Designing a Coherent State System of Accountability: The Every Student Succeeds Act and Perkins V

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Introduction

Over the last five years, the U.S .Department of Education (USED) is requiring states to provide more and better evidence supporting the quality and validity of their assessment and accountability systems. Notably, states are asked to explain more fully how the proposed design of their systems will provide accurate and reliable information that improves student outcomes. One sees this expectation in the USED guidance regarding the assembly of materials for assessment peer review (U.S. Department of Education, 2015) and the development of state plans for the Every Student Succeeds Act (U.S. Department of Education, 2017). For example, the initial ESSA template challenged each State Education Agency (SEA) to "reflect on its overall vision and how the different sections of the consolidated state plan work together to create one comprehensive approach to improving outcomes for all students," and, further, to articulate how the plan would "serve to meet the SEA's vision with regard to its education system."

While this call for coherence traditionally has focused on a state's response to specific legislation, USED recently pushed for improved coherence across state plans. This is evident in ESSA and the Strengthening Career and Technical Education for the 21st Century (Perkins V) Act (2018) both of which necessitate and support improved alignment with each other and the Workforce Innovation and Opportunity Act (WIOA) as demonstrated by the:

- inclusion of common terms and definitions;
- required alignment of academic and Career Technical Education (CTE) content standards;
- increased focus on incorporating, and measuring, the state's academic content standards in CTE courses and programs of study;
- increased consistency in the indicators and procedures required for accountability;
- aligned requirements for federal reporting (Advance CTE, n.d.); and
- increased flexibility afforded to states around the use of federal funds.

In its appeal for alignment, USED is acknowledging that these laws, despite their different requirements, timelines, and resources, have common goals and objectives that will not be met if a state responds to each in isolation (Cushing, E., Therriault, S. and English, D, 2017). Most notably, all three laws support the development and maintenance of programs to ensure that students and workers acquire the necessary knowledge, skills, and abilities to engage successfully in college and careers, ultimately strengthening the workforce.

Federal efforts to improve alignment are a good start, to be sure. But they are not enough to help those who are charged with designing and implementing these programs establish accountability provisions that work in a coordinated manner to effectively and efficiently meet a state's goals. This requires not only an understanding of what it means for a system to be coherent, but also a reconceptualization of ESSA, Perkins V, and WIOA as complementary elements of a larger state system of accountability. Further, since these programs typically are developed, monitored, and administered by different offices, SEAs need a strategy that serves to align these efforts. To that end, this brief discusses the characteristics and features of a coherent system, outlining ten recommendations to support those charged with developing, evaluating, or modifying state plans under ESSA, Perkins V, and WIOA.

What is a coherent system?

At the most basic level, a coherent system can be described as one in which (a) each element of the system is designed to interact with other elements in a specified manner to achieve common goals, and (b) there is a clear theory of action undergirding the intended interaction of system elements toward this end.

Thus, a coherent system is

- purposeful: developed in service of a particular goal;
- rational: supported by a clear and evidence-based rationale;
- efficient: each system element has a clear, non-duplicative role complementing that of other elements in the system;
- transparent: primary elements of the system, and their intended role, are concrete and intuitive; and

- communal: developed through a collaborative process, ensuring that all participants understand the goals of the system and have a common vision of how these goals will be achieved.

The role and significance of coherence in system design is addressed frequently in the field of educational assessment. For example, the authors of the seminal work Knowing What Students Know: The Science and Design of Educational Assessment (NRC, 2001) argue that coherence across key components of an educational system (curriculum, assessment, and instruction), undergirded by a clear theory of how students acquire knowledge, is required in order for assessments to support student learning. Chattergoon and Marion and (2016) extend this argument, citing coherence as one of three core criteria states should consider when developing or evaluating a balanced assessment system. Specifically, in order for assessment results to support valid inferences about, say, student achievement, teacher instruction, or school quality, assessments at all levels of the educational system—classroom, school, district, state—must be designed in consideration of a common model of student learning, mirroring that reflected in curriculum and instruction. Without a clear model to tie system elements together, assessment results may provide conflicting information to students, teachers, parents, and administrators and therefore constrain, rather than support, good decision making.

Similarly, a compilation of independently developed state plans will not result in an accountability system that incentivizes collaboration and provides a state and the institutions it serves with accurate, consistent information about progress toward desired student outcomes. To have the intended impact, SEAs must thoughtfully design their implementations of ESSA, Perkins V, and WIOA for coherence by

- establishing an overarching goal and theory of action for student learning that serves as a shared foundation for accountability system design and evaluation (*providing for a system that is purposeful and rational*);
- identifying common elements across the three laws that are used to support coherence (*providing for a system that is efficient*); and

- engaging in strategic, ongoing system design and evaluation activities that include representatives from K-12, CTE, workforce, and higher education (*providing for a system that is transparent and communal*).

