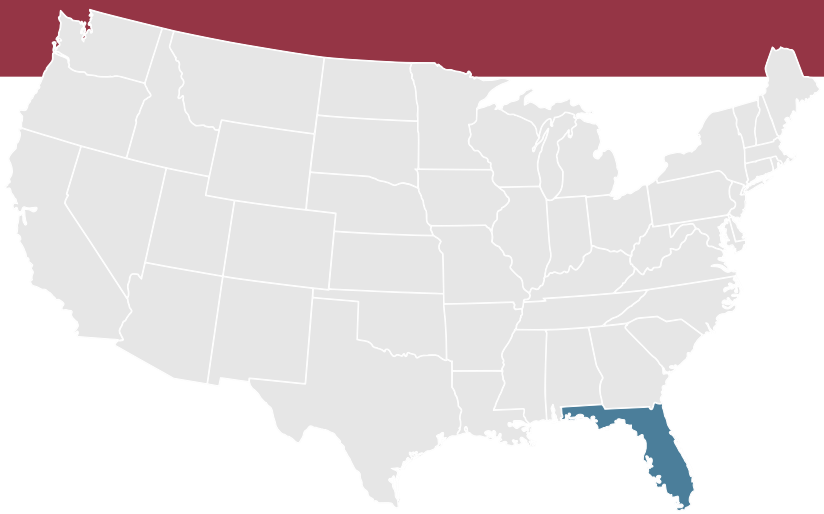
An Independent Review of ESSA State Plans



Florida

Project Overview

Bellwether Education Partners, in partnership with the Collaborative for Student Success, 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 reviewing 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 September–November 2017, and we anticipate that states will continue to update their plans going forward.

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

Overall Strengths and Weaknesses

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

Florida has a clear overall, student-focused vision around high standards, college and career readiness, and rigorous accountability and improvement. It makes the case, fairly convincingly and using historic data, that the approach it has taken to date is working and that it plans to stay the course.

Florida also has a clearly defined and easy-to-understand A-F grading system, which places a strong emphasis on academic growth and accelerated coursework. The system identifies struggling schools to ensure stakeholders, schools, and students know how schools are serving their students each year, and to guide differentiated school improvement strategies. Florida's inclusion of science and social studies assessments is another strong element, as are the subsequent interventions for schools that do not exit improvement.

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

Florida's approach to incorporating subgroups in its accountability system is a significant area for improvement and exposes some shortcomings of the state's existing system. First, the state does not include individual subgroup data in its A-F grades. While Florida provides data demonstrating that an indicator focused on the bottom quartile of students in a school over-represents students from traditionally underserved subgroups, it is unclear if schools could still receive high overall grades even if individual subgroups are performing poorly. Additionally, the state declines to define what a consistently underperforming subgroup means, and instead focuses on overall school averages to identify schools. This approach is not only inconsistent with ESSA, but could also result in schools with low-performing subgroups failing to receive targeted support.

Florida also has not incorporated an indicator of progress toward English language proficiency, as is required by ESSA, in its school identification process. Perhaps more alarming, the plan does not mention providing any accommodations or supports for its significant portion of students who are English learners, who also tend to be generally lower-performing than their English-speaking peers.

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

Florida has a clear overall, student-focused vision around high standards, college and career readiness, and rigorous accountability and improvement. It makes the case, fairly convincingly and using historic data, that the approach it has taken to date is working and that it plans to stay the course: The state's goals under ESSA are clearly aligned to the State Board of Education's strategic goals. This alignment comes with pros and cons, however. Sending a coherent signal for expectations across the state is helpful for educators, district and school leaders, and the public, but it also means—in Florida's case—that the "long-term" goals are more like "short-term" goals. They are based on a school year 2014-15 baseline and end in school year 2019-20, when the board will set its new five-year strategic goals. As a result, Florida's plan doesn't provide a specific long-term vision for student outcomes; Florida's goals are, more or less, its ESSA starting point.

Florida has included two different kinds of goals for achievement and graduation, with annual progress targets: one that examines increases overall, and another that examines reducing gaps between subgroups. For the first goal, Florida expects to increase the percentage of *all students* achieving at the proficient level by six points in reading and in math, and to increase four-year graduation rates by seven points (to 85 percent). For the second goal, Florida includes *individual subgroups* and aims to reduce the size of achievement and graduation gaps by one-third. While it is helpful that the plan includes data on previous student gains to validate the ambition of its goals, unfortunately, the state's students are already behind on meeting them, and the plan does not describe any adjustments the state is making.

