



S E A C
Special Education Advisory Council

919 Ala Moana Blvd., Room 101

Honolulu, HI 96814

Phone: 586-8126 Fax: 586-8129

email: spin@doh.hawaii.gov

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**Special Education
Advisory Council**

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Margaret Cox, Chair
Student Achievement Committee
Hawaii State Board of Education
P. O. Box 2360
Honolulu, HI 96804

RE: Agenda Item IV. A. Committee Action on amendments to
Section A.4.iii, A.4.v.b, A.4.vi.e, and Appendix A of Hawaii's
ESSA consolidated state plan

Dear Chair Cox and Members of the Committee,

The Special Education Advisory Council (SEAC) supports the
Department's amendments to its ESSA State Plan due for submission
later this month with the following comments and recommendations:

Minimum "n" size

SEAC has stated in numerous testimonies that we prefer a minimum
"n" size of 10 for accountability purposes. However, we acknowledge
that the Department has chosen to utilize an "n" size of 20. As noted
in Table A.2 of the plan, this "n" size will exclude 44 schools from
reporting the achievement of their special education students and
103 schools from reporting the achievement of English learners. In
future revisions of the plan, we ask that the Department reconsider
using a smaller grouping of students to ensure that more academically
vulnerable students are identified and provided supports.

Revision of long-term goals and measurements of interim progress

Long-term and interim goals for students with disabilities for ELA
and Math proficiency, as well as graduation rates, have been revised
downward from the June 2017 draft. SEAC believes these new goals
are achievable yet ambitious enough to close the achievement gap.
They do, however, conflict somewhat with the targets or goals set in
the State Performance Plan/Annual Performance Plan—the document
required annually by the U.S. DOE's Office of Special Education
Programs (OSEP) as part of its IDEA continuous improvement
monitoring.



Revision of long-term goals and measurements of interim progress (cont.)

In the current State Performance Plan (SPP), these targets are only set through SY 2018-19, yet they exceed the ESSA plan goals for students with disabilities by a significant margin. For example, the SPP reading goal for SY 2018-19 is 61%, the math goal is 56% and the graduation rate goal is 90%. Since both the ESSA Plan and the SPP/APR are submitted to the U.S. DOE, SEAC recommends that the Department make the goals or targets for the two plans consistent to avoid confusion.

The SPP/APR also uses ELA and math scores on the National Assessment on Educational Performance (NAEP) in determining whether Hawaii is achieving good academic results for students with disabilities compared to the other 49 states. Currently, Hawaii falls in the lowest performing one-third of states in this standardized test, which has resulted in a rating of “needs assistance” for the past three years. Hopefully, the Department’s renewed commitment to close the achievement gap will allow the state to meet its OSEP monitoring goals as well.

Stakeholder feedback re: Targeted Support and Improvement

Section A.4.vi.(e) of the amended plan adds a mechanism to collect stakeholder feedback in developing a proposal for the threshold of underperformance required to trigger Targeted Support and Improvement for consistently underperforming subgroups. Currently, the only stakeholders to be included in the discussion are Complex Area Superintendents, principals, and the Superintendent’s Cabinet. In the interest of transparency and inclusion, SEAC recommends that the Department also elicit feedback from other stakeholder groups, including parent and community groups.

Thank you for this opportunity to provide input on the ESSA Consolidated State Plan. SEAC stands ready to support the Department and the Board in the implementation and evaluation of the plan. Should you have any questions regarding this testimony, please contact me or Ivalee Sinclair, our Legislative Committee Chair.

Sincerely

Martha Guinan
Chair

Ivalee Sinclair
Legislative Committee Chair