachers and leaders.

### STRATEGY 2.3

Provide district and school leaders with the training and support needed to improve instruction in their schools.

### STRATEGY 3.2

Strengthen and increase family and community engagement to support student learning.

## 1. Outcomes and Objectives (ESEA section 5223(b)(1)): Provide information on program objectives and outcomes for activities under Title V, Part B, Subpart 2, including how the SEA will use funds to help all students meet the challenging State academic standards.

Measurable program objectives to help rural and low-income schools (RLIS) achieve the challenging state academic standards include:

- Increasing federal program-specific distance PD opportunities offered by the OSDE to LEAs through webinars, video conferences, etc., to reduce the financial burden that LEAs would encumber from physical attendance; and
- Training LEAs on best practices regarding the hiring and retention of state-qualified teachers, which will lead to improved student academic achievement and help students meet the challenging state academic standards.

Oklahoma’s measurable program outcomes include:

- At least a 10% annual increase in small, rural LEA participation in program-specific distance trainings offered by the OSDE, to be achieved over the next five years; and

- A 1% annual increase in small, rural LEA participation in trainings specifically addressing strategies to attract and retain effective teachers.

The OSDE reserves the allowable 5% of Title V, Part B, Subpart 2 funds for state administrative costs and for providing technical assistance to eligible LEAs. In an effort to help students meet the challenging state academic achievement standards, the OSDE uses these funds to:

- Hire personnel to review LEA applications, audit expenditure reports and monitor the use of funds;
- Provide daily services to LEAs (e.g., telephone communication, emails, one-on-one training, etc.) to guide them on the allowable use of funds that will lead to improved academic achievement by students;
- Deliver professional development activities to LEAs to meet programmatic and fiscal compliance;
- Monitor the LEAs to ensure that federal funds are expended within the intent and purpose of the program;
- Participate in national conferences to disseminate program and fiscal updates to LEAs; and
- Analyze accountability and assessment data to improve LEA instructional practices.


Oklahoma allocates the remaining funds to 131 eligible LEAs on a formula basis using the number of children in average daily attendance. LEAs complete the rural and low-income schools application as part of their consolidated application, indicating which programs will be supported by project funds to improve student achievement. Allowable program activities include those authorized under Title I, Part A; Title II, Part A; Title III, Part A; Title IV, Part A and family and parent engagement.

## 2. Technical Assistance (ESEA section 5223(b)(3)): Describe how the SEA will provide technical assistance to eligible LEAs to help such agencies implement the activities described in ESEA section 5222.

The OSDE provides continuous technical assistance throughout the year to all LEAs, including RLIS-eligible LEAs, through multiple avenues, including but not limited to:

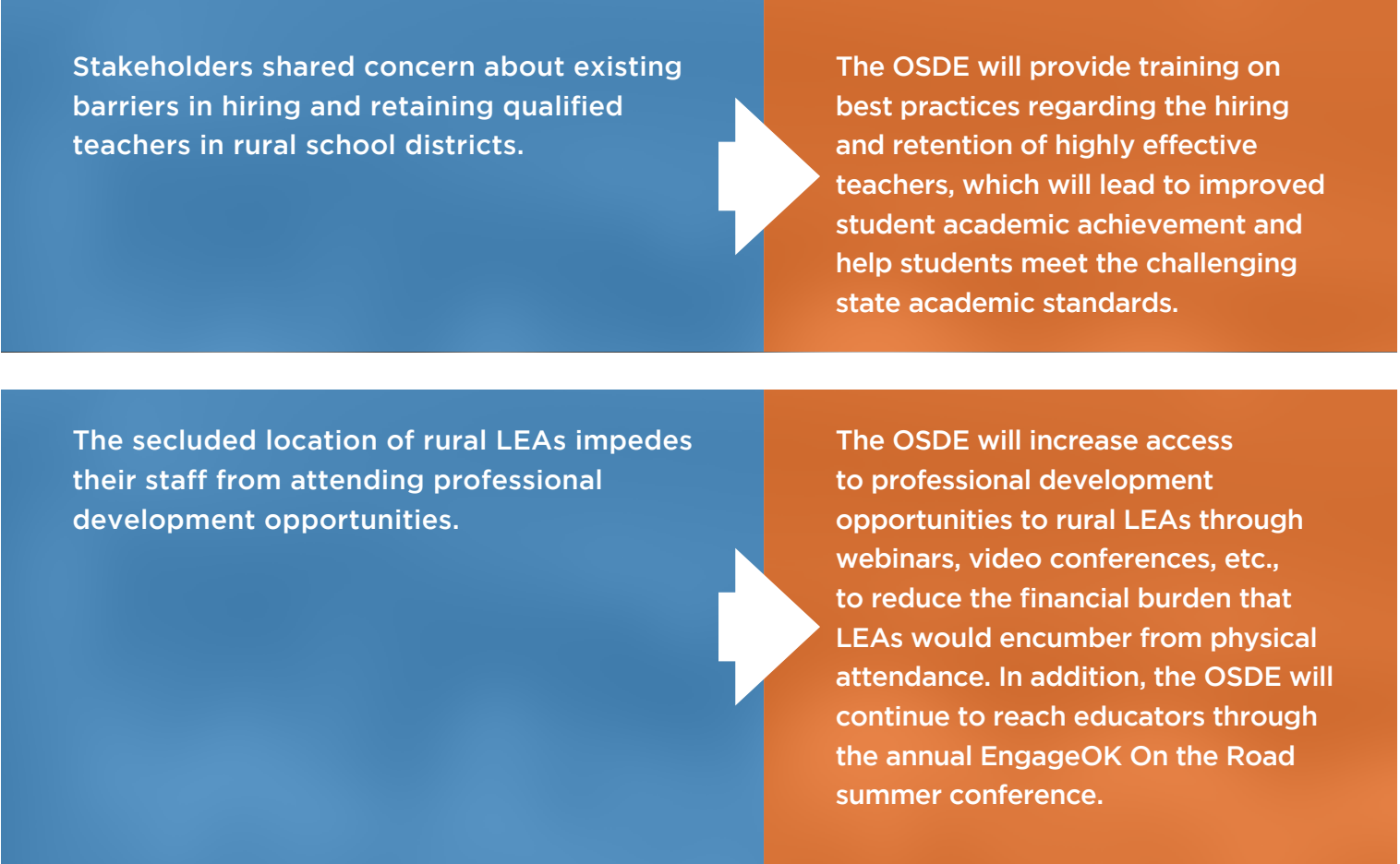
- The application process;
- Expenditure report reviews;
- Desktop and on-site monitoring processes;
- One-on-one technical assistance;
- Conferences;
- Communication via emails, phone calls, newsletters, etc.; and
- The OSDE website.

In order to better serve LEAs, the OSDE will conduct a survey to determine the needs of rural and low-income schools. As a result, the survey will inform the types of activities the state may provide to help all students meet the challenging state academic standards. Additionally, the survey will evaluate the effectiveness of the technical assistance provided. The survey will provide the baseline data to determine necessary action steps for technical assistance.

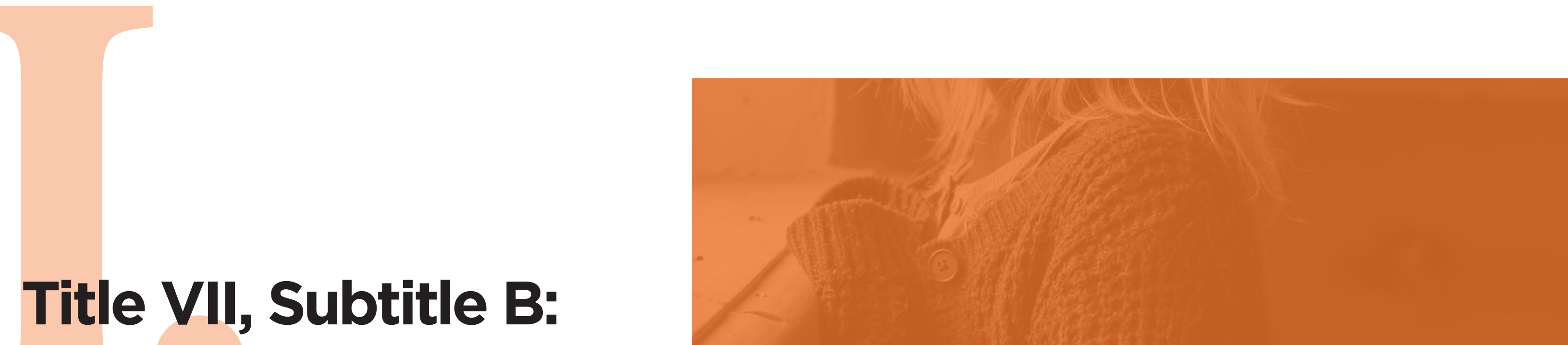
The OSDE recognizes that many rural and low-income schools and families lack internet connectivity. Therefore, the agency will identify innovative ways to connect students, families and schools to emerging technologies. Such innovation might include ensuring that schools have sufficient broadband to carry digital capacity for advanced and well-rounded educational opportunities. Also, the agency will look for ways to support LEAs in providing students who lack home internet connection with mobile Wi-Fi hotspots. 