Designing for coherence is beneficial on multiple fronts. Not only does it result in systems having the desired characteristics, the design process itself necessitates coordination and communication between key stakeholders and fosters a shared sense of responsibility for meeting the state's goals. The remainder of this report is structured around ten actionable recommendations: concrete steps states can take to promote coherence across a state's plans for accountability under ESSA, Perkins V, and WIOA. While the text and exemplars focus primarily on ESSA and Perkins, due to their shared focus on accountability for educational institutions, the overarching recommendations can easily be extended to include WIOA.

As shown Table 1, these recommendations are structured in terms of three factors that influence coherence: clarity, consistency, and collaboration.

Table 1. *Recommendations for Establishing Coherence across a State's Plans for Accountability*

Coherence Factors	Recommendations
Clarity - around the state's goals, priorities, and vision for student learning	1. Articulate the State's Goals and Theory of Action for Student Learning
	2. Identify and Define Student Outcomes that Represent Attainment of the State's Goal for Student Learning
	3. Define the Role of Accountability in Supporting the State's Goal for Student Learning
Consistency - across common structural elements in service to the shared goal(s) and vision for student learning	4. Define and report common indicators in a consistent manner
	5. Use consistent procedures to establish annual targets for performance
	6. Use common business rules and psychometric approaches to address similar design decisions
	7. Consistently highlight state values and priorities in design decisions
	8. Represent a consistent philosophy related to the role of identification and the state's system of support

Collaboration - among state and local leaders in K-12, CTE, and workforce to ensure that each state plan is designed to support progress toward the shared goal and vision for student learning	9. Coordinate across state offices to establish a state-wide glossary summarizing terminology specific to the state's system of assessment and accountability
	10. Bring together state leaders in K-12, CTE and Workforce when evaluating, developing or revising states plans under ESSA, Perkins V, and WIOA.

Recommendations 1-3: Clarify the State's Goals, Priorities and Vision for Student Learning

At a high level, the accountability requirements under ESSA and Perkins V share several common elements (Figure 1).

***Figure 1**. Shared Accountability Elements under ESSA and Perkins V*

Both require a state agency to articulate indicators and associated measures of quality, establish annual performance targets for those indicators, identify institutions in need of improvement and support, and annually report overall and disaggregated results. Despite these common elements, however, accountability provisions designed to support ESSA and Perkins V will not be coherent in the absence of three essential conditions:

1. The state must have a clear goal for student learning and a vision for how that goal will be achieved.

2. The state must identify and clearly define goal-related student outcomes.

3. The state must define the accountability system's intended role in supporting the state's goal for student learning.

These three conditions collectively define a theory of action, highlighting the features to be valued and prioritized when designing the state's system of accountability. As illustrated in Figure 2 and discussed in the sections that follow, a state's response to these conditions (blue ovals) will influence the design decisions (green ovals) in a consistent manner, providing for both within and between-plan coherence.

