Oct. 27, 2021

Dear President Shadd:

Thank you for Youngstown City School District’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**

There are two types of requests below: requests to revise the academic benchmarks, and general acknowledgement of incomplete benchmarks due to lack of baseline data. The benchmark revisions requested below follow the principle that any final summative benchmark be set not lower than pre-pandemic baselines from the 2018-2019 school year. While your plan has set some academic targets low, I acknowledge that the goal is to work on a progression to reach higher academic achievement levels for all students to at least pre-pandemic levels and higher.
The proposed plan your district submitted acknowledges the tension between setting ambitious but realistic improvement benchmarks for the purposes of this three-year plan, while also recognizing the need for higher achievement levels for all students.

Your proposed plan notes this tension by providing the following narrative for several benchmarks:

While all goals in YCSD point to high level success for all scholars, this benchmark is an incremental improvement goal to demonstrate appropriate improvement to exit the Academic Distress Commission and to continue with local control and implementation of the district’s strategic plan and other district improvement initiatives (Youngstown City School District Academic Improvement Plan).

This language suggests the proposed benchmark is designed to demonstrate progress during the three-year plan while acknowledging the bigger-picture goal for the district is higher achievement for all students. Accordingly, the Department requests you clearly state the long-term success goals in the context of the improvement goals. This is especially important context when reviewing the benchmarks your district set related to Ohio’s State Tests (in benchmarks 6, 11-13, 16-17). Specific requested revisions are noted below. For example, your district’s goals in the 11 District Plan1 focused on students with disabilities, including specific targets for special education students that are much higher than the proposed improvement targets for all scholars.

- **1. Literacy:** While the literacy goal using the Preschool Early Literacy Indicators (PELI) Assessment has been established (p.7), the district must submit a request to modify the improvement plan and annual targets after complete baseline year data is available. This amendment, once submitted, should reflect high expectations for students. The Department’s literacy team is well-versed in this assessment and will assist the district in designing an amended target.

- **6. Literacy:** In addition to the stated three-year goal that will be evaluated in June 2025 for the purpose of determining whether the district is making sufficient progress to avoid reverting to oversight by an Academic Distress Commission, please also identify a long-term goal for meeting the expectation of a “high level success for all scholars.”

- **7. Math for grades K-3:** The final benchmark of 51% of scholars in grades K-3 meeting their expected growth on the NWEA MAP Math assessment (p. 20) is below the previous baseline of 63% set in the 2018-2019 school year. While we understand the level of scholars meeting growth expectations dropped to 17% in 2020-2021 due to lasting impacts of the pandemic, to demonstrate substantial progress, the district must implement strategies and articulate a revised goal target for June 2025 that exceeds the pre-pandemic baseline of 63% set in 2018-2019.

- **10. Math for grades 9-12:** The final benchmark of 65% of scholars in grades 9-12 meeting their expected growth on the NWEA MAP Math assessment (p. 26) is below the previous baseline of 69% set in the 2018-2019 school year. While we understand the level of scholars meeting growth expectations dropped to 42% in 2020-2021 due to lasting impacts of the pandemic, to demonstrate substantial progress, the district must implement strategies and articulate a revised goal target for June 2025 that exceeds the pre-pandemic baseline of 69% set in 2018-2019.

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1 The 11 District Plan is a comprehensive five-year plan focused on improving outcomes for students with disabilities in Ohio’s 11 urban districts. The 11 District Plan is a result of a settlement agreement in a special education lawsuit, Doe v. State of Ohio.”
• **11. Math for grades 3-5**: The final benchmark of an average of 16% of scholars in grades 3-5 scoring proficient or above on their respective Ohio’s State Tests in math (p. 28) is low and below the previous baseline of 27% in the 2018-2019 school year. While we understand the average proficiency dropped to 7% in 2020-2021 due to lasting impacts of the pandemic, to demonstrate substantial progress, the district must implement strategies and articulate a revised goal target for June 2025 that exceeds the pre-pandemic baseline of 27% set in 2018-2019.
  o In addition to the stated three-year goal that will be evaluated in June 2025 for the purposes of determining whether the district is making sufficient progress to avoid reverting to oversight by an Academic Distress Commission, please also identify a long-term goal to meet the expectation of a “high level success for all scholars.”
  o In the district’s 11 District Plan, the district set the 2024-2025 math proficiency target for students with disabilities at 32% proficient. This exceeds your district’s academic improvement plan target for all scholars in 2025.

• **12. Math for grades 6-8**: The final benchmark of an average of 14% of scholars in grades 6-8 scoring proficient or above on their respective Ohio’s State Tests in math (p.30) is low and below the previous baseline of 19% set in the 2018-2019 school year. While we understand the average proficiency dropped to 5% in 2020-2021 due to lasting impacts of the pandemic, to demonstrate substantial progress, the district must implement strategies and articulate a revised goal target for June 2025 that exceeds the pre-pandemic baseline of 19% set in 2018-2019.
  o In addition to the stated three-year goal that will be evaluated in June 2025 for the purposes of determining whether the district is making sufficient progress to avoid reverting to oversight by an Academic Distress Commission, please also identify a long-term goal to meet the expectation of a “high level success for all scholars.”
  o In the district’s 11 District Plan, the district sets the 2024-2025 math proficiency target for students with disabilities at 32% proficient. This exceeds your district’s academic improvement plan target for all scholars in 2025.

