



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

June 13, 2023

The Honorable Christopher Woolard
Interim Superintendent of Public Instruction
Ohio Department of Education
25 South Front Street
Columbus, OH 43215

Dear Interim Superintendent Woolard:

I am writing in response to Ohio's request to the U.S. Department of Education (Department) to amend its approved consolidated State plan under the Elementary and Secondary Education Act of 1965 (ESEA). Ohio first submitted its request on June 17, 2022. Our staffs discussed the request several times and Ohio most recently submitted a revised version on April 13, 2023. Prior to implementing any revisions to its approved consolidated State plan, a State must submit its proposed amendments to the Department for review and approval.

I have determined that the amended request meets the requirements in the ESEA and, for this reason, I am approving Ohio's amended State plan. A summary of Ohio's amendment is enclosed. This letter, as well as Ohio's revised ESEA consolidated State plan, will be posted on the Department's website. Any further requests to amend Ohio's ESEA consolidated State plan must be submitted to the Department for review and approval. Because it is the end of the 2022-2023 school year and Ohio's consolidated State plan must be used by the State to identify schools for Comprehensive Support and Improvement (CSI), Targeted Support and Improvement (TSI), and Additional Targeted Support and Improvement (ATSI), based on data from the 2021-2022 school year, Ohio must provide documentation to the Department within 10 business days that it has run its accountability system and notified local educational agencies and schools of the results of that system, including notifying schools if they have been identified for CSI, TSI, or ATSI. That notification must indicate that the schools are required to begin implementing support and improvement activities at the beginning of the 2023-2024 school year (*i.e.*, these schools may not use the 2023-2024 school year as a planning year).

Please be aware that approval of this amendment to Ohio's consolidated State plan is not a determination that all the information and data included in the amended State plan comply with Federal civil rights requirements, including Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, and requirements under the Individuals with Disabilities Education Act. It is Ohio's responsibility to comply with these civil rights requirements.

400 MARYLAND AVE., SW, WASHINGTON, DC 20202
<http://www.ed.gov/>

The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Thank you for the work that the Ohio Department of Education has put into its consolidated State plan under the ESEA. If you need any assistance regarding the implementation of your ESEA consolidated State plan, please contact Fatimah Abdullahi in the Office of School Support and Accountability at: OESE.TitleI-a@ed.gov.

Sincerely,

/s/

James F. Lane, Ed.D.
Principal Deputy Assistant Secretary
Delegated the Authority to Perform the
Functions and Duties of the Assistant Secretary
Office of Elementary and Secondary Education

Enclosure

cc: Jeremy Marks, ODE
Rachel Wakefield, ODE
Bryan Hoynacke, ODE

Amendment to the Ohio Consolidated State Plan

The following is a summary of the Ohio Department of Education’s (ODE’s) amendment request. Please refer to the U.S. Department of Education’s website <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/essa-consolidated-state-plans/> for Ohio’s complete consolidated State plan.

Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies

- *Subgroups*
ODE will no longer use the “Gifted Achievement” and “Value-Added” subgroups for Federal accountability purposes.
- *Minimum N-size*
ODE will revise the minimum number of students for school-level accountability determinations from 15 to 10 students. ODE will continue to use a minimum number of students of 15 for accountability determinations based on student subgroups. The State did not make any changes to the minimum number of students necessary for reporting purposes, which remains at 10.
- *Academic Achievement Long-Term Goals*
ODE amended its baseline data from school year (SY) 2015-2016 to SY 2020-2021 and updated its long-term goals. ODE also revised its plan to only use its long-term goals based on its performance index, rather than goals based on both the performance index and percent proficient. ODE changed its measurements of interim progress (MIPs) accordingly.
- *Graduation Rate Long-Term Goals*
For its graduation rate long-term goals, ODE updated its baseline data from SY 2015-2016 to SY 2020-2021 and changed its long-term goal to 96.5 percent in SY 2030-2031 (from 93 percent in SY 2025-2026). ODE made corresponding revisions to its MIPs. ODE also removed its long-term goals for the five-year adjusted cohort graduation rate (ACGR).
- *English Language Proficiency (ELP) Long-Term Goals*
For its progress in achieving English language proficiency (ELP) long-term goals, ODE changed the year of its baseline data to SY 2020-2021 and revised its timeline for meeting the goal to SY 2030-2031 (from SY 2025-2026). ODE made corresponding revisions to its MIPs.
- *Academic Achievement Indicator*
ODE modified its Academic Achievement indicator, which is based on its performance index and, for high schools, also includes student growth. For the performance index, the State will determine a statewide goal each year by averaging the top two percent of schools based on overall index score. Every school will receive points (from 0-5) based on the percentage of the goal that is reached (e.g., if the school has a performance index score that is 95 percent or more of the statewide goal, the school receives five points; a