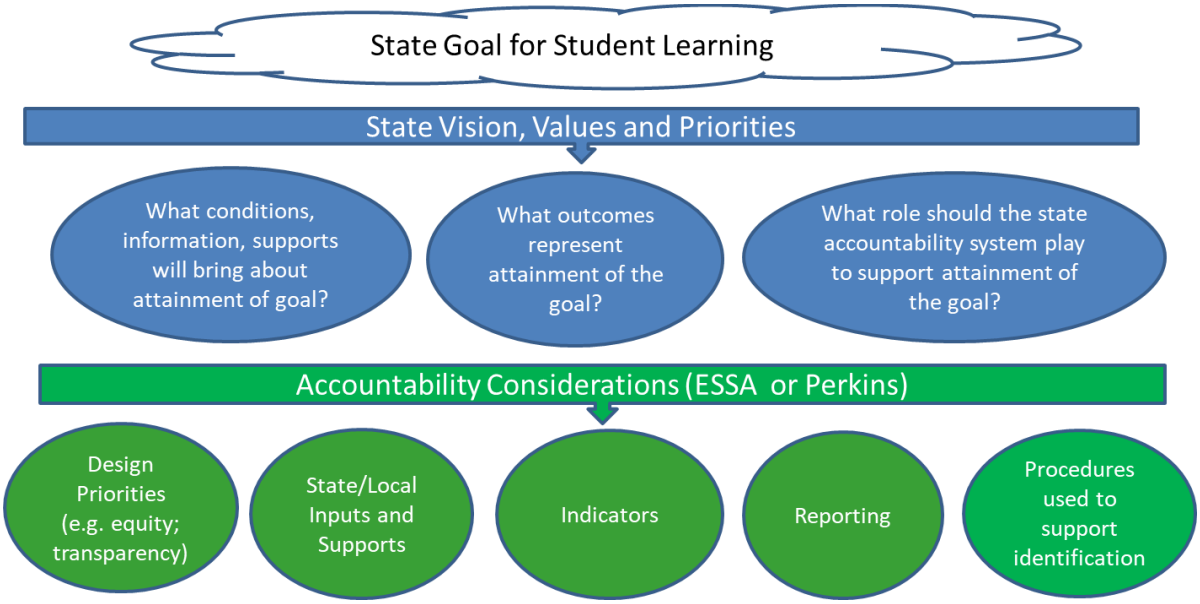

Figure 2. *Accountability System Design Elements Influenced by a State's Theory of Action*

The need for a clear, state-defined theory of action recurs throughout this paper.[1] If a state cannot articulate what it is trying to accomplish and, in turn, provide a roadmap for getting there, efforts to design for coherence will be futile. The ten recommendations highlight key elements of a state's overarching theory of action and their role in effecting broader system-level coherence.

[1] See Hall, E., Domaleski C., Russel, M., and Pinnsonneault, L . (2016) *A Framework to Support Accountability Evaluation* for a broader discussion of the elements of a theory of action and how they support the design and evaluation of accountability systems. Retrieved on September 18, 2018 from https://www.centerforassessment.org/sites/default/files/publications/A%20Framework%20to%20Support%20Accountability%20Evaluation.pdf

Recommendation 1: Articulate the State's Goal for Student Learning

To facilitate the development of a coherent system of accountability, a state must operationalize its desired goal—defining the goal and specifying how its attainment will be determined—for all students receiving state-funded educational services. The goal statement should delineate what the state intends to accomplish for its students but also be broad enough to resonate with stakeholders affiliated with different components of the educational system (e.g., K-12, CTE, workforce, higher education). For example, a state department of education may claim its overarching goal for student learning is to ensure all students are "ready for college and careers" or will be "successful in post-secondary education, training or employment." While such statements often can be interpreted in various ways, the process of operationalizing the goal facilitates communication across offices within a state agency and, further, provides the foundation for building a coherent system of accountability.

In addition to simply stating a goal, state leaders must work together to establish a clear vision for how this goal will be achieved. Specifically, they must describe the conditions, activities, interactions, and initiatives they believe will bring about change, and determine how those elements should be represented across state plans. They must collaborate in answering the question, "What do we as a state need to focus on to make progress toward meeting this goal in the short and long term?" If college and career readiness (CCR) is the desired goal for all students, for example, what is most likely to bring about that objective—personalized learning, a supportive school climate, more occasions to apply skills within an authentic work-place setting? A state must articulate its beliefs and priorities so they are represented clearly and consistently in a state's implementation of ESSA, Perkins V, and WIOA, as appropriate.

While more prescriptive than ESSA, Perkins V does allow for the inclusion or reporting of additional indicators of performance for career and technical education activities the state believes will drive progress and provide for the greatest return of investment of federal funds. Therefore, important non-mandated indicators (e.g., school climate, community servce) in the state's theory of action should be incorporated into the state's plan. Further, Perkins V also allows for the inclusion of additional measures of student success in CTE, provided they are "valid and reliable." It is through these additional indicators that a state can highlight shared priorities and strengthen the influence of those priorities in supporting the attainment of state goals.

Recommendation 2: Identify and Define Student Outcomes that Represent Attainment of the State's Goal for Student Learning

While an overarching goal and vision is necessary, it is not sufficient for supporting the development of a coherent accountability system. The SEA also must identify those outcomes it believes represent successful attainment of that goal and, further, describe how they will be defined and operationalized. For example, if the goal is for all students to be "college and career ready," the associated student-level outcomes endorsed by the state (e.g., meeting proficiency on the state assessment, attaining an industry credential) must be clearly defined and consistently represented at all levels of the system, as appropriate.

While different student outcomes may be reported and prioritized under ESSA and Perkins V, how the student-level outcomes are defined, measured, and referenced on reports and in state plans should not. For example, what it means to be "college-ready" should not be defined by different standards (i.e., cut scores on the state test) under ESSA and Perkins V. Similarly, the various credentials deemed appropriately rigorous for demonstrating "career readiness" should be the same across the two. Working together, state leaders must ensure that all stakeholders understand the outcomes that are valued and prioritized and how they are defined.

