WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION

Tony Evers, PhD, State Superintendent

July 28, 2016

Meredith Miller
U.S. Department of Education
400 Maryland Avenue, SW, Room 3C106
Washington, DC 20202-2800

Docket ID: ED-2016-OESE-0032

Dear Ms. Miller:

The Wisconsin Department of Public Instruction (WDPI) appreciates the opportunity to comment on the Department of Education's (ED) Notice of Proposed Rulemaking (NPRM) on accountability and state plans under the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA).

Our concern with the rules as proposed lies in our belief that many aspects of this rule contradict and contravene specific provisions of ESSA and Congressional intent as clarified through the hearings held by the Senate Health, Education, and Pensions Committee and the House Education and the Workforce Committee. The rule is overly prescriptive in some areas and burdensome in others, all the while restricting the ability of states to respond to the feedback they receive from their citizens in order to innovate and address specific needs. As a result, the WDPI urges ED to reconsider aspects of the proposed rule as noted in greater detail below.

1. **Timelines Surrounding Implementation of Accountability Systems**
   ESSA requires Title I provisions surrounding accountability to "take effect beginning with the 2017-18 school year." This language is open to broad interpretation due to questions surrounding whether the language is meant to reference the first year of data that shall be used to identify schools or the implementation of the new accountability system. While we are glad ED has chosen to clarify this through rule, the way in which ED has done so is unworkable.

   The proposed regulation would require states to do initial identifications of schools under the new system before the beginning of the 2017-18 school year and use data from the 2016-17 school year to do so.

Yet, Wisconsin, like many states, is in the process of consulting with the public and stakeholders regarding what that system should look like and needs the time identified in the rule to create that plan. There are deep discussions that need to occur around indicators of English language proficiency, school quality and student success, indicator weights, and establishing criteria and procedures for school identification. There are significant discussions that need to be had governing our existing state accountability system and how the new system under ESSA will interact. We likely will need to utilize the later submission date of July and will not have a plan submitted until after the school year ends, much less have it approved prior to the beginning of the next school year.

Moreover, it is not just the establishment of a new federal accountability system for Wisconsin that needs to be created but the collection of data needed for that system to work. We do not yet know what indicators will be part of our new system. This makes it impossible to collect this data in 2016-17 to use for identification of schools in 2017-18.

Adding to this challenging timeline are the requirements surrounding the use of cohort graduation rates for identification of schools. These rates are calculated by including students who graduate at the conclusion of the school year as well as those who graduate at the end of the summer session that follows the school year. We cannot calculate those graduation rates for 2016-17 until the mid-fall of 2017, by which time SEAs are required to identify schools.

It should also be pointed out that moving forward under these timelines, accountability indices could continue to use a lagged cohort graduation rate. Yet, the language regarding ESEA report cards specifically says that states must report the graduation rate for the school year that just completed. ESEA report cards under the proposed regulations must be out by December 31st. While WDPI could probably provide graduation rates for the prior year in the required timeline, there is a challenge in the contradiction in the proposed regulations. ESEA report cards must include results of the accountability system, which will necessarily include lagged cohort graduation reporting.

Recommendation*:*

For those states that need to utilize the later July submission date, WDPI recommends instead that 2017-18 data be used to identify schools and districts for improvement with that notification occurring by December 31, 2018. Schools and districts could then plan in spring 2019 for implementation of improvement activities in 2019-20.

2. Timelines Surrounding School Improvement

The proposed regulations [see 200.19 (d)(2)] would require that each State identify schools for comprehensive and targeted support and improvement by the beginning of the school year for which a school is identified.

This timeline is impractical and should be adjusted given the implications for interventions and planning. Given that the reporting timeline in ESSA is December 31, the notification timeline should be aligned, with school improvement implementation expected the following school year. We cannot reconcile how we would use data prior to the start of the school year to identify schools when that data is not ready to be posted until the end of the calendar year. This is even more so the case given that we administer annual spring assessments to more accurately gauge student achievement for the year.

Recommendation:

Align notification and reporting requirement timelines to December 31 in order to leave the latter half of the school year open for school improvement planning to be implemented in the following school year.

