



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND REHABILITATIVE SERVICES

November 24, 2020

Honorable Molly Magarik
Cabinet Secretary
Delaware Department of Health and Social Services
1901 North Du Pont Highway
New Castle, Delaware 19720

Dear Cabinet Secretary Magarik:

I am writing to advise you of the U. S. Department of Education's (Department) 2020 revised determination for Delaware under sections 616 and 642 of Part C of the Individuals with Disabilities Education Act (IDEA). The Department has revised Delaware's determination from "needs intervention in implementing the requirements of Part C of the IDEA" to "needs assistance to meet the requirements and purposes of Part C of the IDEA." This revised determination letter replaces the Department's June 23, 2020 letter and is based on the totality of the State's data and information, including the original and subsequent submissions provided by the State after the Department's June 23, 2020 determination letter. Specifically, the original submission included the Federal fiscal year (FFY) 2018 State Performance Plan/Annual Performance Report (SPP/APR), other State-reported data, and other publicly available information as of June 23, 2020. Subsequent submissions include documents and information provided by the Delaware Department of Health and Social Services (DHSS) on July 10, 2020, and August 11, 2020, as well as information provided during a video teleconference conducted on September 25, 2020.

The Department's revised determination is based on acceptance of the State's FFY 2018 SPP/APR data for Indicators 1, 7, 8A, and 8C, which were initially determined as not valid and reliable and thus the primary factors contributing to the Department's "needs intervention" IDEA Part C determination for Delaware. The Department's Office of Special Education Programs (OSEP) had identified a number of issues during the SPP/APR clarification process as well as OSEP's December 2019 monitoring visit as to how DHSS collected and reported its data for these compliance indicators. Ultimately, through the appeal process, DHSS provided documentation to confirm that its data were valid and reliable. During the APR clarification process, DHSS explained how it had revised its data collection to address some concerns raised during the 2019 monitoring visit, but had not provided sufficient explanation during clarification and prior to the June 2020 determination to address all the concerns related to the validity of the data.

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

At the outset of the SPP/APR clarification process, OSEP's pre-clarification response informed DHSS that the reported data for Indicators 1, 7, 8A, 8B, and 8C were not valid and reliable because the State had reported to OSEP that "it has been [DHSS] practice, when noncompliance is identified through monitoring, [that early intervention service or] EIS programs are given the opportunity to correct the noncompliance prior to the State finalizing the data that is calculated and reported as the State's indicator data in the SPP/APR." OSEP indicated that it could not determine whether "Correction of Noncompliance Identified in 2017" as reported under Indicators 1, 7, 8A, 8B, and 8C was consistent with OSEP Memo 09-02, because the State had reported "that it has been [DHSS] practice to not issue findings of noncompliance to its EIS programs."

During the SPP/APR clarification period, DHSS acknowledged under Indicators 1, 7, 8A, and 8C that the State's practice regarding identified noncompliance did not adhere to the requirements articulated in OSEP Memo 09-02. The State indicated that it was working with technical assistance advisors to "develop appropriate corrective action measures to ensure future data is valid and reliable." The State's changes to those indicators made during the clarification period did not refute OSEP's assertion that the FFY 2018 data were valid and reliable. However, the State did make changes to Indicator 8B addressing the Department's pre-clarification response, further explaining how data was collected and why the data was in fact reliable. In issuing its initial June 23, 2020 determination, the Department accepted the State's clarification regarding Indicator 8B and accepted the data for that Indicator as valid and reliable. For Indicators 1, 7, 8A, and 8C, given that the State had acknowledged failures regarding correction of identified non-compliance, asserted that corrective action would be taken to ensure future data are valid and reliable, and had not clarified why the data reported under these indicators should be considered valid and reliable, OSEP maintained its pre-clarification interpretation that the data were not valid and reliable for these indicators and the Department issued a determination of Needs Intervention.

