

1 **A. Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)**
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3 1. **Challenging State Academic Standards and Assessments** (ESEA section 1111(b)(1) and (2) and 34 CFR
4 §§ 200.1–200.8.)¹
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6 2. **Eighth Grade Math Exception** (ESEA section 1111(b)(2)(C) and 34 CFR § 200.5(b)(4)):

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

9 Yes

10 No

- 11
12 ii. If a State responds “yes” to question 2(i), does the State wish to exempt an eighth-grade student
13 who takes the high school mathematics course associated with the end-of-course assessment
14 from the mathematics assessment typically administered in eighth grade under section
15 1111(b)(2)(B)(v)(I)(aa) of the ESEA and ensure that:

- 16 a. The student instead takes the end-of-course mathematics assessment the State
17 administers to high school students under section 1111(b)(2)(B)(v)(I)(bb) of the ESEA;
18 b. The student’s performance on the high school assessment is used in the year in which
19 the student takes the assessment for purposes of measuring academic achievement
20 under section 1111(c)(4)(B)(i) of the ESEA and participation in assessments under
21 section 1111(c)(4)(E) of the ESEA;
22 c. In high school:

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

27 2. The State provides for appropriate accommodations consistent with 34 CFR §
28 200.6(b) and (f); and

29 3. The student’s performance on the more advanced mathematics assessment is
30 used for purposes of measuring academic achievement under section
31 1111(c)(4)(B)(i) of the ESEA and participation in assessments under section
32 1111(c)(4)(E) of the ESEA.

33 Yes

34 No

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

40 As part of Ohio’s ESEA flexibility waiver approved in 2015, the state requested and was granted very broad
41 waiver authority that allowed any student in middle school to take a high school end-of-course assessment in any
42 subject, not just mathematics, when the student was enrolled in the corresponding course. This waiver allowed the
43 Department and Ohio’s schools and districts to ensure that students were assessed on the curriculum that was fully

¹ 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.

44 aligned to their instruction. Ohio’s approved waiver addressed all situations where accelerated students were
45 taking high school courses before entering ninth grade.

46 As part of its ESSA plan, Ohio is requesting to continue with its current practice as a way to ensure that districts
47 continue to have incentives to properly serve all students with advanced coursework and also to ensure that
48 students will be assessed on the appropriately aligned curriculum.

49 (Note: Additional changes may be made from time to time in Ohio’s assessment system relative to tests that are
50 not required for federal compliance purposes. Ohio will make appropriate notification if such changes are made
51 and will ensure that testing in high school is conducted at least once in English language arts, mathematics and
52 science.)

53 **Opportunity for All Students:** All districts in Ohio have local control to provide any high school courses,
54 including mathematics, English and biology, to their middle school students for high school credit as long as
55 certain conditions are met. The course curriculum used for middle school students must be the same as that used
56 in high school and must be taught by a teacher certified to teach the high school level of content. With these
57 conditions met, each school has the ability to offer its students high school-level courses. All district can make
58 choices regarding resource allocation priorities in order to support greater access to high school course content by
59 middle school students. Some districts may choose to prioritize the use of Title I funds to support these efforts,
60 including through strategies such as distance learning, on-line learning, shared teachers, etc.

61 **Course-Assessment Alignment:** It is important that when a middle school student takes a high school course,
62 that the assessment taken by the student aligns to the course. Ohio administers high school end-of-course tests in
63 four content areas: English language arts, mathematics (algebra I, geometry, integrated mathematics I, integrated
64 mathematics II), science and social studies. Alignment of coursework and testing across all academic content
65 areas is important because Ohio implemented a new system of graduation requirements that includes seven end-
66 of-course tests at the high school level beginning with the graduating class of 2018. Many districts are offering
67 advanced coursework to middle school students in many academic content areas to support students meeting
68 graduation requirements. Districts have increased their efforts in recent years because Ohio had been granted the
69 waiver from double testing.

70 It is Ohio’s policy intent that all students should have access to a rigorous and relevant curriculum with fully
71 aligned assessments, and that students taking advanced classwork will be required to participate in the aligned
72 assessments. This waiver created incentives to let students take advanced coursework in middle school by
73 relieving students and districts of the burden of preparing for multiple assessments.

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75 **Opportunities for Accelerated Students:** Ohio’s accountability system includes strong incentives for districts to
76 provide all students with the opportunity to be prepared for and to take advanced coursework across all academic
77 content areas in middle school. As is explained below in Section A.4, state law created incentives for districts to
78 identify and serve their top-performing students with formal written acceleration plans. If a student on a written
79 acceleration plan takes an assessment above his or her normal grade level, the student’s score counts one
80 performance level higher on the Performance Index score than what the student scores. For example, if a student
81 skips a year of math and takes algebra I as an eighth grader and scores “accelerated” on the algebra I assessment,
82 the score is counted as “advanced” when calculating the Performance Index score.