In contrast, we do expect different outcomes and measures of *system quality* to be considered under ESSA and Perkins V. That is, each program should identify different indicators/measures to evaluate the extent to which schools (under ESSA) or eligible entities/institutions (under Perkins V) provide the intended high-quality services and opportunities for effecting desired student outcomes. In its plan for Perkins V, for example, a state may include an indicator of participation in work-based learning, believing that such participation increases the likelihood of attaining an industry credential or related outcome. While perhaps not included in the state's plan under ESSA, this indicator nonetheless supports system coherence if it aligns with the state's overarching vision and supports the attainment of desired student outcomes.

Recommendation 3: Define the Role of Accountability in Supporting the State's Goal of Student Learning

From a federal perspective, accountability systems provide a means to assess the effectiveness of a state in achieving progress related to its specified goal(s) for student learning. However, each state is responsible for determining how the accountability system facilitates this progress. One state

may believe that accountability will foster change by motivating educators to work harder, while another believes the sole function of the system is to provide formative feedback for improvement. And yet another state may view the system as way to provide stakeholders with fair and unbiased information about the school performance and quality, or as a means for determining where state support for local reform initiatives are most urgently needed. The intended role of the accountability system directly influences key design decisions affecting the selection and weighting of indicators, procedures for identifying schools/agencies/institutions for support, and the content and format of reports. Therefore, a state's perspective on the intended impact of the accountability system must be clear so that viewpoint can be consistently represented across state plans, as appropriate.

Table 2. *How the Role of an Accountability System can Influence Design Decisions*

Example of intended role of accountability system	How influence accountability system design?
To **motivate** schools/entities to establish conditions and opportunities that provide for more equitable outcomes	- Include indicators reflecting the degree to which a school/entity/institution provides students access to opportunities relating to desired outcomes (e.g., high-quality teachers, courses providing college credit, work-based learning or apprenticeship opportunities, a variety of programs of study, certifications) - Identify schools/entities/institutions that are performing far below expectations regarding these indicators. - Highlight schools/entities/institutions showing significant improvements from the previous year
To **shine a spotlight** on gaps in achievement	- Establish an indicator that reflects a measure of differential performance by subgroup (e.g., on academic assessments, industry credential rate, graduation rate, employment rate upon exit) - Report or reward progress in reducing gaps in subgroup performance for selected indicators - Require schools/entities/institutions having the largest gaps in performance on key indicators to develop targeted improvement plans
To **provide information** that helps systems identify areas of strength and need and strategies for improvement.	- Develop reporting systems allowing for data disaggregation and comparisons to similar schools/entities; connect to external resources that identify evidence-based strategies for improvement on indicators for which the school/entity did not meet expectations

Recommendations 4-8: Strive for Consistency across Common Structural Elements

If we see ESSA and Perkins as two components of a state accountability system designed to support a shared goal and vision, then it makes sense that common features across the two laws are defined and operationalized in a consistent manner where appropriate. Table 3 highlights four important touchpoints—a common element, design feature, or legislative requirement—across ESSA and Perkins V that should be considered when designing, evaluating, or modifying state plans for coherence. Recommendations accounting for these touchpoints are detailed in the sections that follow.

Table 3. *Key Touchpoints across ESSA and Perkins V*

- **Performance Indicators**: Both Perkins V and ESSA identify performance indicators that serve as the basis for evaluating the performance of the state and its eligible recipients (i.e., those that receive state funding). Two indicators, academic achievement and graduation rate, are common to ESSA and Perkins V. *(Appendix A describes the required indicators under ESSA and Perkins V.)*

- **Annual Performance Targets**: Both ESSA and Perkins V require states to establish annual expectations for performance in specified areas. Under ESSA, states must establish long-term goals and measures of interim progress for academic achievement, graduation rate, and, in the case of English learners, progress toward English language proficiency. Under Perkins V, the state and each eligible entity must establish "levels of performance" for each core indicator listed in Appendix A, including academic achievement and graduation rate. *(Appendix B provides the requirements for the specification of performance targets under ESSA and Perkins V.)*

- **Annual Reporting against Targets and Indicators:** Under ESSA and Perkins V, states and local entities are required to report on the performance of all students and for each subgroup for each indicator and against established performance targets. States are required to define the minimum n-count to be used for reporting results, and explain its determination.

- **Identification of Systems Requiring Support:** Both ESSA and Perkins V require states to determine the criteria for identifying schools/eligible entities for support. Under ESSA, schools can be identified for Targeted Support and Improvement (TSI) or Comprehensive Support and Improvement (CSI), each of which has different consequences and requirements. Under Perkins V, the state and each eligible recipient not meeting 90% of the defined level of performance on each indicator will be required to develop and implement an improvement plan. In all cases, criteria for the provision of technical assistance and/or subsequent action are defined by the state. *(See Appendix B for factors influencing identification under ESSA and Perkins V.)*

Recommendation 4: Define and report common indicators in a consistent manner.