In its July 10, 2020, letter requesting that the Department reconsider its determination, the State contended that its FFY 2018 data reported under Indicators 1, 7, 8A, and 8C were valid and reliable. The State submitted additional documentation related to its process for collecting its SPP/APR data on August 11, and October 2, 2020. Additionally, during a video conference on September 25, 2020, the State acknowledged that its data collection reflected input from OSEP's December 2019 monitoring visit to address two areas of noncompliance that had been identified by OSEP regarding not permitting EIS provider pre-finding correction to affect whether the data reported reflected the level of compliance. Specifically, the State confirmed in September 2020 that its FFY 2018 data (which were submitted in February 2020) distinguished between documented exceptional family circumstances and noncompliance with relevant timeline requirements. DHSS representatives also acknowledged during the September 2020 hearing the need for DHSS to continue to improve its data collection going forward in order to capture accurate, valid and reliable data for its compliance indicators and to address other areas of general supervision and monitoring, which OSEP will address separately in its response to the December 2019 monitoring visit.

The Department reviewed the State's arguments and supporting documentation related to SPP/APR Indicators 1, 7, 8A, and 8C specific to the validity and reliability of its FFY 2018 data. After careful consideration of the information submitted by Delaware, the Department accepts the FFY 2018 data reported under these indicators as valid and reliable. As a result, the

Department is revising the State’s 2020 Determination from Needs Intervention to Needs Assistance. Your State’s 2020 revised determination is based on the data reflected in the State’s revised “2020 Part C Results-Driven Accountability Matrix” (RDA Matrix). The RDA Matrix is individualized for each State and consists of:

- (1) a Compliance Matrix that includes scoring on Compliance Indicators and other compliance factors;
- (2) Results Components and Appendices that include scoring on Results Elements;
- (3) a Compliance Score and a Results Score;
- (4) an RDA Percentage based on both the Compliance Score and the Results Score; and
- (5) the State’s Determination.

The revised RDA Matrix is further explained in a document entitled “How the Department Made Determinations under Sections 616(d) and 642 of the Individuals with Disabilities Education Act in 2020: Part C” (HTDMD). While the HTDMD is attached to this letter for your convenience, the document is unchanged from the version dated, June 23, 2020. The Department’s revised determination is based on a review of newly available information presented by the State and does not reflect a change in the rationale used by the Department to make determinations.

OSEP is continuing to use both results data and compliance data in making the Department’s determinations in 2020, as it did for the Part C determinations in 2015 through 2019. (The specifics of the determination procedures and criteria are set forth in the HTDMD and reflected in the RDA Matrix for your State.) For 2020, the Department’s IDEA Part C determinations continue to include consideration of each State’s Child Outcomes data, which measure how children who receive Part C services are improving functioning in three outcome areas that are critical to school readiness:

- positive social-emotional skills;
- acquisition and use of knowledge and skills (including early language/communication); and
- use of appropriate behaviors to meet their needs.

Specifically, the Department considered the data quality and the child performance levels in each State’s Child Outcomes FFY 2018 data.

You may access the results of OSEP’s review of your State’s SPP/APR and other relevant data by accessing the EMAPS SPP/APR reporting tool using your State-specific log-on information at <https://emaps.ed.gov/suite/>. When you access your State’s SPP/APR on the site, you will find, in Indicators 1 through 10, the OSEP Response to the indicator and any actions that the State is required to take. The actions that the State is required to take are in two places:

- (1) actions related to the correction of findings of noncompliance are in the “OSEP Response” section of the indicator; and
- (2) any other actions that the State is required to take are in the “Required Actions” section of the indicator.

It is important for you to review the Introduction to the SPP/APR, which may also include language in the “OSEP Response” and/or “Required Actions” sections.

You will also find all of the following important documents saved as attachments to the Progress Page:

- (1) the State’s RDA Matrix (revised);
- (2) the HTDMD document (unchanged);
- (3) a spreadsheet entitled “2020 Data Rubric Part C,” which shows how OSEP calculated the State’s “Timely and Accurate State-Reported Data” score in the Compliance Matrix (revised); and
- (4) a document entitled “Dispute Resolution 2018-19,” which includes the IDEA section 618 data that OSEP used to calculate the State’s “Timely State Complaint Decisions” and “Timely Due Process Hearing Decisions” scores in the Compliance Matrix (unchanged).

As noted above, the State’s 2020 determination is Needs Assistance. A State’s 2020 RDA Determination is Needs Assistance if the RDA Percentage is at least 60% but less than 80%. A State would also be Needs Assistance if its RDA Determination percentage is 80% or above, but the Department has imposed Special or Specific Conditions on the State’s last three IDEA Part C grant awards (for FFYs 2017, 2018, and 2019), and those Specific Conditions are in effect at the time of the 2020 determination.

