



Metropolitan Wilmington  
Urban League

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*Empowering Communities  
Changing Lives*

December 1, 2015

Wilmington Education Improvement Commission  
c/o The Institute of Public Administration  
111 Academy Street  
Newark, DE 19716

Commission Members & Members of the Delaware State Board of Education:

Today, the Metropolitan Wilmington Urban League (MWUL) offers a strong endorsement of the school governance plan for the City of Wilmington. This plan is no silver bullet. However, after 60 years of silence from lawmakers at every level of state and municipal government and a reform effort's most significant hallmark being that of federal court intervention, it is the view of the MWUL — a multi-racial coalition of thousands of Delawareans over its 16-year history — that simply doing nothing and returning to business as usual is no longer tolerable.

Our most compelling evidence for change is two-fold. The first is an analysis of the performance of all students in New Castle County disaggregated by those who are low-income, those who are City of Wilmington residents and those who are both low-income and Wilmington residents. In each case, performance declines based on income and geography across all districts and in most of the attenuating charter schools (see "2014 Colonial City of Wilmington Low-Income Students and Statewide Low-Income Students").

To be clear, that means, quite literally, none of the more than 18 governing units suggesting that they are delivering quality education to 11,500 city students are even remotely close to closing the achievement gap. Moreover, those who are making progress have not found away to routinely sustain such success or to scale it up in other learning environments.

We believe that doing nothing would assure that the cost of education in Delaware will continue to rise — to a level we believe is unsustainable. Low-income students across the state will continue to underperform their middle-class counterparts, rates of incarceration and recidivism will reach unprecedented levels, and Delaware, and its central city, will be increasingly less attractive to employers large and small. This is not supposition. Further, it is substantiated by the recently released report from the Centers for Disease Control and Prevention (CDC), which was commissioned by Wilmington City Councilwoman Hanifa Shabazz, [Elevated Rates of Urban Firearm Violence and Opportunities for Prevention](#). We would like to submit the full CDC report for the record as well.



Chairmen Pika & Harper  
December 1, 2015  
Page Two

The second most compelling evidence for change is that the state finds itself — perhaps intentionally — lagging on any number of the most regarded best practices for student success. Most notably, Delaware is one of only 15 states in the country that does not have a funding allocation for schools with high concentrations of low-income students, even though 50% of its public school children are, in fact, low-income. It is one of only five states that do not offer funding allocations to schools with high concentrations of English Language Learners, even though that segment of the student population is its fastest growing. This means that for more than 50 years, the state funding formula has assumed no changes in its student profile, demographics or family income.

In 2002, the MWUL issued Delaware's first-ever comprehensive report on the status of people of color in Delaware. In the foreword, Pulitzer-prize winning journalist Norman Lockman wrote:

"An examination of the numbers reflecting the achievement gap that exists between children of color and their white peers shows more than differences in "intelligence indicators;" it also shows that the results of school systems, both secondary and higher, that denied minorities access to academic opportunities for so long that it created generations of individuals who dismissed education as meaningless because there was so little pay-off for them. Worse still is the fact that these same educational institutions, having helped create the gap, are now willing to gloss it over in an act of politeness or an assumption that it is too late to do anything about it." (*The Pace of Progress*, 2002, pps. 10-11).

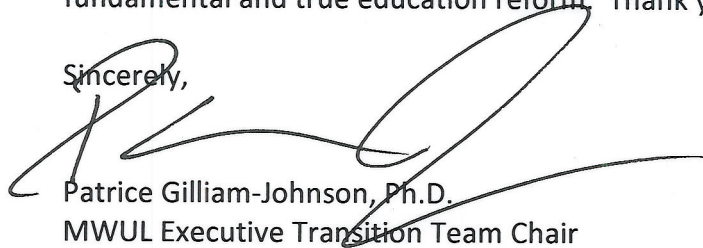
Despite the rapidly changing diversity of our community, state and country, Delaware has not kept up with times. We would like to submit *The Pace of Progress* for the public record as well.

As a final word, the National Urban League has been around since 1911. It was established as a response to the great black migration from the South to the North at the turn of the 20<sup>th</sup> century and was founded by a white female philanthropist and one of the few black scholars in the country at that time. Their mission was then what it is today: "to enable people of color to secure economic self-reliance, parity, power and civil rights." Those goals remain unchanged and are under-girded by the simple notion that every child should have access to a quality education. Coupled with the comprehensive workplan codified in "Strengthening Wilmington Education: An Action

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Agenda," five more years of intense programmatic and legislative activity from the Commission and the recognition that the only real measure of success is improved student outcomes, we believe that the Commission's school governance plan is a big step in the right direction and keeps the pressure on all levels of government for fundamental and true education reform. Thank you.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Patrice Gilliam-Johnson'.

Patrice Gilliam-Johnson, Ph.D.  
MWUL Executive Transition Team Chair

A smaller, stylized handwritten signature in black ink, appearing to read 'Raina Harper Allen'.

Raina Harper Allen  
MWUL Transition Executive



## DELAWARE BLACK CAUCUS

Phone 302.897.7683

425 Bradford Street | Wilmington, Delaware 19801

**The Honorable Hanifa G. N. Shabazz – Chair**

**The Honorable Charles Potter, Jr. – Co-Chair**

December 5, 2015

Delaware State Board of Education  
Dover, DE 19977

Dear Sirs:

On behalf of the Delaware Black Caucus, please accept this statement of support of the Redistricting in the City of Wilmington and New Castle County - A Transition, Resource and Implementation Plan presented by the Wilmington Education Improvement Commission. Our pledge of support of the plan is presented with the understanding and expectations of this multi-part agenda for improved outcomes of the education of black students in Wilmington and amendments as required to insure its successful implementation and goal.

It is also our understanding that implementation of the plan under the enabling legislation requires actions by many institutions over four years and should be contingent upon the provision of the necessary resources to improve the student's outcomes. The recommendations for 2016-2017 include the establishing of a weighted unit funding to address the needs of low-income and English language learners and other students at risk. We also support the recommendation of providing the transition funding as well as initial capital funding to support the immediate cost of the implementation.

The Caucus extends its support to the long term recommendations of strengthening the revenue base that supports public education at both the state and local levels. The effective implementation requires the mobilizing of cross sector resources that aligns with and is supported by many other educational initiatives including more effective coordination of state programs and services; alignment of nonprofit and communication support lead by the United way, and most essential, the establishing and authorizing of the Wilmington Office of Education and Public Policy.

Upon the confirmation of the District boundaries as defined in Part VIII of the plan, the DBC looks forward to reviewing the annual evaluation of milestones and measurements of success of the plans implementation and the students improvement outcomes, such as; increased attendance, persistence and engagement rates, and growing participation in high quality early childhood educational programs.

Sincerely,

*Hanifa Shabazz*

Hanifa Shabazz, Chair  
Delaware Black Caucus



## CFRC Statement

The CFRC reviewed the attached Items to be Considered for the Fiscal Year 2017 Budget presented by Jill Floore at the CFRC October 2015 meeting. The CFRC recognizes its main concern and obligation is to protect and maintain the financial integrity and viability of the district, including the districts ongoing improvement plans, for all Red Clay residents and students. The CFRC believes Red Clay provides superior educational programs. However, expanding these programs or incorporating additional students brings extensive challenges. The CFRC supports moving forward with the WEIC plan if and only if funding is included in the Governor's recommended budget in January and approved by the state legislature as part of the Fiscal Year 2017 Budget plan. In the short term, dedicated funding commitments must be made. In the long term, a specific Action Plan must be developed and adopted now in order to ensure the future success and financial viability of Red Clay. These funding items are:

- Weighted funding to meet the needs of all low income students and English Language Learners
- Transition funding to support redistricting planning to move students to Red Clay
- Facilities assessments and major and minor capital improvement monies to address deferred maintenance and support upgrades and programming changes for schools being transitioned to Red Clay
- Property tax reassessments in all New Castle County districts that recur regularly and on a rolling basis
- Ability of the school board to set and adjust operating taxes yearly, which power will remain in effect until the property tax reassessment occurs.
- No disproportionate tax impact on current Red Clay residents
- State funding for early childhood education

As the WEIC committees work through issues and analyze data, actual and sufficient dollar amounts need to be attached to each of the above items. Without adequate, clear and consistent funding that cannot be removed by the State at a whim or when times get tough, the CFRC believes that the WEIC plan would expose Red Clay to unacceptable financial risk which will be detrimental to the current students and the Red Clay community.



Wilmington Education Improvement Commission  
Interim Plan Public Comment  
Submitted by Daynell Wright on behalf of  
Wilmington Head Start Inc.

Pg. 96 – In alignment with the proposal to form a citywide partnership work in conjunction with Delaware Head Start Association which has representation from all of the Early Head Start, Head Start and ECAP programs across the state.

Pg. 98 & 103 – Develop transition plans from Pre-K to kindergarten that ensure best early childhood practices and have children transition gradually into the current model of instruction in kindergarten. Provide professional development for current kindergarten teachers to understand current best developmentally appropriate practices and Delaware Stars standards to facilitate changes that would ensure more seamless transitions.

Pg. 112 – What will be the impact on current pre-school programs if as suggested there is either an expansion or consolidation of school based pre-k programs? Will consolidation cause a gap in services for those children who are not eligible for ECAP or Head Start?

The plan states that funding will be provided for quality early childhood education. Will funds be allocated for existing programs to enhance services?

## The Wilmington Education Strategy Think Tank

Tuesday, December 8, 2015

Dear Dr. Allen & Wilmington Education Improvement Commissioners,

We, the members of the Wilmington Education Strategy Think Tank (WESTT) appreciate the depth of the work that has been put into the Commission's Interim Plan "Redistricting in the City of Wilmington and New Castle County: A Transition, Resource and Implementation Plan".

As you know, our group of concerned citizens has been working since 2013 to develop, prioritize and advance specific goals for the benefit of Wilmington students, including (1) the reduction of districts that serve the city, (2) the development of an equitable, weighted funding formula addressing student need and (3) the establishment of an authoritative role for Wilmington in the continuous improvement of the education of its residents.

We were pleased to see these priorities reflected in the WEAC recommendations earlier this year. In endorsing WEAC's Action Agenda, we committed to supporting viable action steps and resource oriented proposals. The ideas presented here and our ongoing work are evidence of that commitment.

**WESTT supports the Commission's Plan with conditions.** We believe there are several key principles that must be the foundation of the ongoing work of the Commission, State, and the General Assembly for any plan to succeed. Our continued support will be based on indication that these are accepted and pursued.

- **RESOURCES FIRST:** The transformation of the structure of school funding to be weighted towards student need is critical and achieving this must take precedence in the Governor's recommended budget and in the decisions made during the 2016 legislative session.
- **ADDRESS CONCENTRATED POVERTY:** The continued proliferation and maintenance of schools with highly concentrated poverty and inequitable distribution of resources is unacceptable.
- **COMMITMENT TO EQUITY:** Policies to ensure equity must be central to any process moving forward, at every level (district to state).
- **NO OPTING OUT:** Colonial and Brandywine School Districts' status quo positions are unacceptable.
- **GET THE METRO DISTRICT RIGHT:** A consolidated metropolitan (city/county) school district is highly desirable but we feel further deliberation is needed regarding its ideal configuration to ensure the above priorities are pursued.

We have included a table on page 3 to further explain these positions and have attached reports on WESTT's position on school funding reform.

