



# THE WASHINGTON STATE BOARD OF EDUCATION

*A high-quality education system that prepares all students for college, career, and life.*

<b>Title:</b>	<b>Update on the ESSA Accountability Workgroup</b>	
<b>As Related To:</b>	<input type="checkbox"/> Goal One: Develop and support policies to close the achievement and opportunity gaps.	<input type="checkbox"/> Goal Three: Ensure that every student has the opportunity to meet career and college ready standards.
	<input checked="" type="checkbox"/> Goal Two: Develop comprehensive accountability, recognition, and supports for students, schools, and districts.	<input type="checkbox"/> Goal Four: Provide effective oversight of the K-12 system.
		<input type="checkbox"/> Other
<b>Relevant To Board Roles:</b>	<input type="checkbox"/> Policy Leadership <input checked="" type="checkbox"/> System Oversight <input type="checkbox"/> Advocacy	<input type="checkbox"/> Communication <input type="checkbox"/> Convening and Facilitating
<b>Policy Considerations / Key Questions:</b>	<p>The AAW was reconvened as the Every Student Succeeds Act (ESSA) Accountability Workgroup to develop the statewide accountability system for the ESSA state plan and to continue to inform the Board on other accountability issues. The SBE may wish to explore additional changes to the statewide accountability system that may now be permissible under the ESSA. Key Questions would include but not be limited to the following:</p> <ol style="list-style-type: none"> <li>1. How should ambitious and achievable long term goals be set and for how many years?</li> <li>2. What types of school quality and student success indicators should be added to the Index?</li> <li>3. Should the identification of the lowest performing schools be based on a holistic measure, such as lowest Index rating?</li> </ol>	
<b>Possible Board Action:</b>	<input checked="" type="checkbox"/> Review <input type="checkbox"/> Approve	<input type="checkbox"/> Adopt <input type="checkbox"/> Other
<b>Materials Included in Packet:</b>	<input checked="" type="checkbox"/> Memo <input type="checkbox"/> Graphs / Graphics <input type="checkbox"/> Third-Party Materials <input type="checkbox"/> PowerPoint	
<b>Synopsis:</b>	<p>The OSPI requested that the Achievement and Accountability Workgroup (AAW) reconvene as the ESSA Accountability Workgroup for the purpose of developing a statewide accountability system that will pass peer review and be approved by the USED. The ESSA Accountability Workgroup will explore current and new ideas on the topics of long term goals, performance indicators, system of school differentiation, identification of the lowest performing schools, accountability for student participation on statewide assessments, and other changes.</p> <p>The memo describes the current state of the Washington accountability system and frames new ideas in the context of the ESSA.</p>	



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## ESSA ACCOUNTABILITY WORKGROUP

### Policy Considerations

The State Board of Education (SBE) is authorized to perform a number of tasks for the overarching purpose of developing a statewide accountability system to improve outcomes for students, for example, in RCW 28A.305.130 (Powers and Duties), RCW 28A.657 (Accountability System), and RCW 28A.655 (Academic Achievement and Accountability). These RCWs have been further defined in rules (WAC 180-105 and WAC 180-17).

### Summary and Key Questions

The AAW was reconvened as the Every Student Succeeds Act (ESSA) Accountability Workgroup to develop the statewide accountability system for the ESSA required state plan and to continue to inform the Board on accountability issues. While much of the statewide accountability system was recently overhauled to reflect federal accountability flexibility, the SBE and OSPI may support additional changes that may now be permissible under the ESSA. Some key questions the ESSA Accountability Workgroup will be addressing and that the Board will want to consider providing input on are:

- On the topic of long-term goals, what should the endpoint goal be (for proficiency and graduation) and how many years should be provided to meet the endpoint goal?
- What measure or measures of school quality and student success should be added to the Index for differentiation, and how heavily should that indicator be weighted?
- Is the will of the Board to continue to support the identification of the Persistently Lowest Achieving schools based on proficiency rate or graduation rate, or make the identifications based on a holistic measure such as schools with the lowest Index rating?

### Background

The Every Student Succeeds Act was signed into law in December 2015 and is the reauthorized Elementary and Secondary Education Act (ESEA), more recently referred to as the No Child Left Behind Act. The ESSA addresses many aspects of public school K-12 education for low performing student populations, such as students from low income families, students with a disability, English language learners, and others. The federal government provides supplemental funding to states to help cover the higher costs of educating certain student groups, and in return expects the states to follow regulations developed by the U.S. Department of Education (USED) for serving the above-cited student groups.

