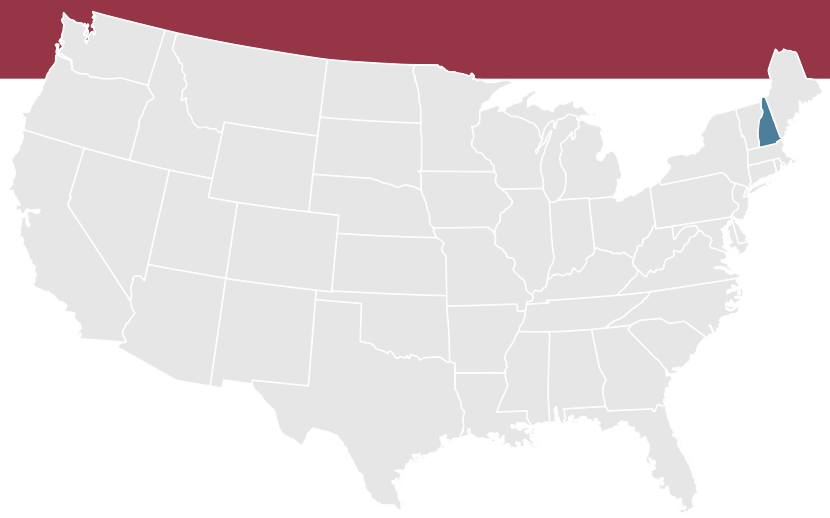


# An Independent Review of ESSA State Plans



## New Hampshire

### *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?

New Hampshire is considered a national leader in the development of a student-centered system that asks all stakeholders to contribute and that applies competency-based models to emphasize a broader set of student skills. The Performance Assessment of Competency Education (PACE), though still in the pilot stages, has generated a great deal of excitement. This statewide vision of a system that supports personalized learning with student success based on mastery feeds into the state’s strategic goals and, in turn, its ESSA goals. New Hampshire is also committed to continuously improving its system over time based on implementation and historical data.

New Hampshire additionally proposes using a straightforward performance dashboard on its school report cards, with a common 1-4 scale across indicators, to communicate school performance on a focused list of accountability indicators to parents and the public, with a strong emphasis on student growth, achievement at different performance levels, and demonstrating postsecondary readiness in multiple ways.

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

New Hampshire’s embrace of innovative approaches comes with trade-offs. For example, it is unclear what assessments the state will be administering to all students in grades 3-8 in the upcoming school year, whether they are aligned with the state’s college- and career-ready standards, and whether there is comparability between the statewide test and the PACE assessments some districts will administer instead. In particular, peers were concerned that students in non-PACE schools might not be taking statewide assessments in grades 3-8 in the coming year.

While its accountability measures are generally strong, New Hampshire’s process to identify schools also lacks sufficient information to determine how indicators are aggregated and whether the threshold is appropriate to ensure the schools most in need, and with struggling subgroups, are identified. A composite rating or average may be more intuitive to understand as a guide to school identification. In addition, once schools are identified, New Hampshire’s planned interventions lack specificity, and the state plans to distribute all of its funds intended for school improvement via formula. While respecting local decisions regarding school improvement, the state could be more concrete in its plans to provide resources, supports, and guidance on evidence-based interventions in addition to partnering with an external entity.

New Hampshire’s plan also appears to include a few ideas that could inhibit equity and high standards for all students. For instance, the long-term goals for subgroups do not seem particularly ambitious, given the achievement gaps across the state. And the state proposes to use only the five-year graduation rate in its graduation indicator, de-emphasizing on-time completion and at odds with its focus on postsecondary readiness.

## 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?



New Hampshire has a clear vision for student outcomes: 65 percent of its working-age adults will have a postsecondary credential by 2025. This vision is rooted in the state’s shift to more competency-based approaches to instruction, informed by significant stakeholder engagement, and is the basis for its achievement and graduation goals. New Hampshire’s plan could be a model for others as it moves towards personalized, student-centered learning.

That said, alignment between the state’s focus on college- and career-ready competencies and its ESSA goals could be improved. The state is aiming for 94 percent of students to graduate on time, yet its achievement goals only expect 74 percent of students to be proficient in English language arts and 54 percent in math. The gap between graduation and proficiency will need to narrow in order to ensure students are on a path toward postsecondary success.

