



STATE OF CONNECTICUT

STATE BOARD OF EDUCATION



March 29, 2021

The Honorable Ian Rosenblum
Deputy Assistant Secretary for Policy and Programs
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Dear Deputy Assistant Secretary Rosenblum:

I am writing to request a waiver, pursuant to section 8401 of the Elementary and Secondary Education Act of 1965 (ESEA), of the following requirements as a result of ongoing challenges related to the novel Coronavirus Disease 2019 (COVID-19):

State: Connecticut

Please check all that apply:

- Accountability and school identification requirements in ESEA sections 1111(c)(4) and 1111(d)(2)(C)-(D): the requirements that a State measure progress toward long-term goals and measurements of interim progress; meaningfully differentiate, on an annual basis, all public schools, including by adjusting the Academic Achievement indicator based on a participation rate below 95 percent; and identify schools for comprehensive, targeted, and additional targeted support and improvement based on data from the 2020- 2021 school year.
- Report card provisions related to accountability in ESEA section 1111(h) based on data from the 2020-2021 school year. These include:
 - Section 1111(h)(1)(C)(i)(I)-(IV) and (VI) (Accountability system description, other than the list of comprehensive, targeted, and additional targeted support and improvement schools).
 - Section 1111(h)(1)(C)(iii)(I) (Other Academic indicator results for schools that are not high schools).
 - Section 1111(h)(1)(C)(v) (School Quality or Student Success indicator results).
 - Section 1111(h)(1)(C)(vi) (Progress toward meeting long-terms goals and measurements of interim progress).
 - Section 1111(h)(2)(C) with respect, at the local educational agency (LEA) and school levels, to all waived requirements in section 1111(h)(1)(C).

Consistent with the requirements of ESEA section 8401(b)(1)(C), describe how the waiving of such requirements will advance student academic achievement.

Provide a description here.

The 2020-21 school year has been unique and challenging as districts and schools in Connecticut have continually adapted to the changing health and local conditions and modified the learning model (i.e., in-person, hybrid, or remote) made available to students sometimes on a weekly basis. Removing the expectation of formal school and district accountability, including reporting of accountability data, will free educators to keep their focus on high-quality instruction that is aligned to the state standards, regardless of the learning model offered. It will enable them to see the state assessment not as a tool for accountability of adults but as a means to evaluate the full impact of the pandemic on student achievement and growth.

Consistent with the requirements of ESEA section 8401(b)(1)(F), in order to maintain or improve transparency in reporting to parents and the public on student achievement and school performance in school year 2020-2021, including the achievement of subgroups of students, I assure that:

- The State will make publicly available chronic absenteeism data, either as defined in the State’s School Quality or Student Success indicator, if applicable, or ED Facts, disaggregated to the extent such data are available by the subgroups in ESEA section 1111(c)(2), on State and local report cards (or in another publicly available location).
- The State will make publicly available data on student and/or teacher access to technology devices and high-speed internet, disaggregated by the subgroups in ESEA section 1111(c)(2), to the extent such data are collected at the state or LEA level.

Provide any additional information about maintaining and improving transparency here, including whether the state or LEA collects information on access to technology and high-speed internet and other existing collections of opportunity to learn data (e.g., data used for the State’s School Quality or Student Success indicator(s), school discipline data, access to a well-rounded education (such as advanced courses, music, and the arts), access to support staff (e.g., nurses, social workers, psychologists), and/or access to qualified educators data, which could include teacher and staff turnover data).

For the 2020-21 school year, the State Board of Education expects districts to provide rigorous learning and engagement opportunities regardless of the learning model. The Board also charged the Connecticut State Department of Education (CSDE) with collecting whatever data are necessary and making that information transparent. Therefore, at the start of the 2020-21 school year, Connecticut established two new data collections to support student participation in schooling:

1. The learning model data collection collects data weekly on the learning model offered by each district for each grade; and
2. The monthly attendance data collection collects student-level membership and attendance data; this is reported separately for in-person and remote days.

