In partnership with the Collaborative for Student Success, Bellwether Education Partners, 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 writing their own reviews 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 April–June 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?

Vermont’s choice of indicators, emphasis on the growth of all students, and system of identifying comprehensive support schools are all promising. In particular, Vermont has successfully broadened the definition of school quality to include science, physical education and health, and measures of college and career readiness—while still using a relatively small number of high-quality indicators that will focus schools on what is most important to the state. The state’s goals and indicators appear to be backed by strong assessments and standards.

It is also worth noting that Vermont uses its ESSA flexibility in creative ways to attempt to hold schools accountable for students who would otherwise be overlooked. Finally, Vermont’s decision to incorporate both a school’s current score and its year-to-year change in a matrix approach is creative and will help the state identify the schools that are struggling the most.

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

Although Vermont is working to translate its plan for educators and parents, the overall complexity of its proposed system may challenge some stakeholders to understand the performance of their local schools. While Vermont’s matrix approach holds promise, it also relies on a number of arbitrary cut points that will be difficult for educators or the public to interpret.

Vermont’s system is also heavily weighted toward student growth at the exclusion of proficiency. Absent some checks against proficiency, it could leave low performers behind. More worrisome is the fact that Vermont’s plan may ultimately mask the performance of low-performing subgroups of students. Due to its small size and lack of racial diversity, Vermont proposes an “equity index” as a way to incorporate subgroup performance, but it does not show data on how that decision will affect schools in the state. Without seeing how this will translate in Vermont schools, it’s difficult to know how the state’s decisions will play out in its schools.

While Vermont’s plan to support low-performing schools seems to meet the federal guidelines, it is not clear how the state will develop a menu of evidence-based strategies linked to needs assessments of these schools. As the state moves forward, it should also consider how it will learn from implementation and make adjustments moving forward, particularly with respect to interventions in its low-performing schools.
Plan Components

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

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

1 2 3 4 5

Despite lacking a vision statement, Vermont established long-term goals that are set to a nine-year time frame. By 2025, Vermont would like its schools to have an average scale score that is at the midpoint of the proficiency range for each grade level they serve for both English-language arts and mathematics. The goal applies to all subgroups of students in both subjects, but the midpoint of the proficiency range may not be an ambitious target for all groups of students. Without additional context it is difficult to tell for certain.

While these goals may serve an important purpose in Vermont, the state’s plan lacks targets for students meeting grade-level standards. ESSA allows states to use other measures of achievement in their accountability system, and Vermont can certainly add other goals if it chooses, but ESSA specifically requires states to set proficiency goals.

Vermont’s graduation goal is for 100 percent of schools to have 90 percent of their students graduate within four years and 100 percent of students within six years. The four-year graduation goal is not very ambitious because the state’s current four-year graduation rate is close to 88 percent. The state acknowledges that the graduation goal might not appear ambitious, but it cautions that because the state is switching to a proficiency-based graduation system, it did not want to create a disincentive to successfully transition to this system. Vermont’s use of an additional six-year graduation rate should help drive improvements for students who may take longer than four years to graduate.
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?

Vermont’s adoption and implementation of the Common Core State Standards and the Next Generation Science Standards, as well as the state’s use of Smarter Balanced and a future science assessment developed by a consortia of states, shows a clear focus on college and career readiness across multiple subject areas. The state is also in the process of developing a science assessment to be used as one of its accountability indicators, and for English-language learners it is using the ACCESS assessment, which is also a high-quality assessment aligned to rigorous English-language proficiency standards. In addition, for the 1 percent of students with the most severe cognitive disabilities, Vermont will continue using the Dynamic Learning Map that is developed and used by a multistate consortium.

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?

Vermont provides an innovative approach to its school quality indicator, which includes science, physical education, career and college readiness, and postsecondary outcomes. These indicators are aligned to the state’s goals and will resonate with families concerned that a focus on math and ELA assessments could narrow the curriculum. They will incentivize schools to take a more holistic view of school quality.

At the high school level, Vermont is proposing to calculate an overall graduation rate indicator score based on the average of four-year and six-year adjusted cohort graduation rates. The state could strengthen its plan by giving stronger weight to the four-year rate in its accountability system, and not just average the two together.

Vermont’s college-and-career-readiness measure helps to mitigate some of the concerns related to the state’s formal assessment system ending in ninth grade. This indicator includes a wide variety of readiness measures for students who are planning different types of postsecondary pathways. Vermont gives schools a menu of options for this measure—SAT, ACT, AP, IB, CLEP, ASVAB, Industry Recognized Certificates—but the state should monitor its data to ensure all of these options are equally predictive of postsecondary success.