To continue to receive certain federal funding, the state education agency (OSPI) is required to submit a state plan to the USED for approval after being subjected to a peer review process. For Washington, the OSPI is charged with creating and submitting the state plan to the USED after consulting a wide range of stakeholders. To accomplish this large task, the OSPI created approximately a dozen workgroups to simultaneously create and develop components of the state plan. The OSPI requested that the Achievement and Accountability Workgroup (AAW) reconvene as the ESSA Accountability Workgroup for the purpose of developing a statewide state wide accountability system that will pass peer review, be approved by the USED, and inform the Board on other accountability issues.

### **Key Concepts Covered in this Memo**

The ESSA Accountability Workgroup will serve the dual purpose of Informing the Board on accountability issues and craft the state accountability system for the ESSA state plan.

The state plan must establish ambitious long-term goals for proficiency on statewide assessments, graduation rates, and progress in achieving English language proficiency.

***How will the long-term goals form part of the new AYP? How do we replace AYP? Is it the Index rating? Is AYP a part of the Index?***

The state's system of annual school differentiation is the Achievement Index, which will need to include at least one measure of progress in achieving English language proficiency and at least one other measure of school quality/student success.

***How can we use the new ESSA landscape to address alternative schools?***

***Is there a desire or need to create a district-level analysis for informing or for accountability?***

The state must continue to identify low performing schools and low performing subgroups at schools but have flexibility in designing the methodology to make the identifications.

***How could or should the identification of low performing subgroups be changed so that student groups other than SWDs and ELLs are identified?***

Participation rate must be a factor in the accountability system and the state plan must explain how that will be accomplished.

***What can or should be done about participation rates?***

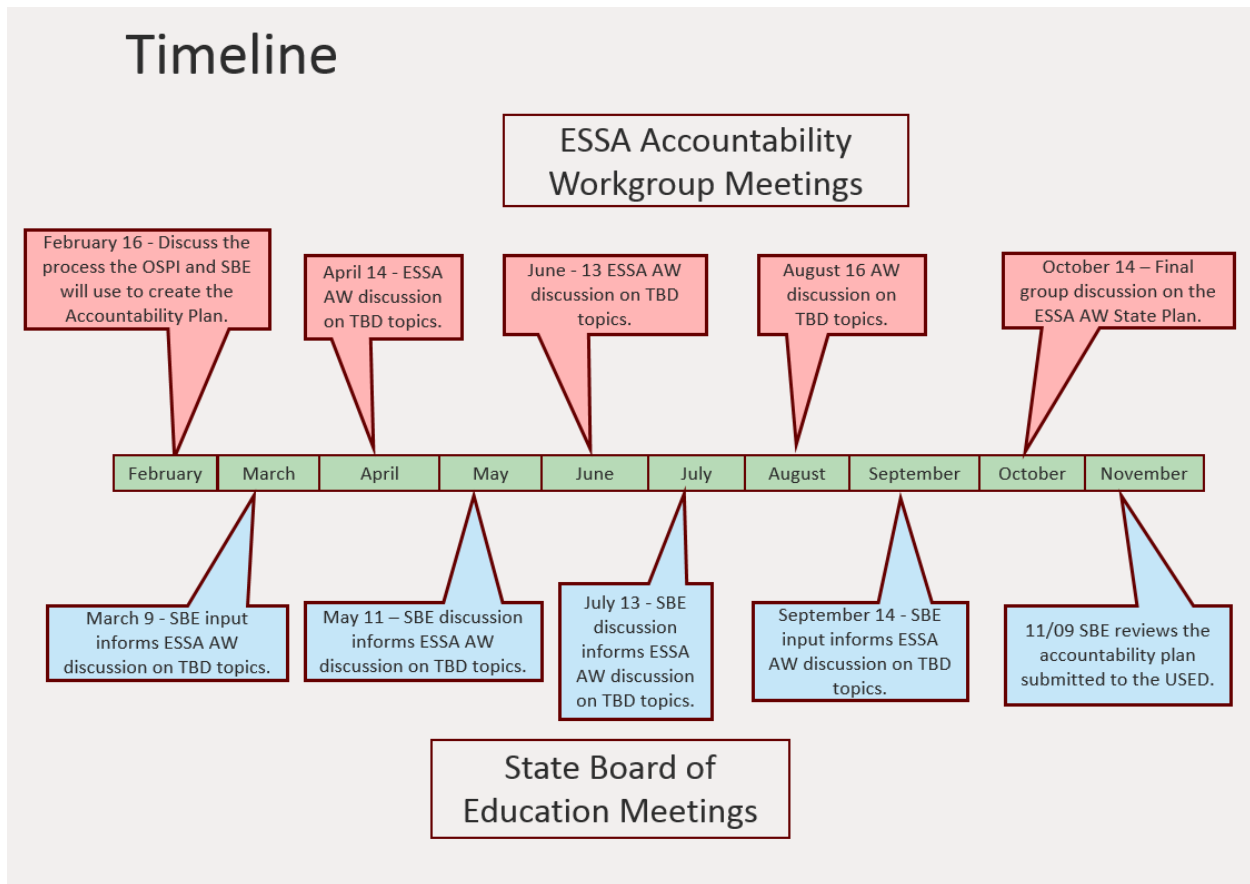
The AAW (hereinafter referred to as the ESSA Accountability Workgroup) met on February 16 to learn about their role in informing the OSPI state plan for the USED. After hearing the opening presentation by Dr. Gil Mendoza (OSPI) and Executive Director Ben Rarick, the ESSA AW heard presentations from the OSPI and SBE staff on the breadth of topics to be addressed in the state plan.