We take seriously our responsibility to facilitate the best possible opportunities for our youngest citizens to succeed. We thank the members of the Committee for doing the same and seeing the value in our expertise. We look forward to continuing to work together toward these ends.

## **The Wilmington Education Strategy Think Tank**

Tuesday, December 8, 2015

Sincerely,

The Wilmington Education Strategy Think Tank

Raye Jones Avery  
*Executive Director, Christina Cultural Arts Center*

Nnamdi Chukwuocha  
*Wilmington City Councilman & Chair of Education, Youth & Families Committee*

Theopalis K. Gregory, Sr.  
*President, Wilmington City Council*

Shannon Griffin  
*Community Organizer, ACLU of Delaware*

Lynne Howard  
*Consultant, Christina Cultural Arts Center*

Jacqueline Jenkins  
*Chief Strategy Advisor, Office of the Mayor of the City of Wilmington*

Kathleen MacRae  
*Executive Director, ACLU of Delaware*

Rourke Moore  
*Special Projects, Office of the Mayor of the City of Wilmington*

Maurice Pritchett  
*Chief Executive Officer, Pritchett Associates*

Jea P. Street  
*New Castle County Councilman*



# The Wilmington Education Strategy Think Tank

Tuesday, December 8, 2015

PRINCIPLE	SUPPORT & SOLUTIONS
The transformation of the structure of school funding to be weighted towards student need is critical and achieving this must take precedence in the Governor's recommended budget and in the decisions made during the 2016 legislative session.	<ul style="list-style-type: none"> <li>Funding reform has been sought, unheeded, for at least two decades. Because so much hinges on this improvement, it must be prioritized regardless of progress in other aspects of the plan.<sup>1</sup></li> </ul>
The continued proliferation and maintenance of schools with highly concentrated poverty and inequitable distribution of resources is unacceptable.	<ul style="list-style-type: none"> <li>Significant inequities persist for Wilmington students, from the quality of food served in their cafeterias to the availability and integrity of school infrastructure in their communities.</li> <li>Policies that inefficiently compound disadvantage must be rethought. This includes aspects of Choice/Charter implementation<sup>2</sup> and review of the constitutionality of the Neighborhood Schools Act.<sup>3</sup></li> </ul>
Policies to ensure equity must be made central to any process moving forward, at every level (district to state).	<ul style="list-style-type: none"> <li>Little will improve without authentic commitment to equity from schools and districts serving Wilmington students.</li> <li>This includes an examination of a number of policies which often play out inequitably, such as disciplinary practice<sup>4</sup> and the flexibility of building-level decision-making.</li> <li>A city-based education office would be a critical component in this.</li> </ul>
Colonial and Brandywine School Districts' status quo positions are unacceptable.	<ul style="list-style-type: none"> <li>This current inaction stands in the way of the reduction of districts sought for Wilmington, causing concern about their motivations. The appropriate role of each must continue to be considered.</li> <li>Wilmington students should not have to be assigned to schools outside of the city limits for the entirety of their education.</li> </ul>
A consolidated metropolitan (city/county) school district is highly desirable but we feel further deliberation is needed regarding its ideal configuration and next steps to ensure the above priorities are addressed.	<ul style="list-style-type: none"> <li>While consolidating CSD's Wilmington schools into Red Clay is a step in the right direction, it garners concerns the arrangement is doomed to fall short of goals if it stops there.</li> <li>There are other options to be reconsidered as next steps, which are desirable and potentially more effective:               <ul style="list-style-type: none"> <li>Expand the metropolitan district by consolidating both Red Clay and the Brandywine into one district.<sup>5</sup></li> <li>Establish a single County-wide school district.</li> </ul> </li> </ul>

<sup>1</sup> WESTT Edunomics Report (2015) – see attached.

<sup>2</sup> ACLU: OCR Complaint (2014)

<sup>3</sup> Neighborhood Schools Report (2001)

<sup>4</sup> ACLU: Coalition for Fair & Equitable Schools purpose statement (2014)

<sup>5</sup> Neighborhood Schools Report (2001)

## The Wilmington Education Strategy Think Tank: Fair & Adequate Resourcing of Schools

The Wilmington Education Strategy Think Tank (WESTT) was established in early 2013 - predating the establishment of the initial Wilmington Education Advisory Committee (WEAC) - as a collective of city leaders from nonprofits, government and the school system, to focus their efforts on specific frontiers of systemic improvement, with the well-being of Wilmington students in mind. The following issues were prioritized:

1. Governance Reform as it affects Wilmington students
  - a. Stronger city voice and oversight role in public education through the formation of an education and public policy office.
  - b. Consolidation of districts serving Wilmington
2. Achieve Fair & Adequate Resourcing of Schools as it affects Wilmington students

The members of the WESTT have appreciated the process initiated through the WEAC and the Wilmington Education Improvement Commission (WEIC). In response to the draft report released in January 2015, we offered our feedback and proposals through a letter and attachments dated March 15, 2015, which can be found in the Appendix of WEAC's *Strengthening Wilmington Education: An Action Agenda*. One aspect of the recommendations of which we were particularly supportive was **“the development of an equitable, weighted funding formula addressing student need”**, with the understanding that student need in Wilmington, while acute and a priority for us, is reflective of student need throughout the state of Delaware, particularly similar to those of Dover and Seaford. Real improvements would benefit all students.

We also expressed, at that time, that our group had “already retained a consultant to aid us in crafting proposals for a weighted student funding formula, with the support of the Mayor’s Office and Wilmington City Council” in cooperation with New Castle County Government, the United Way and the ACLU of Delaware. That report was delivered to us by the Edunomics Lab of

## **The Wilmington Education Strategy Think Tank: Fair & Adequate Resourcing of Schools**

Georgetown University in June 2015, and we shared it with a number of stakeholders, including superintendents, principals and the DSEA to receive their feedback. We feel prepared at this time to share some of what we learned throughout the process, to assist in the forward momentum of the effort. In the following pages, we wish to draw attention to highlights of the research and share our own recommendations derived from that evidence.

We take seriously our responsibility to facilitate the best possible opportunities for our youngest citizens to succeed and are happy to be able to play a part in achieving this for students in Wilmington and throughout the state of Delaware. We thank the members of the Commission and its committees for doing the same and seeing the value in our expertise. In advance, we thank the State Board of Education, General Assembly, Department of Education and Governor for their efforts in this regard, as well. We look forward to working together toward these ends.

### **The Wilmington Education Strategy Think Tank**

Raye Jones Avery  
*Executive Director  
Christina Cultural Arts Center*

Nnamdi Chukwuocha  
*Wilmington City Councilman & Chair of  
Education, Youth & Families Committee*

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Jacqueline Jenkins  
*Chief Strategy Advisor, Office of the  
Mayor of the City of Wilmington*

Kathleen MacRae  
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Rourke Moore  
*Grant Writer & Special Projects Specialist  
Office of the Mayor of the City of  
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Maurice Pritchett  
*Chief Executive Officer  
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Jea P. Street  
*New Castle County Councilman and  
Executive Director, Hilltop Lutheran  
Neighborhood Center*

Michelle Taylor  
*President & Executive Director  
United Way of Delaware*

## The Wilmington Education Strategy Think Tank: Fair & Adequate Resourcing of Schools

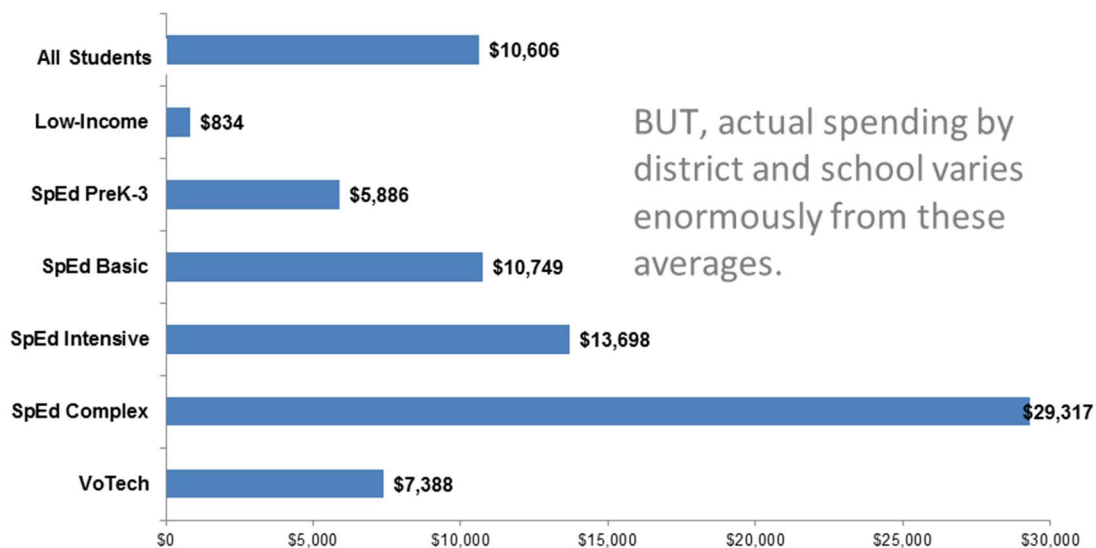
### Selected Edunomics Study Findings

The most striking results from the research showed us that

1. The **current funding structure drives inequities** both across districts and most strikingly, within districts across schools: often, less is spent on our urban schools with high need.
2. There is a **weak connection between school expenditures and school outcomes**, even when the demographics are similar: not only are resources unevenly distributed, nor are they being utilized effectively.



How much money is available in Delaware for public schooling from fed, state, & local sources?  
(Figures represent state-wide averages with increments by student type)



BUT, actual spending by district and school varies enormously from these averages.



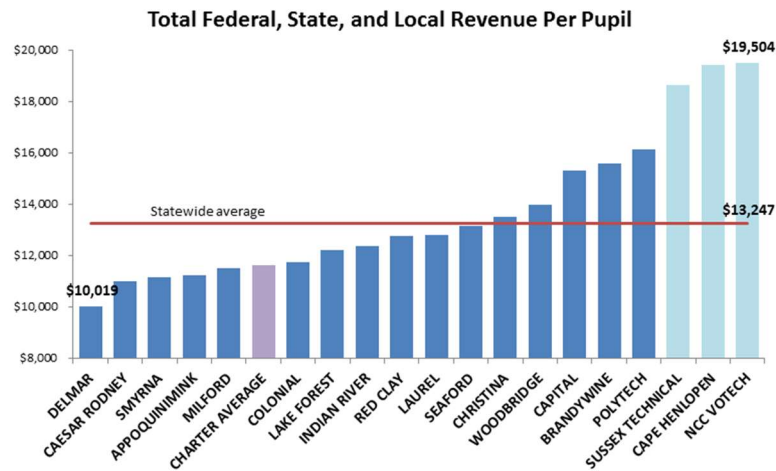


# The Wilmington Education Strategy Think Tank: Fair & Adequate Resourcing of Schools

## Evidence of INEQUITY from Edunomics Study: Per Pupil Expenditure & Average Teacher Salary



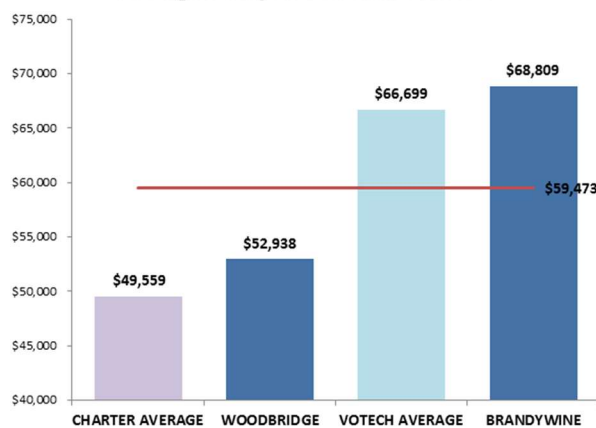
In practice, funds per pupil vary substantially across districts.