New Hampshire deserves credit in its plan for including analyses of historical data across the state to demonstrate how its goals were set in order to expect larger-than-typical gains for students overall and for subgroups, including English learners and students with disabilities. But New Hampshire has, perhaps, set goals that are more realistic than ambitious; for example, achievement gaps of 30 percentage points between groups of students are only expected to close by three or four points over the seven-year goal period, and graduation gaps of 15 points are expected to close only by a percentage point or two. In addition, New Hampshire’s goals do not expect *any* improvement for higher-performing subgroups in some areas, such as for Asian students in math.

New Hampshire has set goals for English learners toward English language proficiency (ELP) using a growth-to-proficiency model, based on student growth percentiles, and expects all English learners to achieve ELP within five years. The state’s seven-year, long-term goal is for all schools in the state to achieve a percentage of English learners making sufficient progress equivalent to the schools at the 75th percentile, currently 26.1 percent. This methodology for setting ELP goals is sound, but reveals that New Hampshire must do more to support high-quality instruction for its English learners so that the majority, not merely a quarter, of students make adequate progress each year.

**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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While New Hampshire’s high standards have remained in place, its assessments have undergone significant changes, especially as the state has focused attention on its innovative Performance Assessment of Competency Education (PACE) pilot in several districts, where New Hampshire has a federal waiver so that students only take the statewide test in English language arts (ELA) and math once in each grade span and PACE in the remaining required grades. Going forward, the state will no longer give Smarter Balanced assessments as its statewide test and plans to use new ELA, math, and science tests in 2017-18; however, the new statewide system is not described in the ESSA plan and greater detail is needed. Because its statewide tests are an unknown commodity, the plan could be improved by outlining the timeline for developing the new tests and the grades in which they will be given in non-PACE vs. PACE districts; how the state ensures alignment between the new assessments and its standards; and the steps the state is taking to verify continued alignment between the new assessments and PACE to ensure the results are comparable and valid. New Hampshire must assess all students annually in grades 3-8 and once in high school on the statewide test, even if PACE is being used instead in some districts. Many of the peers were concerned that the state might not have a statewide assessment in place for grades 3-8 moving forward.

New Hampshire also recently began using the SAT as its high school test. While the SAT is familiar to students and families, and recognized at colleges across the country, absent an independent review, we don’t yet know whether the SAT is fully aligned to the state’s standards. It is also unclear how the state will ensure there are appropriate accommodations in place for English learners and students with disabilities. Offering the SAT as the state’s official test comes with many benefits, but some of those key benefits may not extend fully to all students who require accommodations (e.g., receiving college-reportable scores). In addition, the state could strengthen its plan by providing more information about its alternate achievement standards and aligned assessments for students with the most severe cognitive disabilities, including the steps it will take to ensure that the state does not exceed the 1 percent cap on participation in the alternate assessment for students with the most significant 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?

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New Hampshire has chosen a solid list of indicators: an academic achievement index, academic growth for all students and the lowest-performing students, college and career readiness, graduation rates, and progress on English language proficiency (ELP). However, while it has made some strong choices, New Hampshire’s use of five-year graduation rates instead of the four-year rate is highly problematic and de-emphasizes on-time completion, and the state may also face challenges regarding statewide comparability of achievement and growth data from two different assessments (the new state test and PACE).

New Hampshire will use an index to measure achievement in reading and math, with students awarded one point for each performance level (i.e., an advanced score at level 4 is four points, while a proficient score of level 3 is three points). This index will also apply to performance levels on PACE assessments in participating districts, though the ESSA plan does not directly address comparability between PACE results and results on New Hampshire’s state assessment. New Hampshire will also measure progress over time on these assessments in its growth indicator for elementary and middle schools for all students, and in a school quality indicator for the lowest-performing quartile of students—showing the state’s commitment to closing gaps. The state has set a more rigorous target to earn higher point levels on the school quality measure to reflect the urgency with which lower-performing students need to catch up to grade-level standards.

In addition, the state is using mean Student Growth Percentiles (SGP) in its ELP indicator for English learners. While the approach is a reliable one, it is misaligned with the growth-to-proficiency model used for its statewide goals and may de-emphasize focus on whether growth is sufficient to reach ELP.

For high schools, only the five-year graduation rate will be used, which is out of sync with its long-term goals and ESSA. While schools need to have a high five-year graduation rate to receive a score of three or four on this indicator, New Hampshire’s goals are based on the four-year rate. New Hampshire misses a critical opportunity to incentivize on-time graduation and align its goals with its indicator and identification rules. Further, as New Hampshire’s plan indicates that half of high schools already earn a level 4 on this indicator, it is hard to argue against adding a more rigorous graduation rate measure.