Florida has also set long-term goals for English learners making progress toward English language proficiency (ELP) by the 2019-20 school year. Florida's goals aim to increase the percentage of students making sufficient gains by two points each year, from 60 to 66 percent. To determine whether English learners are making gains, Florida will count the number of English learners increasing their composite proficiency level, to the next highest whole number, or who maintain a composite level of at least a four out of six on the ELP test. This approach may not recognize that English learners make progress toward ELP at varying rates, often based on their initial ELP level and other characteristics. In addition, full "credit" is given for maintaining English learners at level 4 on the ELP test, thus incentivizing less focus on higher-performing (but still not fully proficient) English learners. Florida could strengthen its plan by adding information demonstrating that this is a valid approach to measure progress and that these goals are ambitious and aligned with the state's expectation for students to exit English learner services within no more than five years.

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

Florida has updated its academic standards and aligned assessments twice since 2011. Its most recent revisions, completed in 2015, were intended to ensure the standards were aligned to college- and career-ready expectations and introduced the Florida Standards Assessments (FSA). Florida could strengthen its plan further by providing more information about the process used to update the standards and assessments, particularly steps taken to collaborate with higher education partners and to validate quality and alignment with the depth and breadth of the state's standards.

Unlike some states, Florida provides multiple end-of-course tests in high schools, and the state encourages students to take the classes associated with these tests in middle school. Florida could strengthen its plan by describing the steps it is taking to ensure underserved students have equitable access to rigorous instruction that will prepare them to take these courses in middle school. Further, Florida is proposing to expand this flexibility beyond eighth-grade math to *all* subjects and *all* grade levels, as state law requires middle school students in these classes to only take the end-of-course test. Given that Florida wants to expand on ESSA's flexibility, the state should also more clearly articulate which tests students will take if they take some, or all, of the state's high school assessments early.

Supporting English learners on state assessments is one area for concern, as Florida indicates there are no languages spoken by English learners present to a significant extent, despite its large Spanish-speaking population. Due to state law, Florida only provides instruction in English. As a result, the state will only provide assessments in English, and the plan does not discuss any supports or accommodations provided to English learners to assist them in taking English-language assessments.

Florida could also strengthen its plan by providing more information about its alternate achievement standards and aligned assessments for students with the most severe cognitive disabilities, including the steps it will take to ensure that the state does not exceed the 1 percent cap on participation in the alternate assessment for students with the most significant cognitive disabilities.

Indicators: Are the state's chosen accountability indicators aligned to ensure targets and goals are met and likely to lead to improved educational outcomes for students? Why or why not?

1	✓ 2	3	4	5

Florida's plan provides a simple list of indicators that have been used in its longstanding A-F grading system. Some of these indicators are quite strong, such as its inclusion of science and social studies, signaling the critical importance of college and career readiness and a well-rounded education. And all of the indicators are oriented toward students' academic achievement or growth. But these strengths are undermined by notable and worrisome exclusions.

Specifically, Florida does not include an indicator measuring progress toward English language proficiency (ELP), as required by ESSA. By not including ELP as an academic indicator, the state has excluded this critical measure from "counting" in its accountability system, thus providing schools with few incentives to focus specifically on English learners. Although Florida set a goal for English learner progress, missing this goal carries no consequences.

The indicators Florida does include are relatively straightforward. Besides achievement in reading and math and on-time graduation rates, the state's school grades are based on achievement in science for all grade spans and in social studies for middle and high schools; learning gains for all students and the lowest-performing students in all grade spans; and measures of college and career readiness, or "acceleration," in middle and high schools. This "acceleration" metric deserves particular recognition. In middle school, it measures the percentage of students passing one of Florida's high school tests or receiving an industry certification, encouraging middle schools to increase the number of students prepared for success in high school. Similarly, the high school acceleration metric promotes preparedness for higher education and the workforce by measuring the percentage of graduates who are eligible for college credit on AP, IB, or Advanced International Certificate of Education (AICE) exams; who earned college credits via dual enrollment; or who earned nationally recognized industry certifications.