4



**Average Salary All Full Time Teachers**

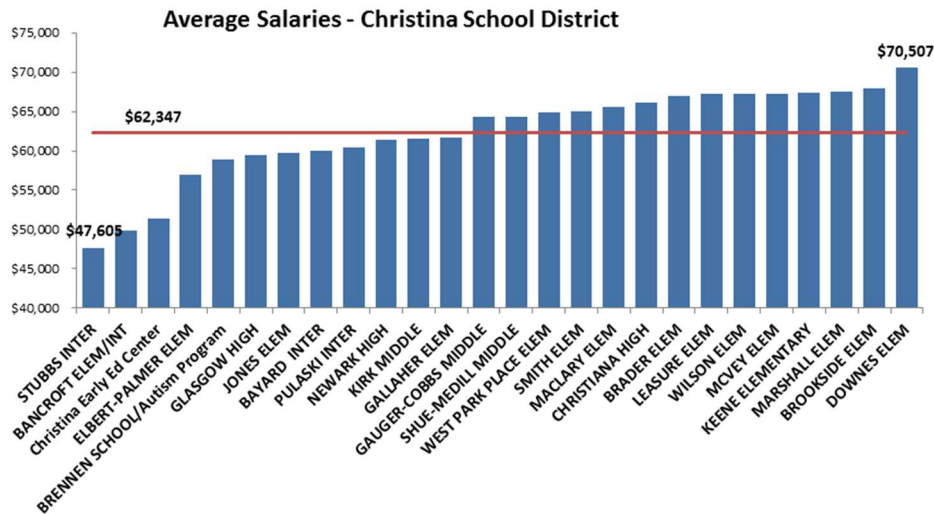


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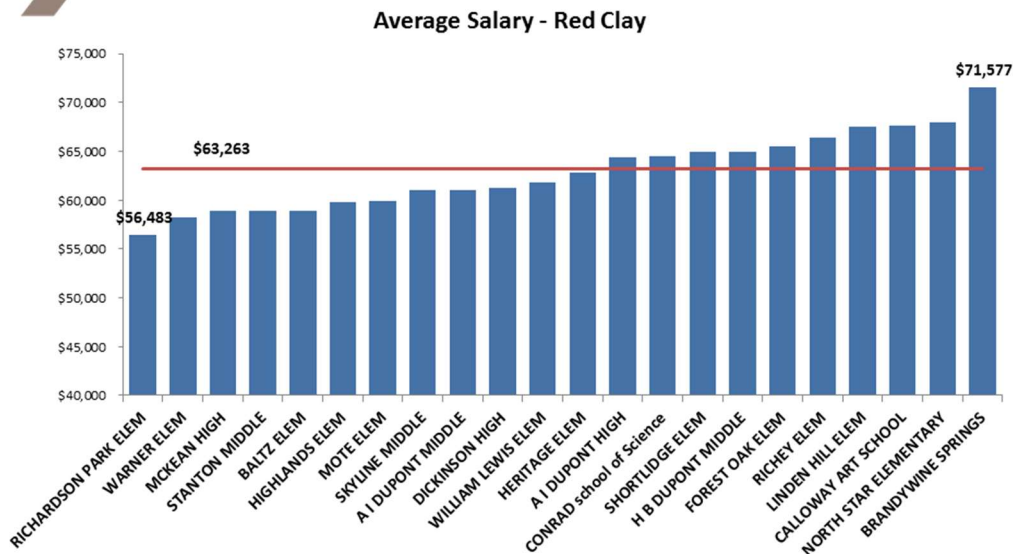


# The Wilmington Education Strategy Think Tank: Fair & Adequate Resourcing of Schools

## Evidence of INEQUITY from Edynamics Study: Average Teacher Salary within Districts



15

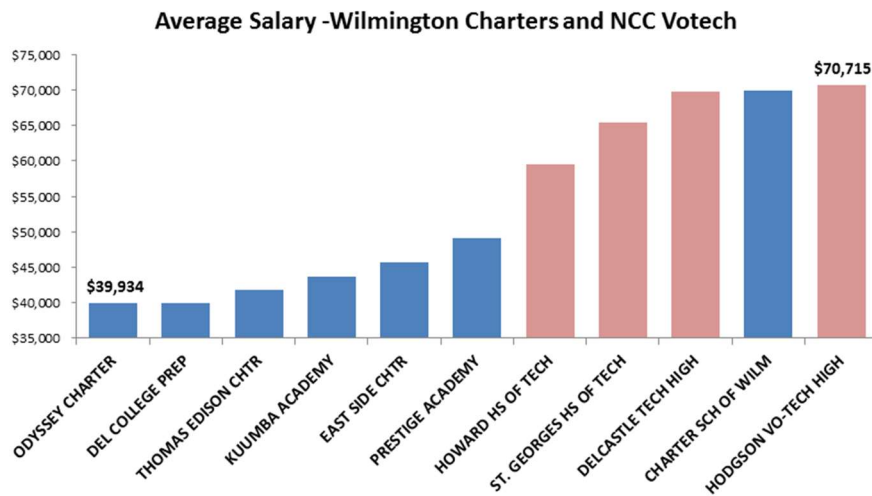


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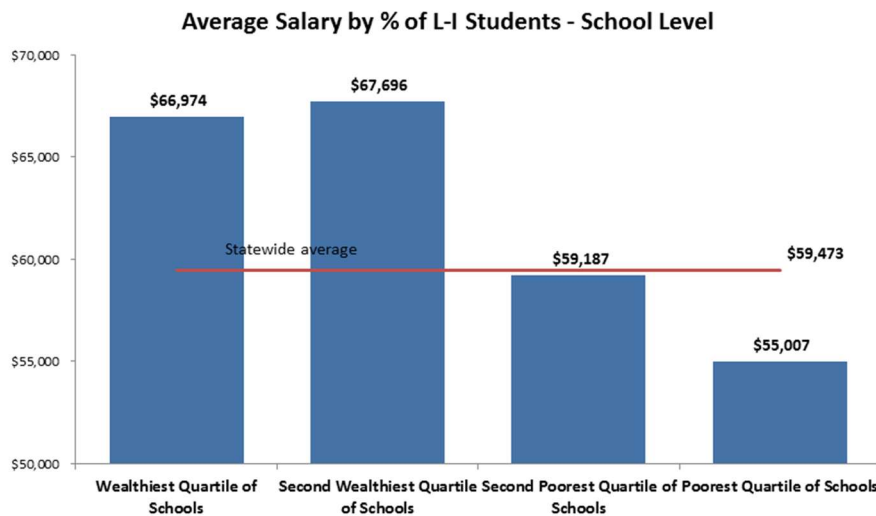


## The Wilmington Education Strategy Think Tank: Fair & Adequate Resourcing of Schools

### Evidence of INEQUITY from Edynamics Study: Average Salary by School Types & Poverty Levels



19



22

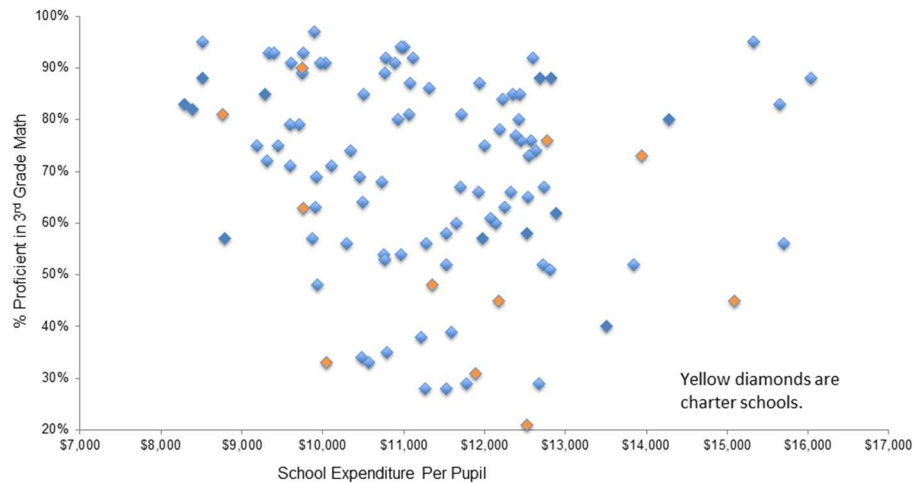


## The Wilmington Education Strategy Think Tank: Fair & Adequate Resourcing of Schools

### Evidence of INEFFICIENCY from Edunomics Study: Weak Link between Spending & Outcomes



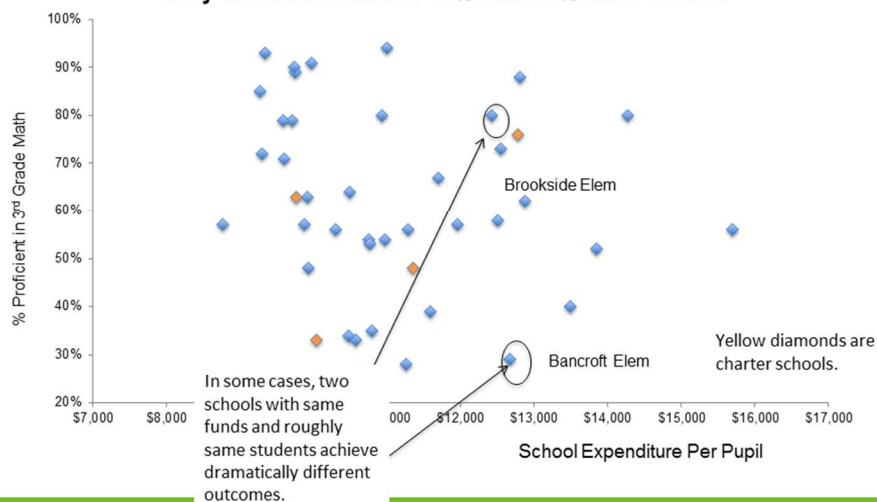
**Poor Relationship Between Spending and Outcomes**



31



**Only Schools Between 50% and 70% Low-Income**



32





## **The Wilmington Education Strategy Think Tank:** **Fair & Adequate Resourcing of Schools**

### **Key WESTT Recommendations**

After consultation with a variety of stakeholders (superintendents, principals and the DSEA), WESTT has concluded that the best path forward is to focus urgently on the following recommendations:

1. **Immediate adoption of a student-weighted unit funding approach**. We support the current direction of the WEIC Funding Student Success Committee to address the lack of adequate funding for higher needs students through the existing unit count system, by devising greater weights for low income and ELL students, as is currently done for students with disabilities. We would ask them to reflect the following considerations in their recommendations:
  - a. There be an **assessment of the need to include additional factors** beyond low income and ELL status, i.e. Trauma Intervention and Academic Intervention factors as we define in our exploration of a complete set of weight factors in Appendix A.
  - b. That there is recommendation for some **mechanism to review regularly** that the weighting factors, weights and retaining a unit-based structure are flexible, effective & efficient in improving equity.