As shown in the enclosed HTDMD and revised RDA Matrix for Delaware, this revision results in Delaware receiving an RDA percentage of 66.07. As noted above, the State’s revised 2020 determination is Needs Assistance.

The State’s determination for 2019 was also Needs Assistance. In accordance with section 616(e)(1) of the IDEA and 34 C.F.R. § 303.704(a), if a State is determined to need assistance for two consecutive years, the Secretary must take one or more of the following actions:

- (1) advise the State of available sources of technical assistance that may help the State address the areas in which the State needs assistance and require the State to work with appropriate entities; and/or
- (2) identify the State as a high-risk grantee and impose Special Conditions on the State’s IDEA Part C grant award.

Pursuant to these requirements, the Secretary is advising the State of available sources of technical assistance, including OSEP-funded technical assistance centers and resources at the following website: <https://osep.grads360.org/#program/highlighted-resources>, and requiring the State to work with appropriate entities. In addition, the State should consider accessing technical assistance from other Department-funded centers such as the Comprehensive Centers with resources at the following link: <https://compcenternetwork.org/states>. The Secretary directs the State to determine the results elements and/or compliance indicators, and improvement strategies, on which it will focus its use of available technical assistance, in order to improve its performance. We strongly encourage the State to access technical assistance related to those results elements and compliance indicators for which the State received a score of zero. Your State must report with its FFY 2019 SPP/APR submission, due February 1, 2021, on:

- (1) the technical assistance sources from which the State received assistance; and
- (2) the actions the State took as a result of that technical assistance.

As required by IDEA section 616(e)(7) and 34 C.F.R. § 303.706, your State must notify the public that the Secretary of Education has taken the above enforcement action, including, at a minimum, by posting a public notice on its website and distributing the notice to the media and to EIS programs.

States were required to submit Phase III, Year Four of the State Systemic Improvement Plan (SSIP) by April 1, 2020. OSEP appreciates the State’s ongoing work on its SSIP and its efforts to improve results for infants and toddlers with disabilities and their families. We have carefully reviewed and responded to your submission. OSEP will continue to work with your State as it implements the fifth year of Phase III of the SSIP, which is due on April 1, 2021.

As a reminder, your State must report annually to the public, by posting on the State lead agency’s website, on the performance of each EIS program located in the State on the targets in the SPP/APR as soon as practicable, but no later than 120 days after the State’s submission of its FFY 2018 SPP/APR. In addition, your State must:

- (1) review EIS program performance against targets in the State’s SPP/APR;
- (2) determine if each EIS program “meets the requirements” of Part C, or “needs assistance,” “needs intervention,” or “needs substantial intervention” in implementing Part C of the IDEA;
- (3) take appropriate enforcement action; and
- (4) inform each EIS program of its determination.

Further, your State must make its SPP/APR available to the public by posting it on the State lead agency’s website. Within the upcoming weeks, OSEP will be finalizing a State Profile that:

- (1) includes the State’s determination letter and SPP/APR, OSEP attachments, and all State attachments that are accessible in accordance with Section 508 of the Rehabilitation Act of 1973; and
- (2) will be accessible to the public via the ed.gov website.

We are committed to supporting Delaware’s efforts to improve results for infants and toddlers with disabilities and their families and look forward to working with DHSS over the next year. If you have any questions or you wish to request technical assistance, please contact Jennifer Miley, the OSEP Contact for Delaware, at 202-245-6049.

Sincerely,

/s/

Mark Schultz
Commissioner, Rehabilitative Services
Administration.
Delegated the authority to perform the functions
and duties of the Assistant Secretary
for the Office of Special Education and
Rehabilitative Services.

cc: State Part C Coordinator

APR and 618 -Timely and Accurate State Reported Data

DATE: February 2020 Submission

Please see below the definitions for the terms used in this worksheet.

SPP/APR Data

1) Valid and Reliable Data – Data provided are from the correct time period, are consistent with 618 (when appropriate) and the measurement, and are consistent with previous indicator data (unless explained).

Part C 618 Data

1) Timely – A State will receive one point if it submits counts/ responses for an entire EMAPS survey associated with the IDEA Section 618 data collection to ED by the initial due date for that collection (as described the table below).