3. Regulations on Accountability

The proposed regulations do not honor the intent of Congress to allow states to have flexibility in designing accountability systems. The regulations are unnecessarily prescriptive when it comes to components of the accountability system [see §200.14, 200.15, 200.16, and 200.18]. In fact, from WDPI's perspective, there was more flexibility with waivers than with the proposed regulations. The regulations would require us either to make major changes to our accountability system or, and this is more likely, have two complex systems – one for the state, and one federal. Examples of how the regulations restrict our flexibility follow.

a) Test participation calculation requirements would require significant changes to how we currently calculate test participation with those results into our system. WDPI currently incorporates test participation as a points-based deduction from an overall accountability score. The proposed regulations would mean that non-tested students would count against proficiency rates or other score-based measures in addition to potential deduction. As a state that allows parent opt-outs of student testing, not including non-tested students in achievement-based indicators has been an important balancing point (countering the fact that all non-tested students count against test participation calculations and could lower a school or district's rate, resulting in a deduction) in our accountability system design.

b) Test participation rates that fall below 95 percent just one time, for even one subgroup, result in the school having to write a test participation improvement plan. This does not recognize the frequency with which this can happen with small n-sizes when it does not represent a chronic problem. States should have more flexibility in these situations than the proposed regulations allow.

c) There is reference of including students who are in a school one-half of a school year. This is significantly different from the full academic year definition, (FAY) that we use

now. This poses a real problem for continuity of data moving forward, not to mention myriad technical questions regarding the definition of half-year and the data collection to that effect. It also raises potential face validity issues in that schools and districts are used to being held accountable for the assessment performance only of students who have been enrolled for the full academic year.

d) The regulations require having sub-section scores that each have level ratings with at least three levels. The levels would then all roll up into a single score. This level of detail is extreme in prescribing how our system would work. This is not just a problem for Wisconsin, but other states who do not have existing systems with subscores and ratings, or do not have an overall summative score. Prescribing this level of detail inhibits our ability to engage meaningfully with stakeholders on the design of the accountability system.

e) All indicators must measure performance for all students and for all subgroups meeting cell size under the regulations. Requiring that everything is based on all students and subgroups results in schools with more diversity having increased chances of missing goals or having lower scores by nature of having more groups of students. In Wisconsin, our state report cards are currently designed in such a way that, while we report on subgroup performance in all priority areas, we do not calculate an indicator score at a subgroup level. Building all scores around subgroup calculations could introduce a lot of challenges, particularly with reliability of the results with small groups.

f) Subgroup performance for identifying targeted support schools may take into account performance on accountability indicators over no more than two years. When examining subgroup performance, especially for high-stakes accountability, it is critical to balance reliability with action. It seems the priority here is to identify immediate need and act, but perhaps at the expense of ensuring the results are valid and reliable. These are small groups of students and using just two years of data could increase the chance of erroneously identifying a school. For Wisconsin's existing report cards we calculate our closing gaps priority area using three to five years of data. Do not limit states in the number of years of data we may use in calculating subgroup performance, but challenge us to demonstrate that our identification of targeted support schools is accurate, appropriate, and timely.

g) We are limited to using three years of data to identify comprehensive support schools. This should not be the case for the same reason noted above in (f). Again, these timeframes are not contained in ESSA.

h) Regulations require a different measure for the school quality and student success indicator than used elsewhere in the system. What if we wanted to use the same measure but in a different way than in another indicator? For example, we may include ACT

proficiency in one indicator, but for a measure of student success, we may want to count the number of students who meet the ACT college and career readiness benchmark in three or more content areas. States should be allowed to demonstrate that, even if using the same data source for an indicator as used elsewhere in the system, they are using the data in a different manner that allows for further meaningful differentiation of schools.

i) The regulations would prevent us from using attendance as a non-academic indicator. Attendance is mentioned as an example of an indicator that does not "meaningfully differentiate" schools. Wisconsin uses this indicator. Attendance matters. It appears the regulations in this instance are assuming that an indicator is not meaningful if many schools or districts do well on it. If we are doing well on something we should be allowed to recognize it in our accountability system.

j) The regulations require consistent weighting among indicators for all schools within each grade span, but weighting doesn't have to be the same for each indicator. We are concerned this may prohibit our current varied weighting for achievement and growth based on the percentage of economically disadvantaged students as that results in varied weighting for schools within the same grade span. Additionally, not all schools within the same grade span will have enough data to calculate all the same indicators. It is important for an accountability system to take such data availability into account, and Wisconsin's current system does so by allowing varied weighting based upon data availability, not grade span.