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

Florida deserves credit for pairing a clear indicator of student achievement against grade-level expectations (the percentage of students proficient in English language arts and math) with a growth indicator that measures student progress, putting additional emphasis on struggling students. Florida measures learning gains in high

school, as well as in the earlier grades, and allows students to demonstrate progress in one of four ways that, when taken together, incentivize educators to pay attention to every student. Students are considered as having made academic progress if they: (1) maintain a score in the top achievement level, level 5; (2) improve by one or more achievement levels; (3) maintain a passing achievement level of 3 or 4 and increase their score by at least one point; or (4) for students who remain in level 1 or 2, increase their score to a higher subcategory within the performance level. That said, it is not clear if the measure is as rigorous for students who are already proficient, as a one-point scale score increase appears to be a much smaller gain than moving up an entire performance level. Florida's plan could be strengthened by providing evidence validating that all of these criteria represent adequate growth.

In addition, Florida places significant weight on measuring these learning gains, giving them twice as much weight in the school grades calculation relative to proficiency in English language arts and math. The reason growth receives such significant emphasis is that it is measured not only for all students, but also for the lowest-performing quartile of students, creating strong incentives for educators and school leaders to focus on moving these students toward grade-level expectations. Some peers, however, felt that Florida overemphasized growth in its A-F grades as a result, relative to achievement, especially given that Florida's long-term goals center on increasing overall achievement.

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?

While the state will include subgroup data on report cards, Florida does not incorporate individual subgroup performance into its A-F school and district grades. Instead, the state measures growth for the bottom quartile of students, which may help capture some of these students, as subgroups that are historically underperforming are overrepresented in the bottom quartile. This could help incentivize schools to focus on students who need the most support. Florida also includes some data showing that schools with low grades have lower subgroup performance, on average. That said, the exclusion of individual subgroup data in A-F grades is still concerning. Without additional analysis, it's impossible to know if a school could have a low-performing subgroup, like English learners, and still receive a high overall grade.

In addition, Florida uses its A-F grades rather than individual subgroup data to identify schools for targeted support. This approach does not ensure schools with consistently underperforming subgroups are identified. Simply reporting on subgroups is inadequate to ensure that all subgroups of students receive a high-quality education and that schools struggling to support them receive the help and attention they need.

Florida's choice of 10 students as the minimum number (i.e., n-size) needed to include disaggregated data in its system is strong, and the state indicates that this is one reason to use the bottom quartile of students as its only subgroup for accountability, as nearly all schools are likely to have at least 10 students in their bottom quartile even if they do not have 10 students in many individual groups. This is undoubtedly true, but Florida could use its lowest-performing quartile subgroup in addition to individual subgroup performance, rather than instead of it. This would increase subgroup accountability without eliminating the combined subgroup that enables small schools to use some disaggregated data and that has been used to shine a light on struggling students.

In addition to failing to meaningfully include English learners in its accountability system, the state proposes to include former English learners as part of the subgroup for accountability purposes, but does not indicate how long they will be included. Since exiting students tend to have higher performance, the state should clarify the length of time they will be part of the subgroup and monitor its data to ensure their inclusion is not masking the performance of English learners still receiving services.

Finally, Florida's policy for holding schools accountable if they do not meet a 95 percent participation rate in annual testing is problematic. While these schools initially receive an "Incomplete" grade, districts may submit data to the state commissioner as part of a required analysis for each school missing the requirement. The analysis determines whether the grade would have changed if 95 percent of students participated; if the commissioner finds that the data is, in fact, representative overall, the school's grade is released without any penalty. ESSA requires all schools to include at least 95 percent of enrolled students in its achievement indicator, meaning that some non-tested students must be counted as non-proficient. Yet Florida's plan explicitly states it will not do so: "If [Florida] assigned the school a grade by counting non-tested students as though they had failed the assessment, the school grade could misrepresent the performance of the students at the school." Florida could take note from other states to create stronger incentives for schools to ensure all students are included, such as lowering schools a letter grade, or docking the number of points the school receives in the achievement indicator.

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

Florida's accountability system produces a single, straightforward A-F grade for schools and districts—which is likely helpful to parents and educators in understanding their school's overall performance. These grades are primarily based on student achievement and progress. However, the state then uses this grade to determine which schools have consistently underperforming subgroups, but this method will identify schools with low overall performance rather than low-performing subgroups of students.

Florida identifies for targeted support any school awarded a D grade (after receiving a C grade or better in the previous year). While the plan includes data showing that subgroup performance in D schools is generally lower than in A, B, and C schools, it does not include data on how many schools will be flagged for targeted support or ensure that any school with a struggling subgroup will be identified. It is likely that some schools with A, B, or C grades could still have at least one subgroup, like students with disabilities, English learners, or black students, that is very low-performing, because the performance of each individual group is not considered in A-F grades. In addition, Florida does not identify schools for additional targeted support—schools where a subgroup is performing similarly to schools among the bottom 5 percent in the state. Florida's plan would be strengthened by ensuring that schools with a single struggling group are identified for targeted support, regardless of school grade, and by including policies to ensure additional targeted support schools are also identified.