The ESSA Accountability Workgroup is scheduled to meet in person on four additional occasions to address elements of the accountability system and additional online meetings will be scheduled as necessary. The meetings are scheduled between the SBE meetings so that Board input can guide the workgroup's work plan (Figure 1).

### **State Plan Overview**

Less than 10 percent of the ESSA document is attributable to the elements required in the state plan described under Title I, Section 1111. Of those approximately 40 pages, only four pages are devoted to explaining the elements of the statewide accountability system the OSPI must describe in the Washington state plan.

Figure 1 shows the ESSA Accountability Workgroup and the SBE meeting dates through November.



The ESSA Accountability Workgroup has been tasked with developing the statewide accountability system for the state plan. Section 1111 (c) (4) outlines the elements that must be described in the statewide accountability system. Fortunately, many of the elements recently enacted into state law conform to the requirements of the new ESSA, meaning that the accountability system described in state law can be included in the state plan to more closely align state and federal accountability. The elements or topics to be described in the state accountability plan include the following:

- Long-Term Goals
- Indicators
- Annual Meaningful Differentiation
- Identification of Schools
- Annual Measurement of Achievement – 95 Percent Participation
- Partial Attendance (0.5 Years in School)

*Long-Term Goals*

Under Section 1111(c)(4)(A) of the ESSA, the state must establish ambitious long-term goals and interim targets for the All Students group and the other student groups as under the ESEA. These long-term goals are considered to be analogous to the annual uniform bar developed for adequate yearly progress (AYP) and the annual measurable objectives (AMOs) developed under the Washington Flexibility Waiver

in 2012. There is little doubt that the state has considerable leeway in setting the ambitious long-term goals for:

- English/Language Arts (ELA), math, and science proficiency
- High school graduation rates
- Progress in achieving English language proficiency

Under RCW 28A.305.130 (<http://app.leg.wa.gov/Rcw/default.aspx?cite=28A.305.130>) the SBE shall adopt and revise performance improvement goals in English/Language Arts (ELA), science, and mathematics, by subject and grade level, as the Board deems appropriate to improve student learning. The goals shall not conflict with the requirements contained in Title I of the ESEA as amended and reauthorized. This means that the long-term goals established as part of the ESSA state plan will have direct impact on school and district improvement goals, so the goal-setting strategy must be carefully considered. Some aspects of goal-setting strategies and lessons learned from previous accountability systems are presented in Figure 2.

Figure 2 shows some goal setting strategies and lessons learned from previous accountability systems.