Recommendation:

WDPI recommends the final regulations include clearer and more flexible language that would allow a variety of state systems so long as they comply with statutory provisions. Flexibility should also be reflected in the language to allow a state to use any indicator they are able to justify serves a meaningful purpose in their accountability system.

4. Report Card Requirements – Expenditure Reporting

Included in the report card requirements for states and LEAs (see §200.35) is a uniform per pupil spending calculation requirement. A State must develop a single statewide procedure to calculate LEA current expenditures per pupil and a single statewide procedure to calculate school-level current expenditures per pupil. Each State report card must also separately include, for each LEA, the amount of current expenditures per pupil that were not allocated to public schools in the LEA.

The details surrounding this provision are burdensome and go beyond the requirements of the statute. ESSA requires us to report per pupil expenditures from federal, state, and local funds. Nevertheless, ED has detailed what must constitute the numerator and denominator

and prescribes a date on which we have to count students (October 1).

In order to comply with these regulations, Wisconsin would have to add a third count date for our school districts on top of the two we already conduct. Even more onerous is the cost and vast amount of work that would need to go into developing our school finance reporting system in order to comply with the level of detail these provisions require.

Furthermore, the regulations require states to comply with the expenditure reporting by December 31 (when report cards are due) beginning in 2017. It is impossible for us to meet this requirement in the timeframe given as we do not currently collect school building level financial information. In order for us to meet the timeframe currently outlined, Wisconsin would already need to be collecting the information required in the 2016-17 school year. At best, given the system development requirements, we may be able to create a system in 2016-17, collect audited information from that system in 2017-18, and report it out in 2018-19.

Recommendation:

ED change the provision to simply require that expenditures from federal, state, and local funds per pupil be reported in a uniform manner as determined by the state. Allow states who need to develop their school finance reporting systems an additional year to comply.

5. Resources for Schools Identified

The proposed regulations state that each State must, with respect to each LEA in the State serving a significant number of schools identified for comprehensive support and improvement and for targeted support and improvement under §200.19(b), periodically review resource allocation between LEAs and between schools, consider any inequities identified under school improvement resource allocation and, to the extent practicable, address any identified inequities in resources [see §200.23(a)]. This also appears to be in contravention to the ESSA requirement that the federal government cannot mandate per-pupil funding be equalized at the state, district, or school level.

This provision raises more questions than it answers. Are states supposed to compare all schools regardless of what district they are in? What does it mean "to the extent practicable?" How is a state to address identified inequities if there is no authority for the state to do so? What sources of funds are states supposed to be looking at? What if there are justifiable reasons for inequities?

Recommendation:

Require states to instead review resource allocations between LEAs and between schools. States could examine and explain why any significant inequities exist between LEAs. For discrepancies between schools in an LEA, require the LEA to explain why significant discrepancies exist. If there is no justifiable rationale, require LEAs to submit a plan to address any significant discrepancies between their schools.

6. Consolidated Plan Reporting Requirements

The regulations surrounding consolidated reporting requirements create major new requirements that are not present in ESSA and represent a significant disincentive for states to do consolidated reporting. Wisconsin has always chosen to do consolidated reporting in the past as it has provided administrative advantages for the state and school districts in terms of both workload and aligning policy objectives. Yet, the number of additional requirements is staggering. WDPI echoes the written comments of the Council of Chief State School Officers (CCSSO) in this regard. They have noted the following examples:

a) Under proposed Section 299.14(c), the SEA would be required to describe its performance management system for "each component required" under Sections 299.16 through 299.19. Each of these descriptions must include six discrete elements. Because sections 299.16 through 299.19 include some 40 different individual requirements, it appears that the states would have to include 240 separate descriptions of their performance management systems, as well as additional performance information required under Sections 299.17(e) and 299.19(b). None of these descriptions is required under the statute.

b) Under section 299.19(a)(ii), the SEA's description of how it will support a well-rounded and supportive education for all students would be required to include the state's strategies (and the rationales for those strategies), timelines, and funding sources for providing equitable access to rigorous courses in 17 separate subject areas, as well as in other subjects in which female students, minority students, English learners, children with disabilities, and low-income students are underrepresented. There is no statutory requirement for this description of this plan in general.

c) The plan would be required to include a review, *on an LEA-by-LEA basis*, of districts' budgeting and resource allocations in four separate areas. There is no requirement to include a review in the statute.