Stakeholder Recommendations

OSDE Implementation







# **Title VII, Subtitle B: Education for Homeless Children and Youth Program, McKinney- Vento Homeless Assistance Act**



**I. Education for Homeless Children and Youth program, McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B**

In the 2015-16 school year, the OSDE served 13,957 students through McKinney-Vento grants. To address this growing need in Oklahoma, the OSDE is committed to ensuring that each homeless child and youth has access to the same free, appropriate public education – including a public preschool education – as other children. The OSDE will address common challenges for homeless children and youth, which include enrolling, attending and succeeding in school through the following strategies:

**STRATEGY 1.1**  
Focus on early childhood education.

**STRATEGY 1.3**  
Improve student equitable access to meaningful and diverse pathways that lead to careers and postsecondary opportunities.

**STRATEGY 1.5**  
Reduce barriers to equity and close the opportunity and achievement gap for all students.

**STRATEGY 2.2**  
Provide support and professional learning to increase instructional capacity for teachers and leaders.

**STRATEGY 3.2**  
Strengthen and increase family and community engagement to support student learning.

**STRATEGY 3.3**  
Build and maintain working relationships and ongoing feedback mechanisms with diverse partners and advisory groups.

**1. Student Identification (722(g)(1)(B) of the McKinney-Vento Act): Describe the procedures the SEA will use to identify homeless children and youth in the State and to assess their needs.**

The OSDE requires each LEA to have a homeless liaison or coordinator. The primary responsibility of the homeless liaison will be to locate and identify homeless children and youth within the community. Once identification has been completed, the liaison will determine the student’s special needs (i.e., educational, health or housing) so that the LEA may provide appropriate services and referrals. The OSDE homeless program specialist and LEA homeless liaison will coordinate and collaborate with other child-serving organizations, such as the Oklahoma Partnership for School Readiness, Oklahoma Association of Community Action Agencies and local early childhood community coalitions, to provide appropriate services to homeless children and youth as special needs are identified to assist them with enrolling and succeeding in school.

LEAs are required to enter student information in the Oklahoma statewide student information system (the Wave) at the beginning of each school year. Homeless students are identified during annual enrollment and data are reported in the Wave along with other student data.

The OSDE implements other strategies to help LEAs identify homeless children and youth in public schools:

- Collaboration with the Homeless Education Advisory Team (HEAT) to create a common identification tool for homeless children and youth;
- Professional development activities for homeless liaisons, coordinators, registrars, and enrollment and school personnel regarding best practices in the identification of homeless children and youth;
- Partnership with Tribal Education Agency (TEA) personnel to identify best practices that will help homeless Native American children and youth meet the challenging state academic standards; and
- Professional development and technical assistance to LEAs that appear to be under-identifying homeless children and youth.

The needs of homeless students and youth will be assessed by the OSDE with data from the Wave, including:

- Educational performance of homeless children and youth (e.g., assessment scores in science, English language arts and math);
- Non-academic indicators affecting academic achievement (e.g., attendance rates); and
- Effectiveness of educational programs for homeless students and youth (e.g., graduation rates).

**The OSDE is committed to ensuring that each homeless child and youth has access to the same free, appropriate public education – including a public preschool education – as other children.**

Analysis of these data provides insight into the identification of homeless program changes and the best practices to implement to enhance student growth and development. If necessary, the OSDE will modify its current strategies and processes to better identify the needs of homeless students and youth in order to help them be successful in school.

