



TRENDS IN STATE ESSA PLANS:

EQUITY ADVOCATES STILL HAVE WORK TO DO*

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Maple Grove Elementary serves 780 students, about 50 percent of whom are White, 20 percent are African American, and 10 percent are Latino. About one-third of the students are from low-income families.

At first glance, Maple Grove Elementary seems to be a high-performing school: 85 percent of its students are on grade level in math, according to the state assessment; 79 percent are on grade level in reading. However, when we look beneath these averages, we see a more complex picture: While the school is getting 92 percent of its White students to grade level in math, for example, it's getting only 54 percent of Black students to grade level. And while getting over 90 percent of higher income students to state standards in reading, it did the same for only 53 percent of low-income students.

Maple Grove Elementary nonetheless received an A grade from its state.

Maple Grove Elementary is not alone. In schools and districts around the country, low-income students, students of color, students with disabilities, and English learners often face drastic inequities in resources and support, which in turn lead to lower outcomes for these groups.¹ Yet these inequities are too often masked by overall averages.

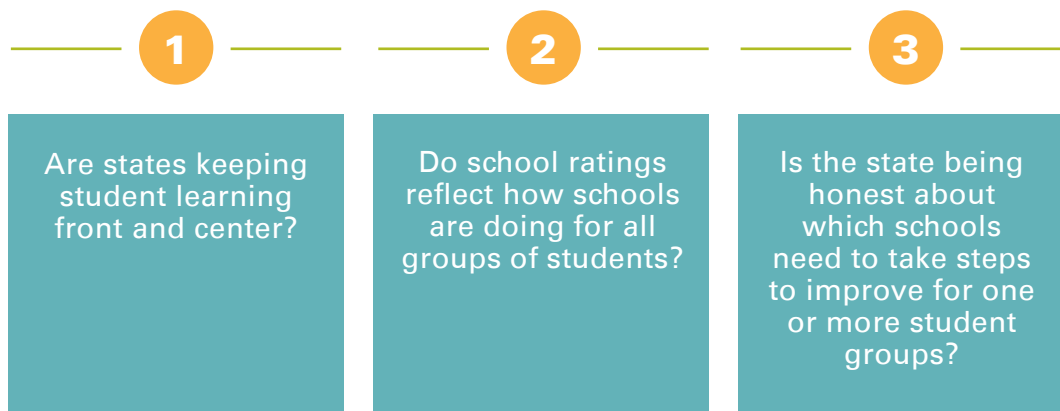
Strong school accountability systems can be a powerful tool for turning these patterns around — for sending a clear message that achievement of all groups of students matter and that to be considered good, a school must serve all groups of students well. But in recent years, many states put in place accountability systems that did just the opposite.² These systems masked disparities in opportunity and achievement rather than highlight them. Too often, these systems gave A's to schools like Maple Grove Elementary that might look just fine on average but that year after year underserve some groups of students.

By giving A's (or 5-star ratings, or labels like "Excellent") to schools with significant opportunity and achievement gaps, states communicate to parents and communities that these gaps are OK. And they risk denying students in these schools the attention they need and deserve.

The Every Student Succeeds Act (ESSA) offers state leaders the opportunity to change these policies and to refocus their education systems on improving opportunity and outcomes for young people that have been underserved for far too long. The law includes a number of important requirements to focus on equity in school accountability (see sidebar, *What Does ESSA Require?*). But it also leaves many key decisions up to states — decisions about what, exactly, to measure, how to communicate how schools are doing on those measures, how to identify schools that need to take action to improve for any group of students, and what to do to support school improvement efforts.