618 Data Collection	EMAPS Survey	Due Date
Part C Child Count and Setting	Part C Child Count and Settings in EMAPS	1 st Wednesday in April
Part C Exiting	Part C Exiting Collection in EMAPS	1 st Wednesday in November
Part C Dispute Resolution	Part C Dispute Resolution Survey in EMAPS	1 st Wednesday in November

2) Complete Data – A State will receive one point if it submits data for all data elements, subtotals, totals as well as responses to all questions associated with a specific data collection by the initial due date. No data is reported as missing. No placeholder data is submitted. State-level data include data from all districts or agencies.

3) Passed Edit Check – A State will receive one point if it submits data that meets all the edit checks related to the specific data collection by the initial due date. The counts included in 618 data submissions are internally consistent within a data collection. See the EMAPS User Guide for each of the Part C 618 Data Collections for a list of edit checks (available at: <https://www2.ed.gov/about/inits/ed/edfacts/index.html>).

FFY 2018 APR

Part C Timely and Accurate Data - SPP/APR Data

APR Indicator	Valid and Reliable	Total
1		
2		
3		
4		
5		
6		
7		
8a		
8b		
8c		
9		
10		
11		
Subtotal		
APR Score Calculation	Timely Submission Points – If the FFY 2018 SPP/APR was submitted on-time, place the number 5 in the cell on the right.	
	Grand Total – (Sum of subtotal and Timely Submission Points) =	

618 Data

Table	Timely	Complete Data	Passed Edit Check	Total
Child Count/Settings Due Date: 4/3/19				
Exiting Due Date: 11/6/19				
Dispute Resolution Due Date: 11/6/19				
Subtotal				
618 Score Calculation			Grand Total (Subtotal X 2) =	

Indicator Calculation

A. 618 Grand Total	
B. APR Grand Total	
C. 618 Grand Total (A) + APR Grand Total (B) =	
Total NA in 618	Total NA Points Subtracted in 618
	Total NA Points Subtracted in APR
Denominator	
D. Subtotal (C divided by Denominator) =	
E. Indicator Score (Subtotal D x 100) =	

* Note any cell marked as N/A will decrease the denominator by 1 for APR and 2 for 618.

Delaware

2020 Part C Results-Driven Accountability Matrix

Results-Driven Accountability Percentage and Determination¹

Percentage (%)	Determination
66.07	Needs Assistance

Results and Compliance Overall Scoring

	Total Points Available	Points Earned	Score (%)
Results	8	6	75
Compliance	14	8	57.14

I. Results Component — Data Quality

Data Quality Total Score (completeness + anomalies)	4
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(a) Data Completeness: The percent of children included in your State's 2018 Outcomes Data (Indicator C3)

Number of Children Reported in Indicator C3 (i.e. outcome data)	829
Number of Children Reported Exiting in 618 Data (i.e. 618 exiting data)	1057
Percentage of Children Exiting who are Included in Outcome Data (%)	78.43
Data Completeness Score²	2

(b) Data Anomalies: Anomalies in your State's FFY 2018 Outcomes Data

Data Anomalies Score³	2
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II. Results Component — Child Performance

Child Performance Total Score (state comparison + year to year comparison)	2
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(a) Comparing your State's 2018 Outcomes Data to other State's 2018 Outcomes Data

Data Comparison Score⁴	1
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(b) Comparing your State's FFY 2018 data to your State's FFY 2017 data

Performance Change Score⁵	1
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¹ For a detailed explanation of how the Compliance Score, Results Score, and the Results-Driven Accountability Percentage and Determination were calculated, review "How the Department Made Determinations under Section 616(d) of the *Individuals with Disabilities Education Act* in 2020: Part C."

² Please see Appendix A for a detailed description of this calculation.

³ Please see Appendix B for a detailed description of this calculation.

⁴ Please see Appendix C for a detailed description of this calculation.

⁵ Please see Appendix D for a detailed description of this calculation.