The CSDE has been reporting these data publicly at [Supporting Student Participation \(ct.gov\)](#) since October 2020.

The learning model data are discussed weekly among senior CSDE leadership and with the Governor's office; these data have been instrumental in guiding CSDE's efforts to support schools to reopen for in-person instruction. Prior to collecting the attendance data, the CSDE issued new guidance for [Tracking Attendance on Remote Days for State Reporting \(ct.gov\)](#). The attendance data are aggregated and updated every month. This includes attendance rates and chronic absenteeism data. CSDE staff use these attendance data to provide technical assistance and supports to districts to increase student participation this year. These efforts were recognized by Attendance Works (see [Emerging Attendance Data Reveals Troubling, Early Trends - Attendance Works](#)).

The CSDE assures that it will make publicly available chronic absenteeism data for districts and schools that can be disaggregated by student subgroups.

Since the pandemic hit in mid-March 2020, the CSDE has worked actively to address device and connectivity issues. A philanthropic donation in March provided 60,000 laptops to high school students in our highest need districts. The Governor then instituted the Everybody Learns Initiative (ELI) which has since delivered an additional 82,000 Chromebooks/laptops. In total, over [142,000 devices have been delivered](#), with nearly three-quarters of these devices going to our highest need Alliance Districts. As part of the ELI, the CSDE provided one-year subscriptions for internet access through hotspots (nearly 13,000 Kajeet hotspots) as well as through broadband cable installations from the five major cable providers. Hotspots were distributed to districts based on a needs assessment, and cable broadband installations were completed after student addresses were verified by internet service providers based on submissions from districts. A hotspot exchange program was also established (see [KajeetHotspotDistrictContacts.pdf](#) for districts identified as having some excess supply).

Connecticut's investments to close the digital divide during this pandemic are [among the highest in the country](#). This fact sheet also provides device investments by district across the state.

While Connecticut does not collect student-level device/connectivity information, it has made significant investments in devices and connectivity access that have enabled students to participate in remote/hybrid learning program offerings and participate in remote administration of state assessments where available. Additionally, CSDE has continued to report data on other metrics where feasible and defensible. For instance, Connecticut reported discipline data for 2019-20 as part of a [report to the State Board of Education](#) to highlight disproportionality, and also launched a [new tiering system for districts based on discipline data](#) to target interventions and supports. Additionally, Connecticut reported data on indicators such as [access to college readiness courses](#) and [postsecondary entrance and persistence](#) which in another year would have been part of the accountability report. The CSDE plans to continue reporting metrics when feasible and defensible.

Consistent with the requirements of ESEA section 8401(b)(1)(F), in order to ensure that schools will continue to provide assistance to the same populations served by Title I, Part A (e.g., subgroups in section 1111(c)(2)), I assure that:

- Any school that is identified for comprehensive, targeted, or additional targeted support and improvement in the 2019-2020 school year (i.e., any school that was in that status as of the 2019-2020 school year), except for comprehensive support and improvement schools identified based on low graduation rates that meet the State's exit criteria, will maintain that identification status in the 2021-2022 school year, implement its support and improvement plan, and receive appropriate supports and interventions.
- The State will identify comprehensive, targeted, and additional targeted support and improvement schools using data from the 2021-2022 school year in the fall of 2022 to ensure school identification resumes as quickly as possible.

This waiver request is materially the same as the state plan addendum submitted by the CSDE to the U.S. Department of Education in late January 2021. Both requests asked for a waiver from accountability for districts and schools in the 2020-21 school year, which results in no summative rating, no school classifications, and no identification of new schools for state support based on data from the 2020-21 school year. Both requests assured that the CSDE would report data on indicators where feasible and defensible and defer identification of schools for state support by a year. Consistent with the requirements of ESEA section 8401(b)(3)(A) the CSDE provided an opportunity for public comment as part of the addendum request in January. Therefore, given the nearly identical nature of this request, the CSDE considers the public comment process from the January addendum as meeting the needs of this waiver request.

Thank you for your consideration.

Sincerely,



Charlene M. Russell-Tucker
Acting Commissioner of Education