Over the past year and a half, a wide range of stakeholders have worked to shape, and subsequently, analyze state ESSA plans — involvement and attention that is crucial given how important the decisions reflected in these documents are. A number of national organizations have released reviews that explore various critical aspects of these plans.³

We at The Education Trust have also been closely following the decisions states are making in their new accountability systems. Our analysis of state ESSA plans focused tightly on three questions we believe are especially important in determining whether a plan is likely to promote opportunity and improve outcomes for all groups of students:



What we are seeing so far is not encouraging.⁴ For all of the talk about equity surrounding ESSA, too many state leaders have taken a pass on clearly naming and acting on schools’ underperformance for low-income students, students of color, students with disabilities, and English learners. Although state leaders, by and large, selected strong measures of school performance, many are choosing to base school ratings on overall averages, largely ignoring results of individual student groups. In other words, schools like Maple Grove Elementary will likely continue to get their A’s — and feel little incentive to focus on raising achievement for underserved student groups. Moreover, when it comes to identifying schools that need to improve for a group of students — such as low-income or Latino students — most state leaders are setting the bar far too low, further overlooking underperformance.

In the subsequent sections of this report, we dig into each of these trends in more detail and, wherever possible, highlight examples of states that are bucking these patterns. We hope that the answers to these three central equity questions can help advocates take advantage of strengths in their plans and keep a laser-like focus on pitfalls as state and local leaders shift from plan development to plan implementation.

**This brief draws heavily on the previously published article: Ryan Smith and Lillian Lowery, “Students Can’t Wait: Promoting Equity and Improvement through ESSA,” The State Education Standard: The Journal of the National Association of State Boards of Education (Alexandria, VA: NASBE, September 2017): 7-10.*

WHAT DOES ESSA REQUIRE?

Although ESSA gives states flexibility to create accountability systems that fit their local context, the law requires all states to hold schools accountable for the achievement of all groups of students. ESSA includes several key requirements related to how states measure school performance, communicate how schools are doing on those measures, and identify schools that need to improve. Below is an overview of these requirements; additional information is available on our website at www.edtrust.org and at www.studentscantwait.org.

The states must include the following indicators in their accountability systems:

- Student performance on state assessments in English language arts and math
- Graduation rates
- Progress toward English language proficiency for English learners
- Another academic indicator for elementary and middle schools
- An additional indicator of school quality or student success for all schools

States have to rate schools based on how they are doing on each indicator for all students and for each student group. Moreover, if a school is consistently underperforming for any group of students, its rating has to reflect that.

States must also identify three types of schools for support and improvement. These include:

- **COMPREHENSIVE SUPPORT AND IMPROVEMENT SCHOOLS:** Schools that are very low-performing (in the bottom 5 percent of Title I schools) for all students, or have low graduation rates
- **TARGETED SUPPORT AND IMPROVEMENT SCHOOLS:** Schools that are consistently underperforming (defined by state) for any group of students
- **ADDITIONAL TARGETED SUPPORT AND IMPROVEMENT SCHOOLS:** Schools that are very low-performing for one or more groups of students (i.e., doing as badly for a student group as the bottom 5 percent of schools are for all students)

Each of these types of schools must take action to improve. Districts must work with these schools to develop and implement improvement plans. If the lowest performing schools do not improve after a number of years, the state has to take action as well.

1

ARE STATES KEEPING STUDENT LEARNING FRONT AND CENTER?

What a state chooses to measure as part of its accountability system matters. That's because one of the key things accountability systems do is communicate expectations. If states measure the wrong things, they risk setting the wrong expectations. If they measure too many things, they risk setting too many expectations — thus having none of them matter. And if states measure things that cannot be measured for each group of students, they risk taking attention away from how schools are serving those student groups.

ESSA gives states new flexibility in choosing what indicators to use to measure school performance, as well as how much emphasis to place on each of the measures. While states have to hold schools accountable for assessment results and graduation rates, the law also requires them to choose at least one additional measure of school quality or student success.

In general, states have selected accountability indicators that keep student learning front and center. Most states are keeping assessment results at the center of their systems, continuing to focus on whether students are meeting grade-level standards in reading and math, as well as in some states, science and social studies. States are also measuring whether schools are making progress over time for individual students.

