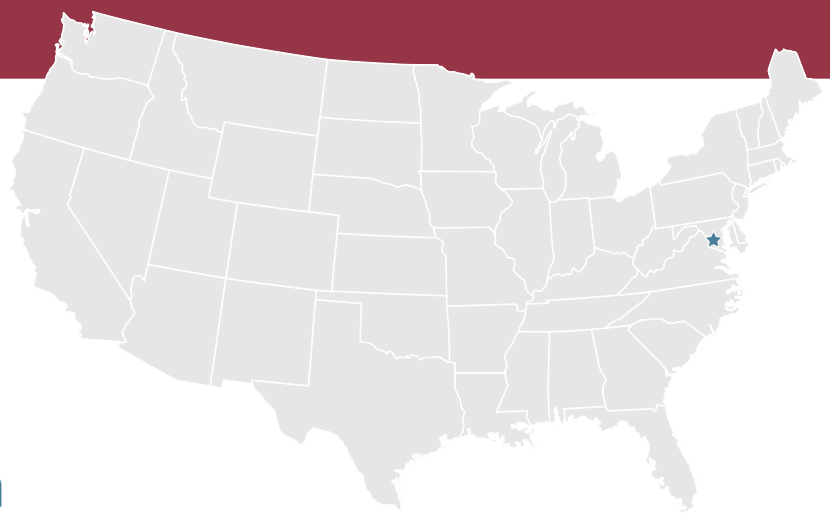# An Independent Review of ESSA State Plans

District of Columbia

Project Overview

In partnership with the Collaborative for Student Success, Bellwether Education Partners, convened an objective, independent panel of accountability experts to review ESSA state plans. We sought out a diverse group of peer reviewers with a range of political viewpoints and backgrounds, and we asked them to review each state's accountability plan with an eye toward capturing strengths and weaknesses.

We aimed to provide constructive feedback to the states, and to serve as a source of straightforward information to the public so that they are better able to engage policymakers if and how they see fit. Inherently, this independent process could not take into account the numerous political and situational challenges that occur in every state. We are in no way attempting to diminish those challenges, but the scope of this review was to compare the rigor and comprehensive nature of state accountability plans.

Peers worked in small teams to review the plans that states formally submitted to the U.S. Department of Education. After writing their own reviews independently, the peers met for two days to discuss their individual reviews and work together on the collaborative draft you'll see below. The teams were asked to use their discretion and expertise to respond to and score each rubric item, and those scores were normed across states and peers.

Each state was given the opportunity to review the draft peer analysis and to provide substantive additions and corrections. Still, the reviews should be considered a snapshot of state plans as of April–June 2017, and we anticipate that states will continue to update their plans going forward.

To read more about the project, as well as a list of the expert peer reviewers, visit the Bellwether website here.

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Overall Strengths and Weaknesses

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

Overall, D.C. set aggressive goals for academic proficiency and high school graduation. D.C.'s plan is aligned to those goals, is built on high-quality standards and assessments, and assigns substantial weight to both academic achievement and growth. D.C. is also attempting to balance different types of incentives around achievement at different performance levels and different types of growth measures. While these different measures combine to create a broad spectrum of incentives for schools, D.C. should monitor its data and stakeholder feedback to ensure that educators and parents understand the implications of these multiple measures.

More broadly, D.C. selected strong indicators of student performance, including new metrics on access and success on college-level coursework and chronic absenteeism. By including a 25 percent weighting for specific subgroups and lowering its minimum subgroup size for accountability purposes to 10 students, D.C. is attempting to ensure that more students are included in its accountability system and their performance is monitored more closely.

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

D.C.'s plan lacks specificity about how it will achieve its goals. The lack of detail is particularly troubling as it relates to how D.C. plans to support its lowest-performing schools and schools with consistently underperforming subgroups of students. Instead of describing in detail how it will provide the necessary supports to turn around struggling schools, D.C.'s plan seems heavily focused on the development of additional plans with deferred stakeholder input. Additionally, there is concern that the proposed system is potentially redundant in places, causing unnecessarily complexity.

D.C.'s school identification plan includes a specific allocation for student subgroups, but it might not provide sufficiently strong incentives. Without seeing additional data on how D.C.'s proposals will play out in practice, there's a concern that the performance of underserved populations will not sufficiently affect a school's rating, and therefore be overlooked.

