

January 15, 2016

***Response to Information Request Received by the Commission Leadership from the  
State Board of Education on Thursday, January 14, 2016, at 9:07 a.m.***

## **Public Comment**

**Please add Dr. Allen's December 18, 2015 email to the SBE addressing questions raised by the SBE at the December meeting to the record of public comment.**

- This response has been added to the Commission's website in the section for the public record. That section has been updated to include all public comment received before public comment closed on January 14, 2016. This correspondence will also be added to the public record.

## **Redistricting**

**1. The action taken by each school board with regard to approval or conditional approval of the WEIC plan occurred well before the plan was finalized. Did WEIC discuss the final plan with each board or was there discussion from the board representatives serving on WEIC of the board's approval of the plan? Was there any additional feedback from district boards received on the final proposal?**

- Christina and Red Clay Consolidated School Board members and administrative staff worked collaboratively to develop the frameworks for planning, found in Appendix B and C respectively. The Commission's own plan for implementation of the Christina/Red Clay redistricting (Part VII) is based on the collaborative work of the two school districts.
- The Christina and Red Clay Consolidated School Boards voted to approve the drafts of their respective frameworks for planning (see page 54), and no changes to those plans have been made to those plans since those votes were taken.
- The Colonial School Board and the Brandywine School Board voted after the Commission's final redistricting recommendations were resolved. Boards supported the move of Christina out of the City of Wilmington and affirmed their commitment to continue to serve Wilmington students within their current boundaries, which also is the recommendation of the Commission.
- Members of the Commission, including members of the Red Clay Consolidated School Board and District gave updates at every scheduled Red Clay School Board meeting from September through December. The Board was advised of all updates in the Commission's plan including an update by the President of the Red Clay School Board (who is Vice Chair of the Commission) on December 16<sup>th</sup>, 2015, the day before the Commission's plan was submitted to the State Board of Education.

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- At each Christina School Board meeting from September through December an update on the Commission's plan was presented in the agenda and discussed at the board meeting. The President of the Christina School Board affirms that the board members were advised and encouraged to provide feedback throughout the period of public comment and that the board supports the proposals in the Commission's final plan.
- The Red Clay, Christina, and Colonial School Board Presidents, and the Brandywine School Board Vice-President, serve on the Commission. These same Board representatives as well as representatives from the district administrations serve on the Redistricting Committee and the Funding Student Success Committee, and were therefore involved in all facets of the process, including the review of all the redistricting recommendations in the final plan.
- All four school board representatives voted on behalf of their boards on December 15, 2015, to approve the Commission's Transition, Resource, and Implementation Plan and submit it to the State Board of Education on December 17, 2015.

**2. In both the Red Clay transitional plan as well as the Redistricting section of the plan there is reference to changes that would need to be made for the school board election districts but there is not a timeline for that work to indicate 1) when that work would be completed and 2) if there are additional costs associated with that work. If there are additional costs, what is an estimate of them and where do they fit into the estimated funding?**

- Transferring population from the Christina School District to the Red Clay Consolidated School District will require adjustments in both the Red Clay and Christina school boards. Christina's total population will drop from 170,139 to 147,043 (estimate from New Castle County Board of Elections based on 2010 census data). Red Clay's total population will increase from 138,228 to 163,957. Consistent with the timeline laid out in the Commission's proposal, these changes would be effective July 1, 2018.
- The New Castle Board of Elections believes that given the magnitude of the population change involved it would be appropriate to seek legislation authorizing redrawing of boundaries earlier than 2020. Such a redrawing would be based on 2010 census data. Presumably, new boundaries would then be needed again following the 2020 census.
- At this time, the Department of Elections has identified no additional costs associated with these changes.

**3. Please clarify what is meant by "program complete" in the 4th bullet of the Executive Summary "Redistricting Recommendation" section, which pertains to students transitioning or remaining at their existing school during Redistricting.**

- Senate Bill 122 states, "The plan shall permit students to continue their attendance at the school they attended prior to the boundary change, with tuition payments by the sending district as provided in Chapter 6 of this title, until such time as the pupils complete the grade levels offered in that school."

