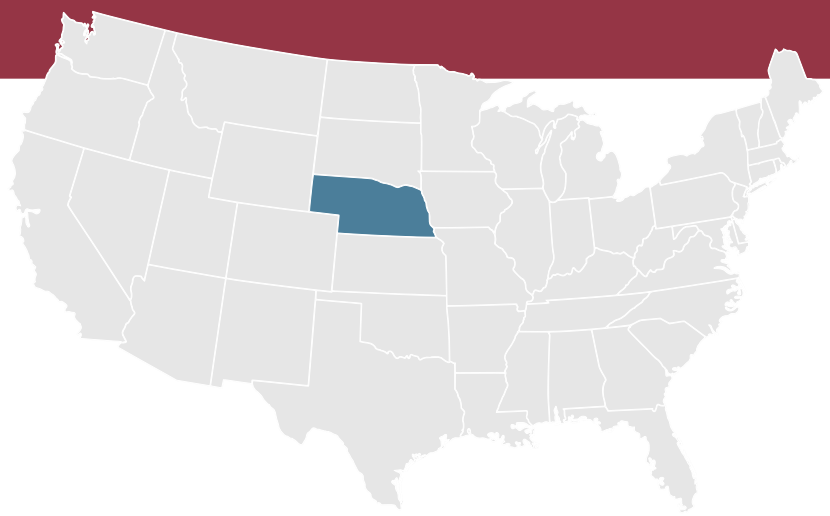


# An Independent Review of ESSA State Plans



## Nebraska

### *Project Overview*

**B**ellwether 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?

Nebraska has endeavored to align its ESSA plan with its existing strategic plan and accountability system, a process that dates back to 2014. In addition, the state engaged in an extensive process to involve multiple stakeholder groups throughout the plan’s development. The state’s mandatory ACT testing and inclusion of science and writing in the state accountability system are both strengths.

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

Nebraska’s vision is ambitious; however, its plan lacks detail. The state neglects to connect the dots between its goals, its accountability system, and how it will identify schools in need of improvement. As a result, Nebraska misses opportunities to tie these together in meaningful and actionable ways.

Nebraska uses a four-tier system, which on the surface appears straightforward, but doesn’t differentiate how a school is actually performing. For example, three of the four tiers are positive (“good,” “great,” and “excellent”). Nebraska places great emphasis on academic achievement scores, but the way the state calculates the score and distributes schools will likely shrink variation between schools, which could mask many schools from being highlighted as in need of improvement. The state has also not given any indication of how it would hold schools accountable for low-performing subgroups of students.

On the issue of school improvement, Nebraska law mandates the identification of only three Priority Schools. That should be expanded given the identification of comprehensive support schools. Heavy supports are directed to those three schools, with only shared best practices available to the other comprehensive and targeted support schools. The wait period over four years is too long for the identification of comprehensive support schools. Greater clarity is needed for what happens when improvements are not met.

There are a variety of instances where Nebraska takes an unnecessarily complicated approach. As a result, communicating the state’s goals, strategies, and outcomes to key stakeholders, like parents, could be very difficult and stymie efforts to achieve educational excellence for all of Nebraska’s students.

# 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?



Broadly speaking, Nebraska aims to increase the number of its citizens “who are ready for success in postsecondary education, career education, and civic life.” To realize this vision, the state has outlined two sets of goals. Nebraska’s goals were set in a strategic planning process, referred to often throughout its ESSA plan as AQuESTT (Accountability for a Quality Education System, Today and Tomorrow). The primary goal is that by 2026, the state will reduce the percentage of students who do not reach proficiency by half, including each subgroup of students. This goal applies to reading, math, and science proficiency. At the end of the 10-year period, if goals are met the all-students category will have 82 percent proficiency in math, 89 percent proficiency in reading, and 82 percent proficiency in science. A second goal set—which the state refers to as its challenge or stretch goals—accelerates both the rate and pace of change, aiming to reduce the number of non-proficient students by 70 percent in five years. This is a novel approach, in the event the first set of goals is insufficiently ambitious, but there is a tension created because having two sets of goals could create confusion and send different messages to different stakeholders, especially parents and educators. The plan could be strengthened by including a clear strategy for communicating the stretch goals and providing sufficient incentives for meeting them.