## **2. Dispute Resolution (722(g)(1)(C) of the McKinney-Vento Act): Describe procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youth.**

The OSDE dispute resolution policy described here is also included in Oklahoma’s administrative rules – Oklahoma Administrative Code (OAC) 210:40-9. If necessary, any modifications of this policy will be based on the requirements outlined in the ESSA and will be reviewed with the HEAT.

Every effort must be made to resolve the complaint or dispute at the district level before it is brought to the OSDE. It is the responsibility of the LEA to inform the complainant of the district’s complaint resolution procedure when a question arises concerning the education of a homeless child or youth.

The process for complaints at the LEA level is as follows:

1. Notify the district’s homeless coordinator. The homeless coordinator serves as a liaison between the homeless child and the school he or she attends. Someone in

the school or in the LEA superintendent’s office will be able to identify the homeless coordinator.

- a. Request a copy of or access to the district board of education policies addressing the education of homeless children and youth. After reviewing the policies, make an appointment with the homeless coordinator to discuss the complaint.
  - b. If the dispute is not resolved after the initial discussion with the district’s homeless coordinator, the complainant may file a written complaint to the district’s homeless coordinator for further review.
  - c. In the complaint, include a request that a written proposal or plan of action resolving the dispute be provided within five days of the date the complaint was received by the district’s homeless coordinator. A review of the proposal or plan of action with the homeless coordinator should follow. The parties may mutually agree on an extension; however, every effort should be made to resolve the complaint in the shortest possible time.
2. If the dispute is not resolved at the district homeless coordinator level, the complaint may be forwarded to the superintendent of the district for review after first meeting with that superintendent. The complainant should request a written resolution from the superintendent within five days of

the date of the discussion. The parties may mutually agree on an extension; however, every effort should be made to resolve the complaint in the shortest possible time.

3. If the dispute is not resolved at the district superintendent level, the complainant may take the matter before the school district board of education for resolution.

If the dispute is not resolved in a satisfactory manner at the LEA level, the complaint – which must be written and signed by the complainant – may be brought to the OSDE. The process for complaints at the state level is as follows:

1. Address a written complaint to the OSDE homeless program specialist. Include in the complaint:
  - a. A detailed description of the dispute;
  - b. The name(s) and age(s) of the child or children involved;
  - c. The name(s) of involved school district personnel and the district(s) they represent; and
  - d. A description of attempts that were made to resolve the issue at the school district level.
2. The OSDE office of federal programs will inform the district of the complaint. The office will gather needed information, including documentation

and statements of the parties, and may conduct an independent investigation through an on-site visit if necessary.

3. Within 30 days after receiving and investigating the complaint, the office of federal programs will make a determination regarding the allegations and will inform the parties in writing of the decision. The parties may mutually agree on an extension; every effort, however, should be made to resolve the complaint in the shortest possible time.
4. If a complainant disagrees with the decision, he or she may, within 10 working days, appeal the decision to the deputy state superintendent of finance and federal programs. This appeal must be in writing and state why the complainant disagrees with the decision.
5. Within 30 days after receiving the appeal, the deputy state superintendent of finance and federal programs will render a final decision and notify the complainant and all other interested parties in writing. Although the standard procedure allows 30 days for a response, every effort will be made to resolve the complaint in the shortest possible time.
6. While the dispute is ongoing, the child in question must be enrolled in and attending school. If the dispute is about which school is best for the child, the child shall remain in the school he or she currently attends until the dispute is resolved, unless previously implemented arrangements allow that child to attend the school of origin.



### 3. **Support for School Personnel (722(g)(1)(D) of the McKinney-Vento Act): Describe programs for school personnel (including the LEA liaisons for homeless children and youth, principals and other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel) to heighten the awareness of such school personnel of the specific needs of homeless children and youth, including runaway and homeless children and youth.**

The OSDE offers opportunities to increase school personnel awareness of topics related to children and youth experiencing homelessness and addressing the needs of unaccompanied homeless youth and runaway youth, including the following programs and activities:

- The annual EngageOK statewide education conference;
- Webinar trainings;
- The Joint Federal Programs Summit (federal grant programs-specific); and
- Additional resources (e.g., brochures, books, websites and community supports).

