Bellwether Education Partners, in partnership with the Collaborative for Student Success, convened an objective, independent panel of accountability experts to review ESSA state plans. We sought out a diverse group of peer reviewers with a range of political viewpoints and backgrounds, and we asked them to review each state’s accountability plan with an eye toward capturing strengths and weaknesses.

We aimed to provide constructive feedback to the states, and to serve as a source of straightforward information to the public so that they are better able to engage policymakers if and how they see fit. Inherently, this independent process could not take into account the numerous political and situational challenges that occur in every state. We are in no way attempting to diminish those challenges, but the scope of this review was to compare the rigor and comprehensive nature of state accountability plans.

Peers worked in small teams to review the plans that states formally submitted to the U.S. Department of Education. After reviewing independently, the peers met for two days to discuss their individual reviews and work together on the collaborative draft you’ll see below. The teams were asked to use their discretion and expertise to respond to and score each rubric item, and those scores were normed across states and peers.

Each state was given the opportunity to review the draft peer analysis and to provide substantive additions and corrections. Still, the reviews should be considered a snapshot of state plans as of September–November 2017, and we anticipate that states will continue to update their plans going forward.

To read more about the project, as well as a list of the expert peer reviewers, visit the Bellwether website [here](http://www.bellwethereducation.org).
Overall Strengths and Weaknesses

**Strengths:** What are the most promising aspects of the state's plan? What parts are worth emulating by other states?

California aims to prepare students to thrive in a highly connected world. To realize this aspiration, the state adopted college-ready standards and high-quality, aligned assessments, and set rigorous academic goals. Furthermore, California identified a meaningful set of accountability indicators that will measure student performance across many different dimensions. Importantly, including suspension rates in its accountability system will send a message to schools and districts to pay attention to disparities in student disciplinary actions.

The state should also be praised for its dual focus on current performance and change over time. This reflects a desire for all schools to improve, and provides all schools a path to demonstrate success. It is clear the state places a premium on using multiple measures to assess student performance. The state can further strengthen its plan by ensuring the measures are actionable for all stakeholders.

**Weaknesses:** What are the most pressing areas for the state to improve in its plan? What aspects should other states avoid?

Overall, California's plan could be strengthened by providing additional detail throughout the plan. Its dashboard accountability system is complicated and incomplete. The state's system depends on a color-coded, 25-square performance grid for each indicator that will create a number of arbitrary cut points between performance levels. Moreover, the state has not fully articulated a method for how it will combine the indicators in the performance dashboard to identify schools in need of additional support, how the state would identify schools with low-performing subgroups, or what the state would do about that low performance. The plan would also potentially allow schools to exit improvement status by declining less than they had in the previous year, rather than by increasing student performance.

It is positive that California attempts to include both current performance and growth in its accountability system; however, the state lacks a method of measuring individual student growth over time. Instead, it only tracks year-over-year changes at the school level, which is susceptible to student enrollment differences in a given school and in a given year. As the state indicates it intends to do in the near future, California should move to adopt an individual student growth measure into its accountability framework to encourage schools to improve both student proficiency and growth.
Plan Components

Each state's plan has been rated on a scale of 1 (“This practice should be avoided by other states”) to 5 (“This could be a potential model for other states”).

Goals: Are the state's vision, goals, and interim targets aligned, ambitious, and attainable? Why or why not?

1 2 3 4 5

California's goals are built into what it calls the California Model, which is a system based on a color-coded grid reflecting an equal focus on current performance and improvement (at both the school and student level). Schools and students are rated on each indicator as red, orange, yellow, green, or blue — with a goal of getting every school in the state to green within a seven-year time period. As such, each school will need to look at the 25-square performance grid to identify how much progress they will need to make to reach their goal, and the state does not include any interim targets toward its long-term goals.

California’s academic goal is to bring all students, within seven years, to the performance of today’s top third of achievement in the state in English language arts and the top quarter in mathematics. However, these goals are based on the average scores on the assessment across all students (e.g., scale scores). While scale scores may be useful as a way to measure performance across all students, communicating performance goals using scale scores may be problematic, especially for parents and the broader public. To illustrate this confusion, California’s target is for the schoolwide average to be at least 10 scale points above the lowest score eligible for Level 3 (i.e., proficiency), with no more than a 1 point decrease from the prior year.

Additionally, except for not regressing too much, California does not appear to have any goals for schools or subgroups that have already surpassed the overall goal for any given indicator.

The state’s goals for English language proficiency is for 75 to 85 percent of English learners (EL) to improve at least one level annually over seven years, which appears to be ambitious and achievable. However, there are inconsistencies within the plan regarding the timeline to proficiency for ELs. The state’s graduation rate goal of all schools reaching at least 90 percent within seven years is admirable, but according to the plan 59 percent of schools already meet that threshold, raising questions about the ambitiousness of this goal.
Standards and Assessments: Is the state’s accountability system built on high-quality standards and assessments aligned to college and career readiness? Why or why not?