- The intent of this language was to allow students to remain in their schools, as of the end of the 2017–18 school year, until their grade configuration is complete, or until they complete their unique program. Some examples of specialized programs include Sarah Pyle Academy, Douglass Academy, and students receiving special education services.

**4. Please clarify recommendations referencing the addition of additional seats for Wilmington students at vocational schools and the plan initially recommended for development of a vocational education partnership between the NCC districts and vocational district.**

- This question refers to a recommendation from the Wilmington Education Advisory Committee (WEAC) Final Report, *Strengthening Wilmington Education: An Action Agenda*, submitted in April 2015. The reference is repeated on page 51 of the Commission’s plan (pages 25–27 from the WEAC Final Report are set aside in a box for reference. The quote referenced is below.

**“The New Castle County Vocational-Technical School District (NCC Vo-tech) should actively collaborate with the Red Clay Consolidated and Brandywine School Districts and with the Wilmington charter schools to expand vocational education opportunities for Wilmington students. We recommend the development of joint programs among NCC Vo-tech, district high schools, Wilmington charter high schools, Delaware Technical Community College, and Delaware businesses to facilitate coordinated pathways for students from all high schools to employment opportunities and advanced technical training. The NCC Vo-tech district should take the lead in developing a comprehensive plan for this new vocational education partnership and presenting it to the governor, secretary of education, and state legislature by January 2016.”**

- No action has been taken by the Commission on this WEAC recommendation. This and other recommendations related to collaboration will be considered in the coming year by the Commission’s Committee on Charter and District Collaboration. Representatives from the New Castle County Vo-Tech District sit on both the Redistricting Committee and the Funding Student Success Committee and will be invited to participate in the work of the Commission on Charter and District Collaboration.

**5. How does this final plan address the “case for redistricting” which sites 23 different governing units but this proposal reduces that number by only 1 and introduces at least one additional body with the creation of the Wilmington Office of Education and Public Policy?**

- Reducing fragmentation in the City of Wilmington requires a two-track strategy: consolidation then coordination.
- **Redistricting is the first step of consolidation. This single step will consolidate more than 50 percent of City of Wilmington students under one governing authority, the Red Clay Consolidated School District. This would be the first time in 40 years, one governing unit will have responsibility for the majority of City of Wilmington students.**
- The second step is to coordinate policies and programs of district, charter, and vo-tech schools in order to better streamline governance for City of Wilmington students. This will

be a primary focus for the Commission and Committee on Charter and District Collaboration during the next year.

- The Wilmington Education Improvement Commission is not a governing unit. The Commission has designated and limited responsibilities under legislation, and has no governing authority over schools or students. The Commission’s mandate ends in 2021 when the Commission sunsets.
- **If created, the Office of Education and Public Policy would be a part of the Wilmington City Government. It would have no governing authority over schools or students. The Commission supports its formation as a vehicle for supporting parent and community engagement, but the Commission is not responsible for the development of that office or for its funding, nor is the creation of the office a contingency for redistricting.**

## Funding

**6. Please define the term "other students at risk" which is used in the description of the new weighted unit recommendation.**

- “Other students at risk” refers to basic special education grades K-3.

**7. Please further explain any costs associated with the creation of, as well as the responsibilities of, the Wilmington Office of Education and Public Policy within this plan.**

- The Office of Education and Public Policy is a recommendation of the Wilmington City Council that the Commission has endorsed.
- If implemented, funding for the Office would come from the City of Wilmington.
- Please see the answer to question 5.

**8. Please identify the way funds requested as transition funds will be used and to whom they would be allocated for those uses. Additionally, if there is a request for “ongoing” funds (not planning or transition funds) beyond those outlined in the recommendation for a weighted “At Risk Unit” please outline what those ongoing costs would be used for. Lastly, with respect to the At Risk Unit outline the costs per year in the years beyond the roll out to Red Clay and Christina, what is the estimated funding cost?**

- During the planning year, the transition funds would be used to conduct a facilities assessment for all of the impacted schools, which would be of value under any circumstances as a guide for facilities improvement. In addition, funds would be used for research and analysis of best practices for schools with high concentrations of low-income students and English language learners and best practices for the configuration of schools and programs to serve those students. This would be valuable regardless of which district is responsible for those schools and it would be valuable to other schools in Wilmington and across Delaware with high concentrations of low-income students and English language learners.