school that is within 92.5 to 95 percent of the statewide goal receives 4.75 points). The performance index is unchanged: ODE will continue to award 1.2 points to students who score Advanced on the performance index, 1.1 points for Accomplished, 1 point for Proficient, 0.6 points for Basic, and 0.3 for Limited.

Additionally, ODE clarified that for its high schools, it will calculate growth in the same manner as it does for ODE’s Progress component in the Other Academic indicator for elementary and secondary schools that are not high schools (i.e., calculating growth using the growth index and effect size).

- *Other Academic Indicator*

ODE revised its methodology for calculating its Other Academic indicator for elementary and secondary schools that are not high schools. ODE will calculate student growth using a value-added rating system and assign points (from 0 to 5) based on the school’s index score and effect size.

- *Graduation Rate Indicator*

ODE continues to calculate its Graduation Rate indicator using the four-year ACGR. ODE also clarified that it uses a “State calculation” for its five-year graduation rate, which is considered a School Quality or Student Success (SQSS) indicator for ESEA purposes. To award points to a school, ODE combines the two rates, attributing 60 percent to the four-year ACGR and 40 percent to the State’s five-year graduation rate. Schools are awarded points from 0 to 5 for this indicator based on the combined rate.

- *Progress in Achieving ELP Indicator*

ODE modified its Progress in Achieving ELP indicator. If a school meets or exceeds the State’s MIP or if the school improves by 10 percent from the prior year, it receives 30 points, which is then included in the overall “Gap Closing” component of the system. A school receives points (from 0 to 5) for “Gap Closing” based on the percentage of the school’s total possible points that it earns on the metrics that are included in the “Gap Closing” component.

ODE also clarified that it separately displays and report this indicator in addition to having it contribute points in the accountability system via the “Gap Closing” component.

- *School Quality or Student Success Indicator (SQSS)*

- *Science and Social Studies Achievement*

ODE clarified the assessments included in its science and social Studies SQSS indicator. Specifically, ODE includes science assessments in grade 5 and 8, the biology end-of-course assessment, and the American history and American government end-of-course high school assessments.

- *Gifted Student Performance (Gap Closing)*
ODE removed its gifted student performance measure from its system of annual meaningful differentiation.
- *College, Career, Workforce and Military Readiness*
ODE removed its college, career, workforce and military readiness measure (formerly named prepared for success) from its system of annual meaningful differentiation.
- *Early Literacy*
ODE revised its early literacy SQSS indicator to only include proficiency in third grade reading. A school will receive between 0 and 5 points based on its performance.
- *State’s System of Annual Meaningful Differentiation*
ODE updated its system of annual meaningful differentiation so that schools receive up to five rated components: Achievement, Progress, Gap Closing, Early Literacy, and Graduation. For each component, the school receives between 0 and 5 points. These five components are then aggregated into one summative score using a weighted system to produce an overall score between 0 and 5. Only schools with data for three or more components will be included in the regular system of annual meaningful differentiation (schools with less than three components will be evaluated using an alternate methodology).

