January 7, 2019

The Honorable Betsy DeVos
U.S. Department of Education
400 Maryland Avenue
SW Washington, D.C. 20202

Dear Secretary DeVos,

This letter serves as Arkansas’ official request for amendment to Arkansas’ Every Student Succeeds Act (ESSA) plan regarding long-term goals.

**ELA Long-Term Goals**

In the spring of 2018 the Arkansas Department of Education was notified that ACT Aspire, the state’s Grades 3-10 assessment vendor for English Language Arts, Math, and Science, would be updating the scaled score cut points associated with college and career readiness in English Language Arts.

According to ACT, Inc., the update to ACT Aspire ELA readiness cut points was necessary to set empirically-derived readiness cut points based on the new ACT College Readiness Benchmark for ELA. The revised cut points for ACT Aspire ELA scores are more rigorous than the prior cut points as they are based on ACT, Inc.’s research on college freshmen’s success in multiple courses including English Composition, American History, Other History, Psychology, Sociology, Political Science, and Economics.

The Arkansas Department of Education decided it was important to implement the change to the ELA readiness cut points immediately in order to provide students, parents, and teachers with the most accurate information about whether a student was on a path to readiness for success in college and career.

Doing what is right at the student level must be accompanied by doing what is right for schools who will use the checkpoints for interim progress to gauge school-level progress in meeting the long-term goal of at least 80% of students meeting or exceeding readiness expectations for college and career success. Additionally, these checkpoints for interim progress are used in other programs such as Blue Ribbon Schools and Distinguished Title I schools to determine eligibility for designation. Aligning the long-term goals and checkpoints for interim progress to reflect the change in ELA readiness cut points is sensitive to stakeholder feedback and provides the most accurate information for education stakeholders to gauge schools’ progress in improving students’ readiness for success beyond high school graduation.
As a result of the revised cut score points, and in consultation with Arkansas' Technical Advisory Committee for Accountability and Assessment and Arkansas stakeholders regarding the best course of action aligned to the Arkansas ESSA Theory of Action (pp 14-16), the Arkansas Department of Education requests a revision to the long-term goals for ELA.

**English Learners On Track to English Language Proficiency Long-Term Goals**
The Arkansas Department of Education submitted its ESSA plan shortly after a transition from one English language proficiency exam (English Language Development Assessment [ELDA]) to another (English Language Proficiency Assessment for the 21st Century [ELPA21]). At the time of our submission, we indicated we would be analyzing data from subsequent years of the new assessment to determine if the proposed baseline set appropriate expectations for schools given the prior test transition.

Specifically, our original concern emanated from the impact that the change in English language proficiency assessment had on students' eligibility for exiting English Learner status. The prior years' criteria for exiting English Learners as English Language Proficient (2008 to 2015) were significantly more stringent, resulting in most students remaining classified as English Learners under the old assessment. In the first year of ELPA21, a large number of students scored at the proficient level for English Language Proficiency and were eligible to be evaluated for exiting English Learner status. In our ESSA plan we indicated that an amendment might be sought after three years of ELPA21 results were analyzed if the data supported an amendment.

It is evident from analyses of three years of ELPA21 scores that the effect of the ELDA assessment is diminishing, yet still evident, in the 2017 baseline originally proposed. As a result of these analyses, and in consultation with Arkansas stakeholders, the Arkansas Department of Education requests to revise the baseline for long-term goals for English Learners On Track to English Language Proficiency to use the 2018 ELPA21 scores.

An additional benefit to using the 2018 ELPA21 results for the baseline for long-term goals is that it will ensure congruence with the checkpoints for progress for the academic achievement indicators for ELA.

**Mathematics Long-Term Goals**
Although no changes were made in cut scores for mathematics, Arkansas stakeholders request a revision to the timeline for long-term goals to align with the expectations for ELA and EL On Track to English Language Proficiency. This will provide congruence across these two indicators and avoid confusing stakeholders with different terminal years and checkpoint years for the long-term goals and interim progress.

**Stakeholder Engagement of Amendment Request**
The Technical Advisory Committee (TAC) met on October 2-3, 2018, and recommended Arkansas submit an amendment for long-term goals reporting.

The Arkansas ESSA English Learner/Title III Advisory Group met on October 11, 2018, and reviewed the proposed amendment request for the On Track to English Language Proficiency Long-Term Goals and recommended Arkansas make the amendment request.

On October 19, 2018, the Committee of Practitioners reviewed the proposed amendment request for long-term goals reporting and recommended Arkansas make the amendment request.
The ESSA Steering Committee met on October 24, 2018, and reviewed the proposed amendment and recommended Arkansas submit the amendment request for long-term goals.

The Federal Program Advisory Committee met on November 8, 2018, and also recommended Arkansas submit the amendment request for long-term goals.

The State Board of Education discussed the long-term goals on November 8, 2018, and approved Arkansas’ posting of the amendment request for public comment and submission to the U.S. Department of Education.

The Arkansas Department of Education released the proposed amendment for long-term goals to the public for feedback via Commissioner’s Memo, COM-19-062 posted December 4, 2018. The feedback window was open to the public for 30 calendar days. All respondents to the review were 100% in favor of the amendment. The Arkansas Democrat Gazette ran an education notebook article on December 10, 2018, outlining the requested amendment.

After review of the requested amendment, Governor Asa Hutchinson said, “I support the Arkansas ESSA plan amendment for long-term goals. This amended reporting is essential to long range planning from schools and communities.”

This adjustment is reflected in the attached version of our state plan on pages 30-31, 34, 38-39, and in Appendix A: Measurement of Interim Progress, starting on page 144. I appreciate your consideration of this amendment request.

Sincerely,

Johnny Key, Commissioner of Education
Arkansas