- **Beyond the weighted unit, there are no “ongoing” funding requests. The cost is dependent on the model used and the weights given.**

**9. The timelines for implementation of this new unit allocation formula do not include all students of the city of Wilmington before expanding to include students in the suburbs of the Red Clay and Christina districts. Please discuss the proposed timeline and further explain the decision of WEIC to implement the funding model in this fashion so that we can fully understand why the recommendation is phased in this manner.**

- The Commission has endorsed a change in the allocation system to a more flexible model; however, the Commission did not believe that funding for low-income students, English language learners, and basic special education K-3 should be contingent on changing the funding allocation system in the future.
- Given fiscal constraints, the Commission specifically proposed an initial commitment of funding that applies to the districts impacted by redistricting, Red Clay Consolidated and Christina School Districts.
- We are proposing that funding would expand to all districts and charter schools in the city in the third year and that statewide roll-out be implemented as rapidly as possible given the fiscal constraints.

**10. The funding recommendations for expansion of the unit funding system within the proposal have been discussed before the Board as attempting to work within our existing funding structure. Please address these recommendations, which have been presented not as short term recommendations but as recommendations for 2021 and beyond, with respect to complementary or potentially conflicting actions with the currently meeting task force established through SJR4, Education Funding Improvement Commission, including the statement on page 87 of the tracked changes document that the Commission believes a new allocation system would provide the best opportunity to incorporate the needs of those most at risk.**

- The work of the Wilmington Education Improvement Commission (WEIC) and the Education Funding Improvement Commission (EFIC) are complementary. To be clear, many members of WEIC and its working committees are on EFIC, most notably Jill Floore, Red Clay CFO and Mike Jackson, Deputy Controller General, who chair the WEIC Funding Student Success Committee. WEIC and its Funding Student Success Committee began prior to the initiation of EFIC. It is our understanding that this commission is undertaking a review of the allocation formula as well as matters related to revenue and property reassessment.
- The focus of the WEIC Funding Student Success Committee was on factors relevant to redistricting, specifically the funding for low-income students, English language learners, and basic special education K-3 and the transition fund.
- WEIC endorsed the movement to a more flexible funding system. **The Education Funding Improvement Commission is considering the possibility of a move to a new funding**

system. Should a new funding allocation system be implemented, the WEIC funding requests would be moved into the new system.

**11. Property Reassessment: please clarify the financial burden of this recommendation- is it state or county? Is this a required component of this proposal in order for it to have adequate and sufficient funds?**

- No. We believe property reassessment is essential for the long-term fiscal health of the public education system, and ultimately the state. However, redistricting is not contingent on property reassessment.
- The Commission has not recommended a specific process for property tax reassessment. The Funding Student Success Committee has recognized the 2008 report of the committee formed by House Joint Resolution 22, which did recommend that the process be undertaken at the state level. This report can be found in Appendix E.

**12. If funding is not "restored to FY2008 levels" does that mean that this plan is not adequately funded?**

- Redistricting is not contingent on returning state funding of public education to fiscal year 2008 levels.
- Restoration is supported by the Commission and is highly desirable for the long-term benefit and improvement of Delaware public education.

**13. Please discuss whether the requests for funding of Early Childhood Education initiatives are in addition to existing requests from the Office of Early Learning and pertinent agencies funding Early Childhood education and care or if this request is simply complementary and vocalized support for those existing requests.**

- The Commission's recommendation refers directly to the existing request from the Office of Early Learning.

**14. Please clarify the IRMC's roles and responsibilities with respect to this plan and clarify if this is reducing potential duplicative efforts by multiple groups. Please also identify how WEIC factors into those efforts.**

- The Commission's recommendation is specifically related to alignment of resources and working with existing state groups to strengthen their contributions, not to duplicate efforts, as described on page 112 of the Commission's plan.