Goal Setting Strategy	Lessons Learned from AYP and Flexibility Waivers
The No Child Left Behind law required that all students, student groups, and schools attain 100 percent proficiency in a predetermined number of years.	The goal of 100 proficiency was shown to be unrealistic for many schools and resulted in nearly every school failing the AYP test in the most recent years. Some states lowered the rigor of their assessments for the purpose of showing more proficient students.
The goal of 100 percent proficiency by the 2013-14 school year was inflexible regardless of other circumstances.	When learning standards changed, assessments were required to change and states were required to conduct linking studies and develop transitional cut score plans to maintain the 2014 endpoint goal. Many would contend that resetting end goals and interim targets would have been the preferred alternative.
If a school did not meet the uniform bar (interim target), the school could demonstrate AYP through a Safe Harbor analysis.	Safe Harbor should be thought of as an analysis showing that students at the school were making improvements and making AYP in this manner provided relief for many schools over the years.
The AYP analysis was conjunctive, meaning that a school or district must meet the uniform bar for all content areas for all subgroups. Fail one cell and the entire school failed the AYP test.	Schools engaged in behaviors intended to enhance the learning of select students or groups of students for the sole purpose of helping a few meet the proficiency bar to make Safe Harbor. This became known as teaching the 'bubble kids.'
Important Considerations for Long-Term Goal Setting: Goals should be ambitious but must be <b>achievable</b> , which means less than 100 percent proficient and over an <b>adequate time</b> period. Further, the end goals and interim <b>targets should be reset</b> when required. Schools and districts should have <b>multiple pathways</b> to demonstrating adequate improvement and the overall test should be <b>compensatory</b> rather than conjunctive.	

### Indicators

Section 1111 (c) (4) (B) of the ESSA requires the state to measure and report on different indicators for all reportable subgroups at school level. The ESSA requirements reflect two important shifts in accountability.

- Progress toward English language proficiency as an accountability element is shifted from Title III to Title I.
- Statewide accountability systems are now to include at least one valid and reliable measure of student success and school quality.

Figure 3 below shows the indicators that are required for the different school levels. These are the indicators that are used for the system of differentiation that is described in the next section.

Figure 3 shows the assessment system indicators required under ESSA by school level.

Indicator	Elementary Schools	Middle Schools	High Schools
Proficiency in ELA, math, and science	✓	✓	✓
Growth* in ELA and math	✓	✓	
Graduation Rate <sup>+</sup>			✓
Progress in English language proficiency	✓	✓	✓
Other measures of student success or school quality	✓	✓	✓
*Note: At the discretion of the state, another valid and reliable, statewide, academic measure may be substituted for growth.			
*Note: If the state wishes to report on the Extended (5-Year) graduation rate, the state must also report on the on-Time (4-Year) graduation rate.			

The shift of English language learner (EL) accountability and goal-setting to Title I and covered in the state plan creates perhaps the greatest challenges to the system. Some of the challenges include:

- On the issue of goal-setting, the system is unique for a couple of reasons:
  - As the students improve language fluency (which is the goal), they are removed from the group (reclassified), but the goal never resets
  - Language acquisition outcomes are impacted by home language, grade level at time of identification, and years of formal schooling, to name a few. How are these differences accounted for in goal setting and accountability?
- On the topics of accountability and goal setting, what measure(s) should be used?
  - Percent making a gain on the Washington English Language Proficiency Exam (WELPA) similar to the Title III AMAO 1
  - Percent being reclassified (exiting ELL services) like AMAO 2
  - Median gain on the WELPA (like that used for the English language acquisition award)
- Should different measures be used for different grade spans?

Similar questions and challenges could be put forth in the discussion on student success and school quality. Should the accountability system include multiple measures or different measures by grade span, and how heavily should these measures factor into a school differentiation system?

### *Annual Meaningful Differentiation*

The state plan must describe the system that will meaningfully differentiate all public schools in the state that is based on all of the indicators described above. Further, the system of differentiation must assign substantial weight to the proficiency, growth, graduation, and progress in English language proficiency indicators to a much greater degree than the student success or school quality indicator.

In the spring of 2014, the SBE released the first version of the revised Achievement Index that included proficiency, growth model, and high school graduation measures. In addition, the spring 2016 Index version will include dual credit participation for high schools as a measure of College and Career Readiness (Figure 4). The heavy weighting of proficiency, growth, and graduation rate and the light weighting of the dual credit measure in the current Index would likely meet the requirements generally described in the ESSA.

The Achievement Index differentiates schools by computing an annual Index rating and a Composite Index rating for all public schools for which the required data is available. If measures of progress in English language proficiency and student success and school quality were included in a new Index version, the Index would likely meet the differentiation requirements described in the ESSA with little additional modifications.

