An Independent Review of ESSA State Plans

Indiana

Project Overview

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.
Overall Strengths and Weaknesses

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

Indiana's plan deserves high marks as a model for other states not only for its content, but also for ease in readability and clarity. Indiana's A-F school rating system is clear and straightforward, and it relies on a small number of important, proven indicators of student success. It effectively balances growth and proficiency, and it goes beyond test scores in reading and math.

Indiana's school improvement strategy and exit criteria are potential models for other states. Through those sections, Indiana has committed to taking strong, evidence-based actions in schools that continue to suffer from low performance, and it has set ambitious, high bars for low-performing schools to demonstrate that they've made sustained progress. In particular, the state has thought through how to support districts with multiple low-performing schools.

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

Much of Indiana's plan is up in the air as it transitions to new standards and assessments and builds the results of those new assessments into its formal accountability system. In the next few years, Indiana will be revisiting nearly all parts of its accountability system — its academic achievement and graduation rate goals, plus its calculations for achievement, growth, English language proficiency, and college and career readiness. Given those changes on the horizon, Indiana could have done more to explain how it plans to evaluate its new data, incorporate stakeholder feedback, finalize its decisions, and maintain continuity over time.

The other large concern with Indiana's plan is that the state does not include individual subgroup performance in its letter grade calculations, which creates a significant risk of schools receiving high ratings while underserving particular groups of students. Indiana should consider how to incorporate subgroup performance in a meaningful way into its A-F system, or at the very least monitor its data to ensure that its rules to identify schools with consistently underperforming subgroups are having their desired effects.
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?

Indiana’s overall goal creates high expectations for all stakeholders and focuses on what every parent wants for their child and what taxpayers and patrons expect from public education: “All Hoosier students will be college and career ready, allowing them to successfully embark on their chosen path in life.”

To achieve this, the state expects improvement from all subgroups and expects the greatest improvement from the subgroups that are performing at lower proficiency rates. Specifically, the state established proficiency targets based on current performance of each subgroup and expects larger improvements in the same timeframe from those groups with lower baseline proficiency rates.

Indiana also deserves credit for including historical data on past progress, although this data suggests that its goals would require larger increases for most student groups than they have achieved in the past. Additionally, the plan notes that due to changes in the state’s assessment system and the state’s high school diploma and only a limited amount of data on English learners’ English proficiency, the goals and interim targets in the plan will have to be reconsidered in the future. Indiana also discusses its State Systemic Improvement Plan for students with disabilities, which includes a specific goal for improving 3rd-grade reading achievement for students with disabilities.

Indiana’s plan would be strengthened by aligning the accountability system with the goals more clearly, as the goals don’t appear to be used in the broader A-F school rating system.

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?

Indiana is transitioning to a new assessment beginning in the 2018-2019 school year. The new assessment (called ILEARN) is an end-of-year, computer-adaptive summative assessment aligned to Indiana’s Academic Standards and will measure proficiency for English/language arts, mathematics, social studies, and science.
The change in assessments also means the state has little longitudinal data available. The state could strengthen its plan by providing additional detail on its plans for alignment and coherence going forward, and ensuring the new assessment will actually be ready in time for statewide implementation. Although Indiana’s description of its assessments and the way assessment results will be used to enhance student learning opportunities are impressive, it remains to be seen what actual benefit the new assessment scheme will bring to students and the improvement of Indiana’s education system. The state’s recent test procurement appeal adds further question marks.

In the meantime, Indiana is taking appropriate measures to assure accommodations are made for non-English-speaking students. Indiana has adopted WIDA ACCESS for English learners as the state’s annual English language proficiency assessment. With regard to subject matter tests in other languages, Spanish will be the only language offered. Although the state considers Spanish to be a “significant” language, it does not provide a specific threshold as to what defines a significant language. The state will also offer accommodations, such as translation guides.

Indiana mentions its alternate assessments for students with the most significant cognitive disabilities, but the plan would be strengthened if the state provided steps it would take to ensure that it does not exceed the 1 percent cap on participation in that alternate assessment.

**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?

Indiana’s indicators center on important outcomes (proficiency, growth, ELP, graduation rate, college and career readiness), which should focus schools on helping students meet academic targets and goals.

However, some of Indiana’s choices in how it plans to implement those indicators will weaken their effectiveness. For example, the use of chronic absenteeism is supported by research, but the specific indicator Indiana has chosen—giving schools credit for improving a student’s attendance by 3 percent a year—may not provide a sufficiently clear incentive for schools to focus on every student getting to regular attendance. It is also unclear whether the state will count absences due to suspensions/expulsions in this calculation, but doing so would strengthen the plan. Additionally, the plan would be strengthened if the English language proficiency indicator provided more information about the student-level growth trajectories.