## **The Wilmington Education Strategy Think Tank:** **Fair & Adequate Resourcing of Schools**

### 2. **Improved transparency of state, district and school-level expenditures and resources**. In this way, the public may better understand the connection between

expenditures and outcomes, and better hold the Department of Education, districts and schools appropriately accountable for their effectiveness.

- a. Success should be **a more equitable landscape of resources supporting students and those that teach them**, remedying the difficulty of recruiting and retaining excellent teachers for high needs environments. This could include the adoption of the Opportunity Dashboard model currently proposed by the NEA<sup>1</sup> and supported by DSEA, which showcases real school level resources.
- b. The goal of such **funding revisions and transparency should be focused on finding opportunities for the greatest efficiencies**. This could include the development of differentiated compensation opportunities for teachers in high needs schools as explored by the Committee to Advance Educator Compensation and Careers (CAECC)<sup>2</sup>, to support success.

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<sup>1</sup> See: <https://www.nea.org/assets/docs/NEA-Opportunity-Dashboard.pdf>

<sup>2</sup> See: <http://caecc.us/wp-content/uploads/2014/10/CAECC-Provisional-Recommendations-June-2015.pdf>

## **The Wilmington Education Strategy Think Tank:** **Fair & Adequate Resourcing of Schools**

### **Governance Reform: More to Come**

WESTT is supportive of proposals for governance reform in the form of **redistricting** and **charter/district collaboration** with the long-term aim of developing a stronger metropolitan Wilmington district (inclusive of the city and some or all of the surrounding county) encompassing all of the diverse school types.

WESTT strongly supports the **establishment of a governance and accountability voice for the City of Wilmington, through an Office of Education and Public Policy**, an objective which is support by the Office of the Mayor, recognizing that a viable funding source must be identified for such a project to proceed.

*Further details of WESTT's support and clarifying recommendations are to be covered in a separate report to be released in the coming weeks.*

## **APPENDIX A**

The following weight-categorization list has been drawn from formulas used in Boston and New York City, and are outlined here to inspire discussion regarding the areas of need as observed by leaders in Delaware schools. While most categories are self-explanatory, several (marked with an \*) are proposed risk categories which require a fuller definition and exploration, defined below.

### **Trauma Intervention Factors:**

This is a category the group felt was critical to define and include in any formula intended to do the job of meeting student needs, and could include weights for

- Family Supports
- Policy Factors (rates of crime, incarceration, income, unemployment, disparate health/environmental factors)<sup>3</sup>

### **Academic Intervention Factors:**

This is a category which can continually respond to the changing needs of a student in direct reflection of their academic need. This could include weights for

- Below grade level performance on state tests; Dropout risk
- Interrupted learners (suffering gaps of educational process)

**NOTE:** In districts using SBA, the factors in the formula, and their weights, are frequently revisited. The formula is sometimes used in a hybrid manner, in conjunction with a “school foundation” – all schools receiving base unit funding to cover core administrative and other required roles) with the weighted funding provided “on top” of flexible funding.

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<sup>3</sup> See the recent CDC report on factors influencing gun violence in Wilmington:  
<http://www.delawareonline.com/story/news/crime/2015/11/03/cdc-wilm-target-risk-youth-more-services/75085884/>



**The Wilmington Education Strategy Think Tank:**  
**Fair & Adequate Resourcing of Schools**

Category	Potential Weight Factors	
<b>Grade</b>	Pre-K	
	Kindergarten	
	Grades 1-2	
	Grades 3-5	
	Grades 6-8	
	Grades 9-12	
<b>Students with Disabilities</b>	Low severity	
	Moderate severity	
	High Severity	Autism
		Developmental Delay
		Early Childhood Ages 3-4
		Early Childhood Ages 5-6
		Emotional Impairment
		Full Inclusion - High Complexity
		Intellectual Impairment
		Multiple Disabilities
		Physical Impairment
		Sensory Impairment - Vision
		Specific Learning Disability
<b>English Language Learners</b>	PreK-5 ELL Beginning	
	6-8 ELL Beginning	
	9-12 ELL Beginning	
	All Grades ELL Advanced	
<b>High Needs Students</b>	Trauma Intervention*	
	Academic Intervention*	
<b>Poverty</b>	SNAP/TANFF	
	Poverty Concentration (>60%)	
<b>Vocational</b>		

December 8, 2015

Tony Allen  
Chair, Wilmington Education Improvement Commission

Dear Dr. Allen and the Wilmington Education Improvement Commission,

We are writing in response to the *Redistricting in the City of Wilmington: A Transition, Resource, and Implementation Plan* released by the Wilmington Education Improvement Commission (WEIC) on November 17, 2015. First, let us thank you for countless hours you have spent discussing how to make the Action Agenda of the Wilmington Education Advisory Committee a reality for Wilmington students. The series of town hall meetings, school board presentations, formal public hearings, and online discussions that have occurred since the very start of the commission indicate your sincere intent to foster public discussion about education in Wilmington. We also appreciate the explicit references to Student Success 2025 in the WEIC plan, such as the North Star and metrics of success, and agree with the recognized areas of alignment between the two plans.

The Vision Coalition is comprised of education, government, business, and civic leaders from throughout Delaware. Individually, members of the coalition have been extensively involved in Delaware education for decades. Together, the group has been meeting regularly for nearly a decade to align efforts, evaluate progress, and sustain momentum of this work.

Student Success 2025, a 10-year vision for education in Delaware that we released in September, imagines a landscape where equitable opportunities meet the needs of students and where lifelong learners are equipped to adapt to changing times. This includes providing support needed for all students to succeed, including students who are homeless, living in foster care, hungry, neglected, physically disabled, cognitively challenged, or learning English. **Every child in Delaware—regardless of zip code, economic means, or style and pace of learning—deserves to have options for his or her future and to be ready for whatever tomorrow holds.** We believe that the Wilmington Education Improvement Commission shares this goal and we know that action needs to be taken in the City of Wilmington. Too many city students leave school unprepared to live a lifetime of success in terms of both core academic knowledge and the skills and attributes that go beyond academics.

WEIC states that its work aligns with Student Success 2025. We affirm that alignment. As you noted, many themes and recommendations from Student Success 2025 are reflected in the work of WEIC, including but not limited to:

- **Redistricting Recommendations:** Student Success 2025 supports the development of policies and strategies that increase alignment and take an integrated approach to improving system performance, but does not specifically discuss redistricting.
- **Funding Student Success, Resources for Redistricting:** Student Success 2025 recognizes that our education system, including the way our schools are funded, must respond to the unique needs of students. It calls for increased equity in our funding system by factoring student needs into funding allocations. Also, it recommends

conducting property reassessments on a consistent, rolling basis to enable a more sustainable, sufficient revenue and accurate equalization process.

- **Early Learning:** Student Success 2025 states that it is imperative that Delaware continue to accelerate gains made in high-quality early learning—and sustain and grow investment in this area—in order to serve children throughout the state. As WEIC notes, when the federal Race to the Top—Early Learning Challenge grant lapses, the funding gap needs to be filled in order to sustain the recent improvements in the quality of early childhood education programs available to low-income students.
- **Mobilizing Cross-Sector Resources and Support:** Student Success 2025 recommends integrating and aligning services to our state’s students to create a seamless academic experience for students from birth through career and college readiness. It emphasizes increased collaboration (among districts; between districts and charters; between early learning, K-12 and higher education; between community organizations and the schools etc.). Finally, Student Success 2025 recommends creating incentives for the development of student and family engagement models and encouraging the use of two-way communication strategies between schools and families.

Recognizing that WEIC will continue working until 2021, there are a number of additional areas that must be considered and clearly articulated.

- Shifts in governance and funding are important first steps. As it continues its work, WEIC should consider the broader education needs outlined in Student Success 2025, such as supporting and developing educators, personalizing learning for all students, and ensuring students experience postsecondary success in college and careers.
- The “Milestones and Measures of Success” outlined in the plan, which include those articulated in Student Success 2025, are essential for evaluating the impact of the report’s recommendations. It is critical that a deeper funding investments be coupled with clear accountability for results.
- WEIC should incentivize, rather than require, collaboration and efficiency. Student Success 2025 recommends the following:
  - Encourage public charter and district school boards statewide to find more ways to share services and create more efficiency.
  - Create incentives at the district level and identify opportunities at the state level to increase efficiency, particularly for sharing of services such as transportation or professional development across districts and charter schools.

Throughout the process of developing Student Success 2025, we collaborated with 4,000 Delawareans (including 1,300 students) to understand how we can come together to best support the next generation through education. From those discussions, we know the challenges associated with unifying many voices towards collective action. Yet we know these tough conversations are imperative for progress. We encourage you to continue leading the discussion on how to better serve the students of Wilmington, an issue of vital importance to the entire state of Delaware.

Sincerely,



Ernest Dianastasis, Managing Director, CAI (Computer Aid, Inc.), Chair

On behalf of the members of the Leadership Team

H. Raye Jones Avery, Executive Director, Christina Cultural Arts Center

Lamont Browne, Executive Director, EastSide Charter School and Family Foundations Academy

Susan Bunting, Superintendent, Indian River School District

Steven Godowsky, Secretary, Delaware Department of Education

Paul A. Herdman, President and CEO, Rodel Foundation of Delaware

Mark Holodick, Superintendent, Brandywine School District

Frederika Jenner, President, Delaware State Education Association

Jorge Melendez, Vice President, Delaware State Board of Education

Susan Perry-Manning, Executive Director, Delaware Office of Early Learning

Daniel Rich, Professor of Public Policy, University of Delaware; Policy Director, Wilmington Education Improvement Commission

Gary Stockbridge, President, Delmarva Power



## Response to WEIC Interim Plan “Redistricting in the City Of Wilmington and New Castle County”

December 8, 2015

On behalf of United Way of Delaware, we are ***supportive of all elements of the WEIC Interim plan that are intended to accelerate learning opportunities for low income children, children of color and English Language Learners; ensure a pathway for all children to succeed in school, be college and/or career ready; and eliminate disparities in school readiness and student success through the redistricting of Wilmington Schools.***

At United Way of Delaware, we believe that one’s opportunities for success in life are directly linked to their access to quality education. An important component of accessing quality education includes ensuring that students have access to a comprehensive system of wraparound support services and meaningful engagement by parents and families. The WEIC Redistricting proposal provides a blueprint designed to lead to meet these needs and advance more opportunities for all Wilmington children to excel and achieve academic success.

Specifically, United Way:

- Supports the Redistricting Committee’s proposed recommendation for Christina and Red Clay provided that the legislative policy and funding at the federal, state and local level are equitable and focused on improving student educational attainment, family support for children birth through eight, and overall educational success for students in low income communities; and
- Supports the Redistricting Committee’s recommendation that targets the most vulnerable students and communities and includes income disparities into the funding model; and
- Urges WEIC to hold Christina and Red Clay accountable for continuing the strong collaboration displayed over the past several months with the goal to meet the established timeline for redistricting; and
- In addition, United Way of Delaware urges the Commission to continue to facilitate the process for Christina and Red Clay.

United Way further urges WEIC to devote increased attention the following matters:

- linking of high quality out of school and after school programs to home and schools that meet the needs low income communities; and
- focusing on culturally relevant early intervention services in partnership with the nonprofits and state agencies; and
- driving connections and collaboration between the state children services, early-learning programs and community-based programs (e.g. ***Project Launch***); and
- ensuring parents are informed, supported, and engaged throughout this process; and
- supporting private, unlicensed ECE programs, not currently in the Stars system, that serve the majority of low-income children.