Figure 4 shows the how the current Index design meets or does not meet school differentiation requirements of the ESSA.

School Level	ESSA Requirement	Current Index Design	Meets ESSA Requirement
All School Levels	Measure of proficiency on annual assessments	ELA, math, and science proficiency rates	✓
ES & MS	Growth measure and/or another valid and reliable academic indicator	Growth Model SGPs	✓
HS	Four-year adjusted cohort graduate rate, with discretion to use the extended-year adjusted cohort rate	Extended-year Adjusted Cohort Graduation Rate	✓
All School Levels	Progress in achieving English language proficiency	NONE	✗
ES & MS	One or more measures of student success or school quality	NONE	✗
HS		Dual Credit Participation	✓

If the SBE and the ESSA Accountability Workgroup opted to follow the recommended approach to change the Index as little as possible for the purpose of maintaining a high degree of year-to-year comparability, at a minimum, the Index would need to be revised in the following manner:

- Add a measure of progress in English language proficiency to the Index for all school levels.
- Add a measure of student success or school quality for elementary and middle schools.
- Adjust indicator weightings to accommodate the additional indicators.

However, the Board may wish to take this opportunity to communicate more to stakeholders about Washington schools by including multiple measures of English language proficiency and multiple measures of student success and school quality such as student motivation surveys, school staff surveys, parent engagement surveys, and measures of chronic absenteeism, for example.

#### *Identification of Schools*

Under Section 1111 (c) (4) (D) of the ESSA and based on the system of annual meaningful differentiation, the state plan must describe how the OSPI will identify schools for comprehensive or targeted improvement. At a minimum, the OSPI must identify the lowest performing five percent of Title I schools based on the system of differentiation (Index), high schools that graduate fewer than two-thirds of their students, and continuing Priority Schools for comprehensive support.

RCW 28A.657.020 (<http://app.leg.wa.gov/RCW/default.aspx?cite=28A.657.020>) specifies that the OSPI annually identify two groups of schools in need of supports. These two groups of schools comprise the persistently lowest achieving schools (PLAs) and challenged schools. The PLAs are to be identified on the basis of:

- The academic achievement of the "all students" group in a school in terms of proficiency on the state's assessment, and any alternative assessments, in reading and mathematics combined; and
- The school's lack of progress on the mathematics and reading assessments over a number of years in the "all students" group
- The OSPI is to identify challenged schools in need of improvement that conforms to ESEA requirements and applies to both Title I and non-Title I schools.

At the end of RCW 28A.657.020, the OSPI is directed to use the approved Achievement Index to identify the schools if the USED approves the Index for such identifications. Further, WAC 180-17-100 (3)(c) (<http://app.leg.wa.gov/wac/default.aspx?cite=180-17-100>) states that the composite Achievement Index score should be used as the standard measure of school achievement, and should be directly aligned with designations of challenged schools in need of improvement made annually by the Superintendent of public instruction and the lists of persistently low-achieving schools as required under federal regulations.

The Board will want to consider how to identify the lowest performing schools in the state for comprehensive improvement. Current RCW outlines the identification methodology that conforms to no longer existing ESEA requirements, that being a stacked ranking based on reading and math proficiency rates over three years. However, RCW and WAC direct the OSPI to use the Index and more specifically the composite Index rating to identify the Persistently Lowest Achieving schools and the Challenged Schools in need of improvement when the Index is approved for statewide accountability.

Over the recent years, legislation has been enacted and rules written by the OSPI and SBE regarding the requirements for identifying schools for comprehensive improvement. A key decision for this task moving forward is to choose an approach leading to the identification of schools for improvement:

1. Will it be the Board recommendation to replace the now obsolete federal accountability requirements on identification methodology with those currently described in RCW and WACs, or
2. Will it be the Board recommendation to change the manner in which schools are to be identified and update RCWs and WACs to reflect the new methodologies?

Of course, there are advantages and disadvantages of any identification methodology used for the purpose of identifying the lowest performing schools (Figure 5). The question becomes, lowest performing based on what? Proficiency? Growth? Graduation Rate? Many would support the idea of identifying schools based on multiple factors to be sure the identifications are the most valid.