California uses rigorous college- and career-ready standards in mathematics and English language arts. In 2014, the state established the California Assessment of Student Performance and Progress (CAASPP) system, which is based on the high-quality Smarter Balanced summative and interim assessments. In spring 2017, the state piloted its California Science Tests (CAST), which is aligned with the California Next Generation Science Standards.

California provided a detailed description of its accommodations for English language learners, particularly Spanish-speaking students. The state provides stacked translation in Spanish along with language glossaries, as well as an alternate assessment with accommodations based on a student’s individual education plan. The state has a number of tests under development, including science and Spanish language arts (bi-literacy), and is in the process of transitioning to a new ELP assessment (ELPAC).

The state could strengthen its plan by implementing a process to ensure that it is meeting the 1 percent cap on alternative assessments for students with the most significant cognitive disabilities. Also, California could strengthen its plan by providing more information about its alternative achievement standards and aligned assessments for students with the most severe cognitive disabilities.

Indicators: Are the state’s chosen accountability indicators aligned to ensure targets and goals are met and likely to lead to improved educational outcomes for students? Why or why not?

California will use a dashboard to provide a full picture of how students and schools are performing across a robust set of college and career readiness indicators. Elementary and middle schools will be held accountable for status and change on the CAASPP in English language arts and math, chronic absenteeism, suspension rates, and English language proficiency. The state also intends to embark on further study to expand the list.

The state’s inclusion of school suspension rates as its school quality indicator will drive schools to recognize disparate impacts of school discipline policies. However, the state should monitor its data to ensure that using this indicator does not lead to any unintended consequences, that schools can respond in productive ways, and that schools are defining “suspensions” in the same way and not simply replacing formal suspensions with other forms of exclusionary discipline. The state should also clarify the status and change cut scores for this indicator for elementary, middle, and high schools.
Similarly, chronic absenteeism is a promising indicator, but California’s plan indicates it won’t articulate how it will translate its raw data into an indicator for schools until it has multiple years of data, in fall 2018. Additionally, California is attempting to use chronic absenteeism to satisfy ESSA’s requirement that states include a second academic indicator, but it’s not clear that absenteeism should qualify as an academic indicator.

The state has a solid set of college and career readiness indicators, and intends to embark on further study to expand the list. Further, the state should receive special recognition for calculating this indicator using the four-year graduation cohort. This is the most robust approach for accurately representing students’ success in high school, and is a technical consideration that should be replicated in other states.

**Academic Progress:** Has the state created sufficient incentives for schools to care about both student proficiency and student growth over time? Why or why not?

1 2 3 4 5

California should be commended for attempting to incorporate progress across each indicator in its accountability system. Performance and improvement (i.e. status and change) are weighted equally in each of California’s accountability indicators. However, the state does not include an actual individual student-level growth measure. Instead, it would measure school-level change year-over-year, which may simply reflect that a school’s current group of students is different from past cohorts. In short, this measure does not necessarily indicate whether any individual students are improving.

For schools already performing above the state’s goal, there is little incentive to strive for higher achievement levels. This is particularly evident in the fact that the state considers a school to have met its progress goals as long as its performance declines by no more than one point. California is considering adopting an individual growth model by 2018-19, and we urge it to move forward quickly and shift to a measure that tracks student-level progress over time.
All Students: Does the state system mask the performance of some subgroups of students, or does it have adequate checks in place to ensure all students (including all subgroups of students) receive a high-quality education? Why or why not?

As required by federal law, California says it will identify for targeted support and improvement all schools in which a subgroup of students would, on its own, meet the criteria for being in the bottom 5 percent of all schools. However, the state’s rules for identifying the bottom 5 percent of schools overall are not yet finalized, and thus California could not provide an estimate of how many schools would fall into this category. Moreover, ESSA requires states to come up with a separate definition for schools with “consistently underperforming” subgroups, but California appears to be using the rule described above to accomplish both purposes, rather than having two unique definitions.

California will disaggregate former ELs for reporting depending on how many years they have been reclassified, up to four years. This provides useful data for differentiating performance. While California deserves credit for including foster and homeless youth in its accountability system, its choice to use a minimum subgroup size of 30 students is high and could mean that potentially thousands of students won’t be accounted for in schools with subgroups smaller than 30. The plan could be improved if it provided additional detail about the number of students in each subgroup excluded from its school accountability system based on this decision. Additionally, California forgoes other strategies to count more students, such as averaging data over multiple years, which would be another way to balance the needs of statistical precision with the need to identify subgroups of students requiring additional support.