The weighting framework for schools is:

- For its kindergarten through grade 3 schools, ODE will use a total weight of 97.73 percent for its academic indicators and 2.27 percent for its SQSS indicators.
- For grades 4 through 8, the academic indicators have a weight of 85.33 percent and the SQSS indicators have a total weight of 14.67 percent.
- For grades 9-12, ODE will use a weight 59.02 percent for its academic indicators and 40.98 percent for its SQSS indicators.
- *Alternate Methodology*
For schools that do not have data for two or more components that are included in the accountability system (e.g., K-2 schools), ODE will identify the lowest-performing five percent of schools based on chronic absenteeism rates. ODE also clarified that its dropout recovery and prevention schools are included in the State’s system of annual meaningful differentiation and subject to same Federal accountability requirements as all other schools.
- *Comprehensive Support and Improvement (CSI) – Lowest Performing*
ODE updated its methodology for identifying low-performing Title I schools for comprehensive support and improvement (CSI) such that it will rank-order each Title I schools based on the overall points earned. ODE will then determine the lowest five percent of that list as CSI-low performing schools.

- *CSI-Low Graduation Rate*
ODE clarified that it will use the four-year ACGR to identify CSI schools based on low graduation rate.
- *CSI-Not Exiting Additional Targeted Support and Improvement (ATSI)*
ODE updated its timeline to first identify schools for CSI based on not meeting the exit criteria for ATSI schools in fall 2025.
- *Frequency of Identification – CSI*
ODE clarified its timeline for identification for its CSI schools. ODE will identify schools for CSI using data from the 2021-2022 school year and then every three years.
- *Targeted Support and Improvement (TSI) – Consistently Underperforming Subgroups*
ODE updated its methodology for identifying targeted support and improvement schools based on consistently underperforming subgroups (TSI) so that any school that has a student subgroup in at least the lowest two percent of any of the student subgroups rank-ordered based on their overall points will be identified as TSI. Specifically, ODE will use a ‘subgroup level overall rating’ to calculate each individual student subgroup with an n-size of 15 students. The subgroup’s overall rating must also be 2.5 stars or less. ODE also updated its methodology to indicate it will identify schools for TSI using one year of data from SY 2021-2022 and then use two years of data to identify TSI schools following SY 2022-2023 and in future years.
- *ATSI Methodology*
ODE updated its methodology for identifying a school for additional targeted support and improvement (ATSI). A school will be identified if it has at least one student group whose performance is as low as the “all students” group in a school identified for CSI based on low performance. ODE also updated its timeline to indicate it will identify schools for ATSI following SY 2021-2022 and every three years thereafter.
- *Annual Measure of Achievement*
ODE continues to adjust its Academic Achievement indicator for schools that do not meet the 95 percent participate rate threshold consistent with ESEA section 1111(c)(4)(E). ODE revised its *additional* penalty if a school does not meet the 95 percent participation rate threshold on its statewide assessments. Specifically, for its additional penalty, ODE uses a minimum n-size of 40 to determine the score reduction based on a school’s preliminary point total on the Gap Closing Component to the degree in which they missed the 95 percent threshold.
- *Additional Statewide Categories*
ODE revised its additional statewide categories of schools to no longer include its “focus schools,” which were schools that had one or more student subgroups that failed to meet specific locally determined improvement goals for three consecutive years.

- *CSI Exit Criteria*

ODE clarified that schools eligible to exit CSI status must demonstrate sustained improvement above the cut score on the accountability system that led to its initial identification.

ODE also revised its timeline for a school to exit CSI status from four to three years.

- *ATSI Exit Criteria*

ODE revised its exit criteria for schools identified as ATSI to include a single criterion. A school is able to exit ATSI status if it performs higher than the CSI identification threshold score in the year that it was identified as an ATSI school for two consecutive years. ODE also revised its timeline for a school to exit ATSI status from four to three years.

- *Other Continued Support*

ODE updated its descriptions of its more rigorous State-determined action for schools that fail to exit CSI status after a State-determined number of years.