For high school students, Nebraska has the goal of reducing the dropout rate for all students, including subgroups of students, to less than 1 percent. In addition, the four-year graduation-rate goal is 92 percent for all students and not less than 85 percent for any one subgroup. Nebraska also has a seven-year graduation-rate goal of 95 percent for all students and not less than 90 percent for any one subgroup. The graduation-rate goals would be stronger if they held the same bar for all subgroups of students, and it’s not clear if they are sufficiently ambitious, given the long timeline coupled with the already high graduation rates for most subgroups. In addition, the ultimate goal for English language learners is below the state’s stated ambition of not having any group below 85 percent.

Overall, Nebraska’s goals are fairly straightforward. However, there is little overlap with the goals and the state’s accountability system (discussed below). This could cause confusion about the state’s vision of what excellence looks like.

**Standards and Assessments:** Is the state’s accountability system built on high-quality standards and assessments aligned to college and career readiness? Why or why not?

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Nebraska is one of the few states that decided not to adopt Common Core or any of the Common Core assessment consortia. That might be problematic for some states, yet the high performance on NAEP suggests that Nebraska’s standards, assessments, and accountability system are rigorous. The plan could be strengthened by making clear the alignment between the state’s assessments and college and career readiness.

Nebraska uses the ELPA21 assessment for English learners, which is aligned to Common Core State Standards. The state requires students to take the ACT in 11th grade. Absent an independent review, it’s unclear if the ACT is fully aligned with Nebraska’s state academic standards. While offering the ACT as the state’s official test offers many benefits, some of those key benefits may not extend fully to all students who require accommodations and may not receive college-reportable scores.

The state currently offers and provides math and science content assessments in Spanish for students in grades 3-8. General directions are provided in Spanish for the English language arts assessment. It is expected that ACT will be providing English learner accommodations for its assessment for the 2017-2018 administration.

Nebraska could strengthen its plan by providing more information about its alternate achievement standards and aligned assessments for students with the most severe cognitive disabilities, as well as ensuring that it has a process in place to meet the 1 percent cap on alternate assessments for students with the most significant cognitive disabilities.

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

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Nebraska has a unique set of indicators that may help diversify what it means to be a good school, but there are concerns about the impact on the state’s accountability system. The indicators include achievement, growth on reading and math (which it will measure in three separate ways), graduation rate (four-year and seven-year rates), science, “participation,” and what the state calls an “evidence based analysis” (EBA). The state does not explain how each indicator adds unique value to the system. The EBA is a questionnaire that each school completes to “explain its policies and practices” and is intended to acknowledge distinct circumstances and best educational practices. But while the EBA may be useful as a diagnostic tool, it’s not clear that it belongs in a high-

stakes accountability system. Once schools are held accountable for the results of the survey, there may be an incentive to be lenient with the scoring. Moreover, ESSA requires all accountability indicators be disaggregated by student subgroups, and a school-wide survey like the EBA would not meet that requirement.

Additionally, the state proposes a complicated school identification process (discussed below) that makes it difficult to understand how influential each of the indicators will be in categorizing schools. The state converts the raw data for each indicator into four-point scales, and it provides those cut points in the plan's Appendix F.

For high schools, the state uses graduation rates (the higher of the four- or seven-year rate) as a cap on the overall school's rating. If the school has a graduation rate over 90 percent, it initially receives the highest rating; if its graduation rate is between 80 and 90 percent, the school cannot receive higher than a 3 rating overall; if its graduation rate falls between 70 and 80 percent, the highest rating it can receive is a 2; and if a school has a graduation rate below 70 percent it automatically receives a 1 rating. This could be a good way to ensure graduation rates matter, but by using the higher of the four- and seven-year rates, Nebraska is not giving much incentive to on-time completion (almost by definition, the seven-year rate will always be higher than the four-year rate). Also, the state does not provide any data showing how many schools fall within these various cut points.

On the English language proficiency (ELP) indicator, the plan states that it will set differentiated growth standards depending on initial ELP up to the six-year maximum and that interim targets will be based on annual growth. However, more information about what these student-level trajectories look like would be beneficial. Additionally, the ELP indicator is not its own indicator but is actually consolidated with the academic growth indicator. As a result, it is unclear how ELP will be accounted for in schools' overall ratings, especially since they don't have weights.