We thank the members of the Wilmington Education Improvement Commission for their thoughtful and innovative recommendations to positively change Delaware’s education system and ultimately improve the quality of life of all Delawareans. As a member of WEIC, United Way of Delaware not only supports efforts to rethink district boundaries but aims to be actively engaged in the plans and implementation necessary to make this change successful.



## **The League of Women Voters of Delaware**

### **Comments on The Wilmington Education Improvement Plan**

The League of Women Voters of Delaware commends the Wilmington Education Advisory Committee (WEAC) for its work. We appreciate the complexity of the problems addressed and applaud the depth of analysis that was done. The recommendations are far reaching and ambitious.

As the Wilmington Education Improvement Commission approaches the task of finalizing its report, there are two areas we wish to highlight and support -- namely (1) property reassessment and (2) funding that is equitable and equalized.

The need for property reassessment, articulated clearly in the WEAC report, has been on the radar of the League for many years. We take note of the fact that property in New Castle County has not been reassessed since 1983.

In Kent and Sussex, no reassessment has been done since 1986 and 1974 respectively. Given that property values do not remain constant, inequities arise. After three or four decades, how can anyone disagree?

The League completed a study of the need for property tax reassessment in 2010. It can be found at [http://www.lwvdelaware.org/files/reassessment\\_report\\_-\\_lwvde.pdf](http://www.lwvdelaware.org/files/reassessment_report_-_lwvde.pdf). While data in our study is a little out of date, the message is clear. The time has come for property tax reassessment – statewide!

The need for funding equity and equalization is also clear. Scrutiny of the School District profiles, found on the Department of Education website, reveals the current inequity. Looking at the school districts in northern New Castle County, we found that the Brandywine School District spent \$14,458 per student in 2013-14 (the most current data available), while Red Clay spent \$12,368. Between these extremes are Christina, which spent \$13,586 per student and Colonial, at \$12,493 per student. If the funding equalization process is not updated and made more equitable, the impact of the proposed shift of students from various Wilmington schools into the Red Clay District will be profound. Expenditures there per student would have to go down drastically.

Similar inequities exist in Kent and Sussex.

Clearly, a new funding allocation system is needed to eliminate these inequities, as articulated in the report of the WEAC. The system should take into account the characteristics of the students in each district, factoring in the income level of the families and the presence of children with special educational needs, including *basic* needs, from pre-kindergarten all through grade 12. In addition, allocation amounts should not be based – as is currently the case – on enrollments at one particular point in time during the year. Given family transience and changing circumstances, shifts in the characteristics of each district’s student population are inevitable. As recommended in the WEAC report, adjustment(s) should be made during the year to reflect the characteristics of the student population at the time of the adjustment.

Reforming the process of equalizing funding among Districts is complex but much needed, a fact duly noted in the WEAC report. Studies done for the General Assembly in 2008 and again in 2015 address the technical aspects of this matter, and the reports on those studies are included in Appendix D of the report. We agree that the recommendations contained in those reports need to be addressed by the General Assembly so that a path toward genuine equalization among Districts can be found.

We would expect any change in the equalization formula to apply statewide since there are great inequities in meeting the needs of children throughout the state.

We call upon the Wilmington Education Improvement Commission to stand firm in pushing for these changes. **We pledge our support in that effort.** We know that such initiatives will take resolve, but the future of our state is in the balance. To ensure that Delaware’s economic and social fabric remains strong, we must put aside narrow interests. We must educate all our children in the best way possible - to prepare our future leaders and to enable every child to live up to his and her potential.

# **League of Women Voters Study Property Tax Reassessment in Delaware**

**Spring 2010**

Existing League of Women Voters (LWV) policies call for fairness in tax structures. As a result, the Delegates to the 2009 LWV Convention voted to approve a study committee to “determine the impacts of the counties failure to reassess and to develop facts that could provide a basis for elected officials to support reassessment”. It was noted in the study proposal that the most recent property reassessment took place in Kent County in 1986. New Castle County last reassessed in 1983 and Sussex County last reassessed in 1974.

A recent report from the Delaware Economic Development Office on Delaware Property Tax Rates 2008-2009 states Kent County levies property taxes on 60% of the assessment based on 1987 market value, Sussex levies property taxes on 50% of the 1974 appraised value and New Castle County levies its taxes based on 100% of the July 1, 1983 fair market value. Since three school districts have property that transcend county boundaries they are obligated by law to set two different tax rates within their district in an attempt to get some equity between all of their taxpayers.

The Property Tax Rate report further notes that the “real property taxes in Delaware are imposed at the local level to fund municipal and county governments as well as school districts”.

In addition, some \$74 million in State Equalization funding is distributed to school districts annually based on relative school district property wealth. According to the most recent report Assessment-To-Sales Ratio Study for Division III Equalization Funding: 2008 Project Summary conducted by Edward C. Ratledge at the Center for Applied Demography & Survey Research at the University of Delaware, “Having accurate measures of the assessment-to-sales ratios for each school district is critical....(H)however, these ratios do no reflect changes in property values since the last complete reassessments.” In essence, while a formula is applied to try to ascertain relative wealth among school districts, it is no substitute for current assessments using national standards.

Property tax revenues are an integral part of the local tax structures. The revenues provide the majority of funds for county operations as well as about 28% of the operating and capital (building and maintenance) expenses for public schools. In actuality, the majority of the revenues raised are for the benefit of schools. Based on the most recent budgets listed on the three county web sites:

- New Castle County raises approximately \$110 million in property taxes towards funding a \$164.5 million budget;

- Kent County raises \$9.6 million toward funding a \$43.1 million budget; and
- Sussex County raises \$11.4 million toward funding a \$25.9 million budget for an approximate total of \$131 million.

School districts levy taxes to raise some \$490 million annually.

This results in some \$620 million in property tax raised on an annual basis for both county and school district budgets.

Municipalities are also heavily dependent on property tax levies to fund their budgets which would only add to the total amount of dollars raised on the taxing the value of real property.

Property taxes have provided a very stable and consistent form of revenue since they are less subject to economic downturns. While this may seem a strange statement given the current circumstances in the real estate market, over time, property values and their variations – both up and down – have not had much impact in the actual taxes paid on the property. This is evident by reviewing past county budgets and the various Annual Report of Education Statistics published on-line by the Department of Education.

The authority for taxation of local property comes by virtue of the Delaware Code. The Code also provides the process by which property taxes can be set but it does not require specific time periods for reassessments. As a part of the reassessment process, counties and school districts are restricted in the total amount of dollars they can take in following reassessment. Sections 8002 (c) and (d), Title 9, Del.C specifies that counties may not realize any more than 15% increase in actual revenue over the revenue derived in the fiscal year immediately preceding reassessment, presumably to cover the cost of reassessment, and once reassessment process is complete, the taxes are “rolled-back” to provide the same revenue as was realized prior to reassessments. Section 1916 (b), Title 14, Del.C provides school districts must limit the increase in actual revenue to no more than 10%. This translates to overall lower rates based on higher property values to generate no more than 15% in additional revenue over the previous year. It should be noted that this 15% increase would also include the revenue received for any new properties being built and added to the tax rolls that year.

Property tax collection is further complicated by legislative exemptions. Title 14, Section 1917, Del. C. provides for exemptions of up to \$500 for senior citizens, regardless of income. Title 9, Sections 8329 to 8337, Del. C. provides for special property assessments for parcels of 10 or more acres that are actively used for agriculture, horticulture or forest land. Each county also has a list of tax exempt properties that include state and federally owned property, enterprise zones, and church owned property to name a few of the exempt categories.

There are any numbers of reasons given for the lack of reassessment. The most common concerns are the cost of the reassessment itself. Each county estimated the costs

in the millions when legislation was proposed some 14 years ago that would have required reassessment. Reassessment has also resulted in various property owners being upset with the new values and subsequent tax bills. The most vocal are those owners whose properties have been substantially increased in value and thus subject to some additional taxation. It should be noted that other property owners see reductions and others see no real change in their taxes as a result of reassessment. For political bodies, taxpayer unhappiness, even if it is only a handful of owners, is not pleasant. The other indisputable fact is that the majority of the taxes collected by the counties are for the benefit of the local public schools. The counties are the collecting agency but pass the funds on after collection. Any political body would be averse to taking the "heat" for reassessment when the many of the benefits largely go to other governmental entities such as school districts and towns.

There is another side, however. There is taxpayer equity. Why should some taxpayers pay at a higher rate than others because of the outdated assessments?

On June 29, 2008 the following article appeared in the News Journal Newspaper:

Reassessment gets a look with values at 1970s, 1980s levels, fairness factor is an issue

*By Angie Basiouny, The News Journal*

The nagging problem of frozen property values in Delaware's three counties may begin to thaw in the coming year -- something that could help bring property values out of the last century and equalize the tax burden among homeowners.

New Castle County has not reassessed property since 1983. That means a house that sells for \$400,000, for example, is taxed at a value of about \$75,000.

Kent County hasn't had a reassessment since 1986, and Sussex County values are frozen in 1974.

"This is an issue that got shoved on the back burner and needs to be front burner," said state Rep. William Oberle, sponsor of House Joint Resolution 22, which asks the state budget director, the controller general and the secretaries of Finance and Education to develop recommendations for reassessment.

The resolution passed in the House on Tuesday, the Senate on Thursday and was headed to the governor's desk. Oberle expects the recommendations to be submitted to legislators in the next session that starts in January.

Delaware's counties haven't reassessed in so long because there is little incentive to do so. Reassessments are expensive and time-consuming, and state law prevents counties from reaping a windfall. If counties reassess, they must roll back the tax rate so the total amount of revenue raised is the same as the previous year's revenue. "You don't do [reassessment] to create money. You do it because it's fair," said Eddy Parker, director of Sussex County's Division of Assessment. "We need to put a system in place where we can update these values, so we never get into this situation again."

Counties are allowed to capture 15 percent more money than the previous year. But that money must be used to cover the cost of the reassessment.

The law is designed to protect citizens from unfair tax hikes, officials said.

But it has an unwanted side effect of putting a greater tax burden on the poor. Those residents who live in less valuable homes pay a similar amount in taxes as do wealthy homeowners.

[www.delawareonline.com](http://www.delawareonline.com)

House Joint Resolution 22 was signed into law. The resultant committee formed by the Resolution included members of the Departments of Finance, Education, and Management and Budget. Other members included representatives of school districts, the State Board of Education, the Delaware State Education Association, the Controller General's Office and the University of Delaware's school of Public Policy and Urban Affairs. The Committee has provided a very comprehensive look at reassessment and recommendations for proceeding.

That report that was developed appears in Appendix I.

The issue before us is how to proceed. There is a way forward as issued by the report in response to House Joint Resolution 22. That report recommends:

- The State take on the role of implementing reassessment. It would provide for common standards for a single reassessment across the State.
- It further recommends that all property be assessed at 100% of market value with annual revaluations. The report suggests using the Uniform Standards of Professional Appraisal Practice (USPAP) and the International Association of Assessing Officers (IAAO) standards moving forward.
- In addition, the recommendations state subsequently, all property should be physically inspected every nine years or less.
- Since assessments are so out of date, the recommendations include a three year phase in for those properties that have steep increases in assessments and therefore taxes.
- Once in place, it is further suggested that after the initial reassessment, individual properties be capped at 10% increase based on increased property value. This cap would not apply to increases based on overall rate increases passed by county councils, levy court or school district referenda.
- Finally, the report suggests that any overall increase in tax revenue be held to 7.5%, excluding new property growth, for the year following the first reassessment and to 5% for subsequent reassessments.
- Each county would be responsible for paying for its share of the reassessment and could levy a supplemental tax to raise the needed revenue to cover the costs.