The OSDE homeless program specialist gathers information from other agencies and organizations that provide services to homeless and runaway children and their families. Technical assistance is provided to school district personnel through:

- On-site visits, consultation sessions and/or mailing pertinent program information;

- Communication and coordination of the services available for homeless Native American children and youth;
- Development of strategies to help eliminate enrollment barriers;
- Provision of information for referrals to health and/or housing services; and
- Development of strategies for retaining homeless children and youth in school.

The OSDE will continue efforts to increase awareness of school personnel at all levels to ensure homeless and runaway students and youth are offered the same educational opportunities to meet the challenging state academic standards.

other significant needs.

Knowing that early childhood homelessness can significantly impact a child's academic future and that 93% of Oklahoma's homeless preschool-aged children were not served by an early childhood program in 2015, the OSDE will increase efforts to ensure the state's homeless students have equal access to early childhood programs.<sup>63</sup>

The OSDE homeless program specialist collaborates with other personnel at the agency – including those whose duties encompass Title I, early childhood and afterschool programs – to develop and disseminate information on homelessness and how state and federal funds can assist in serving homeless children and youth, including Pre-K students.

The OSDE provides trainings to LEAs to increase awareness of federal requirements regarding the access to public preschool programs for preschool-aged homeless children and youth. The OSDE homeless program specialist will communicate and coordinate with the agency's designees on various councils and committees (e.g., the Oklahoma Partnership for School Readiness, Oklahoma Association of Community Action Agencies and local early childhood community coalitions) that aim to improve collaboration between state- and local-level service providers of early childhood education for homeless preschool-aged children and youth.

The OSDE homeless program specialist will also collaborate with LEA homeless liaisons to identify preschool-aged homeless

### 4. **Access to Services (722(g)(1)(F) of the McKinney-Vento Act): Describe procedures that ensure that:**

- Homeless children have access to public preschool programs, administered by the SEA or LEA, as provided to other children in the State;**

Oklahoma began its early childhood 4-year-old program in 1980. In 1998, due to its success, Oklahoma became the second state in the nation to provide free preschool for all 4-year-olds. Today, 99% of Oklahoma school districts offer access to the program. Districts receive program funding from the state's school finance formula on a per-pupil rate, with additional resources allocated if a child is considered a dual-language learner or has

**The OSDE will develop local strategies to increase enrollment of preschool-aged children experiencing homelessness.**

children who are not enrolled in school and develop local strategies to increase enrollment of preschool-aged children experiencing homelessness, including giving homeless children priority on wait lists and reserving slots for preschool-aged homeless children and youth based on local data.