The ESSA allows states to identify additional statewide categories of schools, such as those triggering the Required Action District (RAD I) designation that is described in RCW 28A.657.030 and RAD II in RCW 28A.657.100 found at (<http://app.leg.wa.gov/RCW/default.aspx?cite=28A.657.030>) and <http://app.leg.wa.gov/RCW/default.aspx?cite=28A.657.100>. The Required Action specified in RCW is a



strong accountability element that should probably be included in the state plan. However, if the SBE were to recommend this approach, some updates to WAC 180-17 would probably be required.

Figure 5: shows the pros and cons for the current methodologies used to identify Priority and Focus Schools.

Current Identification Methodology	Lessons Learned	
	Pros	Cons
Most Priority Schools are identified due to a three-year average reading and math (combined) proficiency rate of less than 40 percent.	<p>The identification methodology is easy to explain to parents and other stakeholders.</p> <p>The identification is simple and generally understandable.</p> <p>The threshold represents a rigid criterion-based floor that separates acceptable from unacceptable.</p>	<p>The methodology does not take into account other data, such as student growth percentiles.</p> <p>Schools may engage in self-serving strategies such as focusing on the “bubble students.”</p> <p>The methodology discounts the importance or value of other content areas, such as science.</p> <p>Proficiency rates are strongly associated with school poverty rates.</p>
Other Priority Schools are identified on the basis of a low three-year average graduation rate (less than 60 percent).	<p>The identification methodology is easy to explain to parents and other stakeholders.</p> <p>The identification is simple and readily understandable.</p>	<p>LEAs and schools may engage in self-serving strategies by counseling out or transferring struggling students from their home schools to alternative school settings.</p>
Some Priority Schools are identified on the basis of lowest Index rating.	<p>The identification is understandable to most after a short explanation.</p> <p>The methodology considers all content area assessments.</p> <p>The identification methodology considers multiple key indicators.</p> <p>The Index design favors schools who are enhancing the learning of the Targeted Subgroup members.</p>	<p>The derivation of the Index rating is more complex and difficult to explain to many.</p> <p>It might be difficult to explain why a school with higher proficiency is identified while another school with lower proficiency is not identified.</p> <p>The Index rating is computed differently for high schools as compared to elementary and middle schools.</p>
Most Focus Schools are identified due to a low performing subgroup based on the three-year average reading and math (combined) proficiency rates.	<p>The identification is simple and understandable for most stakeholders.</p>	<p>The methodology identifies almost exclusively, the SWD and ELL groups. Does not pass the face validity test.</p> <p>The methodology does not factor in whether the group is improving outcomes.</p>

### *Annual Measurement of Achievement*

Under Section 1111 (c) (4) (E) of the ESSA, the statewide accountability system must report on at least 95 percent of the eligible student population and by subgroup. The state plan must explain how this participation requirement will factor into the statewide accountability system. Washington’s current accountability design considers participation rates in several manners:

- Non-participants are considered non-proficient and this reduces the proficiency rate for a school and has the additional effect of reducing a school’s Index rating.

- Schools with less than 95 percent participation are not eligible to be designated as an Exemplary school, the highest school rating.
- Schools with less than 95 percent participation on statewide assessments are not eligible for most of the Washington Achievement Awards.

### *Partial Attendance*

Under Section 1111 (c) (4) (F) of the ESSA, a student’s assessment outcomes may not be included in the system of school differentiation unless the student has attended the same school for at least half of the school year. Some discussion will occur around the issue of how “half of the school year” is to be defined for school accountability.

- Continuously enrolled for at least 90 days before the day the student begins testing (no break in enrollment is permitted), which is less inclusive.
- Enrolled for at least 90 days at the school before the day the student begins testing (a break in enrollment is permitted), which is more inclusive.

The use of continuously enrolled students only for school accountability was deemed to be the most fair for schools, as the methodology was intended to hold schools accountable only for the students who were at that school the entire year. The filter tended to mask the demonstrably lower performance of mobile students, who are also more likely to be a student of color and from a low income household. By changing this requirement, the USED is showing the desire for schools to be held accountable for more students, especially those from low income households.

The ESSA Accountability Workgroup will be looking for additional guidance on the manner in which to define half of the school year for schools operating under basic education waivers.

- How should the half of a school year be computed for schools operating under efficiency waivers?
- How should the half of a school year be computed for schools operating under a waiver of the 180 day requirement?

### **Action**

No Board action is anticipated.

Please contact Andrew Parr at [andrew.parr@k12.wa.us](mailto:andrew.parr@k12.wa.us) if you have questions regarding this memo.