An Independent Review of ESSA State Plans

Minnesota

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?

Minnesota put forth a solid plan to build on a compelling vision for its K-12 education system. The state set ambitious goals to raise achievement and narrow achievement gaps. Minnesota also took a step in the right direction by including a strong weighting for the results of individual groups of students in its school rating system.

The state should also be recognized for revising the vision for its department of education, placing a significant focus on equity and stakeholder engagement. The state will also go beyond the law's minimum requirements to identify additional struggling schools. Moreover, the state provides detailed estimates of how many schools it would identify under its various identification rules, including the type of school (grade level and Title I versus non-Title I), the geographic region of the school, and, where relevant the low-performing subgroup for which the school was identified.

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

While Minnesota's plan has a number of elements aiming to address equity gaps, its plan has a few places in need of further explanation. Given the state's multiple identification rules, it should work to ensure school leaders and parents can understand why a school earns a particular rating and what it needs to do to demonstrate success. Additionally, the state will be including higher-performing groups in the accountability system, what the state calls “counter groups,” such as students without disabilities and non-low-income students, which could lessen the impact of its focus on historically underserved groups of students.
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?

![Rating Scale]

Minnesota set ambitious long-term academic and graduation goals of a 90 percent rate for all students, with no student group rate below 85 percent by 2025. The state should provide data and evidence to demonstrate that these goals strike the appropriate balance between ambition and feasibility.

The state’s goals and interim targets are aligned with one another, and given the evidence provided in the plan appear to be fairly ambitious. However, within the state’s accountability system there’s no clear consequence for schools or districts for failing to meet the goals, which may undermine their role in incentivizing change. That’s especially important given the low baseline proficiency rates for historically underserved student groups—right now, it’s not clear how the state department of education will get those groups to 85 percent by 2025.

The state’s English language proficiency goal is for 85 percent of English learner students to make progress in achieving English proficiency by 2025. Students are considered to be making progress toward proficiency if they reach or exceed their annual individual target goals on the ACCESS 2.0 assessment. The state bases this goal on past English learner performance data.

Minnesota also deserves credit for setting additional goals. The state set goals for 3rd-grade literacy and 8th-grade math. For both indicators, the goal is an achievement rate of 90 percent with no student group below 85 by 2025. As the state’s school quality indicator, Minnesota set an attendance goal of 95 percent for all students with no student subgroup below 90 percent by 2020.

Minnesota’s vision for its K-12 system places significant emphasis on increasing equity and closing achievement gaps. Minnesota should also be applauded for clearly defining what equity means and for recognizing the challenges posed by structural and institutional barriers. The state set ambitious goals aligned with these values, but could capitalize on them more by having them inform decisions about which schools require support/intervention.
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?

Minnesota's English language arts standards are based on the Common Core State Standards. The state's math standards are based on Minnesota's Academic Standards. Although its ESSA plan does not include much information about assessments, Minnesota will use the Minnesota Comprehensive Assessments (MCA), the Minnesota Test of Academic Skills (MTAS), and ACCESS 2.0 for English language proficiency.

The state determined that Spanish, Somali, and Hmong are all languages other than English that are present in the state to a significant extent. Beginning in 2018, Minnesota will provide translations of academic words for the math and science MCA assessments in Spanish, Somali, and Hmong. Minnesota should be recognized for providing translation accommodations in paper and online exams across three languages other than English and for its commitment to continue to explore other options to support English learner students, including audio translations and translating supporting documents.

Minnesota should strengthen its plan by including information about how it plans to meet the 1 percent cap on alternate assessments for students with the most significant cognitive disabilities. Similarly, Minnesota could further strengthen its plan by providing more information about its alternative achievement standards and aligned assessments for students with the most severe cognitive disabilities.

It is positive that Minnesota will include students who are eligible to but do not participate in the statewide assessment system toward the school's overall academic achievement score. That said, the state could strengthen its plan by clearly identifying schools that miss this mark.

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?