The state’s college- and career-ready indicator, however, is a bright spot. This measures the percentage of graduates who demonstrate readiness for college, career, or the military in at least two ways. New Hampshire should monitor its data to ensure each possible measure aligns with later success, but it deserves credit for pushing in a direction that allows all students to demonstrate advanced skills along multiple pathways, such as through dual enrollment, Advanced Placement and International Baccalaureate courses, ACT/SAT assessments, industry-recognized credentials, and the ASVAB.

**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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New Hampshire's plan places a strong weight on student achievement and growth in elementary and middle schools. It proposes to include an indexed measure of student achievement (with more points awarded for advanced scores, then proficient, and so on), a normative growth model for all students based on Student Growth Percentiles (SGP), and a second normative growth model measuring the average SGP of the lowest-performing 25 percent of students in each school. The state plans to give slightly more weight to its growth indicators (60 percent) than its achievement indicator (40 percent) when identifying schools, although the exact mechanism for applying these weights is not clear from the plan.

One challenge with both the achievement and growth indicators, however, is that some students are assessed on the state test and others on PACE. For example, in districts not participating in PACE, the state will measure growth using SGPs, which compare the progress students make against similarly performing peers. A school's mean SGP will then be translated into a 1-4 point score. Then, schools assessed on PACE will get growth scores based on a value table (i.e., a certain value awarded to students for changes in their performance level on assessments year-over-year), and those scores will be converted to the same 1-4 point scale. Although the specific value table has not been developed yet, this process raises comparability concerns.

SGPs are relatively simple to calculate and interpret, but they do not ensure students cover the content they need to master to stay on track toward college and career readiness at graduation. While New Hampshire does measure mastery in its achievement index, the index gives some credit for students not yet attaining state standards. That choice—in conjunction with placing a strong weight on SGPs—could dilute the benefits of having high standards. That said, New Hampshire clearly tries to recognize performance across a broad spectrum, including students scoring at the highest levels. It will be critical for the state to ensure its achievement index does not mask performance of lower-performing students; for example, the state could report the percentage of students scoring at each level, as vastly different score distributions could lead to a similar average on the 1-4 scale.

**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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New Hampshire does not explicitly incorporate subgroup performance in awarding schools a 1-4 score on each indicator. The state’s inclusion of an indicator of student growth for the bottom quartile of students in elementary and middle schools may help capture some of these students, but without additional data in the plan, it’s impossible to know the overlap between individual subgroups and the lowest-performing subgroup.

Similarly, the state’s plan for defining chronic underperformance of subgroups to identify schools for targeted support lacks sufficient detail to determine whether it captures all schools that may be underserving these groups. This is mostly because the definition requires a subgroup to meet four separate criteria—which could set too high a bar: (1) There must be an achievement gap within the school (i.e., the subgroup must miss an annual target *and* the all-students group must meet that target); (2) The subgroup must be lower-performing in the school on that indicator than is typical statewide (i.e., the subgroup performs below the state average for the subgroup on that indicator); (3) The subgroup also demonstrates low growth on state tests relative to peers (i.e., its mean SGP is below the 50th percentile); and (4) The three conditions must be met for two consecutive years. This approach could be a sensible one, but New Hampshire does not provide any analysis regarding how many schools this approach identifies, and it is concerning that significant gaps exist, based on the state’s 2025 goals.

New Hampshire is a small and relatively homogenous state, demographically, and deserves credit for maintaining a low minimum number of students (11) to include subgroups in accountability and reporting. In addition, the progress in ELP indicator will be weighted (relative to growth for all students and the lowest-performing students) in accordance with the proportion of students in the school who are English learners. This could be a promising practice for other states, but it is complicated, and New Hampshire provides no data on the range of weights that result—it is possible that ELP could rarely be a meaningful factor, but also that it could drown out academic growth. Finally, the state uses a much higher minimum group size for participation rates (40 students). New Hampshire should provide a rationale for using a different number, which weakens its otherwise strong policies to incentivize participation in state assessments; at least 95 percent of enrolled students in a school are included in the achievement indicator, meaning that non-participants may be counted as zero.

**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?

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New Hampshire will report on each indicator using a 1-4 scale, which will be presented on a dashboard and could help educators, parents, and the public understand school performance in context. That said, the overall system is fairly complicated, given the number of indicators based on indices and the use of two different assessment systems; a single summative rating could be simpler and more streamlined, especially to help identify struggling schools. Instead, the state uses decision rules to place schools in one of three categories for support and improvement, or an “unidentified for support” category. These rules are also not based on the 1-4 scores across the indicators, adding a layer of complexity and reducing alignment between the indicators and identification process. In addition, the identification criteria for schools with low-performing subgroups are opaque and so stringent that it seems possible very few schools would be identified.