**"The Meeting the Needs of Students in Poverty Committee will be addressing these recommendations and rolling out their plan in parallel to the implementation of redistricting. This work will engage collaborations with key state agencies and councils, including the Interagency Resource Management Committee (IRMC) responsible for the integration of services for children and families across state agencies, the Delaware P-20 Council responsible for the alignment of educational**

programs and student support services from early childhood through college and career readiness, and the council on higher education to mobilize coordinated support from all higher education institutions. These collaborations will be instrumental for the development and implementation of the Advisory Committee’s recommendation for a comprehensive plan for state and local services, including partnerships with private and nonprofit institutions, which will create a community of support for low-income children and their families.”

**15. Please identify the source of data used for establishing baseline goals as well as the responsibility for providing data and information to determine success of these milestones. Please identify the actual baseline metrics and goals for those stated measures and milestones.**

- The baseline analysis is the 2015–16 school year, which will be included in the first annual report of the Commission. The reports will use each school year’s verified data from the Department of Education. Currently, the Department of Education does not disaggregate data for the City of Wilmington; therefore, this additional analysis is necessary and will not duplicate current efforts.
- The Commission would be pleased to defer to the Department of Education should the Department desire to prepare a report that contains this analysis.

**16. Within the letter to WEIC from the Christina School District in their transitional plan there is statement that the tax base will go down by 20% and a statement that the impact should not negatively impact Christina residents. Please clarify the impact this plan would have on the residents of both Christina and Red Clay districts.**

- The movement of students and schools would change the allocation of funds, and the Commission believes that the funding should follow the students. A district with fewer students will have lower expenses. There may be a need for contingency funds to moderate the impacts of those shifts in the short term, as referenced on page 98 of the Plan. The contingency funds would not be necessary until redistricting takes place in fiscal year 2019.
- This reference refers to the expected impact on the allocation of the New Castle County tax district. Local tax funding for the four northern New Castle County school districts is governed by the guidelines established for the New Castle County tax district, in place since the 1981 court order.

## **Transition Plans from Christina and Red Clay**

**17. Please clarify the educational impacts ongoing for the students in these schools between now and FY2019. Clarification is needed for the educational and instructional programs that may be enacted in some of the impacted schools in the Christina district between now and 2019 that are in process of implementing school turnaround programs.**

- Questions related to the Christina School District’s implementation of school turnaround programs should be directed to the Delaware Department of Education (DDOE) and the Christina School District.
- Secretary Godowsky has confirmed that questions about the educational and instructional programs in turnaround/priority schools should be directed to DDOE and the districts.

**18. Please clearly specify how this plan directly addresses instructional programs/initiatives critical to improving student outcomes and how these are aligned in measures of success and stated milestones.**

- The action agenda, laid out in the graphic on page 8, and its explanation on pages 1–2 and 11–19 specify how this plan directly addresses improved student outcomes. This action agenda is connected back to the milestones and measures of success on pages 164–178. The action agenda was developed purposefully to keep improved student outcomes at the forefront of all recommendations made by the Commission, and action requested of the State Board, General Assembly, and the Governor.
- During the planning year, the transition funds will be used to conduct a facilities assessment for all of the impacted schools. In addition, funds will be used for research and analysis of best practices for schools with high concentrations of low-income students and English language learners and best practices for the configuration of schools and programs. The Commission will not be involved directly in the instruction, but will continue to support the collaboration already going on between the Christina and Red Clay Consolidated School Districts to develop programs and initiatives that best serve these high needs students and lead to the improved student outcomes outlined in the milestones and measures of success.

**19. Are there projected timelines for revisions to in-district boundary lines (feeder patterns) for both districts that have been discussed and are able to further inform these plans?**

- The 2016–17 school year is the planning year. During this time, analysis and research will be conducted on best practices for schools serving high concentrations of low-income students and English language learners and the optimal configuration of schools to support students.
- The Red Clay Consolidated School District and Christina School District will determine any needed changes to feeder patterns during the transition year, the 2017–18 school year, based on the outcomes of the planning year.
- New feeder patterns will be implemented when district boundaries change for school year 2018–19.