Nebraska could simplify its calculations to achieve greater transparency.

**Academic Progress:** Has the state created sufficient incentives for schools to care about both student proficiency and student growth over time? Why or why not?

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The state's accountability system categorizes schools into one of four tiers—"Needs Improvement," "Good," "Great," and "Excellent." The initial categorization is solely on average state test scores for reading, math, science, and writing tests for grades 3-8, and ACT for high schools. These averages do not place any particular weight on students hitting grade-level performance targets. Moreover, initially categorizing schools based only on student proficiency will shrink variation and risks inflating scores. From the initial categorization, Nebraska then considers its other indicators to move schools' final categorization up or down, but it appears that it is difficult for the indicators to negatively impact schools' final categorization. Therefore student proficiency will carry much higher weight than other indicators, including growth.

Nebraska’s chosen progress growth measures are complicated and may be confusing to parents and educators. Schools’ growth performance is included in three separate ways. If a school shows “Improvement” over three years in its average achievement score, the state will raise the score by one point. Another measure, referred to as “Non-Proficiency,” measures the three-year trend in the percentage of students performing below grade-level standards. This is not a simple calculation, however, and involves multiplying scores by a “cut score line slope” and added to a “cut score line intercept.” Neither of these measures is tied to individual-level performance, and a school could look better simply by having new, higher-performing groups of students, as opposed to helping any individual students make progress.

Another calculation, referred to by the state as the “Growth” measure, does follow individual students year-over-year. If the student maintains or advances their performance level from the prior year, the school earns a growth point. If enough students earn growth points, the state awards the school a bonus point. However, this calculation is not exactly simple. The state does not publish any sort of uniform cut point determination for the number or percentage of students making growth; rather, the state describes a process whereby each school has a unique target based on “the count of all Growth-eligible assessments in the current year,” which is multiplied “by the given slope value,” then “the result is added to the intercept value.” This provides little front-end transparency for schools about what they need to shoot for. As in the “Improvement” and “Non-Proficiency” measures above, the “Growth” point is only used as a bonus and schools are not penalized if students fail to make growth.

Without more details, it is unclear how much growth will ultimately matter in the state’s system. Using the growth indicators as business rules that can only amplify, and never decrease, a school’s rating will prevent the state from prioritizing schools with particularly low growth, and it could ignore schools with high achievement and low growth, which will mask underperforming groups of students.

**All Students:** Does the state system mask the performance of some subgroups of students, or does it have adequate checks in place to ensure all students (including all subgroups of students) receive a high-quality education? Why or why not?

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Subgroup performance is not included in Nebraska’s four-tier accountability system. There is no mention of subgroup performance in determining schools’ beginning status, nor in the business rules for the indicators, which can move schools’ final rankings up or down. The state has not yet defined how it plans to identify schools with low-performing subgroups, and it appears in violation of federal requirements around identifying a school where a subgroup, on its own, performs as poorly as the bottom 5 percent of schools in the state.

Nebraska could consider using multiple years of data or lowering the n-size of students to mitigate this issue. In addition, using assessment scores instead of students—and applying them differently to different indicators—raises questions and creates transparency issues.

Interestingly, Nebraska has chosen not to include former students with disabilities into its subgroup, but will include former English learners into the EL subgroup. This seems inconsistent and potentially problematic for diluting the needs of currently identified ELs. An alternative would be to create a separate former EL subgroup for accountability purposes, particularly if the n-size approach is adjusted.

Nebraska calls for a series of escalating sanctions if a school’s participation falls below the 95 percent threshold. Notably, any school with a participation rate below 85 percent automatically receives the lowest rating (Needs Improvement) in the state’s accountability system. However, the state would have a stronger plan if it applied similar rules to subgroup participation, rather than solely basing them on school-wide averages.

**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?

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Nebraska will produce a single summative rating for each school in the state using its four-tier rating system. But while this system may appear simple on the surface, the way individual measures are combined may be confusing to educators and parents. Moreover, Nebraska’s plan to address subgroup under-performance lacks significant detail.