Comprehensive support includes the lowest-performing 5 percent of Title I schools, but the state’s business rules are not clear enough to determine if schools most in need will be captured. Elementary and middle schools will be identified by weighting achievement at 40 percent, and growth indicators (all students and lowest-performing quartile) and the ELP indicator (if applicable) at 60 percent. The specific method of applying these weights, however, is ambiguous as there is no composite score or ranking across the two factors. Similar questions arise with identification of high schools, except that high schools with a graduation rate below 67 percent are pulled out first, followed by those identified based on the achievement index (60 percent) and college- and career-readiness indicator (40 percent). It is unclear which graduation rate is used (four-year or five-year) and how the ELP indicator is considered.

The rules for identifying schools with consistently underperforming groups for targeted support also lack detail, particularly regarding the number of schools identified and their level of performance (as described earlier). The rules require a subgroup to meet *four* criteria, which may be an unreasonable standard. New Hampshire’s plan would be strengthened with data on how many schools are identified. Also, schools that have had a consistently underperforming group for two years and where that subgroup is performing similarly to the lowest-performing 5 percent of schools are identified for additional targeted support. Four years of low subgroup performance is far too long a timeframe to first identify these schools, and it is unclear how the comparison to the bottom 5 percent of schools will work.



**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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New Hampshire’s approach to supporting its lowest-performing schools lacks sufficient detail and is fairly modest. While school improvement funds from the 7 percent Title I set-aside are being made available to all identified schools via a formula, the supports may only be focused on a very few districts with multiple identified schools (only six of over 175 districts have had multiple schools identified in the past), and many of the planned interventions lack specificity. For example, New Hampshire is working to establish a partnership with an unspecified external entity to provide guidance, technical assistance, and monitoring to support the state’s improvement processes and help schools create an evidence-based plan. This could be a promising way of helping schools improve and building state capacity, but it is not clear what supports, if any, are directly provided by the state. New Hampshire should also indicate if and how it will provide direct student services using the optional 3 percent Title I set-aside, another way to leverage funds to help improve its low-performing schools.

In addition, it appears New Hampshire is considering PACE participation as a school improvement strategy. This warrants further explanation in the plan, as PACE requires a significant investment in educator and administrator capacity (which may be lacking in the identified schools) and would mean students in the school are no longer being assessed as frequently on state assessments—a key metric of progress. It also may be more effective as a district-level strategy than one suited for a single low-performing school, given the large shifts in instruction and assessments required.

That said, the state does describe a process for ensuring more rigorous, evidence-based interventions are implemented for schools that fail to exit comprehensive support, including by assigning a school review team, listening to community feedback, and requiring these schools use interventions meeting the two highest tiers of evidence in their revised plans. New Hampshire is also proposing to make sure schools previously in improvement under its NCLB waiver are subject to these more rigorous actions immediately if they are re-identified under ESSA.

**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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New Hampshire proposes to exit schools from comprehensive support when they no longer meet the entrance criteria for two years in a row, and expects these criteria to be met in three years—otherwise, the school must implement more rigorous interventions. While it is wise to look for multiple years of improvement to ensure

gains are more than a one-year trend, it is unclear (given ambiguity in the rules for identifying schools in the bottom 5 percent) whether a school could exit comprehensive improvement status simply by other schools getting worse, and not the school itself improving.

For schools in both kinds of targeted support, a school can exit if it no longer meets one of the four required criteria that are used to identify it in the first place. Thus, this approach could permit schools to exit status due to one factor (e.g., the subgroup is now performing above the state average for that subgroup) even if other factors that led to school identification remain (e.g., the mean SGP for the subgroup is still below the 50th percentile). Given that the bar to be identified for targeted support appears to be high, the bar for exiting status may need to be more rigorous.

**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?



New Hampshire has articulated several places where it plans to monitor implementation over time and make changes. For example, its plan to adjust its goals based on updated baseline data from new state tests suggests a commitment to continuous improvement, as does its work to identify additional indicators that will be reported to augment the state accountability indicators. The state is also committed to innovative approaches to instruction and assessment, embodied in its PACE pilot and attention to personalized learning and student-centered models.

The state appears to value community engagement within the school improvement process and commits to continuing to seek stakeholder feedback on implementation and using educators to disseminate effective practices. In addition to sharing information with districts, the state should also take care to gather this information for its own purposes; the state might find it helpful to develop some sort of overarching stakeholder group that provides feedback and helps it make decisions on the impact of the accountability system on school, district, and classroom practice at regular intervals as the system is implemented.