And beyond assessment-based indicators, most states whose plans we reviewed are choosing a limited number of measures that have the potential to add to the picture of how well schools are serving all groups of students. These indicators include:

- **CHRONIC ABSENTEEISM:** The most commonly selected indicator in states' proposed accountability systems is chronic absenteeism, which research shows is strongly correlated with student success and meaningfully differentiates between schools. **Ohio, Tennessee,** and **Minnesota** are just some examples of states using this measure.
- **MEASURES OF COLLEGE/CAREER READINESS:** Many states are selecting indicators that increase focus on students' preparation for college or a meaningful career. Such indicators include measures of access to/success in AP and IB courses, dual enrollment, CTE concentration and industry credentials. In states such as **New York, Kentucky,** and **Delaware,** schools are being held accountable for increasing access to and success in college-and-career ready coursework in order to prepare students for life post-graduation.
- **ON-TRACK RATES:** Another common trend among states is the inclusion of an on-track rate at the middle and/or high school levels. This measure looks at whether students are successfully completing a certain number or set of courses by the end of eighth or ninth grade, and may help draw schools' attention to students who are falling behind. **Louisiana, Washington,** and **Illinois** are examples of states that include this indicator.

Still, some states may be taking ESSA's flexibility when it comes to indicator selection too far. **Connecticut** and **Arkansas**, for example, each include more than 10 indicators in their accountability systems. With that many measures, there is a real risk that these states' accountability systems may provide schools with little incentive to improve any of them.

In addition, several states indicate that they have not yet finalized some of their accountability measures. **Louisiana**, for example, plans to develop an "Interests and Opportunities" indicator during the 2017-18 school year. Similarly, **Colorado** plans to consider adding indicators of school climate, postsecondary and workforce readiness, and social-emotional learning measures into its system. Both states plan to develop these measures in consultation with stakeholders. Education advocates will need to pay close attention to how these measures are defined; the quality, reliability and validity of the underlying data; and whether each indicator incentivizes schools to improve opportunity to learn for all groups of students.

2

DO SCHOOL RATINGS REFLECT HOW SCHOOLS ARE DOING FOR ALL GROUPS OF STUDENTS?

Whether they are labels — such as 1 to 5 stars, or “Excellent” to “in need of improvement,” — or A-F grades, school ratings communicate to schools, families, and the public whether a school is meeting expectations. Basing school ratings on how schools are doing for historically underserved groups of students — including low-income students, students of color, students with disabilities, and English learners — sends a powerful signal that the achievement of all students matters and that schools have a responsibility to serve all of their students, not just some.

Many state leaders have chosen to use clear summative ratings. That's important. But what's more important is what goes into those ratings — and that's where most states have faltered. Instead of basing ratings on how schools are doing for all groups of students, the vast majority of states whose plans we reviewed chose to assign ratings to schools based mostly or solely on schoolwide averages, ignoring schools' performance for individual student groups. Instead of shining a light on educational disparities, these rating systems risk sweeping inequities in opportunity and achievement under the rug.

Here are some of the most common challenges:

- **SCHOOLWIDE AVERAGES CARRY ALL OR MOST OF THE WEIGHT:** In many states, including **New Mexico**, **Florida**, and **Maryland**, ratings are based entirely on schoolwide averages — meaning the results of individual student groups don't count at all.

In other states, results of individual groups of students count a minimal amount, and only on some indicators. In **Arizona**, for example, schools can earn up to 6 percent of points toward their grades by improving assessment results for individual student groups. The remaining 94 percent of a school's grade depends entirely on schoolwide averages.

- **SCHOOLS GET RATINGS FOR EACH GROUP OF STUDENTS... BUT THOSE RATINGS DON'T COUNT.** Some states, including **Indiana** and **Washington**, plan to calculate overall school ratings based on schoolwide averages, but then separately assign schools a rating for each student group. This additional information may make it easier for parents, educators, and the public to see how well schools are serving individual groups of students. But because these student group ratings have no effect on a school's overall rating, they are unlikely to incentivize improvement for historically underserved groups. In Washington, for example, a school can still get an overall "9 out of 10" even while earning a "2" for how it's serving low-income students.