The report states that these recommendations were shared with county and municipal governments as well as representative of the real estate community.



Apparently they did not grant any official endorsements or comment, but did understand the need.

For those interested in delving in great detail into how various entities levy property taxes, The Lincoln Institute of Land Policy ([www.lincolninst.edu](http://www.lincolninst.edu)) is a source of land tax policy and information for all 50 states. There is little consistency across the country and therefore difficult to determine the most popular or most common practices. They are all reflections of their own state policies and traditions.

In addition to the recommendations found in the report to Governor Minner and the General Assembly, consideration should be given to the following proposals:

- Expand the State Assessment Board into quasi-state body (similar to the structure of the Delaware Solid Waste Authority) which would be jointly managed by the counties, school districts and municipalities to not only conduct the initial reassessment, but also subsequent reassessments and all related appeals.
- The funding for such an agency would come from a special assessment of the counties, school districts and municipalities who levy property taxes independently from the counties devoted to assessment and reassessment. This percent should be determined by the Assessment Board and on a pro-rata basis and levied on the authority of the State Assessment Board. It should be noted that a number of towns and cities in the State conduct their own property assessments for municipal tax purposes. It brings an economy of scale to bring all entities who levy property taxes into one single assessment/reassessment system with the same standards.
- Reassessments subsequent to the initial reassessment would occur on a rotating basis over a three or four year period as is the practice in Maryland.
- Following the initial reassessment, caps would be established for how much an individual tax bill can increase or decrease in any one year. In the past several years, property values based on market value has actually declined in a number of areas.

Maryland faced this issue as reported in the Washington Post on Tuesday, December 29, 2009 when it was reported that on average, residential property values dropped 19.7% over three years. According to John Sullivan, the Director of the State Department of Assessment and Taxation, the drop was unprecedented. Maryland has a three year revolving assessment program. But in Maryland, while property tax values have declined and the assessments of individual properties may decline, most taxpayers will not see a drop in their property tax because of the annual caps that have been in place to minimize the impact of steep increases in assessed value. Because of the annual caps, most property owners are not paying on the full assessed value and are thus within the range of the decrease.

In conclusion, reassessment is extremely important for taxpayer equity, the distribution of school Equalization Funds and to provide simplicity to the property tax system statewide. There are any number of policy questions that must be asked as noted in the report and recommendations. These should be addressed by the legislature and the counties. The specifics are not as important as the overall importance of reassessing using nationally accepted standards and devising a way to keep assessments current so that Delaware never again finds itself in the current situation. Several ideas have been advanced to stimulate discussion and help other interested parties move the issue forward.

The following action steps should be considered by the League of Women Voters:

- Create awareness of the problem of out dated assessments through press releases, newspaper articles and community meetings that will reach the following:
  - Taxpayers
  - Parents
  - Legislators
  - County and municipal leaders
  - School district officials
  - Other state and local organizations such as Rotary, Lions, American Association of University Women
- Gather legislative support for a new assessment system
- Advocate for legislation to require reassessment

## APPENDIX I



STATE OF DELAWARE

November 26, 2008

The Honorable Ruth Ann Minner  
Governor  
Tatnall Building  
150 William Penn Street  
Dover, DE 19901

The Honorable Members of the 144<sup>th</sup> General Assembly  
Legislative Hall  
411 Legislative Avenue  
Dover, DE 19901

Dear Governor Minner and Members of the 144<sup>th</sup> General Assembly:

Please find enclosed the final report of the committee formed by House Joint Resolution 22, which directed our offices to supply "recommendations to provide a mechanism for a fair and equitable reassessment of all real property within the State." This report details a framework for reassessment that balances the needs of all involved stakeholders while bringing Delaware in line with the professional standards of the assessment industry.

The committee developed this framework after consulting assessment professionals in other states, researching and reviewing the industry's best practices and meeting with stakeholders to gather information on needs and to discuss implementation concerns. Consensus was quickly reached that maintaining county independence while simultaneously increasing State oversight was desirable. The structure of our recommended system achieves that goal through the creation of a single statewide property database that will be populated and maintained by the counties and administered by the State. Development of a single database will also capture cost efficiencies at a time when government resources are at a premium.

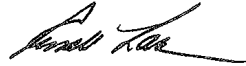
While this report details a fairly comprehensive structure, the committee left some policy decisions unresolved. These issues will need to be addressed if legislative action is pursued. Additionally, the lack of timely reassessment has impacted other areas that were outside of the scope of the House Joint Resolution 22, namely School Equalization funding that might also be addressed if this effort is undertaken. Nevertheless, when presented with the report's general findings, representatives from both the real estate industry and local government commended the committee's work and indicated a willingness to pursue the goals outlined therein.

Thank you for the opportunity to present recommendations on this important topic.

Sincerely,



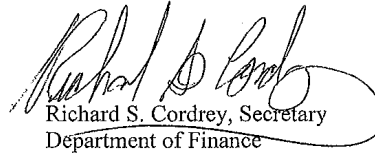
Michael S. Jackson, Acting Director  
Office of Management and Budget



Russell T. Larson  
Controller General



Valerie A. Woodruff, Secretary  
Department of Education



Richard S. Cordrey, Secretary  
Department of Finance

Attachment

## **COMMITTEE MEMBERS**

Tom Cook  
Department of Finance

David Gregor  
Department of Finance

Dorcell Spence  
Department of Education

Michael Morton  
Office of the Controller General

Emily Falcon  
Office of Management and Budget

Edward Ratledge  
University of Delaware

Robert Smith  
Milford School District

Kevin Carson  
Woodbridge School District

George Meney  
Colonial School District

Sally Coonin  
Office of the Governor

Richard Farmer  
State Board of Education

Judi Coffield  
State Board of Education

Jack Polidori  
aware State Education Association

## EXECUTIVE SUMMARY

**Background:** Property reassessment is a common topic among Delaware policy makers. The lack of regular and consistent valuation of property is seen as the cause of many problems and undergoing reassessment is heralded as a solution to many more. House Joint Resolution 22 recognized these issues and asked for recommendations on how best to undertake a statewide process of reassessment.

**General Structure:** The committee charged with developing these recommendations approached the task by looking at previous efforts in Delaware and other states that have gone through similar processes. The 1995 report and subsequent legislation of the Assessment Practice Review Committee served as the foundation for our analysis. The committee quickly saw that most efforts fell into one of two categories- complete state control or local implementation. There are technical and political benefits and drawbacks to each method so the committee attempted to strike a balance that both followed best practices set by the assessment industry and minimized disruption to existing entities.

**Implementation:** The committee recommends that the State take on the role of implementing a comprehensive statewide reassessment of all property. A State Assessment Board would be created with representation from the Governor, General Assembly, Counties and practitioners to manage and oversee the initial implementation. The State would issue a single Request for Proposal (RFP) and contract with a vendor to develop one property assessment system that would be used statewide by all jurisdictions. This would provide uniformity among the counties and make statewide analysis simpler.

**Assessment Practices:** All properties would be assessed at 100% of market value with annual revaluations. Commercial properties would be valued according to methodology recommended by the Uniform Standards of Professional Appraisal Practice (USPAP). All properties would be physically inspected at least once every nine years.<sup>1</sup> The initial reassessment would allow for a three year phase in period for primary residences experiencing steep increases. Additionally, a homestead provision would be implemented limiting the annual increase to a primary residence to 10% after the initial phase in. Excluding growth in the assessment base due to new construction, in the aggregate, County and local governments and school districts would be limited to a 7.5% increase in revenue as a result of the initial reassessment. Overall revenue growth resulting from subsequent revaluations would be limited to 5%.

**Responsibility / Accountability:** Counties and municipalities would maintain responsibility for data collection and conducting the assessments and all Assessors would be required to become licensed by the State within 5 years. During the initial reassessment, counties would work in

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<sup>1</sup> The committee offered a nine-year cycle for consideration, but recognized that, ultimately, the frequency may be different depending upon the best practices identified by nationally recognized organizations. For example, the International Association of Assessing Officers (IAAO) statement on this topic specifies that:

“Sales comparison models permit annual reassessment at comparatively little incremental cost. If an accurate database and ongoing maintenance procedures are in place, property inspections can be spread over three to six years, depending on budgetary and other considerations. The sales comparison approach requires less detailed property characteristics data than the cost approach.”



cooperation with the State vendor to conduct the valuations consistent with the Uniform Standards of Professional Appraisal Practice. The new property tax database would be administered and monitored by the State Assessment Board with staffing help as needed from DTI, OMB and the Department of Finance. The State Board will also be given enforcement powers by tying county governments' full receipt of the Realty Transfer tax to local compliance in maintaining the assessment information.

**Financing:** Each county would be responsible to pay for its share of the reassessment and would be allowed to levy an explicitly identified State-mandated supplemental property tax rate to raise the revenues needed to offset the reassessment's cost.

**Possible Next Steps:** This framework has been shared with representatives from the State's county and municipal governments as well as with representatives of the real estate industry. While it is true that in neither case did the local government or the real estate representatives offer an "official endorsement" of the proposal, in both cases it can be fairly stated that these groups recognized:

1. The practical need for a better functioning property assessment system in Delaware, and
2. That this report's proposals represent a sound foundation for the development of a more refined blueprint for a new assessment system and, ultimately, the legislation that would accomplish just that.

With this in mind, the representatives from both the real estate industry and the State's local government expressed the willingness and desire to pursue the goals expressed in this report.

## INTRODUCTION

House Joint Resolution 22 was passed by the 144<sup>th</sup> General Assembly charging various executive and legislative agencies with “developing recommendations for the reassessment of real property for the purpose of ad valorem taxation by county governments and school districts.” Additionally, these recommendations should “provide a mechanism for a fair and equitable reassessment of all real property within the State.”

Surpassed in Delaware by only the personal income tax and corporate franchise tax, property taxes are a vital source of government revenues. Proper administration of this tax is critical to efficient and effective government operations. The issue of property reassessment has been a topic among Delaware policymakers since the last assessment was conducted in 1986 in Kent County. Numerous attempts to address this issue have been made while none have been successful. Property assessments in Delaware are anywhere from 22 to 34 years old. The current industry standard is to evaluate the actual market value of properties at least once every six years. Not conforming to these standards creates many equity issues throughout the State and could potentially be a violation of the Uniformity Clause under Article VIII, § 1 of the Delaware Constitution.

The lack of regular and timely valuation of property has many undesirable consequences. Many properties that were given the same valuation in the last assessment have substantially different market values today. Since no reassessment has taken place, many properties are assessed at rates as low as 6% of market value. This means that a home with a market value of \$1 million would have an assessed value of just \$60,000. Because assessments have not kept pace with increases in market values, Delaware’s statewide assessed valuation represents just 21% of the market value (\$23.5 billion vs. \$110 billion).

In addition to the equity concerns raised by this issue, school financing has also been affected by the lack of regular reassessment. Both local tax revenues and State Equalization funding are linked to property values and have been impacted. With no growth or changes occurring in property assessments, local school districts must rely on new property development or local referendum to realize an increase in local revenue. Additionally, Equalization funding calculations must rely on a complicated sales to assessment ratio study to attempt to capture the changes that regular reassessment would capture.

