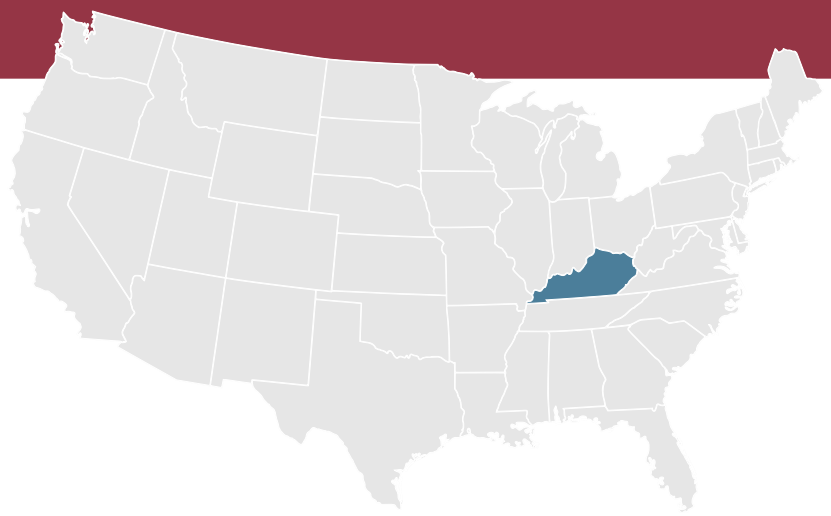


# An Independent Review of ESSA State Plans



## Kentucky

### *Project Overview*

**B**ellwether 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?

Kentucky submitted a thoughtful ESSA plan that is grounded in data and presented in a clear way for the “shareholders” the state wants to engage (educators, parents, and business leaders). The public could read the well-constructed introduction and readily grasp Kentucky’s intention and plan to close the achievement gap. The context and tone provided by the introductory overview is “invitational” and places its accountability plan in the broader state goals of ensuring every Kentucky student is prepared for life after high school.

Kentucky has selected strong and nuanced academic indicators that are designed to recognize growth and encourage focus on students at all levels of achievement, not just those scoring right around the state standard for proficiency. The plan includes strong emphasis on closing achievement gaps, which is reflected in its inclusion of a discrete indicator measuring progress toward closing gaps that will account for a significant portion of overall accountability scores and star ratings in the state’s five-star rating system. The state also deserves credit for a strong rule to encourage student participation and for using a small minimum group size of 10 students for both accountability and reporting purposes, which will help shine a light on subgroup performance.

Kentucky’s system goes beyond the minimum requirements in identifying schools for support. It extends the identification of schools for comprehensive support to non-Title I schools and sets a higher bar for identification based on graduation rates than the law requires. In addition, its criteria for identifying schools with underperforming subgroups for targeted support will capture more schools than the minimum threshold required.

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

Kentucky’s plan provides a strong foundation for its accountability system, but critical elements of its system are still undefined: A quality accountability plan will rest on the adoption and implementation of college- and career-ready standards and aligned assessments; the state’s goals are placeholders, pending new data tied to new standards; the overall weighting system for indicators is not yet finalized, and the ranges provided don’t allow for a clear understanding of how each indicator will factor into summative ratings.

Kentucky’s plan has tremendous potential, but there is uncertainty regarding the final form of several key components, and judgment must be reserved until those are complete.

# 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?



Kentucky’s plan includes a clear vision for the state, centered on preparing all students with the knowledge and skills to support their college or career choice upon graduation from high school. The plan’s introduction communicates the state’s values and delineates ambitious goals and interim targets, while also describing in detail the stakeholder consultation process used to develop them.

The plan lays out goals for the year 2030 that include significant increases in student achievement for all students. The state is beginning a comprehensive review of its standards and assessments. As a result, the plan indicates that these goals are placeholders that will be revisited when new baseline data is available in the coming years.

The state should be commended for establishing ambitious goals based on the current system and supporting those goals with data. Kentucky’s goals strive for a 50 percent reduction in gaps for achievement and graduation rates. Targets and interim goals for student subgroups are designed to reduce achievement gaps by requiring more rapid improvement for underperforming subgroups. While the long-term goals don’t eliminate gaps completely, if achieved, Kentucky would make substantial progress in closing achievement gaps.