Similarly, as required by ESSA, all states are identifying schools that are "consistently underperforming" for a group of students for Targeted Support and Improvement (more on that below). But in the vast majority of states, that identification has no bearing on the rating a school receives. In other words, even schools that the state outright says are not meeting expectations for one or more student groups can still receive an "Excellent," an "A," or "5 stars."

- **CONTINUED USE OF SUPERGROUPS:** Instead of looking at results of each individual student group, some states are continuing to combine students from multiple historically underserved groups together into "supergroups." Both **Massachusetts** and **Connecticut**, for example, plan to base school ratings on schoolwide averages and schools' results for "high needs" students — a supergroup that includes any student who is low-income, an English learner, or a student with a disability. This approach allows the results of one group of students to mask those of another: Most schools in Massachusetts and Connecticut, for example, will have far more low-income students than students with disabilities or English learners, so the results of these smaller student groups can easily slip under the radar. What's more, treating different groups of students as a single entity ignores the unique needs and civil rights protections afforded to each group.

JUST AS BIG A PROBLEM – NO RATINGS AT ALL

Ratings based on schoolwide averages can hide disparities in opportunity and achievement. But the absence of any rating at all can do the same thing. Take **California**, for example, which chose not to assign ratings to schools, but instead to present a color-coded dashboard with data on how schools are doing for each group on each measure. Multiple data points might be fine if the state also provided a summary of how each school was performing, and if those data points were easy to understand. But California presents families, advocates, and the public with a range of indicators that are difficult to interpret. It is near impossible to gauge how well schools are performing either on average or for any group of students, and it's impossible to compare schools to one another. Without a clear signal of whether a school's results meet expectations, California's dashboard is more of a public reporting tool than an accountability system.

State leaders' decision to base ratings on overall averages means that in many states, schools will likely be able to receive high marks despite low outcomes and little to no progress for historically underserved students, sending a dangerous message to educators, parents, and students that such inequities are perfectly acceptable. Instead of clearly signaling that all students matter, these states' rating criteria do the exact opposite.

The good news is that some state leaders made decisions that buck these trends. Take **Tennessee**. Like New Mexico and Florida, Tennessee plans to assign A–F grades to all schools. But unlike those states, leaders in Tennessee chose to base 40 percent of the rating a school receives on results of low-income students, students with disabilities, English learners, and a “Black/Hispanic/Native” supergroup. School ratings will take into account how schools are doing for each of these groups on each of the indicators in the system. In addition, schools that qualify for an A, B, or C grade, but are identified for Targeted Support and Improvement will receive a minus next to their grade.

To be clear, Tennessee's system is far from perfect. As a coalition of Tennessee equity advocates that pushed hard for the 40 percent weighting has pointed out, instead of holding schools accountable for results for Black, Hispanic, and Native students separately, state leaders chose to combine them in a single “BHN” supergroup, obscuring meaningful differences in opportunity and outcomes between the three racial/ethnic groups.⁵ Moreover, placing greater weight on results of historically underserved students could send an even stronger signal about schools' responsibility to improve outcomes for these groups. But Tennessee's system comes closer than many other states' to prompting schools to pay attention to and accelerate learning for groups of students that have been underserved in our schools for far too long.



Courtesy of Allison Shelley/The Verbatim Agency for American Education: Images of Teachers and Students in Action.

3

IS THE STATE BEING HONEST ABOUT WHICH SCHOOLS NEED TO TAKE STEPS TO IMPROVE OUTCOMES FOR INDIVIDUAL GROUPS OF STUDENTS?

When is performance for a group of students so low that it requires attention and action? As mentioned earlier, ESSA requires states to identify any school that is consistently underperforming for a student group for Targeted Support and Improvement. States, however, have a lot of discretion when defining what “consistently underperforming” means.

How a state chooses to identify schools for targeted support matters. First and foremost, identification drives action. Under ESSA, any school identified for targeted supports has to take certain steps, including developing and implementing an evidence-based improvement plan with input from parents and the school community. But identification criteria also communicate expectations: They define the minimum level of performance that is considered high enough, or acceptable, before intervention becomes necessary.