As discussed above, the state categorizes each school based on achievement; schools can raise or lower their scores based on their performance on other indicators. Because Nebraska does not give any data on how many schools are moved up or down based on these rules, it seems at least plausible that schools ranked at the top of the system—“excellent”—and those at the bottom—“needs improvement”—will have their rating solely determined by their academic achievement score. That is, it remains unclear whether Nebraska’s system actually diversifies what it means to be a good school.

Nebraska will identify Title I schools in its bottom category, “Needs Improvement,” as schools in need of comprehensive support. Nebraska will also identify a school for comprehensive support if it is a high school with a four-year graduation rate below 75 percent, or if the school “contains chronically low-performing subgroups.” Schools with identified non-proficient subgroups will be eligible for targeted support. While Nebraska deserves credit for going beyond the federal requirement to identify high schools, it does not appear to define “chronically low-performing subgroups” and could benefit from additional clarity.

The state also has a designation required by state law called “Priority Schools.” The state must designate no more than three Priority Schools at a time. Schools in Priority status receive “the most intensive state support.” The state plans to document successful practices in Priority Schools and assemble them into toolkits that can be shared with all schools needing comprehensive or targeted supports.

**Supporting Schools:** Are the state’s planned interventions in comprehensive and targeted support schools evidence-based and sufficiently rigorous to match the challenges those schools face? Why or why not?

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Nebraska’s plan for supporting schools is fairly limited. Comprehensive support schools must either revise their improvement plan, create a new one, or—in year four of identification—face the possibility of an “alternate administrative structure.” However, the details of this are not provided. The plan for targeted support schools is even weaker. If a targeted support school fails to progress, the state will review its progress plan and may eventually identify the school for comprehensive support.

The state will rely primarily on state staff, education service units (ESU), and external consultants to support schools and help districts identify specific needs and evidence-based interventions. Given there are 17 ESUs across Nebraska, it is likely that some are more effective than others. Are there systems in place to facilitate learning across the ESUs? Can the best ones be leveraged to support the state’s weakest schools and districts? Nebraska might do well to consider these and other questions to maximize its talent and resources.

Nebraska also deserves credit for using a competitive approach to award school improvement funds to districts. The state plans to develop a grant process to select from potential intervention strategies that align with the state’s AQuESTT system and priority school intervention process. Because the grant process has not yet been developed, we cannot comment on its structure or goals, but it could be a good strategy for funding innovative approaches. Additionally, Nebraska has declined to use the optional 3 percent set-aside, which would have provided an additional opportunity for the state to align school improvement activities with its statewide goals.

Nebraska’s plan could also benefit from articulating more extensive interventions for schools that fail to improve over time. The plan indicates state leaders will continue to work with the governor and the legislature to determine how to improve consistently low-performing schools, but the plan could benefit from a timeline for doing so.



**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?



Each school designated in need of improvement in Nebraska will complete a school improvement plan to be approved by the state. Schools will meet exit criteria if they complete all goals identified in the improvement plan and no longer have low-performing subgroups. This could be a strong approach, but the state’s ESSA plan does not provide examples of what improvement plan goals might look like, so it is difficult to determine if this procedure will ensure that low-performing schools will demonstrate sustained improvements. Moreover, it may be possible for a school to meet its goals and still be in the state’s bottom 5 percent.

**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?



It is clear that Nebraska worked with various state stakeholders to integrate the state ESSA plan with its recently developed strategic vision and accountability system, AQuESTT. The state engaged stakeholders online and through in-person feedback sessions to outline their visions for the Nebraska education system. The state also conducted “ESSA Stakeholders Listening Tour” meetings throughout the state to engage feedback on the state’s plan.

Nebraska’s plan calls for ongoing engagement with districts, regional service centers, and advocacy partners throughout ESSA implementation. This includes outreach via an information campaign and solicitation of feedback. Nevertheless, the state’s plan is thin on specifics as to how it might learn and adapt from its implementation efforts. However, the plan states it will do an annual review focused on identifying inequities and making revisions, changes, and modifications to the plan where necessary. Moving forward, the state should consider accelerating its response to low performance given that, in some cases, struggling schools are being provided more than ample time to demonstrate improvement.