Kentucky’s goals are ambitious, requiring improvement of more than 40 percentage points in 11 years for English learners and students with disabilities in several grade level and content categories. Improvement goals of more than 30 percentage points are common across grade levels and subjects for other subgroups. Goals for the all-students group require improvement of more than 25 percentage points in several content areas. The state provides some data projecting a trend through 2030 based on patterns in assessment results between 2012 and 2016, which indicate that the interim targets and 2030 goals would require a faster rate of improvement than Kentucky schools have historically achieved.

**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?

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Following legislative action in 2017 to repeal the Common Core State Standards, Kentucky is now embarking on a comprehensive review and revision of its standards and assessments. The plan provides extensive details on the standards revision process, including plans for stakeholder engagement, but the final results of that process are still up in the air. New standards will be completely adopted by 2021, though the first wave in 2017 includes reading and writing, math, health, physical education, computer science, and career studies. New assessments will follow. The Kentucky Core Academic Standards will remain in effect until new standards in relevant subject areas roll out.

The state’s current assessment system is based on state-developed assessments except for high school. Since 2011-12, the state has relied on ACT’s QualityCore end-of-course assessments in Algebra II, English II, Biology, and U.S. History. With a 2017 change in state law requiring that all assessments be state-developed, Kentucky has proposed that 2017-18 be a transition year while it field-tests new end-of-course assessments.

Kentucky’s current standards and assessments are benchmarked to college and career readiness as measured by NAEP and the ACT. Although Kentucky’s transition plan appears sound, the quality of the rest of the state’s ESSA plan rests on whether the new standards and assessments continue to meet that bar.

Kentucky does not offer assessments in languages other than English based on the rationale that no group of students reporting a home language other than English represents at least 5 percent of the student population. Kentucky does provide a number of testing accommodations and supports for English learners.

Kentucky could strengthen its plan by providing more information about its alternative achievement standards and aligned assessments for students with the most severe cognitive disabilities. Additionally, the state could further improve its plan by providing the steps it would take to ensure that it does not exceed the 1 percent cap for participation in the 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?

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Kentucky provides a detailed description of its accountability indicators and will include measures of proficiency, growth, transition readiness, achievement gap closure, graduation rate, English language proficiency, and a composite “opportunity and access” measure.

For the most part, these indicators are strong and display the state’s commitment to equity, educating the whole child, and having high-quality schools at all levels. The achievement gap closure indicator is particularly creative and elevates the system’s focus on the disparate performance of student subgroups. Kentucky also deserves credit for including science and social studies in its system, which should discourage narrowing of schools’ academic focus. However, the state will need to carefully monitor its data to ensure the combination of indicators produces a clear and meaningful assessment of school performance.

The transition readiness indicator measures the percentage of students deemed ready to transition to the next phase of education, work, and life. It is noteworthy that the state emphasizes the importance of key inflection points in students’ educational path, but absent additional components at the elementary and middle school levels this indicator will effectively double-count certain data (e.g. 4th-grade achievement results) and could create unintended consequences and behaviors in schools. Kentucky should monitor its data as the system is implemented to ensure this indicator adds value and increases the system’s ability to differentiate among schools and provide information to stakeholders.

At the high school level, the transition readiness measure is stronger, reflecting several markers of postsecondary readiness not captured elsewhere in the system. This measure assesses whether Kentucky’s high school graduates also meet one or more indicators of academic, career, or military readiness, demonstrating that there is more than one path to success in Kentucky. Examples of academic readiness indicators include earned college credit through Advanced Placement or dual credit courses. Students can demonstrate career readiness through a combination of industry certifications and approved career and technical education coursework or apprenticeships. Military readiness is measured by meeting the benchmark score for the Armed Forces Qualification Test and either enlisting in the military or completing training through the Junior Reserve Officers’ Training Corps (JROTC) program. Overall, the measure could be strengthened by focusing on cohorts of students entering grade 9, rather than just those who earn a high school diploma. The state also includes an English language readiness measure within the composite transition readiness indicator that credits reclassification as English proficient for any student receiving English language services in high school.

Kentucky's graduation rate indicator includes both the four-year- and five-year-cohort based rates, averaging the two rates for a combined indicator. While a simple average gives both rates equal weight in the accountability system, diminishing pressure on schools to promote on-time graduation, the state has added extra emphasis on the four-year rate by stating that any school graduating less than 80 percent of students in four years will be identified for comprehensive support.

Kentucky will measure progress toward English language proficiency based on growth in WIDA ACCESS scores year over year. The state will assign points based on a comparison of prior-year and current-year scores. Similar to the growth measure for reading and math, the scale assigns negative points for declining scores and positive points for increasing scores, with larger incremental point changes assigned to larger incremental score changes.