**20. There is reference to potential capital repairs of buildings currently in the Christina district that are proposed to become Red Clay facilities. Are those repairs proposed to be state funded, locally funded, or a separate option of public/private partnerships?**

- The districts will collaborate on the facilitation of changes. During the planning year, the 2016–17 school year, funds will be used to conduct a facilities assessment for the impacted

schools. The repairs will occur during the 2017–18 school year based on the facilities assessment and should be paid for by the state.

- Any capital fund requests not related to redistricting will continue to be made in the traditional way.

**21. Please clarify the details of WEIC's role and responsibility in future requests for capital funding or major capital design for updating or constructing new schools in the city of Wilmington?**

- The Commission has no role in current or future capital funding or major capital design requests. That is the responsibility of the affected districts, Christina and Red Clay.

## **Choice and Collaboration Efforts**

**22. There are existing collaborations underway and organizations already in place which are developing charter and district collaboration. What controls or precautions to avoid duplication of those existing collaborative efforts have been discussed by WEIC to include in the proposed plan?**

- The Commission recognizes that there are many existing collaborations underway but also believes that city wide collaboration is not as effective or widespread as necessary to create a coherent system of governance.
- The Charter and District Collaboration Committee is working to identify and review existing collaboration with the intent to expand upon them, not to duplicate or substitute. Any recommendations on this will come from that committee to the Commission for review.
- There are no recommendations related to this phase of streamlining governance, as this is not part of redistricting. See the answer to question 5.

**23. Please explain any specific asks or proposed policy changes with regard to choice that are being recommended in this section.**

- See the answers to questions 5 and 22. The section on Choice Options and Policies refers to the second phase of streamlining governance: coordination.

## **Milestones and Measures of Success**

(The State Board of Education has flagged questions that were already referenced and discussed in previous questions with a star.)

**24. Are baselines for performance being set from most current student achievement and growth data? Who will be responsible for collecting this data and running reports moving forward? How does this differ from the reporting already done by DDOE? Are these baselines goals aligned to state goals and accountability metrics?\***

- The milestones and measures of success are entirely consistent with the state's measures.

- The Commission has included consideration of these milestones and measures for City of Wilmington students disaggregated, which is not included in the state’s assessment.
- The Commission would be pleased if the Delaware Department of Education would like to take on this responsibility.

**25. Please clarify the milestones and timelines for the Department of Elections\***

- Please see the answer to question 2.

**26. The weighted unit funding model was initially understood as a transitional piece that would be implemented immediately. How will this work transition if EFIC recommendations result in a different statewide education funding structure? Is there flexibility for changes as a result of the recommendations from this commission, how does this plan recognize the ongoing work and incorporate that into the final components of the plan? \***

- Please see the answer to question 10.

**27. How does the Red Clay district plan commit to and align with the measurable outcomes of the WEIC plan?**

- The Red Clay district’s plan fully aligns with the Commission’s plan.
- The measureable outcomes of the Commission plan were developed through extensive collaboration with the Red Clay Consolidated and Christina School Districts as well as the Redistricting Committee, which had representation from the Brandywine, Colonial, Christina, and Red Clay Consolidated School District administrations and School Boards.
- The Commission will continue to work with all four districts to align with the milestones and measures of success that they helped develop in the Commission’s plan.

**28. Will measures and milestones be applicable to all students residing within the City of Wilmington or just those students from the city attending Red Clay schools?**

- The milestones and measures of success will be applicable to all students residing within the City of Wilmington. All City of Wilmington students will be included in the annual report submitted by the Commission.

## **Resolution and Plan as a Whole**

**29. Please clarify the funding components that are incorporated and required to meet the "necessary and sufficient" funding measure.**

- The “necessary and sufficient” funding, as specified on pages 167–168 of the Commission’s plan, include the Wilmington Transition Funds requested for the 2016–17 and 2017–18 school years and recurrent funding approved and allocated for fiscal year 2017 to support weighted unit funding for low-income students, English language learners, and basic special

education for grades K-3 in the entire Red Clay Consolidated School District and the current Christina School District schools in the City of Wilmington. These are the funds related directly to redistricting.

- Please see Q&A sent on December 18, 2015, question 1, for the timeline of the funding rollout.