At the high school level, Indiana deserves credit for attempting to incorporate both four- and five-year graduation rates, but the description of the calculation is somewhat unclear. It appears that the state is prioritizing the four-year rate and giving bonus points for improvements in the five-year rate, which is a strong approach. However, it’s unclear whether a school’s ultimate rating would merely reflect the five-year rate, which would not be as strong.
The state’s college- and career-readiness measure is positive and covers high-quality indicators of readiness, including passing an Advanced Placement or International Baccalaureate test, earning at least three college credits, or earning an approved industry certification. However, Indiana could strengthen its plan by incentivizing schools to offer a wider variety of college- and career-ready opportunities and by shifting this measure to include the entire 9th-grade cohort, not just graduates, which would ensure schools were not rewarded simply by having higher percentages of their lower-performing students dropping out. Additionally, Indiana should monitor its data to ensure that all of its options are comparable or to determine whether certain types of students are disproportionately likely to pursue certain pathways.

Finally, there are lots of moving parts to Indiana’s plan. As it acknowledges in the plan, “On-going research will be conducted to determine the reliability of the assessment with specific attention drawn to the repeatability of test scores across years administered.” The state deserves credit for acknowledging the need to reassess its indicators going forward, but this leaves some uncertainty about how exactly it will all be implemented.

**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

Indiana is planning to equally weight growth and proficiency at the elementary and middle school levels, which sends a strong signal about the importance of both of these measures. Indiana has included a progress measure at the high school level, which will send a signal about the importance of improvement.

Indiana also deserves credit for placing a substantial emphasis on students reaching grade-level standards. Its proposed measure of academic achievement—the percentage of students proficient in reading and math—is clear and easy to understand. Additionally, Indiana is proposing to use a relatively simple growth model called a “value table,” which gives students credit for advancing performance levels. This model is not as precise or sophisticated as some other alternatives, but the upside is that it provides clear, upfront signals to students, parents, and teachers about what constitutes sufficient growth in a given year. While not explicitly a growth-to-standard model, this growth measure does implicitly reward schools that are able to help students make continued progress every year.

The downside of this model is that it creates rigid cut points at the borders of the performance levels, and schools may choose to focus on students right on the cusp of a given level. Moreover, Indiana’s specific value table measure is somewhat concerning, since in certain cases it appears to give less credit for lower-performing students who make progress relative to higher-performing students, which could create unfortunate incentives. For example, a student who made growth at the 50th percentile as compared to their peers would be awarded different points if they were initially low-performing (75 points) versus if they entered the year at middle or higher levels of performance (100 points). Indiana could strengthen its plan by providing data to show whether this is a real concern or not.
**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?

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Indiana is planning to base its A-F school grades on school-wide averages, and it will not include the performance of individual subgroups as a separate weight in those calculations. The state will report on subgroup performance and use those scores to identify additional schools in need of “targeted support,” but the scores will not factor into school grades. This will likely allow schools with low performance for individual groups of students to still be rated highly in the state’s accountability system.

Indiana does use subgroup performance to identify additional categories of schools. In particular, it will define a school with persistently underperforming subgroups as a school with one or more subgroups with an overall accountability score at or below the lowest-performing 5 percent of schools for at least two consecutive years. However, the state has not provided data suggesting how many schools this rule might capture.

Indiana does, however, deserve credit for a few of its decisions affecting subgroups. For one, it will lower its minimum threshold for subgroups from 30 to 20 students. Additionally, the state includes a strong rule on participation rates. Indiana will multiply a school’s academic achievement results by its participation rate. If a school meets at least 95 percent threshold, the multiplier is one. Anything less than that reduces the school’s percentage of students attaining proficiency, which sends a strong signal that schools should make every effort to include all students. The plan would be even stronger if it included consequences for schools that miss the 95 percent participation threshold, overall or for particular subgroups.

Indiana’s decision to only consider students enrolled at the school for 90 percent of the school year as part of the proficiency rate calculation could end up excluding significant numbers of students from this calculation. The plan could be strengthened by providing some additional detail on the impact of this decision.

Indiana is planning to slowly phase English learners who have recently arrived into the United States into the formal accountability system. Those students will be tested in year one, but the results will not count for accountability purposes. In year two, their scores will only count toward the state’s growth measure, and those students will be fully included in their third year. The state is also proposing to include former English language learners in the English learner subgroup for up to four years after they are no longer receiving services. Since exiting students tend to have higher performance, the state should monitor its data to ensure it is not masking the performance of students who are still receiving services.
**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?