Recommendation:

Remove requirements that are not contained in ESSA. Streamline the requirements so consolidated plans need only address key elements of ESSA. Ensure the requirements of the consolidated plan are less than if a state submitted a plan for each Title separately.

7. Funding to LEAs for School Improvement

ESSA requires states to use the Title I reservation for school improvement to provide monies "…of sufficient size to enable a local educational agency to effectively implement selected strategies." The proposed regulations would define these allocations as at least $500,000 for

Comprehensive Support and Improvement schools and $50,000 for Targeted Support and Improvement schools, unless a district agrees to accept less money [§200.24(c)(2)(ii)].

The specified monetary amount is concerning given the potential scope of schools identified and the size of the schools' need in relation to the amount of money available. If no LEA can demonstrate they don't need the full amount it is likely that the SEA will not have enough money to fund all required school improvement efforts. This leaves states and LEAs in a difficult position. States should be allowed to determine an appropriate allocation amount and prioritize funds based on identified needs.

Recommendation:

Remove the minimum award requirements.

8. High School Graduation Rates

ESSA requires that SEAs identify, for comprehensive support and improvement, any public high school that fails to graduate one-third or more of its students. Graduation rate methodology is undefined. Yet under the proposed regulations (see §200.19) we are required to use the four-year adjusted cohort rate. Due to this lack of flexibility states will be identifying a large number of alternative high schools created specifically to serve certain student populations regardless of their performance on extended year graduation rates. For instance, WDPI would like the ability to allow exemptions for schools that are centers for dropout recovery students.

Recommendation:

Remove the requirement to use the four-year cohort rate. Allow states to determine whether to use that rate or an extended-year graduation rate in identifying schools for comprehensive support and improvement.

9. Use of Summative Ratings to Identify Comprehensive and Targeted Support Schools

The lowest performing 5 percent of Title I schools, one of the three categories in ESSA that qualifies for identification for comprehensive support and improvement, is described in the proposed regulations (see §200.19). The schools are identified by "taking into account a school's summative rating among all students on the state's accountability indicators, averaged over no more than three years".

The regulations appear to require a state to use the summative overall report card rating across all indicators, rather than having the option of using a specific academic indicator as Wisconsin has used in the past. For instance, a state may want to consider using closing gaps to identify targeted support schools, or some combination of achievement and growth. The key point is that we want flexibility to work within our state-designed systems to

appropriately identify schools and not be limited by only using an overall score, which naturally obscures important details about performance.

Similarly the proposed regulations require states to identify targeted support schools based on low-performing subgroup performance below that of the lowest performing 5 percent of Title I schools. Wisconsin does not currently have summative scores of subgroups of students.

In the past, Wisconsin used another way to calculate the lowest 5 percent than that described under the proposed regulations. Under our ESEA waiver we based this identification on all-students academic percent proficient. WDPI would like the flexibility to continue that previously approved practice.

Recommendation:

Allow states the option to base the identification of the lowest-performing 5 percent of Title I schools on the basis of all-student academic proficiency or another valid method described by the state.

10. Identification of Schools for Targeted Support Due to Low-Performing Subgroups

The proposed regulations [see §200.19 (b)(1) and (2)] require identification of two types of schools for targeted support and improvement. They include 1) any school with one or more consistently underperforming subgroups of students or any school identified due to assessment participation rates and 2) any school in which one or more subgroups of students is performing at or below the summative level of performance of all students in any school identified as falling in the lowest performing 5 percent of Title I schools.

ESSA does not contain the requirement for two separate sets of schools. Rather, it requires that states identify schools "in which any subgroup of students is consistently underperforming, as determined by the State" [see 20 U.S.C. 6311 (c)(4)(C)(iii) as effective July 1, 2017]. This regulation is in direct conflict with this language.

Additionally, it should be noted that the proposed regulations under §200.19(d)(1)(ii) and (iii) require two separate timelines for identifying these schools. This will add significant complexity to the system.

Recommendation:

Refer to the original language in ESSA that allow states to determine the criteria for identifying subgroups of students that are consistently underperforming.