Plan Components

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

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

| 1 | 2 | ✓ 3 | 4 | 5 |

Washington, D.C., set ambitious goals. In terms of proficiency, its goal is for all students and each student subgroup to demonstrate college and career readiness on its statewide assessments by 2038. While this is a long timeline, given D.C.'s low proficiency rates it seems reasonable. However, to increase transparency, D.C. should explain to parents with students currently in the system what they should expect in terms of growth and performance outcomes. If met, this long-term goal would meaningfully close achievement gaps since underperforming groups of students would have improved at a much faster rate than their peers. D.C. set an interim goal of cutting the gap between each group's current proficiency rate and 85 percent in half within 10 years. The plan could be strengthened by providing past performance and demonstrating that these goals are achievable.

D.C.'s graduation rate goal, if met, would fully close gaps between students. By 2038, the four-year adjusted-cohort graduation rate must be 90 percent of all students and each student subgroup. There is some concern over whether this goal is sufficiently ambitious since it requires an annual growth of only 1-2 percent. While D.C. has shown growth in its graduation rate, there is a concern that graduation is insufficiently connected with the proficiency rate. D.C. could strengthen its plan by demonstrating that there is a strong connection between graduation and college and career readiness.

Additionally, D.C. should be credited for setting provisional baselines for English-language proficiency growth using current data—with a promise to recalculate as it gathers new data from the new ACCESS 2.0 assessment. D.C. will set ambitious yet realistic growth targets for English-learner students to reach English proficiency. The system makes adjustments for year and age at entry, and ultimately students are expected to score a 5 on the ACCESS exam by their fifth year of schooling in D.C. While it's not ideal to build English-language proficiency goals based on an old test, D.C. should be credited for making accountability for English-language proficiency a priority during this period.

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?

| 1 | 2 | 3 | ✓ 4 | 5 |

Since 2010, D.C. has been using the Common Core State Standards (CCSS), which are aligned with college and career readiness. It uses the Partnership for Assessment of Readiness for College and Career (PARCC), assessments in English-language arts and mathematics for grades 3-8 and high school. These assessments are high-quality and aligned with the CCSS.

D.C. also conducted focus groups with stakeholders about improving access and accommodations for its annual assessments. Through PARCC, D.C. offers assessments in Spanish, and it will provide instructions in other languages to support students who speak a language other than English or Spanish. D.C. addresses how students with disabilities who take the alternate assessment will be included in the long-term goal for academic achievement, but D.C. should strengthen its plan by including information on how it will enforce the 1 percent cap on students taking the alternate assessment.

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?

| 1 | 2 | ✓ 3 | 4 | 5 |

Overall, D.C. has up to 14 indicators for school accountability, sometimes with only slight differences between measures. D.C. did not provide data suggesting that each measure is sufficiently discrete to add extra information to the system, or if some of the measures are just adding undue noise. For example, using chronic absenteeism as a way to measure student attendance is a positive choice, but D.C. is also proposing to include a more traditional measure of attendance that may be redundant and have the effect of muting the impact of chronic absenteeism on a school's rating. As a result, it could be difficult for educators and other stakeholders to know what D.C.'s priorities are and where schools should focus their resources and efforts.

At the high school level, including participation and performance on the AP/IB tests is a positive step and will provide a more complete picture of school success. Additionally, it is unclear whether or not all students are required to take the ACT/SAT, and D.C. should specify how it will provide accommodations for students with disabilities.

D.C.'s plan to include a re-enrollment indicator is an interesting choice given the large proportion of charter schools in the district. To clarify the indicator, D.C. should provide more information about how it will be used in the broader accountability system since D.C. is an open-enrollment district and parents move their children to new schools for any number of reasons. Moreover, there is a concern that this indicator could create perverse incentives for schools to seek to boost their re-enrollment score by employing practices and expending resources that might not serve students well. Similarly, the state's decision to include both a four-year and extended-year graduation rate is beneficial; however, D.C. could strengthen its plan, and align it closer to its long-term vision, by placing greater weight on the four-year rate. Finally, the inclusion of pre-k as an indicator is promising.

Counting *former* English learners as part of the English-learner subgroup could run the risk of inflating the performance of those students still receiving services. Since exiting students tend to have higher performance, the state should monitor its data to ensure it is not masking the performance of students who are still receiving services. It is also unclear how long D.C. plans to retain former English learners in this subgroup.

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?

| 1 | 2 | 3 | ✓ 4 | 5 |

D.C.'s plan assigns substantial weight to both academic achievement and growth. At the elementary level, for example, 30 percent of a school's rating would be based on achievement, and 40 percent would be based on growth.

D.C. also attempts to balance different types of incentives. For achievement, it includes separate weighting for the percentage of students who are approaching and meeting grade-level standards in math and English. And it includes both a norm-referenced growth model, which compares students to similarly performing peers, and a criterion-referenced measure, which will measure what percentage of students met their pre-determined growth targets. While these different measures combine to create a broad spectrum of incentives for schools, they could also be confusing, and D.C. should make sure to communicate its rationale behind the measures to parents and educators.