**30. Does this proposal, and the SBE approval of such, expire if necessary and sufficient funding is not allocated? Please clarify provision in Resolution #2 relating to Board's suspension of implementation timetable.**

- This provision is consistent with the State Board of Education's authority under SB 122. Under SB 122, only the State Board of Education is authorized to alter the boundaries, therefore the State Board must be involved in any suspension of the timetable or the expiration of the Commission's plan.
- It is the responsibility of the Commission in collaboration with the districts to report to the State Board whether they are able to continue with the redistricting commitment based on the available state funds. This is a multi-district change; therefore, the Commission must facilitate a collaborative decision about the adequacy of funding to meet the contingencies up until July 2018.
- The opportunity to suspend the redistricting timeline only exists for the next two budget cycles. If the funding is not provided by July 2018, the plan expires. After July 2018, the opportunity of suspension of the timeline ends as this is when redistricting would occur. The suspension is only contingent on the conditions stipulated on page 98 of the plan.
- Suspension is only necessary if the state is unable to meet the financial targets that have been set out in the phased approach by July 2018, otherwise the Commission's plan expires. There are no further contingencies beyond 2018.
- The Commission shares the feeling with the State Board that merely changing district boundaries is not adequate. This authority ensures that district boundaries will not change without the adequate funding.

**31. Within the Resolution's Whereas statements it states that this plan is consistent with the objective of improving student outcomes and is in the best interest of all students in NCC. Please provide details supporting this assertion. In prior questions above, we have referenced questions regarding these topics as well specifically in questions 9, 17, 18, 24, 27, 28**

- This statement confirms the expectation shared by both the State Board and the Commission that action should be consistent with the best interests of students. The statement does not refer to the impact of what is being proposed, but rather the objectives and intentions of the Transition, Resource, and Implementation Plan submitted by the Commission and under review by the State Board.
- The Commission commits itself to center all actions around the best interests of students, as does the State Board.

- The Commission’s intention is for the plan to serve in the best interests of all students is clear in the action agenda, laid out in the graphic on page 8, and its explanation on pages 1–2 and 11–19, and connected back to the milestones and measures of success on pages 164–178.

## **Additional Questions Identified by WEIC Staff**

### **32. Will the State commit the necessary and sufficient funds?**

- Governor Markell was present at the Commission Meeting on December 9. He acknowledged the necessity of additional state funding to ensure the plan’s success and avoid placing undue burden on the taxpayers, particularly those from the Red Clay Consolidated School District.

### **33. What is the role of the Commission after implementation?**

- The Commission will take an active role in collaboration with the districts to implement redistricting. Beyond redistricting, the Commission’s mandate is to facilitate the development and implementation of the recommendations of the other Committees. Specifically, the legislation states:  
**“The Wilmington Education Improvement Commission (WEIC) shall advise the Governor and General Assembly on the planning, recommending, and implementing improvements to the quality and availability of education for children in Pre-K through grade 12 in the City of Wilmington and for which such changes maybe be instructive for addressing needs of all schools within the State with high concentrations of children living in poverty, English language learners, or both.”**
- The Commission will submit to the State Board an annual evaluation of progress in achieving milestones and in improving success for City of Wilmington students.
- Page 99 of the Commission’s plan references the continued mandate of the Commission:  
**“The Commission has accepted these recommendations as a baseline for its work not only in redistricting, but in all other aspects of its mission. The Commission will build upon that baseline through all of its operations, beginning with redistricting and extending until it sunsets in 2021. It should be reaffirmed that in this domain the Commission’s legislated mandate is statewide; the Commission is to advise the Governor and General Assembly on addressing the needs of all Delaware schools with high concentrations of low-income students and English language learners. The Commission’s plan for redistricting represents the beginning of the Commission’s efforts to fulfill that larger responsibility. The Commission is committed to the alignment of supports and services through a strong partnership between the community and its schools. Governor Markell was present at the Commission Meeting on December 9. He acknowledged the necessity of additional state funding to ensure the plan’s success and avoid placing undue burden on the taxpayers, particularly those from the Red Clay Consolidated School District.”**