Florida identifies for comprehensive support any school that receives an F grade in a single year, or a D grade for two consecutive years—a strong policy that sends a clear signal about the level of performance that is unacceptable in Florida schools. The state also provides data showing that this includes 6.5 percent of Title I schools, or 132 schools. In addition, any high school with a four-year graduation rate below 67 percent will be placed in comprehensive support. Schools can be identified annually, beginning in 2018-19.

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

Florida's plan describes a multi-tiered system of supports for schools to help improve student outcomes, from the least intensive (Tier 1) to more comprehensive steps (Tier 3). Differentiating support in this manner can help to ensure assistance is appropriate to a school's needs, but Florida's plan could be strengthened by including much more detail on the specific strategies that will be employed and how these supports will promote the use of evidence-based interventions that have a demonstrated record of improving student outcomes in similar schools and settings. For example, the supports provided at Tiers 1 and 2 mainly involve feedback and assistance in creating school improvement plans or a turnaround options plan by state teams embedded across four regions, without articulating the kinds of evidence-based strategies that will be implemented.

Florida's Tier 3 interventions are much more rigorous and meant for schools in comprehensive support that have not improved. For these schools, turnaround is serious business: Unless one additional year is granted because the school is deemed likely to improve by the state, comprehensive support schools that do not improve to a C grade after two years must either close, or turn over their operation from the district to a charter or external operator with a demonstrated record of effectiveness. These are bold actions and could create the conditions in schools that are essential to turnaround, but Florida's plan could be improved with additional information on the effectiveness and process for implementing Tier 3 interventions.

Florida has also missed an opportunity to articulate a plan for how it will be using the 7 percent of its Title I dollars that are intended for school improvement activities. While the plan describes how the state will allocate its own staff time to districts with low-performing schools, it does not describe how fiscal resources will be allocated, nor how the state will encourage more equitable distribution of federal, state, and local resources to support school improvement activities. Further, the state should indicate if and how it intends to provide direct student services using the optional 3 percent Title I set-aside, which could provide an additional opportunity for the state to improve its low-performing schools.

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

Florida's exit criteria for identified schools are generally clear and require improved student outcomes, setting a high overall bar for both comprehensive and targeted support schools to improve to at least a C grade to be removed from improvement. Comprehensive support schools are expected to see this progress after two years of implementation, while targeted support schools only have one year (as a second D grade will result in their identification for comprehensive support). However, for targeted support schools, it is unclear whether a D school could improve its grade without actually improving the performance of individual subgroups, as the school grades do not take into account individual subgroup data.

Florida does, however, provide data indicating this level of progress is possible in a single year: 71 percent of the low-performing schools that had to present their turnaround plans to the State Board of Education in July 2016 improved to a C or better the following year. But it is less clear whether these criteria promote sustained improvement over time. At a minimum, Florida should continue to monitor its criteria to ensure they continue to appropriately balance rigor and attainability, as well as to monitor whether gains are sustained and subgroup performance is improving, as school grades are not based on subgroup performance. In addition, Florida's plan does not include exit criteria for high schools identified due to low graduation rates.

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

It is clear that Florida has some processes in place for continually refining and improving its system: The school rating system's pervasive use, the strong consequences for schools that do not improve quickly, and the support teams dispatched to districts with failing schools all speak to the state's commitment to improvement. Florida's history of modifying and enhancing its accountability plan is also encouraging. For example, the State Board will develop a new strategic plan after the 2019-20 school year, which will reset the state's goals based on more recent data. The plan could be strengthened, however, by providing additional detail regarding how stakeholders will be involved in these decisions and how their feedback will be considered.

Florida also has a plan in place to use data as a tool to support continuous improvement among *districts*, using its EDStats portal to provide clear, actionable data to parents and the public and to support identification of districts that need additional support. As all districts can access Tier 1 supports, this is one way to help schools where students are struggling or where large gaps exist, and could prevent the school from slipping to a D or F grade. Florida also employs an early warning system to help support students, particularly in middle and high schools, who are at risk of not graduating on time. The system helps school districts flag patterns associated with dropout or graduation delay and take action by deploying intervention strategies.