Kentucky also intends to combine a number of components into a single composite "Opportunity and Access" indicator, but the final slate of measures to be included is not yet finalized, pending approval by the Kentucky Board of Education. The composite indicator will reflect the total points across four categories of measures: rich curriculum, equitable access, school quality, and whole child supports. The inclusion of a locally (both school and district) determined accountability indicator is a sign that local community engagement and ownership are priorities of the state. However, by definition, this indicator will not be comparable across the state, which violates one of ESSA's requirements, and the state could accomplish both goals by putting this indicator on school report cards to provide communities with more context about their schools, as opposed to in the formal accountability system. More broadly, the list of potential measures in this indicator is lengthy and complex. While some options may well capture valuable data that add nuance to the system, the number of potential components and the uncertainty regarding how the indicator will ultimately be constructed raise concerns.

**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?



Kentucky should be commended for its combination of indicators that focus on students both reaching high standards and advancing over time across levels of achievement. The structure of Kentucky's indicators suggests a strong commitment to both progress and achievement. The primary proficiency indicator, which applies to all subjects including science and social studies, is based on a points system tied to the four achievement levels on state assessments. Schools receive points ranging from 0.5 to 1.25 for student performance at the Apprentice, Proficient, and Distinguished levels. The biggest gains in points between levels of achievement are credited for progress toward proficiency, and the scoring rubric ensures that performance at the Distinguished level cannot completely compensate for performance below Proficient. This structure provides strong incentives for schools to emphasize support for students who have not yet reached proficiency but also acknowledges continuous progress for students at all performance levels.

Kentucky’s growth indicator for reading and mathematics measures student progress relative to the students’ prior performance and based on progress toward proficiency. Growth over time is measured based on changes in annual reading and math assessments in grades 3 through 8. In addition, student performance is projected two years into the future. Those projections are then compared to actual performance, and schools earn points based on whether the student is “catching up,” “keeping up,” or “moving up” with respect to grade-level proficiency or higher.

However, Kentucky’s plan defers the establishment of final weights for each element of the system until after it completes its standards-setting process, opting instead to provide ranges of possible minimum and maximum weights for each indicator. As a result, whether or not the state balances emphasis on proficiency and growth in the overall accountability system remains to be seen.

**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?



Kentucky’s plan is commendable for its focus on performance and equity across student subgroups. But while Kentucky includes a number of elements that would help illuminate subgroup performance, the state could strengthen its plan to ensure all students are well served.

The state’s accountability system will include a dedicated Achievement Gap Closure indicator that will make up between 15 and 25 percent of school ratings and between 10 and 20 percent of district ratings. The measure represents a creative approach to highlighting the performance of student subgroups in its accountability ratings. However, Kentucky limits its use in identifying low-performing schools. According to the plan, Kentucky will rank schools based on a subset of academic measures that excludes the gap closure indicator and identify the lowest-performing schools based on that ranking for comprehensive support.

Kentucky has also not finalized all of the measures in its system, and thus did not provide any estimates for how many schools it would identify.

The state’s small minimum group size of 10 students for both accountability and reporting purposes should maximize the system’s ability to illuminate disparate performance among student subgroups while maintaining data privacy. This commitment to small group sizes is particularly important in a state like Kentucky, in which the vast majority of districts are small and rural.

If a student opts out of a test, Kentucky will assign the lowest reportable score on that test for accountability calculations for both the school and district. The plan would be even stronger, however, if it included consequences for schools that miss the 95 percent participation threshold, overall or for particular subgroups. Such a provision would help preserve the integrity of the state’s accountability system and ensure that all students are represented equitably.

In addition, the state’s proposed opportunity and access measure could add emphasis on equity of access to educational resources for all students. Several of the potential indicators listed in the plan focus on non-academic indicators that could reveal inequities across student subgroups. However, the indicator is not finalized yet, so it’s unclear how well it will both measure and convey information about equity to the state, schools, and stakeholders.

**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?



Kentucky deserves credit for committing to potentially identifying more schools for both comprehensive and targeted support beyond what the law requires. However, the state’s methodology is not yet finalized, and part of the identification methodology will consider only a subset of indicators and exclude the state’s achievement gap closure indicator.

