

An Independent Review of California's Draft ESSA Plan

Following the first ESSA plan submissions to the U.S. Department of Education in April 2017, Bellwether Education Partners — in partnership with the Collaborative for Student Success — convened a group of 30 education experts to independently review 17 state accountability plans. During the review, the experts, who represented national and state perspectives from both sides of the aisle, identified best practices in providing a high-quality education for all students. A summary of the first round of reviews can be viewed at www.checkstateplans.org.

Because the first round of reviews was designed to help provide important context for the remaining state plans being submitted in September 2017, we conducted an interim review of California's draft plan dated August 8, 2017, using the same rubric and a process that closely mirrored our first set of reviews. We recognize that this represents a snapshot in time and that the state may make revisions prior to the plan's formal submission to the U.S. Department of Education. Given the size of California's student population and its diversity, we felt that feedback on California's plan is important in not only strengthening the state's final submission but also providing information for other states still writing their plans.

We intend to conduct full reviews of all second-round states following their final submissions in September. This interim review of California's plan is separate from that process.

Overall Strengths and Weaknesses

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

California's proposal is based on a positive vision for the state's education system that aims to prepare students to thrive in a multicultural, multilingual, and connected world. To realize this vision, the state adopted high-quality standards and assessments, and set high academic goals. Furthermore, California identified a high-quality set of accountability indicators that will measure student performance against college- and career-readiness benchmarks. While the state must take care to avoid unintended consequences, including suspension rates in its accountability system will send a message to schools and districts to pay attention to disparities in student disciplinary actions. Finally, the state appears to have solicited and utilized stakeholder feedback in the development of its plan.

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

California's plan includes several weaknesses that will limit its ability to effectively communicate with educators, parents, and other state stakeholders. The state's proposal for a "dashboard" accountability system will include important information about school and student performance, but it is unclear how it will be measured and incorporated into an overall measure of school quality. This is true both at the broad level, where California has not completed its approach to identifying low-performing schools — which it says it will submit to the U.S. Department of Education in January

2018 —and at the indicator level, where California has not specified definitions for chronic absenteeism or clarified how its college- and career-readiness indicator will combine various sub-indicators into one measure.

It is positive that California attempts to include both status and growth in its accountability system; however, the current method of measuring growth does not actually capture individual students' improvement over time. Instead, it only tracks year-over-year changes at the *school* level, which is susceptible to differences in the student population enrolled in a given school in a given year. The state should move quickly to adopt and implement an individual student-level growth measure.

It is also unclear how California would factor subgroup performance into school ratings, and the state has not yet estimated how many schools it anticipates identifying due to low subgroup performance. Relatedly, the state's specific accountability rules around defining a minimum subgroup size could be improved to more fully include subgroups of students in the first place.

California has also not articulated a strong system of identifying those schools making sufficient progress toward exiting improvement status. As currently proposed, schools could potentially exit improvement status without making any improvements.

Finally, the state's plan would be greatly improved by including more details about its system of supports and interventions, including the timing of any interventions, the funding allocated to low-performing schools, and any actions the state takes if district-level improvement efforts prove ineffective.

Plan Components

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

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The overall vision articulated in California's ESSA plan is for a single, coherent system that "values supports, and necessitates local control and responsibility to ensure that all students are prepared to live, work, and thrive in a multicultural, multilingual, and highly connected world." This is a compelling vision; however, the state may find it somewhat difficult to quantify and track district, school, and student progress toward realizing it.

California's academic goal is for all students and each student subgroup to achieve and sustain high performance. This corresponds with bringing all students to the performance of approximately the top third of achievement in the state. The goal is tied to scoring at least 10 points above level-three performance on state exams, which corresponds with meeting standards. The state has not yet determined the time frame over which schools must achieve this goal, or the time frame for schools identified for

improvement to make sufficient progress. As such, it's impossible to know if this goal is ambitious or achievable. The state has the same goal structure for its other indicators, and it is similarly unclear how much time schools have to reach any of these goals. Finally, this methodology means that schools that have already surpassed the goal for any given indicator will no longer have any performance goals at all unless they slip below the threshold.

The state's graduation rate goal of all schools reaching at least 90 percent is admirable, but roughly two-thirds of schools already meet that goal. The state's goals for English language proficiency, improving one level annually over five years, is ambitious and achievable.

The state does not set interim targets for its goals. Instead, each school can see where it falls on a 25-square performance grid for each indicator and determine how much progress it needs to make to reach the next goal. As in many states, whether or not schools hit their targets ultimately has no bearing on California's proposed school identification 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?

