



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

June 30, 2017

The Honorable Dianna R. Wentzell
Commissioner of Education
Connecticut State Education Department
165 Capitol Avenue
Hartford, CT 06106

Dear Commissioner Wentzell:

Thank you for submitting Connecticut's consolidated State plan to implement requirements of covered programs under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), and of the amended McKinney-Vento Homeless Assistance Act (McKinney-Vento Act).

I am writing to provide initial feedback based on the U.S. Department of Education's (the Department's) review of your consolidated State plan. As you know, the Department also conducted, as required by the statute, a peer review of the portions of your State plan related to ESEA Title I, Part A, ESEA Title III, Part A, and the McKinney-Vento Act using the Department's *State Plan Peer Review Criteria* released on March 28, 2017. Peer reviewers examined these sections of the consolidated State plan in their totality, while respecting State and local judgments. The goal of the peer review was to support State- and local-led innovation by providing objective feedback on the technical, educational, and overall quality of a State plan and to advise the Department on the ultimate approval of the plan. I am enclosing a copy of the peer review notes for your consideration.

Based on the Department's review of all programs submitted under Connecticut's consolidated State plan, including those programs subject to peer review, the Department is requesting clarifying or additional information to ensure the State's plan has met all statutory and regulatory requirements, as detailed in the enclosed table. Each State has flexibility in how it meets the statutory and regulatory requirements. Please note that the Department's feedback may differ from the peer review notes. I encourage you to read the full peer notes for additional suggestions and recommendations for improving your consolidated State plan.

ESEA section 8451 requires the Department to issue a written determination within 120 days of a State's submission of its consolidated State plan. Given this statutory requirement, I ask that you revise Connecticut's consolidated State plan and resubmit it through OMB Max within 15 days of the date of this letter. If you need more time than this to resubmit your consolidated State plan, please contact your Office of State Support Program Officer, who will work with you in establishing a new submission date. Please recognize that if we accommodate your request for

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

additional time, we may be unable to issue a written determination on your plan within the 120-day review period.

Department staff will contact you to support Connecticut in addressing the items enclosed with this letter. If you have any immediate questions or need additional information, I encourage you to contact your Program Officer for the specific Department program.

Please note that the Department only reviewed information provided in Connecticut's consolidated State plan that was responsive to the Revised Template for the Consolidated State Plan that was issued on March 13, 2017. Each State is responsible for administering all programs included in its consolidated State plan consistent with all applicable statutory and regulatory requirements. Additionally, the Department can only review and approve complete information. If Connecticut indicated that any aspect of its plan may change or is still under development, Connecticut may include updated or additional information in its resubmission. Connecticut may also propose an amendment to its approved plan when additional data or information are available consistent with ESEA section 1111(a)(6)(B). The Department cannot approve incomplete details within the State plan until the State provides sufficient information.

Thank you for the important work that you and your staff are doing to support the transition to the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Jason Botel
Acting Assistant Secretary

Enclosures

cc: Governor
State Title I Director
State Title II Director
State Title III Director
State Title IV Director
State Title V Director
State 21st Century Community Learning Center Director
State Director for McKinney-Vento Homeless Assistance Act: Education for Homeless Children and Youths Program

Items That Require Additional Information or Revision in Connecticut’s Consolidated State Plan

Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)	
A.4.i.b: Additional Subgroups at SEA Discretion	<p>In its State plan, the Connecticut State Department of Education (CSDE) indicates that it will include former children with disabilities in the “children with disabilities” subgroup for two years after they exit the “children with disabilities” subgroup. Under the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESEA), CSDE may include former children with disabilities as a separate subgroup, but not include those students within the children with disabilities subgroup.</p>
A.4.i.d: If Applicable, Exception for Recently Arrived English Learners	<p>Note: Although the CSDE chose an exception for including recently arrived English learners in accountability and assessments that conforms to the statutory provision, CSDE’s definition of recently arrived English learners as described in the State plan– those English learners whose initial entry date in a U.S. school is less than two years (i.e., 24 months) prior to test administration – is not consistent with the statutory requirement. Specifically, under ESEA section 1111(b)(3)(A), a student may be considered a recently arrived English learner if that student has been enrolled in a U.S. school for less than 12 months.</p>
A.4.iii.a.1: Academic Achievement Long-term goals	<p>In its State plan, CSDE proposes long-term goals for academic achievement based on academic growth for grades 4-8. The ESEA requires a State to identify and describe long-term goals and measurements of interim progress for improved academic achievement, as measured by grade-level proficiency on the annual statewide reading/language arts and mathematics assessments, for all students and for each subgroup of students. The ESEA also requires a State to ensure that, as it revises its long-term goals and measurements of interim progress for academic achievement to measure grade-level proficiency (requirement A.4.iii.a.2), it takes into account the improvement necessary for subgroups of students who are behind in reaching those goals to make significant progress in closing statewide proficiency gaps, such that the State’s long-term goals require greater rates of improvement for subgroups of students that are lower achieving (requirement A.4.iii.a.3). A State may include additional long-term goals for academic growth, if it desires.</p>
A.4.iv.a: Academic Achievement Indicator	<ul style="list-style-type: none"> CSDE proposes including science in the Academic Achievement indicator. For the Academic Achievement indicator required under ESEA section 1111(c)(4)(B)(i)(I), a State may include only proficiency on the annual assessments required under ESEA subsection (b)(2)(B)(v)(I) (i.e., reading/language arts and mathematics); CSDE may include performance on science or assessments other than those required under ESEA subsection (b)(2)(B)(v)(I) in the indicator for public elementary and secondary schools that are not high schools required under ESEA