As shown in Appendix A, both ESSA and Perkins V require an indicator of academic achievement and graduation rate. Unless there is a good reason to do otherwise, these indicators should be

defined and operationalized in the same way across the different plans. This is important for at least two reasons. First, stakeholders can discuss performance and results in a consistent manner, minimizing the likelihood of misinterpretation. Second, this sends a clear signal regarding what the state believes should be valued and rewarded for purposes of accountability. Consider a state that defined academic achievement in Perkins V and ESSA as follows:

Perkins V	ESSA
For secondary institutions, achievement scores are calculated as the percentage of CTE concentrators meeting or exceeding proficiency on the state's grade-level assessments for math and English language arts.	School achievement scores are calculated as a weighted sum across student scores where each achievement level is associated with a different point value (e.g., Does not Meet=0; Partially Meets=.5; Meets=1; Exceeds=1.25,)

Under this scenario, a CTE center with a 67% achievement score and a high school with 67% achievement score may be misinterpreted as having identical performance, when this clearly is not the case, as demonstrated in the top half of Table 4. Similarly, a CTE center and a high school having the same distribution of student performance on the state assessment will receive different achievement scores as shown in the bottom half of this table.

Table 4. *Impact of Different Indicator Definitions on Achievement Scores*

		Performance Level				Achievement Score
		Does not meet	Partially Meets	Meets	Exceeds	
Different Performance Distribution/Same Score	**CTE Center A**	13%	20%	40%	27%	40+27 = **67**
	High School A	22%	32%	27%	19%	(.5*32)+(1*27)+(1.25* 19)= **67**
Same Performance Distribution/ Different Score	**CTE Center B**	10%	40%	40%	10%	40+ 10 = **50**
	High School B	10%	40%	40%	10%	(.5*40)+(1*40)+(1.25 *10)=**72.5**

Using the ESSA calculation, High School B earns a score that is 22.5 points higher than CTE Center B even though both met/exceeded the standard at a rate of 50%.

While computational differences across plans were not a major concern in the past, states are diligently working to establish comprehensive accountability dashboards that allow for these types of results to be presented side by side. In the case of the example above, without explicit reference to the calculations used and how/why they differ, stakeholders would not know that these measures cannot be interpreted in a similar manner. Furthermore, in the current example, the proposed definitions make different claims regarding what should be valued and awarded when evaluating academic achievement. The Perkins definition highlights attainment of proficiency while the ESSA definition rewards and incentivizes moving students from one level to the next across the full range of the scale.

Insofar as score misinterpretation can have decidedly undesirable consequences, following Recommendation 4 clearly is in the best interests of all. But if a state concludes it is necessary for common indicators to be defined differently across state plans, the state should ensure that these differences are obvious—and with appropriate caveats—in any reporting of results.

Recommendation 5: Use consistent procedures to establish annual targets for performance

As shown in Appendix B, both ESSA and Perkins require states to report performance against annual targets in the areas of academic achievement and graduation rate. In the same way these indicators should be defined in a consistent manner across state plans, the procedures and rationale underlying the specification of annual targets for performance also should be consistent. This does not mean the targets need to be the same (although this may be reasonable, depending on the state's theory of action), but nor should they be defined in isolation.

Under ESSA, for example, states are required to specify long-term goals and measures of interim progress for all students and each subgroup. Because secondary CTE concentrators are a subgroup of all secondary students, SEAs therefore should consider whether procedures used to determine appropriate and feasible targets for subgroups under ESSA can be used to establish annual levels of proficiency for CTE concentrators under Perkins V. For example, consider a state that defines annual targets for graduation rate based on a long-term goal of 90% for all students and each subgroup by 2023. The state acknowledges that student groups starting at lower points in the baseline year will need to improve at greater rates to achieve long-term goals, but argues that

common goals are necessary to ensure sustained focus on improving the performance of all students. If this argument represents the state's overarching belief and theory of action regarding how improved graduation rates will be realized, is it sensible to establish different annual targets under Perkins? If the answer is yes, the state should explain its rationale for this decision.