Moreover, this measure uses the total number of graduates as the denominator, which ignores students who have dropped out prior to graduation. Vermont should consider using the ninth-grade cohort as the denominator. At a minimum, Vermont should closely monitor dropout rates and the relationship between cohort graduation rates and the college-and-career-readiness measure.
**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?

Vermont’s accountability system places a strong emphasis on student growth over time, which can recognize schools for helping students progress, but it does not place any weight on whether students are meeting the state’s standards. In particular, it uses scale scores rather than proficiency rates and includes a growth model based on how much students grow compared with their similarly performing peers. Either of these measures could produce positive outcomes, but absent some check against proficiency, the system won’t be able to recognize low performance and will not ensure all students are meeting standards.

Additionally, Vermont plans to wait for three years before calculating its growth model, but it is not clear why it needs to wait that long.

**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?

Vermont’s use of an equity index as an additional measure will shine a spotlight on within-school gaps between groups of students. However, the proposed classification system is complicated, and, by focusing exclusively on school-level gaps, it might identify schools with higher overall performance. For example, a school with low-performing students in both historically disadvantaged and historically advantaged groups could have smaller gaps as compared with a school with higher-performing groups that are at the state average or above and yet have a larger gap. In addition, ESSA requires states to identify for targeted support schools with any low-performing subgroups performing at the level of the bottom 5 percent of schools overall, but Vermont has not articulated how it would satisfy this requirement.

Vermont might have a stronger plan if it looked at the schools with the lowest-performing historically marginalized groups in the state, or if it compared a given school’s historically marginalized group with the statewide average for historically advantaged students. Vermont could also consider incorporating its equity index into schools’ overall ratings, or incorporating subgroup performance more directly into the overall rating.
**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?

Vermont’s use of a matrix that evaluates both status and progress on the overall score is a way to identify schools for comprehensive support that are both low performing and not making progress. This strategy is likely to identify schools that are struggling on the most-important measures. However, the progress measure could be problematic given the limitations of the equity index as discussed above. It will be important for Vermont to clearly communicate what the various performance bands mean to schools and to run simulation data to ensure they are capturing schools most in need of support.

Additionally, as mentioned above, Vermont’s approach to schools with large achievement gaps—targeted support schools—may not meet the full definition required by federal law.

**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?

Vermont’s overall approach to supporting schools in the first stages of identification is a fairly light touch, and it is not clear it will lead to significant improvements. The main action for comprehensive support schools appears to be a Continuous Improvement Plan and a state-identified menu of research-based practices, with twice-annual monitoring. The strength of the state’s plan will rest on the strength of this unknown menu. Given that these are the bottom 5 percent of schools in the state, Vermont should consider more aggressive action with these schools.

Vermont is to be commended for articulating its willingness to assume administrative control or close schools (and require districts to pay tuition to another public or independent school) in the event a school does not exit comprehensive status after seven-nine years of consecutive comprehensive identification. However, even after six years without improvement, schools could still choose only modest interventions. Moreover, Vermont has missed an opportunity to articulate a plan for how it will be using the 7 percent of its Title I dollars that are intended for school-improvement activities.

The level of support that targeted support schools will receive from the state is also unclear. The districts have support responsibility and the state discusses a regional approach, but the state does not appear to be involved with monitoring these schools. There also does not appear to be a plan for increased support for targeted support schools if they do not improve.
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?

Vermont is planning to use the same matrix approach, discussed above, to identify when a school has made enough progress to exit improvement status. While this decision aligns with the rest of its system, it has pros and cons here as well. For example, this approach does allow schools to see how much progress they’ll need to make in order to exit improvement status (this compares with other states that rank schools on a comparative basis). However, the matrix itself could be confusing to educators, and they may not be able to interpret exactly what they need to do in order to exit improvement status. Moreover, it appears that Vermont may have set a low bar, because its proposed rules would allow a school to exit status based on the exit criteria and yet still be in the bottom 5 percent of schools statewide.

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?

Vermont did not include a plan for how the state will monitor ESSA implementation and ensure continuous improvement, but the state plan did show a regard for stakeholder engagement, and Vermont will be well-served by continuing that over time. To further strengthen its plan, Vermont could consider more explicitly focusing on learning from school-improvement efforts and engaging local stakeholders at the beginning of and throughout the improvement process.