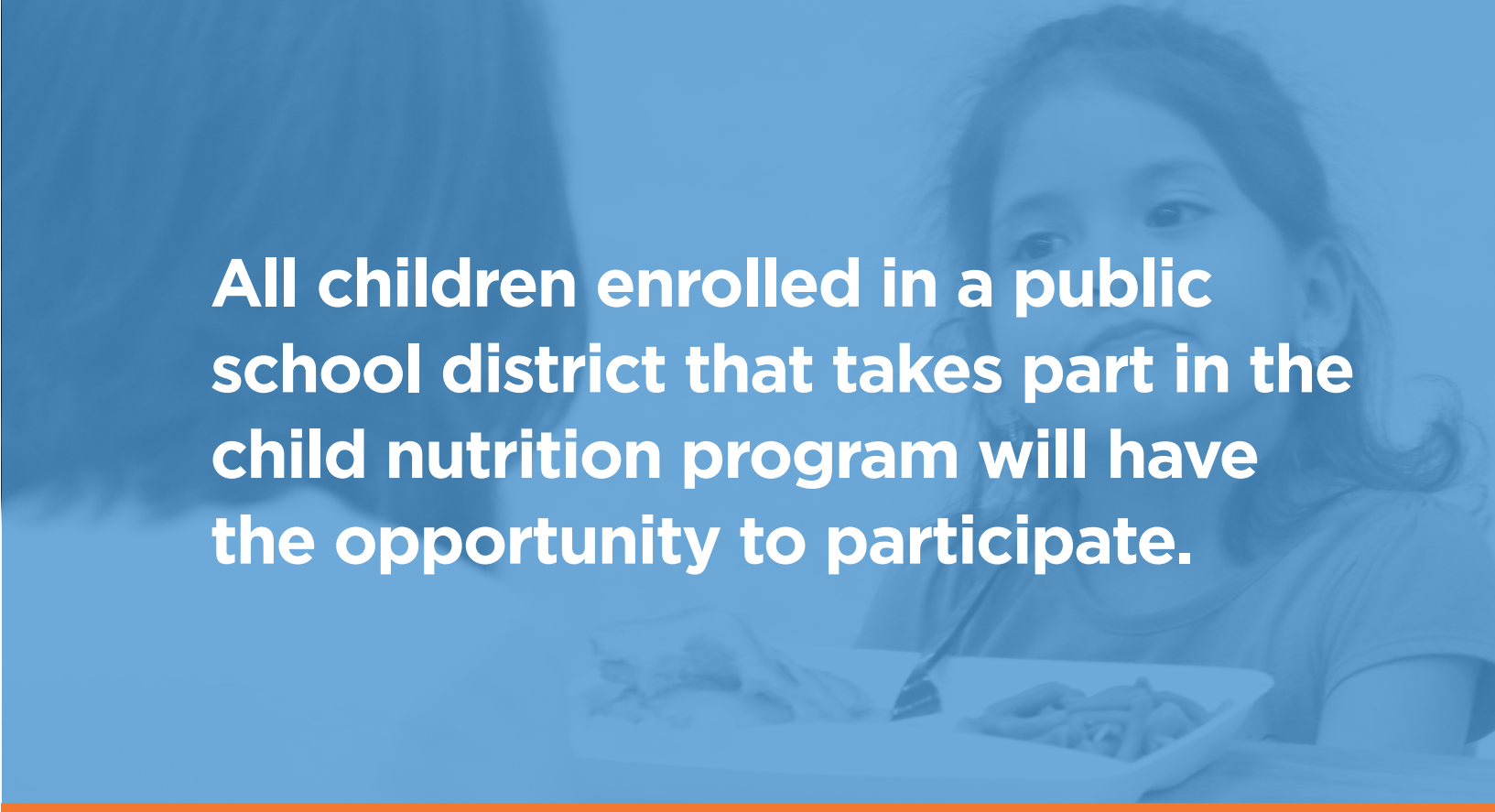
Additionally, the OSDE will provide technical assistance to LEA-administered preschool programs regarding the transportation of preschool-aged children to their school of origin. Upon request of the LEA, the OSDE will work with LEA-administered preschool programs to establish transportation agreements. Transporting homeless students to Pre-K provides a significant opportunity for LEAs to partner with Head Start and other community organizations to meet the needs of homeless students. To support this effort, the OSDE is considering awarding McKinney-Vento grant funds to districts who wish to pilot such a transportation endeavor. This initiative can provide LEAs significant data to impact the trajectory of a homeless student's education, including school attendance, basic academic skills and health and emotional status.

The OSDE will require LEA homeless liaisons to maintain data on outreach and other efforts specific to identification, enrollment and retention of preschool-aged homeless children in the district. In order for LEAs to meet this requirement, the OSDE will provide professional development to LEA homeless liaisons on collecting and reporting data regarding the

outreach and identification of preschool-aged homeless children.

All children, including preschool children, enrolled in a public school district that takes part in the child nutrition program will have the opportunity to participate in the program, assuming all eligibility requirements are met (7 CFR Parts 210 and 220). The OSDE homeless program specialist will collaborate with the OSDE's child nutrition program personnel, as well as other agencies and organizations assisting homeless children and families, to provide information on food and nutrition programs available at the state and local levels. The OSDE homeless program specialist will work with the agency's child nutrition personnel to address any policy barriers that may inhibit a homeless child or youth from participating in the child nutrition program.

**ii. Homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youth described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies; and**



**All children enrolled in a public school district that takes part in the child nutrition program will have the opportunity to participate.**

**CREDIT ACCRUAL AND RECOVERY**

The OSDE's procedures to identify homeless youth and youth separated from public schools, and to give them equal access to appropriate secondary education and support services, include the following:

- Collaborating with LEA homeless liaisons to identify strategies that support efficient retrieval of records containing full or partial coursework satisfactorily completed by homeless children and youth;
- Supporting credit accrual and recovery for highly mobile homeless children and youth by providing professional development webinars on best-practice strategies;

- Working with LEAs to identify common educational tools enabling homeless children and youth to receive appropriate or partial credit for coursework satisfactorily completed; and
- Training LEAs through webinars and professional development activities on strategies to help remove barriers that prevent homeless children and youth from receiving appropriate credit for full or partial coursework.