Commercial interests in Delaware have also felt the affects of outdated property assessments. Businesses such as Verizon and DuPont have successfully challenged their assessments throughout the State based on the lack of comparable technology on which to assess the property. Updating property assessments statewide will help ease the number of appeals to local assessment boards and provide the counties with more accurate property data.

While providing recommendations on some of these related issues is outside of the scope of this committee, addressing reassessment will provide a much more stable and equitable foundation on which to make future policy decisions.

## METHODOLOGY

The committee attempted to identify the wide array of key issues that any property tax reassessment plan must address. As a means of organizing these issues, it relied heavily on past efforts to modernize the State's approach to property assessments and, in particular, Senate Bill 217 from the 138<sup>th</sup> General Assembly.

The committee considered three approaches. In terms of fundamental assessment practices, the three approaches were very similar. All three approaches, for example, embraced the adoption of 100% valuation, regular revaluation, and limits on revenue increases resulting from reassessments. The chief difference between these approaches was the division of responsibilities between the State and its local governments:

1. Limited State Role: Modeled on SB 217, with this approach, the State would set new standards for assessment practices. County governments would be responsible for the design, implementation and operation of the new system. The State would monitor the counties to ensure that they are in compliance with the new standards.
2. Full State Control: Under this model, the State would set new assessment standards for assessment practices. It would also assume all responsibilities for the design, implementation, and operation of the new system. County and municipal assessors would become State employees.
3. Hybrid Approach: Under this approach, the State would set the new standards for assessment practices. Three separate county property tax databases would be replaced by a single statewide database to be housed in and administered by the State. Using a private contractor, the State would assist the counties in the implementation of the new system. A State Assessment Practices Board would be formed to oversee implementation. Once implemented, the counties would be responsible for subsequent revaluations and physical inspections. The State would monitor the counties to ensure that they are in compliance with the new standards.

The committee concluded that the hybrid approach was the most desirable and practical approach. Because the State, instead of each county, would issue a single RFP and develop a single property database, the high costs of implementation would be minimized. Operationally, the hybrid approach avoids the administrative complexities and likely political opposition inherent in the full State control model that would see county employees moving to the State payroll.

## EVALUATION CRITERIA

The following presentation of issues is intended to form a framework of analysis that will ultimately allow the Governor and members of the General Assembly to evaluate reassessment clearly and efficiently. While the list of issues is intended to be complete enough to form the blueprint draft legislation, the committee recognizes that this list of issues may not be

comprehensive. Moreover, it recognizes that, in the instances in which it has expressed clear preferences, these preferences need to be vetted by the counties and other interested parties.

**Standard of Assessment:** Properties in Delaware would be assessed according to the Uniform Standards of Professional Appraisal Practice, as promulgated and updated by the Appraisal Foundation. These assessment practices are:

1. National (international) standards for property assessments,
2. Recognized and accepted by professionals and academics as “best practices” and
3. The standard employed by state and local governments across the county to perform accurate and timely property assessments.

**Definition of Value (for Income Producing Properties):** The committee recommends that valuing income producing property is consistent with the Uniform Standards of Professional Appraisal Practice (USPAP), which, among other objectives, specifies the following goals for discounted cash flow (DCF) analysis:

- DCF analysis is an additional tool available to the appraiser and is best applied in developing value opinions in the context of one or more other approaches.
- It is the responsibility of the appraiser to ensure that the controlling input is consistent with market evidence and prevailing market attitudes.
- Market value DCF analyses should be supported by market-derived data, and the assumptions should be both market- and property-specific.
- DCF accounts for and reflects those items and forces that affect the revenue, expenses, and ultimate earning capacity of real estate and represents a forecast of events that would be considered likely within a specific market.<sup>2</sup>

**Assessment Base:** Property would be assessed at 100% of market value.

**Execution of Initial Reassessment:** The committee identified the following implementation steps:

1. Develop a State RFP requesting professional assistance from a private contractor in the design and implementation of a property tax assessment system. The contractor’s role would include:
  - a. Establishing a single statewide real property database and system to be administered by the State of Delaware,
  - b. Training county and state personnel in the systems’ use,
  - c. Training and assisting county personnel on the conduct of the reassessment itself, and

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<sup>2</sup> USPAP 2008–2009, STATEMENT ON APPRAISAL STANDARDS NO. 2 (SMT-2); SUBJECT: Discounted Cash Flow Analysis.

[http://commerce.appraisalfoundation.org/html/USPAP2008/USPAP\\_folder/statements/CONCLUSIONS\\_SMT\\_2 .htm](http://commerce.appraisalfoundation.org/html/USPAP2008/USPAP_folder/statements/CONCLUSIONS_SMT_2.htm)

- d. Ensuring that all technical specifications and methodologies were made available to the State upon completion of the work.
2. The State Assessment Practices Board, with the contractor's assistance, would oversee implementation.
3. The counties would be responsible for the physical inspection of properties, data collection, and populating the new database.

**Scope and Means of State Oversight:** A State Assessment Practices Board would be constituted shortly after the enactment of the enabling legislation. The Board would consist of 9 members, with slots filled by the Governor, counties and the General Assembly. Serving part-time, the Board, working in conjunction with local governments, other State officials and staff and the contractor, would manage the implementation process.

**Initial Reassessment's Base Year for Valuation:** CY 2012, assuming enabling legislation is passed no later than June 30, 2009.

**Effective Date for Initial Reassessment:** July 1, 2013 (FY 2014)

**Subsequent Revaluations:** All properties' assessed valuations would be adjusted annually. The committee considered a three-year cycle, with 1/3 of all properties being revalued in any given year, but expressed a clear preference for annual revaluations.

**Physical Inspection Cycle:** The committee considered a nine-year cycle (1/9<sup>th</sup> properties per year) assuming, of course, that it is consistent with the guidelines established by the International Association of Assessing Officers.<sup>3</sup> The group also contemplated a different and perhaps more frequent cycle for commercial / industrial properties.

**Cap on Aggregate Revenue Collected as a Result of the Initial Reassessment:** The committee recognized the need for limits on the amount county and school revenues could grow as a result of the initial reassessment. While the level of these limits is a somewhat subjective issue, the committee thought that limiting aggregate local government and school tax growth to no more than 7.5% was a reasonable starting point for discussion. Revenues required to fund the initial reassessment's costs incurred by local governments would be excluded from the cap. The 7.5% limit would not apply to the expansion of the tax base as the result of new construction. Subsequent revaluations would be capped at 5% revenue growth excluding assessment growth.

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<sup>3</sup> The committee offered a nine-year cycle for consideration, but recognized that, ultimately, the frequency may be different depending upon the best practices identified by nationally recognized organizations. For example, the International Association of Assessing Officers (IAAO) statement on this topic specifies that:

"Sales comparison models permit annual reassessment at comparatively little incremental cost. If an accurate database and ongoing maintenance procedures are in place, property inspections can be spread over three to six years, depending on budgetary and other considerations. The sales comparison approach requires less detailed property characteristics data than the cost approach."

**Limitation on Increases in Individual Property Owners' Effective Tax Rates as a Result of the Initial Reassessment:** For residential property owners experiencing sharp increases in the tax bills on their primary residences, a three-year phase-in to the updated assessed value would be permitted. The committee discussed different phase-in provisions for commercial and industrial properties, but did not come to a conclusion regarding this issue.

**Mechanics of the Cap on Aggregate Revenue Collected as a Result of the Initial Reassessment:** (1) Property tax base is reassessed yielding, presumably, much higher valuations, (2) A "rolled-back" rate is established, which when applied to the reassessed base, would produce a revenue neutral result, (3) The local government or school district may propose to increase the rolled-back rate by no more than the amount of the cap. For example:

**Old System**

- Market Value of Property Tax Base: \$2 billion
- Assessed Value of Property Tax Base: \$1 billion
- Statutory Rate: 2.0%
- Tax Revenue: \$20 million

**New System**

- Market Value of Property Tax Base: \$2 billion
- Assessed Value of Property Tax Base: \$2 billion
- Tax Revenue Under Old System: \$20 million
- Rolled-back Rate: 1.0% (\$20 million / \$2 billion)
- Revenue Cap: 7.5%
- Maximum New Tax Rate: 1.075% (1% x 1.075)

Should a local government or school district want to increase revenue collections in conjunction with the initial reassessment, it would be required to provide general notice of the planned increase and announce the date, time and place at which the planned revenue increase would be considered.

**Appeals Process:** The committee did not reject the idea of maintaining the current appeals process, which consists of appeals being heard first by the County Board of Assessment and then, if necessary, appealed to Superior Court. The group did, however, wish to explore the feasibility of adding a State Property Tax Court that could hear appeals from the County Boards. This Tax Court could help ease the burden on the Superior Court. In either case, in anticipation of the large number of appeals originating from the initial reassessment, longer appeal periods would be available.

**Ongoing State Operational Responsibilities:** The State would be responsible for maintaining the single statewide property database. The State Board would monitor counties' assessment practices and performance and, if necessary, initiate remedial actions against counties that fail to meet accepted standards.

**State Staffing:** The Office of Management and Budget, Department of Technology and Information, Department of Finance and perhaps other agencies would provide support to the State Board making use of their current complement of employees.

**Compliance Standards:** The Board would employ the standard developed by the International Association of Assessing Officers (IAAO).

**Licensing and Certification of Staff:** All assessors employed by local governments must be licensed by the State Board within five years. All contractor assessors hired by local governments must be approved / licensed by the State Board.

**Enforcement Provisions:** In the event that the State Board determines that a county is not in compliance with accepted standards and procedures, it would initiate remedial action in the form of a partial or complete “hold-back” of Realty Transfer Tax (RTT) revenues. The committee discussed two approaches. The first would call upon the General Assembly to act upon the Board’s recommendation to hold back the RTT revenues. Under the second approach, the State’s RTT statute would be amended to specify that only those counties in compliance with the State Board’s standards are entitled to levy the full amount of the tax.

**Financing the Initial Reassessment:** Depending upon cash flow requirements, financing could be either in the form of: (1) the State’s issuance of debt coupled with a contractual responsibility from each county to pay their respective share of the debt service (essentially the same arrangement between the State and school districts) or a straightforward add on to the property tax bill specifically identifying a State imposed charge for reassessment expenses.

## CONCLUSION

Performing a statewide reassessment presents a wide array of logistical, political and financial challenges. This report organizes those challenges in such a way that it can serve as the foundation for the concentrated effort that would be required to replace the current patchwork approach to property assessment with a uniform system that continually and accurately updates property values. The working group responsible for this report’s preparation has apprised both local government officials and representatives from the real estate industry on the report’s organization of a reassessment’s key evaluation criteria and of the general strategies for the implementation and operation of the resulting assessment system. While it is true that in neither case did the local government or the real estate representatives offer an “official endorsement” of the proposal, in both cases it can be fairly stated that these groups recognized:

1. The practical need for a better functioning property assessment system in Delaware, and
2. That this report’s proposals represent a sound foundation for the development of a more refined blueprint for a new assessment system and, ultimately, the legislation that would accomplish just that.



With this in mind, the representatives from both the real estate industry and the State's local government expressed the willingness and desire to pursue the goals expressed in this report.