Summary Statement Performance	Outcome A: Positive Social Relationships SS1 (%)	Outcome A: Positive Social Relationships SS2 (%)	Outcome B: Knowledge and Skills SS1 (%)	Outcome B: Knowledge and Skills SS2 (%)	Outcome C: Actions to Meet Needs SS1 (%)	Outcome C: Actions to Meet Needs SS2 (%)
FFY 2018	63.74	38	69.25	34.62	67.05	41.25
FFY 2017	63.79	41.46	67.68	36.15	65.28	42.61

2020 Part C Compliance Matrix

Part C Compliance Indicator ¹	Performance (%)	Full Correction of Findings of Noncompliance Identified in FFY 2017	Score
Indicator 1: Timely service provision	55.33	No	0
Indicator 7: 45-day timeline	92.67	No	1
Indicator 8A: Timely transition plan	100	No	2
Indicator 8B: Transition notification	100	N/A	2
Indicator 8C: Timely transition conference	93.33	No	1
Timely and Accurate State-Reported Data	100		1
Timely State Complaint Decisions	N/A		N/A
Timely Due Process Hearing Decisions	N/A		N/A
Longstanding Noncompliance			1
Special Conditions	None		
Uncorrected identified noncompliance	Yes, 2 to 4 years		

¹ The complete language for each indicator is located in the Part C SPP/APR Indicator Measurement Table at: <https://osep.grads360.org/#communities/pdc/documents/18306>

Appendix A

I. (a) Data Completeness:

The Percent of Children Included in your State's 2018 Outcomes Data (Indicator C3)

Data completeness was calculated using the total number of Part C children who were included in your State's FFY 2018 Outcomes Data (C3) and the total number of children your State reported in its FFY 2018 IDEA Section 618 data. A percentage for your State was computed by dividing the number of children reported in your State's Indicator C3 data by the number of children your State reported exited during FFY 2018 in the State's FFY 2018 IDEA Section 618 Exit Data.

Data Completeness Score	Percent of Part C Children included in Outcomes Data (C3) and 618 Data
0	Lower than 34%
1	34% through 64%
2	65% and above

Appendix B

I. (b) Data Quality: Anomalies in Your State's FFY 2017 Outcomes Data

This score represents a summary of the data anomalies in the FFY 2018 Indicator 3 Outcomes Data reported by your State. Publicly available data for the preceding four years reported by and across all States for each of 15 progress categories under Indicator 3 (in the FFY 2014 – FFY 2017 APRs) were used to determine an expected range of responses for each progress category under Outcomes A, B, and C. For each of the 15 progress categories, a mean was calculated using the publicly available data and a lower and upper scoring percentage was set 1 standard deviation above and below the mean for category a and 2 standard deviations above and below the mean for categories b through e¹². In any case where the low scoring percentage set from 1 or 2 standard deviations below the mean resulted in a negative number, the low scoring percentage is equal to 0.

If your State's FFY 2018 data reported in a progress category fell below the calculated "low percentage" or above the "high percentage" for that progress category for all States, the data in that particular category are statistically improbable outliers and considered an anomaly for that progress category. If your State's data in a particular progress category was identified as an anomaly, the State received a 0 for that category. A percentage that is equal to or between the low percentage and high percentage for each progress category received 1 point. A State could receive a total number of points between 0 and 15. Thus, a point total of 0 indicates that all 15 progress categories contained data anomalies and a point total of 15 indicates that there were no data anomalies in all 15 progress categories in the State's data. An overall data anomalies score of 0, 1, or 2 is based on the total points awarded.

Outcome A	Positive Social Relationships
Outcome B	Knowledge and Skills
Outcome C	Actions to Meet Needs

Category a	Percent of infants and toddlers who did not improve functioning
Category b	Percent of infants and toddlers who improved functioning but not sufficient to move nearer to functioning comparable to same-aged peers
Category c	Percent of infants and toddlers who improved functioning to a level nearer to same-aged peers but did not reach it
Category d	Percent of infants and toddlers who improved functioning to reach a level comparable to same-aged peers
Category e	Percent of infants and toddlers who maintained functioning at a level comparable to same-aged peers

Outcome\Category	Mean	StDev	-1SD	+1SD
Outcome A\Category a	2.24	4.9	-2.66	7.13
Outcome B\Category a	1.85	4.73	-2.89	6.58
Outcome C\Category a	1.91	5.2	-3.29	7.11

¹ Numbers shown as rounded for display purposes.

² Values based on data for States with summary statement denominator greater than 199 exiters.