The OSDE continues to explore avenues that support seamless and efficient transfer of homeless children and youth's coursework that is either complete or partially completed.



**iii. Homeless children and youth who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels.**

The OSDE's procedures to identify barriers of homeless children and youth to academic and extracurricular activities include the following:

- Providing technical assistance to LEAs to deploy strategies that support enrollment and involvement of homeless children and youth in LEA academic and extracurricular activities as well as access to magnet schools, summer school, career and technical education, Advanced Placement (AP), online learning and charter school programs;
- Training LEA homeless liaisons on their responsibilities to inform homeless students about their rights under the McKinney-Vento Homeless Act, which include students' rights to participate in AP classes, career and technical programs, online programs and extracurricular activities offered by the LEA;
- Providing technical assistance to any LEA homeless liaison who identifies barriers that prevent homeless children and youth from participating in academic and extracurricular activities. The OSDE will provide guidance to

help LEAs remove these barriers, to ensure the child can successfully participate in activities such as summer school, career and technical education, AP classes, athletics and online distance learning; and

- Reviewing identified LEA policies that may be barriers to homeless children and youth participating in extracurricular activities and advising the LEAs how to successfully revise these policies to remove barriers.

The OSDE continues to research innovative possibilities to assist LEAs in removing barriers that will help homeless students succeed.

**5. Strategies to Address Other Problems (722(g)(1)(H) of the McKinney-Vento Act): Provide strategies to address other problems with respect to the education of homeless children and youth, including problems resulting from enrollment delays that are caused by—**

- i. requirements of immunization and other required health records;**
- ii. residency requirements;**
- iii. lack of birth certificates, school records, or other documentation;**
- iv. guardianship issues; or**
- v. uniform or dress code requirements.**

The OSDE homeless program specialist assists LEA homeless liaisons in using community resources to locate documents to prevent enrollment delays. In addition, LEAs are required to set aside Title I, Part A funds for the costs related to the retrieval of essential documents.

To eliminate any policy barriers at the OSDE and LEA level that result in enrollment delays due to the lack of required records, the OSDE homeless program specialist implements the following strategies:

- Works with the Oklahoma State Department of Health office of vital statistics to identify seamless ways to retrieve immunization and birth certificate records for homeless students at the LEA;
- Works with all LEAs on enrolling identified homeless children and youth prior to location of documents such as immunization and medical records, residency documentation, birth certificates, school records and guardianship records;
- Works with LEA homeless liaisons to identify key local community resources that support the retrieval of required enrollment records;
- Provides professional development, consultation and technical assistance to LEAs on best practices to eliminate policy and documentation barriers and to support immediate enrollment and retention of homeless children and youth;

- Partners with the HEAT to access data collected during desktop and on-site monitoring visits regarding policies and procedures that lead to documentation barriers ; and
- Provides professional development to LEA homeless liaisons through webinars, telephone conferences, subgrantee meetings and other technical assistance to ensure policies and procedures prevent barriers to enrollment and retention due to outstanding fees, fines or absences.

Additionally, it is an allowable expense to use Title I homeless set-aside funds to help homeless students meet uniform and dress code requirements. The OSDE works with LEAs to ensure they are taking full advantage of the flexibilities offered in meeting students' basic needs. The OSDE continues collaborating with LEAs to develop enrollment policies that will allow homeless students and youth to receive the same educational opportunities as all students and prevent enrollment delays.

**6. Policies to Remove Barriers (722(g)(1)(I) of the McKinney-Vento Act): Demonstrate that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences.**



The OSDE requires LEAs to develop policies that do not impose barriers to enrolling and retaining homeless children and youth in school, including barriers to enrollment and retention due to outstanding fees, fines or absences. The OSDE, the HEAT and the LEA homeless liaisons review and revise these policies as necessary. The OSDE conducts annual on-site and desktop monitoring to LEAs and McKinney-Vento subgrantees to ensure that policies and practices align with immediate enrollment and retention of homeless children and youth in school. Through the Homeless Census Report, the OSDE homeless program specialist collects qualitative information on homeless students and common enrollment barriers and disseminates the overall results to LEA homeless liaisons via newsletters, website, webinars, workshops, etc.