To identify schools for comprehensive support, Kentucky will look to the cohort of schools receiving a one-star rating in the school rating system. The weights of the various indicators used to create its star rating system are still in flux, but the state will rank all one-star schools according to a subset of indicators that include proficiency, growth, and transition readiness. Kentucky will then identify the bottom 5 percent of Title I schools based on this ranking, plus any non-Title I schools that fall within the same range of performance. The identification methodology focuses on important academic indicators, but given the state’s emphasis on closing the achievement gaps, it’s unclear why Kentucky chose to omit its achievement gap measure in these decisions.

Kentucky deserves credit for going beyond the minimum requirement by including non-Title I schools. However, the plan does not specify how many schools, either Title I or not, will be identified based on this methodology. Further, the plan’s implication that the full 5 percent can be drawn from within the pool of one-star schools suggests that at least some one-star schools will not be identified for support. Kentucky also goes beyond minimal compliance in identifying high schools for comprehensive support by identifying any high school with a graduation rate below 80 percent based on its four-year cohort graduation rate, which is much higher than the minimal federal requirements. Additionally, the state will identify schools for comprehensive support annually, which increases the ability of the state to identify the schools and student groups most in need.



To identify schools for targeted support, Kentucky will use two relative thresholds. Tier one criteria will identify schools based on two years of underperformance of student subgroups relative to overall student performance in the lowest-performing 10 percent of schools. Tier two criteria will identify schools based on annually assessed underperformance of student subgroups relative to overall student performance in the lowest-performing 5 percent of schools. Here too, the state deserves credit for going beyond the minimal requirement, but Kentucky could strengthen its plan by providing information about the implications of these cut points.

**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?



Kentucky describes strong state support for working with schools to diagnose challenges, but there is little in the plan that addresses the state’s specific evidence-based or rigorous interventions.

Each school identified for comprehensive support will undergo an audit that includes assessment of leadership capacity, pays particular attention to the relative performance of student subgroups in the school, and provides specific recommendations for steps required to implement a successful turnaround process. The results of the audit form the basis for development of a comprehensive school improvement plan, including guidance on selecting evidence-based interventions, and the state provides training and access to an online tracking and reporting tool called eProve. The plan indicates that the state will provide mentoring, coaching, and support to school leaders and teachers in these schools.

Districts serving high numbers of schools identified for targeted improvement will also be connected to Hub Schools, which are schools that transitioned from low-performing to high-performing through successful turnaround processes.

Additionally, the plan leaves open the possibility of state takeover of management of districts with high numbers of persistently underperforming schools. However, no timelines for when this action may be considered are established in the plan.

Kentucky’s plan would have been stronger if it included additional details on how it plans to use its 7 percent Title I state set-aside funds dedicated to school improvement activities. Additionally, the state could have taken advantage of the opportunity ESSA provides to use federal funding for direct student services.

**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?

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Kentucky schools will exit comprehensive support once performance exceeds that of the lowest 5 percent of schools and they demonstrate continued progress on the indicators that drove their identification. Kentucky’s inclusion of demonstrated continued progress as an exit criterion is commendable and somewhat offsets the challenge of basing exit solely on a relative measure of performance that could enable a school to exit improvement status because other schools worsened, rather than that school showing actual improvement. However, the state is still working on those thresholds, and the plan does not yet specify any clear benchmarks for demonstrating improvement.

The state’s exit criteria for schools receiving targeted support are also relative—solely focused on student subgroup performance improving above that of the lowest 10 percent or the lowest 5 percent of schools, whichever was the relevant threshold for identification. The plan indicates that districts could require some targeted support schools to meet additional exit criteria, but that determination is left to districts. The plan’s lack of a definition for demonstrated progress for targeted support schools is particularly puzzling given the strong language throughout the plan prioritizing the closure of achievement gaps.

**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?

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Kentucky’s plan documents a robust process of stakeholder engagement, including numerous town hall meetings, diverse steering committees and work groups assigned to various aspects of plan development, and multiple opportunities for engagement around the state over months. In addition, the plan describes the process of rewriting all its academic standards and commissioning new state-developed assessments that the state has just begun. That process will include national experts, emerging best practices from across the country, and stakeholder engagement, and will necessarily inform revisions to state goals and benchmarks and standards referenced throughout the plan. However, the plan does not define an ongoing process of continuous improvement specific to the plan itself beyond cases where it cites unfinished work, primarily related to completing technical analyses to underpin standards setting for some indicators. Given Kentucky’s clear commitment to qualitative and quantitative data, this plan could be strengthened by articulating how the state will use this information to inform its policies and practices moving forward.