Recommendation 6: Use common business rules and psychometric approaches to address similar design decisions

There are various technical decisions that must be made to support accountability requirements within ESSA and Perkins V. Some of these decisions are essentially business rules (e.g., rounding rules, minimum n-counts, aggregation procedures), while other decisions are psychometric (e.g., procedures for evaluating alignment, calculating performance gaps, or assessing the reliability and validity of indicators). These decisions are not arbitrary or capricious. Rather, they are supported by data and/or a compelling argument regarding why one approach is more appropriate than another. To the extent possible, states should address common design decisions in the same way across ESSA and Perkins V. This not only improves coherence, but insofar as identifying and defending a particular approach often requires significant resources, time and money will be saved as well.

Recommendation 7: Consistently highlight state values and priorities

To send a clear message and carry the greatest impact possible, the priorities and initiatives highlighted in a state's theory of action should be represented across state plans for educational accountability. For example, if a state indicates that a supportive climate for student learning is necessary to promote student success and therefore puts systems in place to support improvement in this regard, a measure of climate should be represented in each state plan. Consistently attending to state priorities, and in a way that highlights the state's vision for improvement, will facilitate communication and collaboration among stakeholders and, in turn, increase the likelihood of progress toward the state's goals. In addition, section 113 (b)(2)(B) and (C) of the Strengthening Career and Technical Education for the 21st Century Act (2018) states that "in developing core indicators of performance, an eligible agency shall, to the greatest extent possible, align the indicators so that substantially similar information gathered for other State and Federal programs may be used to meet the requirements of this section." This reflects a desire to have consistency in the information provided to stakeholders to inform subsequent decisions about the performance of schools/entities/institutions and the state in driving progress toward desired student outcomes.

Recommendation 8: Represent a consistent philosophy related to the role of identification and the state's system of support.

While legislation often dictates how states identify entities that require support or the development of an improvement plan, the state is responsible for determining the criteria that ultimately result in identification. Under Perkins V, for example, if the state or an eligible recipient of the state fails to meet a level of performance that is at least *90% of that expected* for each core indicator, the state or eligible agency is required to develop and implement a plan for improvement.[2] While there are requirements underlying the specification of performance levels for core indicators, the state defines the annual targets constituting adequate performance.[3] And under ESSA, the state, in consultation with stakeholders, defines the long-term goals and procedures for meaningful differentiation resulting in the identification of schools for support (see Appendix B). Different design decisions send different messages regarding the role of goals/targets in supporting identification. For example, lenient targets and conservative identification criteria throw light on a small number of extremely poor performing systems. In contrast, stringent targets and liberal identification criteria flag a broader range of at-risk schools. Because identification requires an improvement plan and may lead to subsequent action (e.g., more rigorous intervention, suppression of funds), how targets are specified reflects a state's beliefs regarding the utility of identification as a means of supporting improvement. If the identification criteria reflect markedly different philosophies under ESSA and Perkins V (e.g., flag many vs. flag few), this suggests these beliefs vary across programs as well.

States also are charged with determining the nature of support provided and who is responsible for ensuring its effectiveness. Specifically, what are the respective roles of state and local entities in supporting local improvement efforts? Will the state engage in review and audit functions, or will it focus on developing/distributing resources that allow districts and eligible agencies/institutions to implement and evaluate improvement plans at a local level? These decisions impact the resources, supports, and infrastructure required at the state and local level and, therefore, must be considered when making design decisions. A state that wants to monitor the progress of schools/entities

[2] See : Perkins V, Sec 123 - Improvement Plans

[3] Perkins does allow for eligible recipients to either accept the levels of performance established by the state or negotiate local levels of performance. Local levels, if proposed must meet a variety of criteria and be submitted with data that indicates why they are more appropriate given the characteristics of CTE concentrators currently served (See Section 113 (b)(4) (A)

identified for support, for example, first will need to establish identification procedures that allow for this level of engagement.

Establishing a common philosophy related to identification and the provision of support that extends across ESSA and Perkins V may seem difficult to address in practice. However, if the state believes a well-established system of support is the mechanism by which improvement occurs, it should reflect a common vision of how this is represented under ESSA and Perkins V.

Recommendations 9-10: Provide for Collaboration among State Leaders in K-12, CTE, and Workforce

Collaboration is the final coherence factor to be considered. State agencies must collaborate to establish systems that work with, not against, one another toward the attainment of a common set of state goals. This requires a move away from the traditional, silo-based structure within which most education agencies unfortunately exist, to a web-based structure in which connections between state offices/divisions and the initiatives they support are developed and nurtured through communication, transparency, and a shared understanding of the state's goals and priorities. The final recommendations below represent only two of the many things a state can do to facilitate collaboration and improved communication among and between state and local agencies. Local education agencies arguably should engage in a similar process to ensure that the efforts and initiatives established at a local level support each other and align with the priorities and goals defined by the state.