Outcome\ Category	Mean	StDev	-2SD	+2SD
Outcome A\ Category b	21.28	8.29	4.7	37.87
Outcome A\ Category c	18.94	11.52	-4.1	41.98
Outcome A\ Category d	28.16	8.87	10.42	45.9
Outcome A\ Category e	29.38	15.02	-0.65	59.41
Outcome B\ Category b	22.74	9.21	4.31	41.16
Outcome B\ Category c	27.04	11.17	4.7	49.38
Outcome B\ Category d	33.69	8.08	17.54	49.84
Outcome B\ Category e	14.69	9.63	-4.58	33.95
Outcome C\ Category b	18.75	7.69	3.37	34.14
Outcome C\ Category c	21.58	11.78	-1.99	45.15
Outcome C\ Category d	35.37	8.62	18.13	52.61
Outcome C\ Category e	22.39	14.36	-6.32	51.1

Data Anomalies Score	Total Points Received in All Progress Areas
0	0 through 9 points
1	10 through 12 points
2	13 through 15 points

Data Quality: Anomalies in Your State's FFY 2018 Outcomes Data

Number of Infants and Toddlers with IFSP's Assessed in your State	829
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Outcome A — Positive Social Relationships	Category a	Category b	Category c	Category d	Category e
State Performance	5	251	258	192	123
Performance (%)	0.6	30.28	31.12	23.16	14.84
Scores	1	1	1	1	1

Outcome B — Knowledge and Skills	Category a	Category b	Category c	Category d	Category e
State Performance	5	229	308	219	68
Performance (%)	0.6	27.62	37.15	26.42	8.2
Scores	1	1	1	1	1

Outcome C — Actions to Meet Needs	Category a	Category b	Category c	Category d	Category e
State Performance	5	255	227	302	40
Performance (%)	0.6	30.76	27.38	36.43	4.83
Scores	1	1	1	1	1

	Total Score
Outcome A	5
Outcome B	5
Outcome C	5
Outcomes A-C	15

Data Anomalies Score	2
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Appendix C

II. (a) Comparing Your State's 2018 Outcomes Data to Other States' 2018 Outcome Data

This score represents how your State's FFY 2018 Outcomes data compares to other States' FFY 2018 Outcomes Data. Your State received a score for the distribution of the 6 Summary Statements for your State compared to the distribution of the 6 Summary Statements in all other States. The 10th and 90th percentile for each of the 6 Summary Statements was identified and used to assign points to performance outcome data for each Summary Statement¹. Each Summary Statement outcome was assigned 0, 1, or 2 points. If your State's Summary Statement value fell at or below the 10th percentile, that Summary Statement was assigned 0 points. If your State's Summary Statement value fell between the 10th and 90th percentile, the Summary Statement was assigned 1 point, and if your State's Summary Statement value fell at or above the 90th percentile the Summary Statement was assigned 2 points. The points were added up across the 6 Summary Statements. A State can receive a total number of points between 0 and 12, with 0 points indicating all 6 Summary Statement values were at or below the 10th percentile and 12 points indicating all 6 Summary Statements were at or above the 90th percentile. An overall comparison Summary Statement score of 0, 1, or 2 was based on the total points awarded.

Summary Statement 1: Of those infants and toddlers who entered or exited early intervention below age expectations in each Outcome, the percent who substantially increased their rate of growth by the time they turned 3 years of age or exited the program.

Summary Statement 2: The percent of infants and toddlers who were functioning within age expectations in each Outcome by the time they turned 3 years of age or exited the program.

Scoring Percentages for the 10th and 90th Percentile for Each Outcome and Summary Statement, FFY 2018

Percentiles	Outcome A SS1	Outcome A SS2	Outcome B SS1	Outcome B SS2	Outcome C SS1	Outcome C SS2
10	46.61%	39%	55.87%	32.49%	57.81%	39.04%
90	84.65%	70.31%	85.24%	57.59%	87.33%	79.89%

Data Comparison Score	Total Points Received Across SS1 and SS2
0	0 through 4 points
1	5 through 8 points
2	9 through 12 points

Your State's Summary Statement Performance FFY 2018

Summary Statement (SS)	Outcome A: Positive Social Relationships SS1	Outcome A: Positive Social Relationships SS2	Outcome B: Knowledge and Skills SS1	Outcome B: Knowledge and Skills SS2	Outcome C: Actions to meet needs SS1	Outcome C: Actions to meet needs SS2
Performance (%)	63.74	38	69.25	34.62	67.05	41.25
Points	1	0	1	1	1	1

Total Points Across SS1 and SS2(*)	5
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Your State's Data Comparison Score	1
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¹ Values based on data for States with summary statement denominator greater than 199 exiters.