• **13. Math for End-of-Course Exams**: The final benchmark of an average of 17% of scholars enrolled in Algebra I and geometry scoring proficient or above on their respective Ohio’s State Tests (p.32) is low and below the previous baseline of 21% set in the 2018-2019 school year. While we understand the average proficiency dropped to 8% in 2020-2021 due to lasting impacts of the pandemic, to demonstrate substantial progress, the district must implement strategies and articulate a revised goal target for June 2025 that exceeds the pre-pandemic baseline of 21% set in 2018-2019.
  o In addition to the stated three-year goal that will be evaluated in June 2025 for the purposes of determining whether the district is making sufficient progress to avoid reverting to oversight by an Academic Distress Commission, please also identify a long-term goal to meet the expectation of a “high level success for all scholars.”
  o In the 11 District Plan, the district sets the 2024-2025 math proficiency target for students with disabilities at 32% proficient. This exceeds your district’s academic improvement plan target for all scholars in 2025.

• **16. Government**: In addition to the stated three-year goal that will be evaluated in June 2025 for the purposes of determining whether the district is making sufficient progress to avoid reverting to oversight by an Academic Distress Commission, please also identify a long-term goal to meet the expectation of a “high level success for all scholars.”

• **17. U.S. History**: In addition to the stated three-year goal (p.38) that will be evaluated in June 2025 for the purposes of determining whether the district is making sufficient progress to avoid reverting to oversight by an Academic Distress Commission, please also identify a long-term goal to meet the expectation of a “high level success for all scholars.”
• **18. Overall Performance Index:** The final benchmark of an overall Performance Index reaching or exceeding 42% (p.42) is below the previous baseline of 46.6% set in the 2018-2019 school year. While we understand the overall Performance Index dropped to 32.3% in 2020-2021 due to lasting impacts of the pandemic, to demonstrate substantial progress, the district must implement strategies and articulate a revised goal target for June 2025 that exceeds the pre-pandemic baseline of 46.6% set in 2018-2019. Additionally, it should be noted that more than 13% of students were untested in the 2020-2021 school year which had an impact on the calculated Performance Index. With higher rates of participation in the future, there will be a positive impact to the calculation of the performance index.

• **22. Graduation credits:** The current benchmark goal is incomplete (p.50). The district must submit a request to modify the improvement plan and set annual targets after complete baseline year data is available.

• **23. Diploma seals:** The current benchmark goal is incomplete (p.53). The district must submit a request to modify the improvement plan and set annual targets after complete baseline year data is available.

• **24. Expansion of career-technical education (CTE):** While the expansion of CTE with seventh- and eighth-grade scholars has been established (p.55), it is noted and expected that the district may submit a request to modify the improvement plan and annual targets after complete baseline year data is available.

**Improvement strategies**

The following comments reflect specific revision requests related to the improvement strategies in the proposed plan. These revisions should be included in your next submission of the academic improvement plan within 15 days. Team members at the Department are available for additional assistance and information in specific subject areas.

• **State Support Team and independent monitoring:** The state support team should serve as a partner in the implementation of the plan. However, in light of that critical support role, the state support team should not serve as an independent monitor. The monitor should have a third-party perspective that is able to provide honest formative feedback about the status of the implementation. Please identify a replacement for independent monitoring to reflect the state support team as a partner rather than as an independent monitor.

  ▪ **Literacy:**
    o **Existing comprehensive literacy plan.** Youngstown’s existing comprehensive literacy plan is well designed at the elementary level and reflects the support that Youngstown leadership has requested from the Department’s literacy team and the state support team. This existing literacy plan should be explicitly referenced in the strategies of your proposed academic improvement plan to ensure alignment between these two related plans. The Department previously has assigned Youngstown an urban literacy specialist to support the literacy component of the 11 District Plan. This specialist is very knowledgeable in the science of reading and will be a positive support for implementation. This same literacy specialist can help with the implementation of the newly enacted dyslexia legislation.
    o **Other literacy recommendations:**
      ▪ The strategies on secondary literacy proposed in the academic improvement plan state that the district is using myPerspectives core reading program to support scholars’ vocabulary, background knowledge and reading comprehension of rigorous instructional strategies.
      ▪ The improvement plan should include action steps for adult implementation, such as trainings and timelines to ensure a strong implementation of myPerspectives before adding in Pre-AP Access for All. Implementing both at the same time is not advisable and may hinder the success of both initiatives.
As referenced in the literacy benchmarks and strategies, ensure that current decision rules to determine targeted interventions are aligned across all assessments at each grade level.

**Special Education:**
- **11 District Plan:** The district’s existing 11 District Plan is a well-designed plan that comprehensively addresses language and literacy, professional learning for individualized education program (IEP) supports and services, professional learning for leadership and teachers, positive behavioral intervention and supports, multi-tiered system of support (MTSS), post-secondary transition, Universal Design for Learning and Assistive Technology and services through age 22 for students on IEPs. This existing 11 District Plan should be explicitly referenced in the strategies of your proposed academic improvement plan to ensure alignment between these two related plans. For example, identify how all students (including students on alternative assessments and in a self-contained classroom) are included in the least restrictive environment, provided instruction with evidence-based practices, progress monitored and included in local assessments.

**Recommendation for graduate success:** Include targeted strategies to increase student access to alternative demonstrations of competency, specifically career-focused options like industry-recognized credentials, career-technical education and pre-apprenticeship programs.
  - Explicitly reference the 11 District Plan as it relates to the strategies identified for graduate success. Specifically reference dedicated strategies to improve post-secondary learning experiences and outcomes.

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 intervention and supports and special education. In addition, State support teams can assist with building capacity to support your plan goals.

State law requires that the revised improvement plan must be submitted within 15 calendar 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,

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

cc: CEO Justin Jennings, Youngstown City School District