![Score: 3](image)

Indiana’s identification system is likely to capture the lowest-performing schools overall, since it will identify both schools with F grades and those in the bottom 5 percent overall, as well as high schools with low graduation rates, even if they are not rated F. Indiana has a clear method for identifying targeted support schools, but because Indiana does not include subgroup performance in the A-F grades, it is possible that schools with low subgroup performance will still receive high ratings and may not be identified for support. Additionally, the state’s accountability and assessment systems would allow schools with low subgroup performance to avoid serious consequences until the 2022-23 school year. That seems too slow, and the state would strengthen its plan by adding more urgency to the system.

Indiana will also create a list of “at-risk” schools that fall outside the lowest-performing 5 percent of Title I schools and secondary schools with graduation rates between 68 and 70 percent. This will provide a warning to schools that, though they face no consequences immediately, are on the verge of being identified for improvement activities. Indiana could further strengthen its plan by, for example, asking schools to draft improvement plans, or by making additional technical assistance available to these schools to prevent them from slipping into comprehensive support status.

**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?

![Score: 5](image)

Indiana has a strong plan to support its identified schools and should be a model for other states. The plan includes specific state- and district-level roles and responsibilities, from needs assessment to planning to selection of interventions and supports. Indiana’s criteria for making grants for school improvement are also clear and rigorous, and the state’s strategy for supporting districts with multiple low-performing schools is particularly promising.

The state seems to have well-thought-out courses of action for comprehensive and targeted support and improvement schools, and the state has delineated how it will award school improvement funds. The plan outlines the state’s efforts to help schools and districts, and it appears to be comprehensive and helpful (e.g. providing templates; outlining evidence-based approaches; providing models on how to use data to improve schools; offering targeted professional development; and facilitating technical assistance from partners). Additionally, the state has built in stakeholder engagement as a key element of the comprehensive needs assessment.
Indiana will first use its 7 percent set-aside dedicated for school improvement activities for planning grants to all comprehensive support schools in their first year of identification. The planning grant funds will be used to conduct a comprehensive needs assessment, develop a school improvement plan, and “ensure the required conditions (e.g., leadership at all levels, academic strategy, student supports) are in place to enable successful implementation” of the school improvement plan. The state will develop a model comprehensive needs assessment aligned to an evidence-based framework for school improvement; provide a recommended protocol for planning and conducting the comprehensive needs assessment, including strategies for stakeholder engagement; and define an optional menu of supports for districts and schools to support their planning and/or implementation of one or more sections of this recommended protocol.

After the initial year of identification, additional grant funds will be awarded on a competitive basis to applications using strong, evidence-based interventions. The state will also run a special school improvement grant competition for districts with four or more comprehensive support and improvement schools, which will help districts with particularly intense challenges.

For schools that continue to be identified for comprehensive support for four years, Indiana has a set of statutorily required steps directed by the state board. The board will hold public hearings and hear testimony concerning the following options for school improvement: merging the school with a nearby school that is in a higher school performance category under Indiana’s school accountability model; assigning a special management team to operate all or part of the school; approving the school district’s plan to improve the school through the creation of a transformation zone; approving the school district’s plan to improve the school through the creation of an innovation network school; implementing the state department of education’s recommendations for improving the school; examining other options for school improvement expressed at the public hearing; and closing the school. The board of education has the authority to decide which intervention a school must pursue and when it should pursue that intervention (it can delay for one year if students are making progress).

Finally, the state could strengthen its plan by indicating if and how it intends to provide direct student services using the optional 3 percent set-aside, which provides an additional opportunity for the state to align 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?

Indiana’s plan for schools to exit improvement status is a potential model for other states. Indiana’s exit criteria are quite rigorous, requiring that comprehensive and targeted support schools reach at least a C grade for the entire school or the low-performing subgroup, respectively, for two consecutive years before they are eligible to exit improvement status. This is likely to represent significant improvement, and maintaining that level for two years should help avoid the risk of backsliding after only one year of improvement. Additionally, the state says the school must “demonstrate a strong plan for sustainability.” This is a good idea, but the state could strengthen its plan by further defining how it would monitor what constitutes a “strong plan for sustainability.”

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?

Indiana has outlined a plan to modify and add to its accountability indicators over time based on feedback from stakeholders, including piloting culture and climate surveys. It seems like the state is very involved in assisting schools and districts in the improvement process, both at the beginning of the planning process and during plan implementation. The state appears to have a number of built-in supports and information for the schools and districts in need of support.

However, Indiana could do more to describe how it plans to adjust its statewide system based on data. What will be learned, on what schedule, and how will the analysis be reflected into a continuous feedback and improvement loop? Much of Indiana’s plan is in flux until the 2018-19 school year or beyond, so regular and ongoing review and adjustment will be of critical importance.