Appendix D

II. (b) Comparing your State’s FFY 2018 data to your State’s FFY 2017 data

The Summary Statement percentages in each Outcomes Area from the previous year’s reporting (FFY 2017) is compared to the current year (FFY 2018) using the test of proportional difference to determine whether there is a statistically significant (or meaningful) growth or decline in child achievement based upon a significance level of $p \leq .05$. The data in each Outcome Area is assigned a value of 0 if there was a statistically significant decrease from one year to the next, a value of 1 if there was no significant change, and a value of 2 if there was a statistically significant increase across the years. The scores from all 6 Outcome Areas are totaled, resulting in a score from 0 - 12.

Test of Proportional Difference Calculation Overview

The summary statement percentages from the previous year’s reporting were compared to the current year using an accepted formula (test of proportional difference) to determine whether the difference between the two percentages is statistically significant (or meaningful), based upon a significance level of $p \leq .05$. The statistical test has several steps.

Step 1: Compute the difference between the FFY 2018 and FFY 2017 summary statements.

e.g. $C3A\ FFY2018\% - C3A\ FFY2017\% = \text{Difference in proportions}$

Step 2: Compute the standard error of the difference in proportions using the following formula which takes into account the value of the summary statement from both years and the number of children that the summary statement is based on¹

$$\sqrt{\left(\frac{FFY2017\% * (1 - FFY2017\%)}{FFY2017N} + \frac{FFY2018\% * (1 - FFY2018\%)}{FFY2018N}\right)} = \text{Standard Error of Difference in Proportions}$$

Step 3: The difference in proportions is then divided by the standard error of the difference to compute a z score.

$\text{Difference in proportions} / \text{standard error of the difference in proportions} = z \text{ score}$

Step 4: The statistical significance of the z score is located within a table and the p value is determined.

Step 5: The difference in proportions is coded as statistically significant if the p value is it is less than or equal to .05.

Step 6: Information about the statistical significance of the change and the direction of the change are combined to arrive at a score for the summary statement using the following criteria

0 = statistically significant decrease from FFY 2017 to FFY 2018

1 = No statistically significant change

2 = statistically significant increase from FFY 2017 to FFY 2018

Step 7: The score for each summary statement and outcome is summed to create a total score with a minimum of 0 and a maximum of 12. The score for the test of proportional difference is assigned a score for the Indicator 3 Overall Performance Change Score based on the following cut points:

Indicator 2 Overall Performance Change Score	Cut Points for Change Over Time in Summary Statements Total Score
0	Lowest score through 3
1	4 through 7
2	8 through highest

¹Numbers shown as rounded for display purposes.

Summary Statement/ Child Outcome	FFY 2017 N	FFY 2017 Summary Statement (%)	FFY 2018 N	FFY 2018 Summary Statement (%)	Difference between Percentages (%)	Std Error	z value	p-value	p<=.05	Score: 0 = significant decrease 1 = no significant change 2 = significant increase
SS1/Outcome A: Positive Social Relationships	602	63.79	706	63.74	-0.05	0.0267	-0.018	0.9856	No	1
SS1/Outcome B: Knowledge and Skills	625	67.68	761	69.25	1.57	0.0251	0.626	0.5313	No	1
SS1/Outcome C: Actions to meet needs	651	65.28	789	67.05	1.76	0.0251	0.7033	0.4819	No	1
SS2/Outcome A: Positive Social Relationships	697	41.46	829	38	-3.47	0.0251	- 1.3782	0.1681	No	1
SS2/Outcome B: Knowledge and Skills	697	36.15	829	34.62	-1.53	0.0246	-0.6244	0.5323	No	1
SS2/Outcome C: Actions to meet needs	697	42.61	829	41.25	- 1.36	0.0254	- 0.5349	0.5927	No	1

Total Points Across SS1 and SS2	6
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Your State's Performance Change Score	1
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