Recommendation 9: Develop tools and resources that facilitate collaboration and improve communication across state agencies

State departments of education should have tools and resources that facilitate coherence in the development of plans, procedures, and documents by different offices and divisions. Consistent with federal efforts to align definitions across ESSA, Perkins V, and WIOA, for example, states should establish a glossary of state-specific terms, phrases and acronyms. Such a glossary promotes not only coherence, but it also improves communication across departments and is helpful when responding to legislation. Regarding the interdepartmental communication, for example, different levels of performance on the state summative assessment should not be referred to as "performance levels" by one division/agency and "proficiency levels" by another. As for responding to legislation, college-and-career readiness, for example, should be defined in the same

way even if different indicators are reported under ESSA and Perkins V. To support coherence in its reports and communications involving results, furthermore, a state should develop shared business rules and data systems that facilitate the transfer, combination, and comparison of data across divisions/offices within the SEA, where appropriate.

Recommendation 10: Bring together state leaders in K-12, CTE, and workforce when evaluating, developing, or revising states plans for ESSA and Perkins V.[4]

To develop and implement a coherent accountability system, state leaders from each education agency/division first must have a shared understanding of the state's current system of accountability. This includes the requirements, goals, and decisions underlying the current plans for ESSA, Perkins V, and WIOA. Only then can state leaders collectively engage in the critical activity of looking across these plans to identify and, in turn, address potential elements of incoherence. This activity is part of a larger process that should entail

- reflecting upon the state's overarching goal for student learning and broad vision of how it will be achieved;
- discussing the required accountability elements of each law and how they currently are addressed in the state's plans for ESSA, Perkins V, and WIOA;
- sharing the rationale underlying key design decisions reflected in each state plan, highlighting program-specific goals and the priorities these decisions are intended to support;
- identifying ways the current state plans work with, or against, one another;
- identifying state-specific touchpoints for improved coherence;[5] and
- crafting short- and long-term recommendations for modification and ongoing evaluation, consistent with the state's overarching goals and priorities.[6]

Again, design decisions for coherence must be grounded in a shared vision of the state's goals and priorities and a mutual understanding of how to meet those goals. Otherwise, efforts to design for

[5] While several touchpoints are addressed in this brief, group discussion likely will identify additional opportunities to effect systematic coherence.

[6] This bulleted list assumes there is a shared vision for student learning and accountability, as reflected in the top half of Figure 2. If not the case, this clearly is the place to start.

alignment—fundamental to achieving coherence—will seem arbitrary and senseless, with participants in the process reasonably asking "Alignment to what end?"

Conclusion

System coherence does not come easy. Rather, it is the product of a thoughtful, intentional design process that requires

- Clarity – around the state's goals, priorities, and theory of action for student learning common to K-12, CTE, and Workforce programs;
- Consistency - in the definition and specification of common elements and procedures, and
- Collaboration – among state and local leaders in K-12, CTE, and workforce to ensure that state plans are designed to be mutually supportive in achieving the state's goals.

Over the last several years, SEAs have devoted significant time and effort developing plans for K-12 accountability that comply with ESSA. This effort, in combination with the reauthorization of Perkins, makes this an opportune time for states to review their existing plans and, in turn, determine the necessary improvements for establishing a more coherent system of accountability.

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Appendix A.1: Required Indicators under ESSA, Perkins V, and HR.2353

ESSA – Secondary Students	Perkins V Secondary CTE *Concentrators*
Academic Achievement: As measured by *proficiency* on the annual state assessments in Reading, Mathematics, and Science. **Graduation Rate** 4-year adjusted or extended	**Academic Achievement:** Attainment of challenging academic standards as measured by performance on the state assessments defined in ESSA **Graduation Rate:** As defined in ESSA
English Learner Progress in Achieving English Language Proficiency: for English learners in each grade 3 through 8 and the same high school grade in which the State assesses for Mathematics and ELA **School Quality or Student Success:** At least one measure of school quality or student success that is valid, reliable, and comparable at a state-level.	**Post-Secondary Success:** The percentage of CTE concentrators who, in the second quarter after exiting from secondary education, are in postsecondary education or advanced training, military service or a service program that receives assistance under title I of the National and Community Service Act of 1990 (42 U.S.C. 12511 et seq.), are volunteers as described in section 5(a) of the Peace Corps Act (22 U.S.C. 2504(a)), or are employed. **CTE Program Quality:** The percentage of CTE concentrators graduating from HS having (at least one of the following to be included) • attained a recognized post-secondary credential; • attained post-secondary credits in the relevant CTE program or POS earned through dual and concurrent enrollment program or another transfer agreement; or • participated in work-based learning. May include any other measure of student success in career technical education that is state-wide, valid and reliable. **Non-traditional students:** The percentage of CTE concentrators in CTE programs and Program of Study that lead to nontraditional fields .