Finally, the state’s approach to handling the 95 percent participation rate threshold is cause for concern. Specifically, the state proposes four discrete icons to show a school’s status, though it’s questionable how helpful these will be when layered upon the state’s already confusing color-coded system. In addition, the participation rate does not affect the calculation of performance on academic indicators, meaning some schools could appear to be higher-performing than they were if they excluded lower-performing students.

Identifying Schools: Is the state’s plan to identify schools for comprehensive and targeted support likely to identify the schools and student groups most in need?

California has not finalized its methodology for identifying the lowest-performing 5 percent of Title I schools. According to its plan, the state will identify any school with all “red” indicators and schools with all red indicators except for one orange indicator. This approach, as the state concedes, does not identify the statutorily required 5 percent of the lowest-performing Title I schools in the state.
California also plans to identify high schools for comprehensive support only if their graduation rate is lower than 67 percent for three consecutive years. This is a considerably longer timeline than other states and may not be allowed under the law.

To identify targeted support schools, California will identify annually a school in which a subgroup on its own meets the criteria to be identified for comprehensive support as among the lowest-performing 5 percent of Title I schools. However, it’s unclear how this methodology would work in practice, since California is not planning to create a list ranking its schools, and the state has yet to finalize its methodology to identify the lowest-performing 5 percent of schools. Currently, it appears as though the state will identify for additional targeted support any Title I school with a student subgroup scoring all red or all red with one orange on its indicators.

California proposes to weight each of its indicators equally, arguing it will provide more significant weight on the academic indicators as opposed to non-academic ones because there are more academic indicators. However, it is unclear how different levels of performance across different indicators will translate into a school’s overall rating to clearly differentiate between schools. For example, a school with very low English and math scores might not get the support it needs if it scores at a “yellow” level on an indicator like chronic absenteeism.

**Supporting Schools:** Are the state’s planned interventions in comprehensive and targeted support schools evidence-based and sufficiently rigorous to match the challenges those schools face? Why or why not?

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California employs a tiered system that provides general supports to all districts, technical assistance from county superintendents and the California Collaborative for Educational Excellence to those with performance gaps, and more intense interventions in the case of chronic underperformance. Although not included in the plan, the state is in the midst of building out these supports. Still, the state has not yet articulated specific interventions that will be offered among the three levels, or whether they are rigorous and research-based.

Given the challenges faced by struggling schools, the state’s supports are rather limited and unlikely to meet the task of turning around the lowest performers. California should consider expanding the options available and publish clear timelines for implementation, monitoring, and making any necessary adjustments.

In this proposal, California indicated that it expects to receive nearly $2 billion in Title I Part A funds in 2017-18. The state is required to set aside 7 percent of those funds (approximately $120 million) for school improvement activities. However, it is unclear how it plans to distribute those funds, whether they will be allocated based on formula or through a competition, whether schools will be evaluated based on their plan’s use of evidence, and what, if any, state priorities will be emphasized in those activities.
Additionally, California does not plan to take advantage of the optional 3 percent set-aside to provide direct student services, which would have provided additional opportunity for the state to align its school improvement activities with its statewide goals.

**Exiting Improvement Status:** Are the state’s criteria for schools to exit comprehensive and targeted support status sufficient to demonstrate sustained improvements? Why or why not?

1 2 3 4 5

California plans to exit schools from identified status if they have improved performance so that they no longer meet the criteria used initially to identify them. Schools are expected to meet these criteria within four years from initial identification. The identification process takes place every three years. While this proposal is clear enough to explain, it does not require identified schools to show sustained improvement. In fact, it is unclear how the state defines the progress sufficient to demonstrate sustained improvement. For example, is a school that goes from all red and one orange to all red and two oranges positioned for enduring success? California would have a stronger plan if it set a higher bar, such as two consecutive years at a particular threshold, before allowing a school to exit support status.

**Continuous Improvement:** Has the state outlined a clear plan to learn from its implementation efforts and modify its actions accordingly, including through continued consultation and engagement of key stakeholders? If not, what steps could the state take to do so?

1 2 3 4 5

California’s focus on year-to-year improvement in the accountability system is an aspect of continuous improvement that should be recognized and celebrated. However, despite frequent mention of monitoring and engagement of multiple constituencies, the state does not articulate a clear plan to learn from and adapt its implementation efforts. Given the scale of the state’s education ecosystem, developing and implementing such a plan would be no easy undertaking. However, California could begin, as an example, by establishing a process to evaluate the efficacy of some of the state’s essential actors, like external support entities and county offices of education. Furthermore, the state should continue to solicit feedback from stakeholders about the accountability performance grid and how it might be refined.