The OSDE’s procedures to remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in schools, include the following:

- Meeting with the HEAT at least semi-annually to review LEA policies and practices that may lead to the removal of enrollment barriers for homeless children and youth;
- Conducting on-site and desktop monitoring of LEAs to ensure policies do not create barriers for the enrollment of homeless children and youth; and

- Providing technical assistance to LEAs to identify policies that lead to barriers for the enrollment of homeless children and youth.

**7. Assistance from Counselors (722(g)(1)(K)): A description of how youths described in section 725(2) will receive assistance from counselors to advise such youths, and prepare and improve the readiness of such youths for college.**

The OSDE has a partnership with the Oklahoma State Regents for Higher Education to deliver professional development workshops and disseminate information to school counselors to advise and prepare homeless students for postsecondary opportunities, such as the Oklahoma’s Promise college tuition scholarship and the Free Application for Federal Student Aid (FAFSA).


The OSDE requires LEA homeless liaisons to ensure that unaccompanied homeless youths are informed of their status as independent students in accordance with Title IX, Part A, section 722(g)(6)(A)(x)(III). The OSDE will present a series of professional development webinars and other activities to homeless liaisons and school counselors to emphasize the importance of identifying and declaring unaccompanied homeless youths as independent students for financial aid purposes. Webinars will address the following topics:

- Removing enrollment barriers for homeless youth (e.g., immunization requirements and other health records, residency documents, birth certificates, school records or other documents, guardianship issues, uniform and dress code requirements, etc.);
- Homeless youth access to postsecondary opportunities; homeless youth transportation issues; a counselor’s role in schools in assisting homeless students; and
- Homeless liaison’s role in assisting homeless students; family and community resources for homeless youth and their families.

Through the monitoring process, the OSDE will ensure that LEA homeless liaisons coordinate with LEA school counselors regarding the postsecondary academic needs and resources available for homeless children and youth. In addition, the OSDE disseminates information about unaccompanied homeless youth access to postsecondary education opportunities through the OSDE’s communication platforms. The OSDE will continue to assist homeless liaisons and school counselors in advising and preparing homeless youths for postsecondary education. School counselors will assist homeless youth with issues including but not limited to:

- Facilitating housing arrangements;
- Connecting with nonprofit organizations, community agencies, faith-based organizations and employers;

- Obtaining fee waivers for college entrance tests (i.e., ACT, SAT, etc.), Advanced Placement tests and college applications;
- Completing the FAFSA application;
- Connecting with college recruiters;
- College tours;
- Participation in GEAR-UP and career tech programs; and
- Participation in ICAP (Individual Career and Academic Planning) programs starting in seventh grade.

The OSDE encourages school counselors to continue engaging in professional development training, participating in national conferences, and networking with colleagues and other organizations that focus on meeting the needs of homeless children and youth. 

Stakeholder Recommendations

OSDE Implementation

Stakeholders shared concern about the equal access of homeless students to appropriate secondary education and support services and expressed a continuous need for providing homeless students with access to postsecondary educational and career opportunities.



The OSDE will continue to provide training to LEA homeless liaisons and school counselors about partnerships with higher education and CareerTech centers to expand postsecondary and career opportunities for homeless students.

Stakeholders suggested that the OSDE provide technical assistance to close the gap of services to homeless preschool students throughout the state.



The OSDE collaborates with LEAs and statewide agencies such as the Oklahoma Partnership for School Readiness, Smart Start Central Oklahoma and Oklahoma Association of Community Action Agencies to improve early childhood education services for homeless preschool-aged children and youth. Results of the collaboration include training, data sharing and early childhood resources.

Homeless students encounter many obstacles to meeting graduation requirements. Stakeholders suggested looking for credit accrual strategies specifically for homeless students.



The OSDE participates in LEA consortium meetings in which graduation and credit accrual strategies are shared. The OSDE then disseminates these strategies to all LEAs statewide.



OKLAHOMA STATE DEPARTMENT OF  
**EDUCATION**  
— CHAMPION EXCELLENCE —