11. Transition of Schools out of Targeted Support

ESSA requires schools identified for targeted support to transition to comprehensive support

and improvement status if they have not met statewide exit criteria. Under ESSA, that transition occurs "within a State-determined number of years."

The regulations contravene the statutory language. The proposed regulations specify [see §200.19(a)(3)] that a school must meet exit criteria in three years or transition to comprehensive support and improvement. This is in direct conflict with the ability of states to determine an appropriate number of years that a school has to meet exit criteria. There is nothing magical in educational research about three years. School improvement takes time and states should be allowed to set the acceptable number of years a school has to improve before transitioning to comprehensive support and improvement status.

Recommendation:
Remove the minimum number of years by which a school must meet the exit criteria for targeted support.

12. Evidence-based Interventions

ESSA requires the use of evidence-based interventions in school improvement. ED [see §200.21(d)(3)] in the proposed regulations expands on this and provides a list of examples of evidence-based interventions. Yet the list of examples includes some interventions (e.g. charter conversion, changing school governance) of which we are unaware of evidence as effective school improvement strategies. The examples in rule seem to serve no purpose other than to point states in a direction, which ED could accomplish through technical assistance and support or guidance.

Recommendation:
Remove the list of examples of evidence-based interventions.

13. Interventions for Comprehensive Schools Not Meeting Exit Criteria

Comprehensive schools that do not meet exit criteria are subject to additional state interventions as determined by the state [see §200.21(f)(3)(iii)(A)]. At the same time these schools must develop another needs assessment and develop a plan based on those interventions.

There is a disconnect between the needs assessment and plan that must be developed by the school and the fact that the state is the one determining interventions. Why have the school redo the needs assessment and plan at this point? The state has the prior plan, needs assessment, and results of those interventions. Moreover, the state could, if it so chose, ask the district to do another assessment.

Recommendation:

Remove the duplicative requirement to do another needs assessment and plan for comprehensive schools that do not meet exit criteria.

14. English Learners and Accountability

In setting long-term goals and measurements of interim progress, the proposed regulations stipulate that the same multi-year timeline must be applied for all students and each subgroup for academic achievement (200.13(a)(2)(ii)) and graduation rate (200.13(b)(3)(i)), but at the same time (200.13(c)(2)(ii)) appropriately acknowledges that English learners may take different lengths of time to achieve English language proficiency, dependent upon a number of factors including initial ELP level.

States should be allowed to recognize in their accountability systems the fact that there will be different lengths of time to English proficiency.

Recommendation:

Regulations should recognize flexibility in this area. States should be given the options, but not required, to set any maximum timelines and weights in the accountability system based on state-level empirical data.

15. Students in Foster Care

School districts are responsible for costs of transportation to school districts of origin under the proposed regulations even if the LEA and local child welfare agency do not agree on which agency or agencies will pay any additional costs incurred to provide such transportation. [§299.13]

Essentially, this creates additional disincentives when LEAs are making decisions regarding transporting students. ESSA does not assign the payment of transportation costs for foster children to the LEA.

Based on the regulations, there is no fiscal incentive for cooperation between child welfare entity and LEA. This also raises concerns about the impact on students maintaining enrollment at school of origin due to excessive transportation costs that are now permanently required. LEAs are already navigating the additional costs of transporting homeless students to school of origin using Title I-A dollars (this was new beginning in 2014). Additionally, there may be some conflict between the Fostering Connections Act of 2008 and the proposed regulations, specifically that the Act has the authority to ensure that foster children who need transportation promptly receive it [see section 475 (4)(A) of Title IV-E of the Social Security Act].

Recommendation:

Disputes between child welfare agencies and LEAs should be handled to create incentives for those agencies to work together and align with the Fostering Connections Act of 2008.

16. Presentation of Report Card Information

The proposed regulations require parental consultation on the design of the SEA and LEA report cards, respectively, but mandate a "clearly labeled overview section that is prominently displayed."

What if the result of parental consultation is that parents want something different than a clearly labeled overview section? This is particularly an issue for the LEA report card, which is required to be distributed to parents on a "single piece of paper." Moreover, on that single piece of paper it is required that the overview section must include, at a minimum, not only all the information required on the SEA report card, but additional data, for each school in the LEA. This seems like an impossible standard. Requiring consultation but also mandating the design muffles that consultation. [§200.30(b) and 200.31(b)]

Additionally, the dissemination of the LEA report card is required to be distributed by mail or email. Could there be a district option? For example, what if the district has a parent dashboard they'd like to use through their student information system? [§200.31(d)]

Recommendation:

Change the regulations to allow LEAs to work with parents to help design the overview section. Allow states and LEAs to alternatively present a dashboard display rather than the requirement for a single piece of paper. Allow for a distribution option for school districts that exist outside of mail or email.