Undertaking a statewide reassessment will not only restore the integrity and equity to the property tax base, it allows for administrative efficiencies to be realized. By adopting a hybrid approach to implementation and undergoing one RFP process and standardizing the database used to warehouse the information, the State ensures uniformity among the counties and a simplified method of collecting and analyzing data for statewide purposes while keeping land use and zoning functions at the local jurisdiction level.

This proposal also recommends establishing and enforcing the annual revaluations of property. By establishing a rolling cycle and taking over enforcement abilities, the State ensures the current situation of outdated assessments does not reoccur and provides a stable revenue source for local governments and school districts. Establishing a homestead provision and allowing an initial phase-in will help mitigate any steep increases that may cause hardship for homeowners while still restoring integrity to the administration of the property tax.

## ACKNOWLEDGEMENTS

The following people are sincerely thanked for their cooperation in developing this study report:

### LWV Members:

Susan Marbury  
Susan Mathe  
Micky McKay  
Bob Taggart

### Outside Support and Resource:

Edward C. Ratledge  
Peter M. Ross

Ann C. Case, Principal Author

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Final report of the committee formed by House Joint Resolution 22, November 26, 2008:  
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Kent County Department of Finance: [www.co.kent.de.us/Departments/Finance](http://www.co.kent.de.us/Departments/Finance)

New Castle County Office of Finance: [www.nccde.org/countyfinances](http://www.nccde.org/countyfinances)

Report of Education Statistics 2007-2008 Financial Information, District Financial Data:  
[http://www.doe.k12.de.us/reports\\_data/edstats/edstats0708.shtml](http://www.doe.k12.de.us/reports_data/edstats/edstats0708.shtml)

Sussex County Finance Department: [www.sussexcountyde.gov](http://www.sussexcountyde.gov)

2009-2010 Property Tax Report, Delaware Economic Development Office:

## **ADDITIONAL REFERENCE MATERIAL**

Lincoln Institute of Land Policy: [www.lincolninst.edu](http://www.lincolninst.edu) (Provides tables of data for property tax information on all 50 states)

Ratledge, Edward C., Center for Applied Demography & Survey Research, College of Human Services, Education and Policy, University of Delaware: *Assessment-To-Sales Ratio Study for Division III Equalization Funding: 2008 Project Summary prepared for the State of Delaware Office of Management and Budget*



December 23, 2015

Nemours continues to support the work of the Wilmington Education Improvement Commission and the culture of health and learning for children and families in Wilmington, and throughout Delaware.

As the state's single pediatric health care system, Nemours' commitment to achieving the highest quality clinical care is paired with a family-centered approach encouraging active caregiver participation in understanding what is best for a child. Based on a decade of experience, Nemours Health & Prevention Services continues to serve the health system and collaborate with community partners and families in settings such as child care, youth-serving organizations, the built environment, and schools to positively influence where children live, learn, play, and worship.

Nemours deeply values a collaborative and wholistic approach to achieving the best outcomes for children and their families. To achieve a vision of optimal health, weaving in the expertise of communities, partners, and families to assist in the identification of needs, to promote policies, practices and sustainable systems-level changes is essential.

In response to the Commission's interim plan, Nemours:

- Supports the mobilization of cross-sector resources as a key component to success; and
  - Urges strong collaboration with health-related quality improvement initiatives in the state such as the Delaware State Health Improvement Plan (<http://dhss.delaware.gov/dhss/dph/sha.html>) and <http://delawarephi.org/>) and Delaware State Innovation Models Initiative (<http://dhss.delaware.gov/dhcc/sim.html>); and
- Urges that a health perspective continue to remain prevalent in conversations and considered an integral component of this strategy; and
- Encourages supporting the complete picture of needs for a child – including the interrelationship of health, social, and emotional development to academic success; and
- Encourages a strong emphasis on supporting the social, emotional, and behavioral health needs of those involved; and
- Encourages alignment between the early childhood education and K-12 systems to provide children with the greatest opportunity for success for lifelong achievement.

We encourage the Commission to remain vigilant and proactive as allies in addressing systematic issues and barriers for children and understand the deep connection between physical, social, and emotional health and academic performance. Programs, policies, and systems must support optimal health and development. It is with anticipation that we look forward to future collaboration and partnership to support the highest health, wellness and educational outcomes for children in Delaware.

Sincerely,

A handwritten signature in blue ink that reads "Mary Kate Mouser".

Mary Kate Mouser  
Operational Vice President  
Nemours Health & Prevention Services

Chip Rossi, Chairman  
A. Richard Heffron, President

Mark A. Turner, Chairman  
Robert W. Perkins, Executive Director

January 14, 2016

Dr. Tony Allen  
Chair  
Wilmington Education Improvement Commission  
c/o The Institute for Public Administration  
111 Academy Street  
Newark, DE 19716

Dear Dr. Allen and the Wilmington Education Improvement Commission,

We are writing in response to the Redistricting in the City of Wilmington: A Transition Resource, and Implementation Plan. As two of the state's largest business associations, we wanted to lend our support to the critically important effort the commission has taken on. It is clear that the time is now to make the much needed changes in our system of education to ensure the youth in Wilmington will play a key role as future leaders of the businesses in Delaware.


As I am sure you are aware, because of the shared interest we have in the success of our youth, the business community in Delaware has continually been front and center around partnering with our educators to prepare students to enter the workforce. Through policy development, funding, internships, pathways development and interactions in the schools across the state, the business community has made it clear that we want to help Delaware to be the best in the nation at developing the workforce of the future through an outstanding educational system.

It is in this light that we offer the following areas we believe are important components of the work you are all doing and should be guiding principles in the work ahead:

- As all of us in the business community strive to do each day within our businesses, we believe the policies and processes developed should seek to make our education system as efficient as possible. For example, as the commission moves forward on its current recommendations, every effort should be made to reallocate resources that are not currently maximized in areas such as transportation, facilities and staffing.
- We support a system that is responsive and aligns funding to the unique needs of students so long as the overall per student funding remains competitive with other states. Creating an efficient system of education should allow us to accomplish both.
- We support a heightened investment in early childhood education as we see the greatest return on investment occurring at this point in the educational system.
- We support the commission's focus on student success. As is alluded to in the plan, shifts in governance and funding are not meaningful if they do not result in real and measurable changes in the lives of our young people.

We appreciate the hard work this commission has taken on, we recognize the work has state-wide implications, and we stand ready to continue to support the work going forward. As we mentioned above, the time is now to make the important changes you are championing. We encourage you not to miss this opportunity to make long lasting, fundamental, and critical changes needed to empower the young men and women, especially throughout Wilmington, to succeed in life and hopefully be the future leaders of the businesses throughout the state.

Sincerely,



Chip Rossi  
Chairman, Board of Governors  
Delaware State Chamber of Commerce



Ernie Dianastasis  
Chair of Education Committee  
Delaware Business Roundtable



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January 14, 2016

Dr. Tony Allen, Chair  
Wilmington Education Improvement Commission

Dr. Allen and the Wilmington Education Improvement Commission:

On behalf of the Rodel Foundation of Delaware, I would like to thank you for your continued commitment to not only engaging the community on how best to improve public education in Wilmington, but also for leading the push for action.

Personally, these are issues I care deeply about. I have dedicated the better part of 30 years working on issues related to improving public education, particularly for those most in need. Over the last decade, our foundation has given millions of dollars to organizations serving high-need children throughout the state, and I have been involved in many education committees here in Wilmington, where I live and work. Unfortunately, the most common response upon the release of such committee reports has been passivity and paralysis. As you say in your report, "waiting is no longer an option." I couldn't agree more.

I will address some specific recommendations below, but first, an overall suggestion. We all know that there are many interconnected parts that impact the educational experience of our children, and I realize that the committee has focused first on the governance and funding shifts. My suggestion is to try and focus even further on the first phase of work.

Given that your group is looking to inspire public action on several politicized fronts—the legislature, the state board, local school boards, and others—I'd suggest further refinement of the funding and governance requests. They are of course interconnected: to redraw the district lines between Red Clay and Christina, there are reasonable concerns about the financial impact on Red Clay parents, so here are a few suggestions.

In regard to **funding** we agree that funding equity is long overdue. We have publicly argued for weighted student funding since 2005. We agree that the needs of low-income and English language learner students need to be incorporated into the state's funding allocation. However, we firmly support a comprehensive shift away from the unit system to a true weighted student funding system that allocates money based on individual students and their needs. In moving to a wholesale shift we offer the following:

- While there may be a need to make some short-term allocations to better support the students in our high-need schools, we strongly encourage the state to not just layer on additional dollars to the unit count system as part of a long-term strategy. If weighted unit funding is meant to be a short-term step on the path to weighted student funding, as the





Commission indicates in its report (page 90), then why wait? Allocating resources through units has contributed to the current state of inequality, as demonstrated by recent work by Georgetown University in partnership with the Wilmington Education Strategy Think Tank. Related, if we can agree the world is changing and students are going to be learning online, taking dual enrollment courses, and receiving more wraparound supports, then we need to let go of a system that locks the vast majority of its funds for any student in “units” or people.

- There should be a phased in, statewide strategy that may start with some additional allocations on top of our current system, but this must be accompanied by an approach or mechanism for designing a complete transition to a student-based (vs. “unit” or adult-based) system. As stated in the WEIC report, the Education Funding Improvement Commission (EFIC) may be the body to outline this transition as opposed to WEIC. A weighted student funding approach will make the allocation of education funding more equitable, simple, and transparent, and ultimately better utilize state funds to improve the education of all Delaware students.
- I also suggest that the Commission consider making the request for this coming year more concrete and building some efficiencies into the proposal to offset the costs. For example, it may not make sense to pay for capital changes to all the buildings in the city when some schools are not operating near capacity. Further, there should be some efficiencies found in transportation and other fixed costs if Christina students and buildings become part of Red Clay. These potential savings should be explicitly named in the report. An independent review of building utilization and core services could be helpful first step in this regard.

In regard to the “**Redistricting Recommendations,**” Red Clay’s willingness to take on more responsibility for the City of Wilmington creates a great opportunity to do things differently for the city’s students. Pushing back the timeline for implementation was a sensible change, and we recommend that:

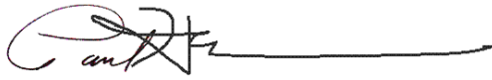
- During that planning period, Red Clay lay out a plan for how it is going to do things differently and hold itself accountable to the public once it receives more kids and funding. As has been stated by some of the other district leaders serving Wilmington, Red Clay, to date, has not consistently demonstrated better progress with its most challenged schools. Therefore, having a clear sense of the proposed strategies and how the community can partner will be important to see well before the students’ transition. As we know, governance and funding changes alone are not enough to improve student achievement without shifts in leadership and instruction.

Lastly, in regard to **evaluation**, the “Milestones and Measures of Success” section of the report is a great first step for outlining how WEIC will monitor and report ongoing progress. We are supportive of the approach to focus on multiple measures of success and to align with, in the long term, the metrics laid out in the Vision Coalition’s *Student Success 2025*. We also strongly recommend that:

- WEIC provide more explicit, shorter-term metrics in order to help make the case for ongoing financial support.

In closing, thank you again for all of the efforts made by WEIC to work toward solutions to these very important issues. The extraordinary public engagement efforts undertaken by the Commission thus far in the creation of this report have been a huge asset to the community. Please let us know how we can help moving forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul A. Herdman", followed by a long horizontal line extending to the right.

Paul A. Herdman, Ed.D.  
President and CEO, Rodel Foundation of Delaware