	<p>section 1111(c)(4)(B)(ii) (i.e., the Other Academic indicator) for elementary and secondary schools that are not high schools or in the School Quality or Student Success indicator for any schools, including high schools.</p> <ul style="list-style-type: none"> • In its State plan, CSDE bases its Academic Achievement indicator on scale scores. The ESEA requires a State to measure and describe in its State plan an Academic Achievement indicator that is based on grade-level proficiency on statewide assessments in reading/language arts and mathematics. In its State plan, CSDE does not describe how it calculates an Academic Achievement indicator based on proficiency, inconsistent with the statutory requirements.
<p>A.4.iv.d: Progress in Achieving English Language Proficiency Indicator</p>	<p>CSDE does not include the Progress for Achieving English Language Proficiency indicator in its State plan. The ESEA requires a State to establish and describe a Progress in Achieving English Language Proficiency indicator that is the same indicator across all LEAs in the State, is based on the State’s definition of English language proficiency, is measured by the State’s English language proficiency assessment, and includes the State-determined timeline for students to achieve English language proficiency.</p>
<p>A.4.v.b: Weighting of Indicators</p>	<ul style="list-style-type: none"> • As discussed in A.4.iv.d above, the ESEA requires a State to establish and describe a Progress in Achieving English Language Proficiency indicator in its accountability system. The ESEA also requires that the Progress in Achieving English Language Proficiency indicator receive substantial weight individually. • The ESEA requires a State to describe the weighting of each indicator in its system of annual meaningful differentiation, including: <ul style="list-style-type: none"> ○ How the Academic Achievement, Other Academic for elementary and secondary schools that are not high schools, Graduation Rate for high schools, and Progress in Achieving English Language Proficiency indicators each receive substantial weight individually; and ○ How the Academic Achievement, Other Academic for elementary and secondary schools that are not high schools, Graduation Rate for high schools, and Progress in Achieving English Language Proficiency indicators receive, in the aggregate, much greater weight than the School Quality or Student Success indicator(s), in the aggregate. <p>CSDE provides information in its plan about the weighting of each indicator in a sample K-12 district to which all indicators in the State’s accountability system would apply, but does not describe the weighting of each indicator for a school in each grade span (as opposed to the K-12</p>