States had the opportunity to prompt more schools to take action for student groups that have been underserved for a long time by setting a clear and rigorous definition of consistent underperformance. Unfortunately, most didn’t do so.

Many of the states whose plans we reviewed set their expectations too low, seemingly more concerned with identifying as few schools as possible than with making sure that any school that is underserving low-income students, students of color, students with disabilities, or English learners has to take meaningful steps to improve. Here are some of the common trends.

- **LOW CRITERIA FOR EACH GROUP OF STUDENTS:** Some states, including **New Mexico** and **Washington**, are identifying schools as consistently underperforming only if they are performing as badly for a group of children as the absolutely lowest performing schools (e.g., the bottom 5 percent) in the state are doing for all kids. Schools that are doing only slightly better are considered just fine. This sets far too low an expectation and disregards the distinction between Targeted Support and Improvement and Additional Targeted Support and Improvement identification in the law (see *What Does ESSA Require?* for more on these categories.) Some states went even further. In **Connecticut**, for example, a school has to have a subgroup in the bottom 1 percent for three years in a row before being identified.
- **LOW AND DIFFERENT CRITERIA FOR SOME GROUPS OF STUDENTS:** Even worse, some states such as **New York**, **Georgia**, and **Massachusetts** are identifying schools only if their performance for a student group is in the bottom 5 or 10 percent of results for that group.⁶ This approach does not just set very low expectations, it sets different expectations for different groups of children. Under such definitions of consistent underperformance, a school where 20 percent of White students are on grade level could have to take action to improve, but a school where 20 percent of Black students are on grade level could be considered just fine.

FLORIDA, A STATE APART

Florida went a step beyond other states to sweep schools' underperformance of individual student groups under the rug. Unlike most states, which at least identified Targeted Support and Improvement Schools based on outcomes for historically underserved student groups, state leaders in Florida chose to ignore these students all together. According to the plan Florida officials submitted in September, not only did the state choose to assign A-F grades to schools based entirely on schoolwide averages, it is planning to identify schools for Targeted Support and Improvement based on those overall results as well.

When pushed to justify these low criteria, some state leaders expressed concern about state capacity to provide support to a large number of schools. But while limited capacity is a valid concern, it's important to remember that many schools that are underserving one or two groups of students actually have substantial resources at their disposal and face a far narrower set of challenges than the lowest performing schools in the state. Identifying these schools for Targeted Support and Improvement could prompt them, and their districts, to change the way they use their resources and capacity so as to eliminate disparities in opportunity and achievement. Instead, most states' identification criteria are condoning their underperformance.

Although no state is handling identification particularly well, some are making strides in the right direction. **Nevada**, for example, identifies any school for targeted support that misses interim targets in English language arts and math for two years in a row for any group of students. Although Nevada's interim targets differ for each student group, they require substantially faster progress for groups that are further behind. In other words, to avoid identification, a school needs to be making meaningful progress toward eliminating disparities in achievement.

Another state with stronger identification criteria is **North Carolina**. In North Carolina, each school will receive an A-F grade based on overall results, as well as an A-F grade based on how it is serving each of its student groups. Although individual group grades do not factor into a school's overall grade, schools that earn an F for a group of students for three years in a row will be identified for targeted support. Certainly, an "F" is a pretty low bar (What about schools that earn a "D" for one or more student groups, for example?), but the clear letter grade signal and consistent grading criteria across all student groups are both steps in the right direction.

WORK OF EQUITY ADVOCATES IS NOT DONE

If state ESSA plans show one thing clearly, it's that the work of equity-focused education advocates is not done. Of course, leaders at all levels have important roles to play in advancing opportunity and achievement for historically underserved students. The U.S. Department of Education has a responsibility to implement the law, especially all of the equity-advancing provisions, faithfully. And state policymakers have a responsibility to take those requirements seriously, and to prioritize the needs and interests of the low-income students, students of color, English learners, and students with disabilities, who represent a large and growing part of the population, in all ESSA decisions.