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?

| 1 | 2 | ✓ 3 | 4 | 5 |

D.C. deserves credit for including subgroup performance in its overall school ratings. It should also be commended for lowering its n-size from 25 to 10. Under the D.C. plan, race/ethnicity, economically disadvantaged, and English-learner subgroups each account for 5 percent of a school's overall grade. The students-with-disabilities subgroup receives more significant weight at 10 percent. Yet given this structure and the fact that D.C. identified 10 unique student groups, it is concerning that the low performance of any one group will not have a significant impact on a school's overall rating. D.C. should monitor its data and raise these weightings if they fail to provide sufficient pressure on schools to address individual subgroup performance. Similarly D.C. asserts that it will identify schools with low-performing subgroups as targeted support schools, but it does not present data on how its plan will play out in its schools.

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

| 1 | ✓ 2 | 3 | 4 | 5 |

D.C.'s School Transparency and Reporting (STAR) system will provide an annual summative rating for all public schools in D.C. Each school will receive one to five stars, providing parents with a clear grade for each school. That said, D.C. has not yet finalized its cut points for how its STAR summative rating will be determined.

Every three years D.C. plans to identify schools in the bottom 5 percent of the overall performance index as schools in need of comprehensive support and improvement.

Schools identified for targeted support and improvement follow a similar process. But in this case, a school is identified for targeted support if any subgroup's performance by itself would score among the bottom 5 percent of index scores. D.C. did not provide information on how many schools this method would identify, but it should run its data to ensure this is a meaningful check, and the plan should describe how many schools D.C. expects would be identified for each group.

Additionally, D.C.'s lack of consequences beyond feedback and support to schools that do not meet the 95 percent participation rate in annual testing is problematic, could undermine the school-rating system, and could result in low participation rates.

It is a positive step that for the first time, public charter schools will be rated with the same ratings as public schools for systematic accountability purposes. The plan could also be clearer in how it articulates the role between the Public Charter Schools Board and the Office of the State Superintendent of Education to ensure that the authorizer has clear authority over identifying low quality. The plan uses the term "coordinating" among these bodies, but it's not particularly clear what that would mean.

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?

1   ✓ 2   3   4   5

D.C. plans to use its 7 percent set-aside for school-improvement activities through both a formula and competitive process. However, the plan does not provide many details about how grants will be awarded and how much they will be. D.C. does not provide sufficient information about the amount of progress schools will need to demonstrate to show progress or that a particular intervention is working. Furthermore, there is not a clear process for how the state will engage with community stakeholders.

It does not appear that D.C. plans to lead the interventions and support process, but instead would monitor and fund strategies, as well as provide data and feedback to the charter and traditional public school sectors. Rather than describing how it will support struggling schools, D.C.'s plan includes a vague process of seeking proposals for interventions from external providers, and to sharing updates with stakeholders and community members.

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?

1   ✓ 2   3   4   5

Schools will exit comprehensive and targeted support status in three-year cycles, and can be granted a fourth year if they are making considerable progress. It is unclear what constitutes "considerable progress." Schools in targeted support status can exit their improvement status in two years if the specific group of students is no longer in the bottom 5 percent overall. Schools must perform self-assessments and create plans to address low subgroup performance. Since these schools are compared with each other, it is entirely possible that an identified school could exit an identified status less because of its improvements and more because another school underperformed.

D.C. does not provide a clear picture of the school-improvement continuum for schools, and the plan does not articulate clear consequences or interventions for schools that remain in the comprehensive support category for longer than six years. D.C. does not provide a clear framework for how schools must identify key issues in student performance, why a strategy or approach will work, and what kinds of support or resources will be required. Unhelpfully, the plan explicitly states that school closure would not be a state-initiated option, even after many years of underperformance.

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?

1	✓ 2	3	4	5

D.C. plans to include an annual resource equity review with a significant number of schools in need of comprehensive or targeted support. It will review access to experienced teachers, per-pupil expenditures, access to advanced coursework, pre-k programs, and specialized instructional support. Data will be updated and shared publicly at least every three years. There is no articulated plan to adjust resource inequity—it simply commits to conducting the review and sharing the data. Additionally, the data should be shared annually rather than on a three-year cycle.

D.C.'s plan does not describe a process for providing regular feedback to stakeholders, or to review and possibly modify the plan as implementation is underway. A cycle of feedback, review, and adjustment is not detailed here, either for school-improvement processes, or for public engagement purposes. There is no mention of how it will conduct public reporting of results on the accountability framework or other metrics beyond accountability.