



Department of Education

Mike DeWine, Governor
Dr. Stephanie K. Siddens, Interim Superintendent of Public Instruction

Oct. 27, 2021

Dear President Ballard:

Thank you for Lorain City School's recent submission of a proposed academic improvement plan pursuant to [Ohio Revised Code 3302.103](#). State law requires the state superintendent of public instruction to review each proposed plan and approve it or suggest modifications within 30 days of receiving it. If the state superintendent suggests modifications, the district board must revise the plan and resubmit it within 15 days after receiving the suggested modifications.

The academic improvement plan outlines the key strategies and related benchmarks to ensure the long-term success of students in your district. In my review of this plan, I focused on the proposed academic benchmarks to ensure they represent ambitious, achievable goals while also looking for evidence of stakeholder input and effective improvement strategies.

The pandemic continues to have a major impact on achievement at the local and state levels. In the 2020-2021 school year, district-level student performance generally was lower than in previous (pre-pandemic) baseline years. The Ohio Department of Education recognizes districts have had to work even harder to support students as a result of pandemic-related challenges. At the same time, it is important that we continue to have high expectations for student success. The benchmarks are designed to determine whether, after three years of implementation, the district is making sufficient progress on long-term goals to justify the continued implementation of the plan rather than reverting back to the oversight of an Academic Distress Commission. Requested revisions should ensure all summative three-year benchmarks are set no lower than pre-pandemic levels.

Accordingly, I am requesting the following revisions to your proposed academic improvement plan:

Academic Benchmarks

1. Important Notes

- a. The current benchmark goals for several measures (#3-7, 14-21) are incomplete. It is expected the district will modify the improvement plan and set benchmarks after complete baseline year data is available.

- b. **Graduation rate data:** Due to timing of graduation data collection, the class of 2025 graduation data may not be official by the 2025 deadline for this academic improvement plan. The Department will work with the district in the summer of 2025 as needed to calculate an unofficial graduation rate for the purposes of evaluation of this benchmark.
 - c. **Modified graduation rate:** Due to timing of graduation data collection, the class of 2025 graduation data may not be official by the 2025 deadline for this academic improvement plan. The Department will work with the district in the summer of 2025 as needed to calculate an unofficial graduation rate for the purposes of evaluating this benchmark.
2. **Measurement period for #1 and #2:** In your revision, please include an explanation for the different measurement periods for each of the graduation rate benchmarks (for example, provide clarification on why one measurement period is summer to summer, and the other is fall to fall).
 3. **Chronic Absenteeism:** The 2025 target is a minor improvement from pre-pandemic levels. Please set a more ambitious target to ensure student absenteeism is not an impediment to meeting the goals of the improvement plan.

Improvement strategies

The following comments reflect specific revision requests related to the improvement strategies in the proposed plan. Team members at the Department are available for additional assistance and information in specific subject areas.

- **District leadership team:** Provide the action steps and a timeline (years 1-3) for the work of the district leadership team.
- **Graduation plan:** Strategies directed toward improving graduation in the district likely would have a significant impact. Potential strategies and action steps should include:
 - Increasing student access to alternative pathways to graduation, specifically career-focused options.
 - Ensuring graduation plans are in place and being updated at least yearly for each student.
- **Literacy:**
 - The state support team's regional early literacy specialist and the literacy specialists at the educational service center can provide support on literacy-related activities. Please revise the academic improvement plan to include partnership with these key literacy supports in each of your literacy-related strategies.
 - **Teaching and Learning tab, Row 12: Create a training series that develops literacy practices (reading, writing, speaking, listening) across all grade levels and disciplines that includes the science of reading.** Please address the following recommendations:
 - The literacy team recommends adding the term "evidence-based" in front of "literacy practices." Please see recommendations for professional learning from [Ohio's Striving Reader's Districts](#).
 - Newly enacted dyslexia legislation will require educators in grades K-12 to receive specific training. Please see the [Adolescent Literacy video](#) on the Department's webpage and address specific related strategies in your plan.
 - The Department also recommends the use of a professional development template for Lorain City School leaders to use when identifying and compiling a professional learning series for educators and administrators,

see the link on the bottom of the [Comprehensive Literacy State Development Grant webpage](#).

- **Leadership tab, Row 7: Develop a protocol to differentiate meaningful professional development based on need for all staff.** Please address the following recommendations:
 - Revise the academic improvement plan to clarify that professional learning will be based on the results of student assessment and progress monitoring data. This means professional development will focus on improving knowledge for effective implementation in subject areas where students show the greatest need. For example, if your K-3 data reveals a high percentage of students with low phonological awareness and phonics subscores, then professional learning should focus on building educator knowledge and skills to effectively implement evidence-based phonological awareness and phonics based on explicit, systematic teaching.
 - Identify specific activities for instruction for grade bands, such as: K-3 explicit instruction for [phonological awareness \(Heggerty\)](#) and [phonics \(Florida Center for Reading Research\)](#) and for adolescent [Anita Archer's explicit instruction \(Phonics for Reading\)](#).
- **Row 23: Develop a PreK-12 curriculum team to support the development and implementation of LCS curriculum.**
 - The academic improvement plan should outline a procedure to implement a curriculum audit.
 - Additionally, include a plan to review evidence-based instructional materials at each grade band. Consider adopting an existing evidence-based curriculum. There are [evidence-based curriculum resources listed on the Department's webpage for 6-12 supplemental materials](#). Others are listed in the above recommendation. The state support team's regional early literacy specialist can help identify high-quality instructional materials for grades preK-12.
- **Row 24: Develop a PreK-12 curriculum team to support the development and implementation of LCS curriculum.**
 - Ensure observational walkthrough forms align with the curriculum and evidence-based language and literacy strategies. See [Ohio's Plan to Raise Literacy Achievement](#) for strategies.
 - Describe how teacher-based teams, building leadership teams and the district leadership team will ensure fidelity of implementation for curriculum selected for each grade level.
- **Special Education Recommendations:**
 - Develop specific supports related to the identified outcomes for students with disabilities. Describe how all students (including students on alternative assessments and in a self-contained classroom) will be included in the least restrictive environment, progress monitored and included in local assessments.

As always, please continue to engage your state support team as you make adaptations to your plan and embark on implementation. Your state support team is available to assist your district leadership team using the Ohio Improvement Process (OIP) to develop and align your improvement infrastructure (district leadership teams, building leadership teams and teacher-based teams). State support teams also have expertise in early literacy, early learning and school readiness, Positive Behavioral Interventions and Supports and special education. In addition, state support teams can assist with building capacity to support your plan goals.

State law requires revised improvement plans to be submitted within 15 days (no later than Nov. 11, 2021) after receipt of this letter. The Department stands by to assist and provide additional information on these revisions. Please contact Marva Kay Jones at marva.jones@education.ohio.gov to coordinate any follow-up requests.

Sincerely,

A handwritten signature in black ink that reads "Stephanie K Siddens". The signature is written in a cursive, flowing style.

Stephanie Siddens, Ph.D.
Interim State Superintendent of Public Instruction

cc: CEO Jeffrey Graham, Lorain City Schools