But the Trump Administration has made clear that it will default to state decision-making as much as possible and has demonstrated time and again that in the immediate future, we cannot depend on the federal government to protect or advance the rights of students of color, students from low-income families, English learners, and students with disabilities. And despite lots of rhetoric about the importance of equity, many states' ESSA plans put forth policies that enable schools and districts to continue to underserve these student groups.

This means that equity advocates will need to work together to keep the pressure on state leaders through constant vigilance, to draw inspiration from leading states and districts, and to push their state leaders to become the equity champions that many claim to be.

So what should advocates focus on in the coming years?

- 1) TAKE ADVANTAGE OF NEW DATA:** Although most states plan to base school ratings mostly on overall averages, many do say that they will report how schools are doing on each indicator for each student group. Advocates should use these data to learn more about patterns of performance for historically underserved students on important new indicators, such as chronic absenteeism and college/career readiness. Which schools and districts are struggling the most with preparing low-income students for postsecondary success, for example? Which are getting results that we should be recognizing and learning from?
- 2) KEEP AN EYE ON DATA QUALITY:** Including new indicators of how well schools are serving students is a good thing. But as states release data on how schools are doing on those new measures, it'll be important for advocates to be vigilant about the quality and validity of the data. Trends that appear too good to be true often are. For example, if it looks like a school's chronic absenteeism rate has declined dramatically from one year to the next, there may be some gaming going on. Or, if it looks like all students are graduating ready for postsecondary success, the measure of college readiness may not be sufficiently rigorous.

- 3) KEEP MONITORING AND PUSHING FOR IMPROVEMENTS IN SCHOOL ACCOUNTABILITY SYSTEMS.** When new school ratings come out, advocates should make sure to look “underneath the hood.” How are schools that receive those A’s or 5 stars actually performing for individual groups of students? Are schools that are clearly struggling to serve one or more student groups being identified so that those students get the attention and support they deserve? If high ratings are masking underperformance for one or more student groups, or if schools that are not serving individual groups well are not being identified as such, advocates will need to make that known to parents, educators, and policymakers and push for improvements to the system.
- 4) PUSH YOUR STATE AND DISTRICTS TO PROVIDE MEANINGFUL SUPPORT TO SCHOOLS THAT NEED TO IMPROVE:** Indicators of performance and school ratings are important, but what happens as a result of those ratings matters just as much, if not more. In their ESSA plans, states did not have to say much about the support they would provide — or require their districts to provide — to struggling schools, and most said very little. As states move from planning to implementation, advocates should ask state and district leaders how they will support low-performing schools or schools that are underperforming for a group of children to improve. How will they help school leaders select evidence-based interventions that address their challenges? How will they allocate resources to schools identified for improvement? How will they monitor whether schools are getting better, and what will they do differently if a school doesn’t improve?

We at EdTrust stand ready to be a resource in this critical work.



Courtesy of Allison Shelley/The Verbatim Agency for American Education: Images of Teachers and Students in Action.

ENDNOTES

1. When used in this document, the term “district” refers to both traditional public school districts and charters.
2. See EdTrust, 2013, “Making Sure All Children Matter: Getting School Accountability Signals Right,” <https://edtrust.org/resource/making-sure-all-children-matter-getting-school-accountability-signals-right/>
3. These organizations include the Migration Policy Institute, Bellwether Education Partners, Achieve, Inc., the Advocacy Institute, the National Council for Teacher Quality, The Fordham Institute, and ExcelinED.
4. The information in this paper is current as of November 2017. At the time of publication, all states have submitted their proposed ESSA plans the U.S. Department of Education, and 15 of the state plans have been approved. As such, it is possible that some states cited here will make additional modifications to their plans prior to approval.
5. Tennessee Educational Equity Coalition letter to Commissioner Candice McQueen, January 19, 2017, <http://tnequity.org/wp-content/uploads/2017/01/TEEC-Response-to-TN-draft-ESSA-plan-C.-McQueen.pdf>
6. In New York, schools are identified as underperforming for low-income students, students and disabilities, and English learners based on such within-group comparisons, In Georgia and Massachusetts, criteria differs for each group of students.



The Education Trust