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California uses the Common Core State Standards for mathematics and English language arts. These are rigorous college- and career-ready standards. In 2014, the state established the California Assessment of Student Performance and Progress (CAASPP) system, which is based on the high-quality Smarter Balanced summative and interim assessments. In spring 2017, the state piloted its California Science Tests (CAST), which is aligned with the California Next Generation Science Standards.

California provided a detailed description of its accommodations for English language learners, particularly Spanish-speaking students. That said, the state could strengthen its plan by implementing a process to ensure that it is meeting the 1 percent cap on alternative assessments 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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California's proposed list of indicators is straightforward. Elementary and middle schools will be held accountable for status and change on the CAASSP in English language arts and math, chronic absenteeism, suspension rates, and English language proficiency. High schools are accountable for status and change on CAASSP in English and math, the

four-year adjusted cohort graduation rate, performance on a college- and career-readiness indicator, suspension rates, and English language proficiency.

The state's inclusion of school suspension rates as its school quality indicator will force schools to recognize disparate impacts of school discipline policies. However, the state should monitor its data to ensure that using this indicator does not lead to any unintended consequences, schools can respond in productive ways, and schools are defining "suspensions" in the same way and not simply replacing formal suspensions with other forms of exclusionary discipline. The plan would be improved by clarifying that the measure includes both in-school and out-of-school suspensions. Furthermore, because the results may differ among high, middle, and elementary schools, the state could clarify how it will translate the raw results into school accountability decisions. Similarly, chronic absenteeism is a strong indicator, but it could be improved if the state describes how it will define the measure, and it's unclear if chronic absenteeism fits ESSA's requirement for a second academic indicator.

At the high school level, California should be commended for including a college- and career-ready indicator. This overall measure currently comprises several components, including dual enrollment, Advanced Placement (AP) and International Baccalaureate (IB) exams, and CTE pathway completion. However, the plan could further address how these measures will be comparable statewide, and it does not include details about how the state plans to measure and assess progress across those metrics, nor how those indicators will be weighted to build toward an overall score. Finally, California should clarify the weight it will assign to the extended-year graduation rate and how it will relate to the four-year rate when it is finalized in fall 2018.

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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California measures status by the school-wide proficiency rate relative to a level-three score on its state assessments. It also measures change over time. These indicators are weighted equally. However, due to how California plans to initially assess change over time, the measure does not necessarily indicate that students are improving. Rather than measuring student growth, it may simply point out that a school's current group of students is different from past cohorts. According to the draft plan, the California State Board of Education is considering adopting an individual growth model by 2018-19, and we urge it to move forward quickly and shift to a measure that tracks student-level progress over time.

Also, for schools already performing above the state's goal, there is little incentive to reach toward higher levels, particularly because schools can have slightly worse performance from the first year to the next and still qualify as achieving its growth goals.

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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It is unclear how California's plan integrates the performance of subgroups into its dashboard. The plan indicates that all subgroups will be assessed with the same 25-square matrix for each indicator that schools are evaluated on, and that the data will be reported separately for subgroups. However, it's unclear how, if at all, those subgroup results will factor into a school's performance. It is also problematic that California plans to address the federally required 95 percent participation rate in state assessments by simply adding an icon to the dashboard for those schools that fail to reach the participation threshold. It is unlikely that this will provide sufficient incentive to ensure that 95 percent of all students, and each subgroup of students, participate in assessments at equal rates.

As required by federal law, the state says it will identify for targeted support and improvement all schools in which a subgroup of students would, on its own, meet the criteria for being in the bottom 5 percent of all schools. However, California has not provided any indication of how many schools would fall into this category. Moreover, the state has not identified a method to identify schools with "consistently underperforming" subgroups on an annual basis, as is required by law.

The state is also doing the bare minimum on defining what constitutes a sufficient subgroup size for accountability purposes. For accountability purposes, California proposes to use an n-size of 30, which is higher than that of many other states and means that potentially thousands of students won't be accounted for in schools where subgroups are smaller than 30. California's plan also notes its intent to use an n-size of 11 for reporting purposes, but it's unclear what metrics that would apply to or where the data would be reported. Additionally, California forgoes other strategies to count more students, such as averaging data over multiple years, which would be another way to balance the needs of statistical precision with the need to identify subgroups of students requiring additional support.