17. Additional Timeline Waivers Requested

a) Due to the later July submission date that many states will likely need to use, we recommend that ED clarify regulations to allow SEAs to waive certain timelines so that LEAs may develop and submit plans after the SEA plan is approved.

b) We recommend ED clarify that there is some type of waiver so LEAs have the 2017-18 school year to develop plans, and still remain eligible for ESSA funds. The need for this is due to EDGAR 76.708, which states that subrecipients may begin to obligate funds on the date the applicant submits its application in substantially approval form. Can an LEA's application for grant funds be submitted separately from their plan?

Particular Issues for Comment

1. *Whether the suggested options for States to identify ''consistently underperforming'' subgroups of students in proposed § 200.19 would result in meaningful identification and be helpful to States; whether any additional options should be considered; and which options, if any, in proposed § 200.19 should not be included or should be modified. (§ 200.19)*

   WDPI addressed the issue of underperfoming subgroups in comments above.

2. *Whether we should include additional or different options, beyond those proposed in this NPRM, to support States in how they can meaningfully address low assessment participation rates in schools that do not assess at least 95 percent of their students, including as part of their State-designed accountability system and as part of plans schools develop and implement to improve, so that parents and teachers have the information they need to ensure that all students are making academic progress. (§ 200.15)*

   As we addressed earlier in our comments, WDPI believes ED should consider other options for states to address low participation.

   For instance, test participation rates that fall below 95 percent just one time, for even one subgroup, would result in the school having to write a test participation improvement plan. This does not recognize the frequency with which this can happen with small n-sizes when it does not represent a chronic problem. States should have the ability to recognize these situations.

   Test participation calculations also do not allow for the way we currently incorporate it into our state accountability system. WDPI currently incorporates it as an overall deduction to the total score.

   The proposed regulations would mean that non-tested students would count against proficiency rates or other score-based measures. ESSA specifically allows for parent opt outs and, as a state that allows parent opt-outs of student testing, not including non-tested students in achievement-based indicators has been an important balancing point (countering the fact that all non-tested students count against test participation calculations and could lower a school or district's rate, resulting in a deduction) in our accountability system design.

3. *Whether, in setting ambitious long-term goals for English learners to achieve English language proficiency, States would be better able to support English learners if the proposed regulations included a maximum State-determined timeline (e.g., a timeline consistent with the definition of ''long-term'' English learners in section 3121(a)(6) of the ESEA, as amended by the ESSA), and if so, what should the maximum timeline be and what research or data supports that maximum timeline. (§ 200.13)*

Wisconsin state statute calls for districts to establish biliteracy and bicultural programs. These programs support students learning English and a target language simultaneously, resulting in improved academic and English Language proficiency. Such achievement can take more time, and in many cases beyond the five year or defined "long-term." Factors such as starting level of English proficiency, language, and program model are all significant factors in how long it will take a student to gain English language proficiency.

There are significant benchmarks in language growth. SEAs need the flexibility to design accountability systems that identify and support students' growth in language proficiency within the context of the English learner programming that best fits the needs within communities.

4. *Whether we should retain, modify, or eliminate in the title I regulations the provision allowing a student who was previously identified as a child with a disability under section 602(3) of the Individuals with Disabilities Education Act (IDEA), but who no longer receives special education services, to be included in the children with disabilities subgroup for the limited purpose of calculating the Academic Achievement indicator, and, if so, whether such students should be permitted in the subgroup for up to two years consistent with current title I regulations, or for a shorter period of time. (§ 200.16)*

   Students who have exited special education are no longer in need of special education services. As a result, in Wisconsin we do not include former students with disabilities in the subgroup of students with disabilities for accountability purposes in our current accountability system.

If additional clarification is needed or if you have any questions about our comments on these proposed regulations, please feel free to contact me.

Sincerely,

Mike Thompson, PhD
Deputy State Superintendent

MT:jk