Minnesota plans to use a small set of indicators to assess school, district, and student performance. These measures include academic achievement, academic progress, graduation rates, progress toward English language proficiency, and chronic absenteeism. These indicators are aligned with the state's goals and will provide useful information about student and school success.
The state's graduation rate indicator is based on the four-year and the seven-year adjusted cohort rate. By using both measures, Minnesota hopes to both encourage on-time graduation and incentivize schools to graduate students who may need additional time. The four-year rate is weighted higher than the seven-year rate, giving a higher relative weight to on-time graduation. The state may want to monitor its data to ensure that including both rates does not deemphasize the focus on on-time graduation if a school's seven-year rate is high enough to offset the four-year rate.

In addition to student achievement and growth, Minnesota plans to use a measure of attendance as its school quality or student success indicator, at least in the short term. It does not appear that this measure captures student absences due to suspension.

The state is considering, however, whether in the future to include in-school suspensions as within the chronic absenteeism indicator. Minnesota is exploring—due in large part to stakeholder input—the possibility of including other measures. For example, in 2020-21, the state plans to add a measurement of equitable access to a well-rounded education, including high school courses focused on college and career readiness. Expanding the indicator would result in greater alignment with the state’s vision and goals.

The state will also include a strong indicator measuring English language proficiency. Student targets are based on their entry grade and performance level. Depending on their entry level, students are afforded a maximum of seven years to reach English proficiency. Points are awarded on a percentage basis, and students who reach 70 percent of their targets receive 70 points. Targets are updated annually based on students’ progress in the prior year. However, if a student misses his or her target, the goal remains the same.

**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?

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Minnesota’s academic achievement indicator is based on the percentage of students who meet or exceed standards in English language arts and mathematics. Formerly, Minnesota gave partial credit to students who did not fully meet standards, but it will no longer do so; its new approach sets a higher standard.

For elementary and middle schools, Minnesota will use a growth-to-proficiency model that awards points based on students improving through achievement levels on state math and English language arts assessments. The way that this system awards points is structured such that those students who make the greatest growth earn the most points. Furthermore, the system awards significantly more points to schools that move students from failing to meet standards to meeting standards.
Minnesota also deserves credit for ensuring that all schools in the bottom 25 percent on these indicators (plus English language proficiency and graduation rates) will be identified for additional support from the state’s regional support centers. They will also have access to additional networking and training opportunities focused on needs assessments and continuous improvement plans.

**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?

1 2 3 4 5

In determining how many points schools earn for each indicator in the accountability system, Minnesota will average the results across all qualifying subgroups of students (as opposed to looking solely at a school-wide average). The state will use a minimum threshold of 20 students to determine if schools should be held accountable for the performance of subgroups. However, in addition to including federally required subgroups, Minnesota includes higher-performing “counter groups,” such as students without disabilities and non-low-income students, which will water down the benefits of weighting each historically underserved group equally.

What’s more, Minnesota is using a normative, rankings-based system to identify schools for improvement. While that may help to identify the schools with the absolute most need, it might ignore schools with low performance that happen to fall just above the cutoff for identification (overall or for a group of students) to improve. While any accountability system will have cutoff points, the challenge with a normative system such as Minnesota’s is that the threshold is based on a school’s performance relative to other schools in the state rather than an objective performance outcome such as college-and career-readiness. In this kind of system, it’s possible for students to appear as though they are performing well when in fact they are not on track to be ready for college or career after graduation.

The state also plans to include English learners who achieved proficiency as members of the English learner subgroup in its accountability system. Although this will tend to inflate the scores of those English learners who continue receiving services, on its state report card Minnesota will disaggregate the data to allow the unique performance of current English learners to be identified.
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?

1. Minnesota has a unique method for identifying low-performing schools, and the state deserves credit for going beyond ESSA's requirements both in terms of the number and types of schools identified. Moreover, the state provides a detailed appendix with estimates of how many schools it would identify under its various rules, including the type of school (grade level and Title I versus non-Title I), the geographic region of the school, and, where relevant the low-performing subgroup for which the school was identified.