Identifying Schools: Is the state's plan to identify schools for comprehensive support and targeted support likely to identify the schools and student groups most in need?

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California proposes to weight each of its indicators equally, arguing it will provide more significant weight on the academic indicators because there are more of them. However, it is unclear how different levels of performance across different indicators will translate into a school's overall rating to clearly differentiate between schools.

The state's proposed methodology is based on multiple tiers of 5x5 matrices, one for each indicator. Each 5x5 matrix tracks five performance levels for status as well as five levels of change. The average status score is a school that achieves around level three on the state assessment. These schools are colored yellow. The average change score is also colored yellow and corresponds with little to no change from last year. For both measures, the highest scores are colored green and blue, while the lowest are red.

The matrix approach could be a promising way of combining multiple indicators; in its current form, however, California has not clearly articulated how it will combine a school's various scores across multiple indicators. This not only makes it difficult for educators to assess their own performance and determine how best to improve, but also it will be a serious challenge for parents and other stakeholders to interpret.

California has not yet finalized its approach to identifying low-performing schools and says it is waiting to finalize that methodology until it has new data in December 2018. As currently presented, the state would identify all schools that score red on all indicators, and those that score red on all indicators except one orange. This approach could potentially ignore some very low performing schools. For example, a high school could score red in both achievement and graduation rates but not be identified if it scored yellow (roughly middle-of-the-pack) on suspension rates. The state plans to identify schools with a graduation rate below 67 percent only if they fall below that threshold for three consecutive years. That could allow some schools with volatile graduation rates to escape identification. The state acknowledges its baseline methodology does not identify at least 5 percent of Title I schools, as is required by ESSA, and it will have to add additional color combinations in the future.

As mentioned above, California does not include subgroup performance in its school grading system. The state has also not yet specified a methodology for holding alternative schools accountable. Depending on the outcome of those rules, the state should make sure to avoid loopholes that allow schools and districts to improve their accountability ratings by sending more students to alternative schools.

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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California's draft plan provides only a general sense of its multi-tiered statewide system of support. The plan broadly describes how schools in each tier will receive support and technical assistance, and the state is developing a new grant application process that local school districts will use to explain how they will use federal funds to supplement goals and priorities identified under the state's Local Control and Accountability Plan (LCAP) submissions. In reviewing these LCAP addenda, the state says it will return any

district submission that's insufficient, but it's still unclear how the state would define "insufficient" in this context. The plan would benefit from significantly more detail about how the state will support underperforming schools and districts, a timeline for those interventions, and how the state will recognize when more rigorous interventions should be applied and what those interventions will be.

In this proposal, California indicated that it expects to receive nearly \$2 billion in Title I Part A funds in 2017-18. The state is required to set aside 7 percent of those funds (approximately \$120 million) for school improvement activities. However, it is unclear how it plans to distribute those funds, whether they will be allocated based on formula or through a competition, whether schools will be evaluated based on their plan's use of evidence, and what, if any, state priorities will be emphasized in those activities.

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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California plans to exit schools from identified status if they no longer meet the identification criteria. The identification process takes place every three years. This proposal is clear enough to explain, but it has a few significant weaknesses. First, it does not require identified schools to show sustained improvement, and a school could leave identified status simply because another school's performance drops significantly. In other words, a school may exit identified status without actually improving. Second, this proposal provides no upfront guidance for a school about what it needs to accomplish to demonstrate improvements. Rather than having a clear target, schools will be left to guess about what level of performance will be good enough in future years to exit improvement status.

California's plan would be greatly enhanced by requiring identified schools to show sustained improvement and providing schools with predetermined targets for which they should aim. Otherwise, the state risks simply shuffling schools in and out of comprehensive- and targeted-support status based more on statistical volatility than on real improvements.

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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California's plan appears to be founded on a "continuous improvement" theory of action. The 5x5 matrix for each indicator, for example, attempts to create a

performance continuum designed to incentivize school improvement. California could improve its implementation of this theory of action by providing clear and consistent incentives for improvement throughout its plan and by providing effective supports for those school struggling to make progress.

California should be commended for its outreach to stakeholders in the development of its ESSA plan. It should also be applauded for establishing a review committee, and for planning to add new indicators and review its accountability system and potentially revise goals after five to seven years. That said, the plan lacks important specificity about its continued engagement with key stakeholders *after* the state begins implementing its plan. The state would improve its proposal by clearly describing in more detail its process for gathering data and input along the way, for continuing to engage with stakeholders, and for modifying its system as necessary.