	<p>district as a whole) or how the weighting is adjusted for schools for which an indicator cannot be calculated due to the minimum number of students (<i>e.g.</i>, for the Progress in Achieving English Language Proficiency indicator). Therefore, it is unclear if CSDE meets the statutory requirements.</p>
<p>A.4.vi.c: Comprehensive Support and Improvement Schools— Additional Targeted Support Not Exiting Such Status</p>	<p>The ESEA requires CSDE to describe a methodology for identifying Additional Targeted Support schools that receive Title I, Part A funds and that have not exited such status within a State-determined number of years. CSDE does not describe its methodology for identifying such schools in its State plan.</p>
<p>A.4.vi.e: Targeted Support and Improvement Schools— “Consistently Underperforming” Subgroups</p>	<ul style="list-style-type: none"> • The ESEA requires a State to describe in its State plan its methodology for annually identifying schools with one or more consistently underperforming subgroups as determined by the State, if any. In its State plan, CSDE discusses the identification of schools with consistently underperforming subgroups but, because it does not include a definition of “consistently underperforming,” it is unclear whether CSDE meets the statutory requirements. • The ESEA also requires a State’s methodology for identifying these schools to consider all subgroups of students and all indicators in the statewide system of annual meaningful differentiation. CSDE’s plan states that it will only consider the “high-needs” subgroup and the Academic Achievement indicator.
<p>A.4.vi.f: Targeted Support and Improvement Schools— Additional Targeted Support</p>	<p>The ESEA requires that a State describe its 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). Because CSDE does not describe its methodology for identifying these schools, including the year in which the State will first identify such schools and the frequency with which the State will, thereafter, identify such schools, it is unclear whether CSDE meets the statutory requirements.</p>
<p>A.4.viii.a: Exit Criteria for Comprehensive Support and Improvement Schools</p>	<p>In its State plan, CSDE does not specify the number of years by which a school must meet the exit criteria, but indicates that a school may exit comprehensive support and improvement status if it no longer meets the reason for identification. Specifically, CSDE proposes exit criteria that may permit a school identified on the basis of being among the lowest-performing Title I, Part A schools to exit status based on the decline in the performance of other schools, which would not ensure continued progress in improved student academic achievement and school success. The ESEA requires a State to establish and describe exit criteria that ensure continued progress to improve student academic achievement and school success in the State, including the State-determined number of years over which such schools must satisfy the exit criteria, which may not exceed four years, consistent with ESEA section 1111(d)(3)(A)(i)(I).</p>

<p>A.4.viii.b: Exit Criteria for Schools Receiving Additional Targeted Support</p>	<p>The ESEA requires CSDE to establish and describe the statewide exit criteria for schools receiving additional targeted support that ensure continued progress to improve student academic achievement and school success in the State, including the State-determined number of years over which such schools must satisfy the exit criteria. The State’s plan does not address this category of schools.</p>
<p>A.5: Disproportionate Rates of Access to Educators</p>	<p>Although CSDE describes disproportionate rates of access to educators for all schools, CSDE does not specifically address ineffective teachers or schools assisted under Title I, Part A. The ESEA requires a State to describe the extent, if any, that low-income and minority children enrolled in schools assisted under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers.</p>
<p>Title II, Part A: Supporting Effective Instruction</p>	
<p>D.4: Improving the Skills of Educators</p>	<p>In its State plan, CSDE describes how it will improve the skills of teachers, principals, or other school leaders in order to enable them to identify students with specific learning needs, and provide instruction based on the needs of such students, for children with disabilities, English learners, and students with low-literacy levels. However, CSDE does not address all required student subgroups. Specifically, the ESEA requires the State to describe how it will improve the skills of teachers, principals, or other school leaders in order to enable them to identify students with specific learning needs and provide instruction based on the needs of such students, specifically for students who are gifted and talented.</p>
<p>D.5: Data and Consultation</p>	<p>In its State plan, CSDE describes how it will use data to continually update and improve the activities supported under Title II, Part A. However, the ESEA also requires the State to describe how it will use ongoing consultation as described in ESEA section 2101(d)(3) to continually update and improve the activities supported under Title II, Part A. Additionally, the ESEA requires a State to describe ongoing consultation for all required stakeholders consistent with ESEA section 2101(d)(3), which includes teachers, principals, other school leaders, paraprofessionals (including organizations representing such individuals), specialized instructional support personnel, charter school leaders (in a State that has charter schools), parents, community partners, and other organizations or partners with relevant and demonstrated expertise in programs and activities designed to meet the purpose of Title II.</p>
<p>Title IV, Part A: Student Support and Academic Enrichment Grants</p>	
<p>F.1: Use of Funds</p>	<p>In Section 6, CSDE describes how it will use funds from Title IV, Part A <i>or other programs</i> (emphasis added) to support many State-level activities related to Title IV, Part A; however it is not clear in sections 6.1.A and 6.1.B which of these State-level activities will be supported in</p>