Perkins V: Post-Secondary CTE *Concentrators*
Post-Program Success: Percentage of CTE concentrator who, in the second quarter after program completion, are in advanced training, military service, or a service program receiving assistance under Title I of the National and Community Service Act of 1990, are volunteers as described in 5(a) of the Peace Corps Act, or are placed or retained in employment **Attainment:** Percentage of CTE concentrators who receive a recognized post-secondary credential during participation within one year of program completion. **Non-traditional students:** The percentage of CTE concentrators in CTE programs and or a Program of Study leading to nontraditional fields.

Appendix B: Annual Performance Targets & Procedures for Identification

Both ESSA and Perkins V require states to report performance against annual state-established targets. Under ESSA, states must establish long term goals and measures of interim progress regarding academic achievement, high school graduation rate, and increases in the percentage of students making progress in achieving English language proficiency (ELP). Under Perkins V, targets must be established for each core indicator presented in Appendix A. The first table below summarizes key requirements for the specification of annual performance targets under ESSA and Perkins V. The subsequent table outlines how schools (under ESSA) and states/eligible recipients (under Perkins V) are identified for support and improvement.

Annual Performance Targets

ESSA	Perkins V
• Long term goals and measures of interim progress for academic achievement and graduation rate must be established for all students and separately for each subgroup.[7] • Goals for academic achievement must be defined in terms of the percentage of students achieving proficiency on the annual assessments in mathematics and reading or language arts, and include students who are assess with alternate achievement standards. • Goals for extended graduation rate, if defined, must be more rigorous than those set for the four year adjusted rate.	State "levels of performance" for each core indicator must be the same for all CTE concentrators in the state and, at a minimum • be expressed in a percentage or numerical form; • require the state to continually make meaningful progress toward improving the performance of all CTE students and subgroups; • be subject to public comment; • when being adjusted pursuant to clause (ii)[8] - take into account how the levels of performance involved compare with the State levels of performance established for other States - be higher than the average actual performance of the 2 most recently completed program years; • take into account the extent to which they advance the eligible agency's goals, as set

[7] In this subsection and subsection (d), the term 'subgroup of students' means—
"(A) economically disadvantaged students;
"(B) students from major racial and ethnic groups;
"(C) children with disabilities; and
"(D) English language learners

[8] Clause (ii) allows states to, prior to the third program year, revise the performance levels for any of the core indicators of performance and submit them to the secretary for approval.

	forth in the state plan.

Identification Under ESSA and Perkins V

ESSA[9]	Perkins V (Section 123)
Based on the system of meaningful identification the state must identify schools for (CSI) at least every three years: - at least the lowest-performing 5% of all schools receiving Title 1 funds; - all public high schools in the state failing to graduate one third or more of their students; and - schools that were previously identified for TSI and did not improve within the state-define timeline. Schools identified for CSI must develop an improvement plan and may be eligible for "more rigorous state-determined action" if they do not meet exit criteria in a specified number of years. Identify annually for targeted support and improvement, those schools having one or more consistently underperforming sub-groups (as defined by the state). Schools receiving TSI must develop an improvement plan and may be eligible for additional action if the LEA's exit criteria are not met. Identify at least every three years those schools having a subgroup that would, on its own, lead to identification for CSI for additional targeted support and improvement.	If a state fails to meet at least 90% of the State determined level of performance for any of the core indicators of performance, the eligible agency shall develop and implement a program improvement plan during the first program year succeeding the program year for which the eligible agency failed to so meet the State adjusted determined level of performance for any of the core indicators. The secretary may withhold funds if the state does not implement an improvement plan or fails to meet at least 90% of the State determined level of performance for any core indicator for 2 consecutive years after identification If an LEA determines that 90% of an agreed upon level of proficiency has not been met for one or more core indicators by an eligible recipient, that recipient shall develop and implement an improvement plan The LEA may withhold funds if the eligible recipient does not implement an improvement plan or fails to meet at least 90% of the agreed upon level of performance for any core indicator for 2 consecutive years after identification

[9] For a comprehensive summary and interpretation of ESSA's requirements see Lyons, S., D'Brot, J. and Landl, E (2018) *State Systems of Identification and Support under ESSA: A focus on designing and revising systems of school identification* at https://ccsso.org/sites/default/files/2017-12/State%20Systems%20of%20ID%20and%20Support%20-%20Designing%20and%20Revising%20Systems_0.pdf