83 **Opportunities for Gifted Students:** In addition, Ohio is one of the only states in the nation to rate schools and
84 districts on the performance of and opportunities provided to its gifted students. The “gifted indicator,” also
85 described more fully in Section A.4, includes gifted inputs as part of the calculation. Ohio has seven different
86 categories of gifted students, and, as part of the gifted indicators, schools and districts earn points based on the
87 percentage of students identified and served in the different categories. Moreover, the calculation provides an

88 incentive to identify and serve traditionally under-represented populations (racial/ethnic minorities and
89 economically disadvantaged students) by awarding bonus points if a certain identification and service threshold is
90 reached.

91 To ensure that students are not identified in error, or simply to help a district do well on its gifted inputs, Ohio
92 developed an objective definition that must be met as a condition for a student to be identified as gifted. For
93 example, to be labeled superior cognitive or specific academic gifted, a student must either score two standard
94 deviations above the mean on an approved standardized assessment, must perform at the 95th percentile on a
95 nationally normed assessment or must attain an approved score on an above-grade-level assessment. To be
96 deemed creative thinking gifted or gifted in the area of visual or performing arts, a student must demonstrate
97 superior abilities through a combination of standardized assessments and a portfolio of work.

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99 **Frequency of High School Courses Taken by Middle School Students:** Actual course and test records from the
100 2014-2015 and 2015-2016 school years indicate that algebra I is the high school course most frequently taken by
101 students below the ninth grade. More than 32,000 middle school students took this course in each of the last two
102 years and nearly 90 percent of those students took the course one year early while in the eighth grade. Other high
103 school courses are much less likely to be taken by students prior to entering the ninth grade, but it does happen..
104 In each of the last two school years, between 1,600 and 1,800 students took a high school English language arts
105 course while in middle school, with nearly 96 percent taking integrated English language arts I as eighth-graders.
106 Fewer than 2,500 middle school students took a high school integrated math course in each of the last two years
107 and between 3,500 and 4,000 students took geometry each of the last two years while in middle school. The data
108 are equally limited when looking at science courses with small numbers of students taking high school-level
109 biology in a grade below nine. In summary, the vast majority of middle school students who take advanced
110 coursework do so one year early as eighth graders and will be able to meet federal testing requirements.

111 **Reporting of Data:** This data will be reported for relevant federal accountability purposes and will be integrated
112 into Ohio's State Report Card according to the description in the accountability sections of this plan. Ohio will
113 continue to calculate participation rates for these students. In the case of an eighth grader enrolled in an algebra I
114 course, that student will be expected to participate in the algebra I assessment and will be reported as part of the
115 middle school's participation rate data. That 'math' assessment also will be included in the middle school's Gap
116 Closing calculation and will count for all other aspects of the report card (indicators, Performance Index, and
117 Value-Added). Ohio will comply with all other ESSA reporting and accountability requirements using the
118 appropriate assessment based on the course taken by each student.

119 **High School Testing in Cases Where Students Take All High School Assessments in Middle School:** The
120 state recognizes that a very small number of students may take all end-of-course tests in a particular content area
121 prior to entering high school. Actual test data indicates that fewer than 4,000 students complete end-of-course
122 testing in one or more academic content areas while in middle school. Ohio will address the requirement to test
123 students once during high school in English language arts, math and science as follows: Ohio implemented
124 college and career readiness assessments for all students using the ACT and SAT starting in the 2016-2017 school
125 year. Students are required to participate in these assessments in the spring of their 11th grade year. The results of
126 these assessments (a remediation-free benchmark) will be included in the graded Prepared for Success measure,
127 which is described more fully in Section A.4 and is Ohio's college and career readiness measure on district and
128 school report cards. Additionally, any student who has taken both the algebra I/integrated math I and
129 geometry/integrated math II tests or the English language arts I and English language arts II tests or the biology
130 test in middle school will be required to use the college and career readiness assessment (ACT or SAT) as the
131 federal accountability measure in the year the assessment is given.

132 **Equivalent Proficiency Determination:** Similar to other states, such as North Carolina, that previously received
133 federal approval to use the ACT assessment as the high school accountability measure, Ohio will create an

134 equivalent proficiency determination that will be reported for students who have completed any respective set of
135 content area end-of-course tests while in middle school. Such students will be included in the Gap Closing
136 measure participation rate calculation using the English language arts and math sections of the college-readiness
137 test. The various sections also will be used to fulfill the requirement to include all students in the high school’s
138 Gap Closing calculation, and those scores will count for all other aspects of the report card (indicators met,
139 Performance Index, and Value-Added).

140 Ohio will comply with all other ESSA reporting and accountability requirements using the appropriate assessment
141 based on the courses taken by each student.