2. Still, there’s a concern that Minnesota's approach won’t provide sufficient incentives for improvement or clear front-end transparency for schools. While Minnesota’s approach is thoughtful for identification purposes, it may be difficult to explain to families, educators, and the broader community, which may ultimately undermine its ability to incentivize change.

3. The state will sort schools into categories based on their performance and need of support. To identify the lowest-performing 5 percent of Title I schools for comprehensive support, Minnesota will use three-stage processes that vary somewhat by grade span. The first step for elementary and middle schools is to identify the lowest-performing quarter of Title I schools in terms of math, English language arts, or growth toward English language proficiency. In the next step, the state will identify from among that subset of schools those within the lowest quarter of either math progress or reading progress. Finally, among the even smaller group of Title I schools, the state will identify the 5 percent (from among the total number of Title I schools) with the lowest attendance rates.

4. The process is similar for high schools. The major difference is that the second step is based on school graduation rates and is bifurcated to accommodate both the four- and seven-year graduation rates. Thus, after identifying the lowest quarter of schools based on achievement, the state then identifies the lowest half of schools based on the four-year cohort graduation rate. From within that subset of schools, the lowest half will be identified based on the seven-year graduation rate. The final determination among those schools is based on attendance.

5. To identify schools for targeted support, Minnesota compares subgroup performance against the 25th percentile of the bottom quartile of all students in math and English, as well as English language proficiency. For graduation, the state will compare subgroup performance with the 50th percentile of the bottom quartile of the all-students group. Finally, the state will identify schools for additional targeted support if they have a subgroup of students whose performance is below the average of all students in schools identified for comprehensive support.
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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Minnesota proposes a tiered approach to school support and interventions, and the state outlines the theory, structure, and approach to its school improvement system. It also sets a clear timeline for improvement that indicates when schools and districts will receive various types and intensities of interventions.

The state’s plan describes two main avenues of intervention. The first is support from Regional Centers of Excellence, and the plan provides statistics on the centers’ past track record in supporting school improvement. The second is competitive grants for districts with the highest proportions of schools identified for comprehensive or targeted support, but it’s not clear what exactly districts might do with the funds.

Although Minnesota describes how it will increase state capacity to support school improvement, it is unclear whether the capacity described will be sufficient to support effectively the number of districts and schools in need of improvement.

In addition, the plan suggests that the entire 7 percent school improvement set-aside will be for grants and for Regional Centers, which may leave districts that have a lower proportion of schools identified without external support and without resources to boost their internal capacity. Additionally, it’s unclear from the plan what the funding balance will be between competitive grants and Regional Center support, or what would constitute sufficiency for either. Finally, the state has chosen not to provide direct student services using the optional 3 percent set-aside, which would have provided the state an additional opportunity 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?

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Despite relying on a rankings-based identification system, Minnesota requires schools identified for improvement to do more than simply no longer qualify in the next round of identification. In addition to no longer meeting identification criteria, both comprehensive and additional targeted support schools also have to improve on all indicators that led to identification, and to demonstrate higher proficiency rates and progress toward English language proficiency than the 25th-percentile Title I school.
The state could build on this solid start by specifying how much improvement is needed and how that will be defined. For example, rather than pegging its exit criteria to the performance of the future 25th percentile, the state could use the current level of performance at the 25th percentile as a clear target for schools to shoot for. In addition, the state should consider setting exit criteria for targeted support and improvement schools (in addition to comprehensive and additional targeted support schools).

**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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Minnesota’s continuous improvement plan lacks details. The state’s plan includes several references to continued stakeholder engagement. For example, the plan highlighted engagement related to assessments and school recognition. The state also described insights from the stakeholder engagement Minnesota conducted prior to submitting the plan. However, the plan does not include a comprehensive plan for ongoing stakeholder engagement to revise the plan as needed, nor for learning from implementation efforts and modifying as needed.