	whole or in part by Title IV, Part A funds. The ESEA requires a State to describe how it will use funds received under Title IV, Part A, Subpart 1 for State-level activities, and clarify which of the State-level activities in Section 6 will be supported in whole or in part by Title IV, Part A funds.
F.2: Awarding Subgrants	Note: The Consolidated Appropriations Act, 2017 (Pub. L 115-31) provides States with a new option of awarding the Title IV, Part A subgrants to LEAs competitively. Please consider whether CSDE wishes to revise this response in light of this new flexibility.
Title IV, Part B: 21st Century Community Learning Centers	
G.1: Uses of Funds	CSDE describes the local activities it will support through subgrants to eligible entities, but does not describe how it will use funds reserved for “State activities” (SEAs may reserve up to five percent of program funds for State activities). The ESEA requires that a State describe the State activities it will carry out under the program, which may include monitoring and evaluating programs; providing capacity building, training, and technical assistance; conducting a comprehensive evaluation of the effectiveness of programs; providing training and technical assistance to applicants or recipients; ensuring activities are aligned with State academic standards; ensuring that eligible entities identify and partner with external organizations, if available; working with stakeholders to review and improve State policies to improve program implementation; coordinating funds with other Federal and State funds; and/or providing a list of pre-screened external organizations.
G.2: Awarding Subgrants	CSDE describes the objectives of its program, including a number of application requirements that eligible entities must address in their local subgrant applications, but does not describe the procedures it will use to ensure that community learning centers will help participating students meet challenging State and local academic standards. The ESEA requires that each State describe: (1) how it will ensure that proposed community learning centers will target their activities to students’ academic needs; and (2) how CSDE will implement a rigorous peer review process.
Education for Homeless Children and Youths Program, McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B	
I.1: Student Identification	In its State plan, CSDE indicates a variety of activities to identify homeless children and youth in the State. However, the State plan does not describe procedures CSDE will use to assess the needs of homeless children and youth. The McKinney-Vento Act requires the State to describe the procedures it will use to assess the needs of homeless children and youth.
I.2: Dispute Resolution	CSDE describes procedures for the resolution of disputes regarding educational placement. The plan does not, however, include procedural timelines or any other information that indicates that

	these procedures would result in the <i>prompt</i> resolution of disputes. The McKinney-Vento Act requires the State to describe the procedures it will use that will result in the <i>prompt</i> resolution of disputes.
I.3: Support for School Personnel	In its State plan, CSDE indicates there is training and outreach by LEA liaisons, with support from the SEA, for school personnel to heighten the awareness of such school personnel of the needs of homeless children and youth. It is not clear, however, how these activities will heighten the awareness of such school personnel of the specific needs of runaway and homeless children and youth. The McKinney-Vento Act requires the State to 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 runaway and homeless children and youth.
I.4 i: Access to Services	In its State plan, CSDE indicates there is collaboration between the State coordinator and other early childhood programs to ensure access and equity for its youngest students. The McKinney-Vento Act, however, requires the State to describe how collaboration between the State coordinator and other early childhood programs includes procedures that will ensure that homeless children have access to public preschool programs, administered by the SEA or an LEA, as provided to other children in the State.
I.4 ii: Access to Services	CSDE’s State plan mentions the State’s cross-systems approach to improving educational opportunities and outcomes. The plan does not, however, include <i>procedures</i> that ensure that homeless youth and youths separated from public schools are afforded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent them from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies. The McKinney-Vento Act requires the State to describe procedures that ensure that homeless youth and youths separated from public schools are afforded equal access to appropriate secondary education and support services, including removing barriers that prevent them from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies.
I.4 iii: Access to Services	While CSDE’s State plan indicates LEAs attest to their compliance with laws governing the access, enrollment, and success of homeless children and youth, it does not describe State procedures that ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to activities such as magnet schools, summer school, career and technical

	<p>education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels. The McKinney-Vento Act requires the State to describe procedures that ensure that homeless children and youth who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet schools, summer school, career and technical education, advanced placement, and charter school programs, if such programs are available at the State and local levels.</p>
<p>I.5: Strategies to Address Other Problems</p>	<p>In its State plan, CSDE indicates that the SEA works with district liaisons and partners to reduce barriers and enrollment delays for homeless children and youth. The plan does not, however, provide strategies to address problems resulting from enrollment delays that are caused by—(1) requirements of immunization and other required health records; (2) residency requirements; (3) lack of birth certificates, school records, or other documentation; (4) guardianship issues; or (5) uniform or dress code requirements. The McKinney-Vento Act requires the State to provide strategies to address problems resulting from the enrollment delays set forth above.</p>
<p>I.6: Policies to Remove Barriers</p>	<p>While CSDE indicates that policies related to the enrollment and retention barriers to homeless children and youth are developed, reviewed, and revised with LEAs, the State plan does not demonstrate that the SEA and LEAs have developed policies that they will review and revise to address specific to barriers to enrollment <i>due to outstanding fees or fines, or absences</i>. The McKinney-Vento Act requires the State to demonstrate how the SEA and LEAs in the State have developed policies that they will review and revise to remove barriers to the enrollment and retention of homeless children and youth in the State due to outstanding fees or fines, or absences.</p>