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

143 **i. Provide its definition for “languages other than English that are present to a significant**
144 **extent in the participating student population,” and identify the specific languages that**
145 **meet that definition.**

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147 Ohio defines significant languages other than English as those that include at least 20% of the
148 state’s English learner (EL) student population. Spanish has been identified as meeting this
149 definition. Somali, Arabic, and Chinese currently include approximately 5 percent each of the
150 state’s languages other than English present in the EL school population.

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

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155 Ohio attempts to meet the needs of English learner students by making available native language options,
156 as follows:

- 157 • Ohio currently offers the state mathematics, science and social studies assessments in Spanish for
158 grades 3-12.
- 159 • Districts are required to provide, to the extent practicable, translation accommodations for ELs
160 taking the compulsory state assessments. For example, the Department provides reimbursement
161 to districts for translation services. Information on translators is provided in the [Ohio’s State](#)
162 [Tests Rules Book](#) and [Ohio’s Accessibility Manual](#).
- 163 • Ohio does not permit the English language arts tests to be administered in any language other
164 than English except in very specific situations for students with disabilities. Along with the state's
165 computer-embedded accessibility features, English learners are allowed extra time and the use of
166 an approved bilingual, word-to-word dictionary to demonstrate what they know and can do, as
167 described in Ohio’s Accessibility Manual.

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

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174 Yearly student academic assessments are available for all languages (Spanish) identified in
175 question 3(i) above, which are present to a significant extent in the participating student
176 population. Assessments are not available for languages other than English and Spanish; a full list
177 of native languages can be found in (see Appendix). However, Ohio makes available translation
178 services for students speaking these other languages.

- 179 iv. Describe how it will make every effort to develop assessments, at a minimum, in languages
180 other than English that are present to a significant extent in the participating student
181 population including by providing
182 a. The State’s plan and timeline for developing such assessments, including a description
183 of how it met the requirements of 34 CFR § 200.6(f)(4);
184 b. A description of the process the State used to gather meaningful input on the need for
185 assessments in languages other than English, collect and respond to public comment,
186 and consult with educators; parents and families of English learners; students, as
187 appropriate; and other stakeholders; and
188 c. As applicable, an explanation of the reasons the State has not been able to complete
189 the development of such assessments despite making every effort.

190 **Plan and Timeline:** For languages other than English present to a significant degree in the
191 student population (Spanish), the Department has contracted with the American Institutes for
192 Research (AIR) to provide the state tests in mathematics, science, and social studies in Spanish.
193 AIR continues to work with Ohio to determine new technologies to provide the tests in Spanish as
194 Ohio transitions to fully online testing. The state plans to be fully online except for paper
195 accommodated forms for students unable to test online by 2018-19. The Department is working
196 to utilize technology to provide needed translations in Spanish and in other languages.

197 In previous years, the Department has provided the state graduation assessment in multiple
198 languages other than English and Spanish (at times, nine languages other than English). The tests
199 were translated and provided on CDs to standardize the translation. The Department determined
200 that this was not cost-efficient as many of the CDs were returned unopened, or the test was
201 translated into a language variation not understandable to the students (e.g., Puerto Rican Spanish
202 vs. Guatemalan Spanish). Based upon feedback from stakeholders, the Department determined it
203 was more effective to reimburse for translation services provided at the local level by the districts.

204 **Meaningful Input:** Gathering meaningful input regarding the need for assessments in languages
205 other than English has taken many forms:

- 206 • Districts engage regularly with the Department regarding the need for assessments in
207 languages other than English. The total number of students speaking the 81 languages
208 other than English in Ohio is collected by the Department to assist the districts in locating
209 the translators required for state test translations.
- 210 • Ohio gathers input from individuals seeking technical assistance, professionals across the
211 regional educational service centers, and through communications with coordinators,
212 teachers and community members within districts with English learners.
- 213 • The Department engages members of community groups that include the Commission on
214 Hispanic/Latino Affairs, the Coalition for Parents of Students with Disabilities, English
215 Learner Advisory Group, the Ohio Education Association and the Ohio Federation of
216 Teachers to gather meaningful input to determine the needs of the English learners.
- 217 • The Lau Resource Center participates in sessions during the annual state TESOL
218 conference. The sessions provide opportunities for educators to share resources and
219 provide meaningful feedback regarding the need for accessible testing accommodations
220 and assessments in languages other than English.
- 221 • The Lau Resource Center participates in sessions during the annual state TESOL
222 conference. The sessions provide opportunities for educators to share resources and
223 provide meaningful feedback regarding the need for accessible testing accommodations
224 and assessments in languages other than English.

224 Ohio is fully committed to meeting the needs for assessments in languages other than English
225 through the Spanish language test forms and the provision of translation services. Discussion is

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ongoing to determine cost-efficient processes in the future using technology to provide the state assessments in languages other than English that will be acceptable and appropriate for Ohio's students, parents, community, stakeholders and districts.

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