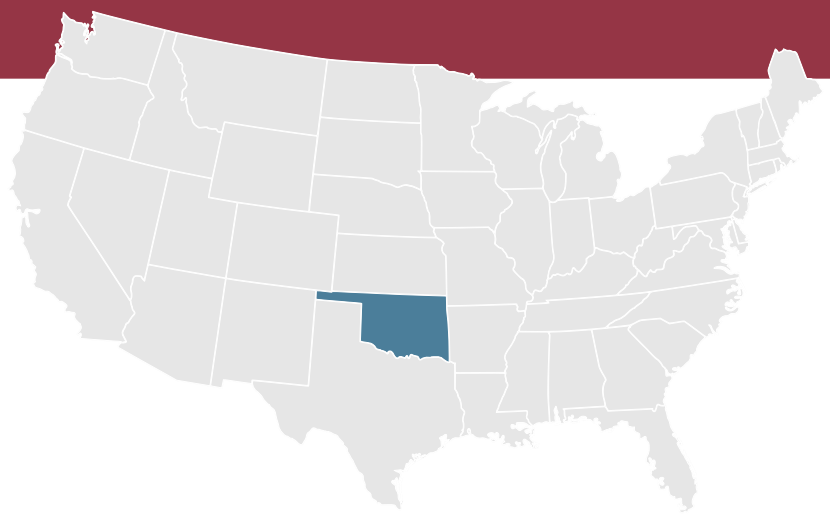


An Independent Review of ESSA State Plans



Oklahoma

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?

Oklahoma should be commended for putting significant thought and effort into its ESSA plan. The state has sought to make itself a leader by trying new accountability measures that other states have not yet implemented, with the aim of developing a system that holds schools accountable for the performance of all students.

Oklahoma’s accountability system is clear and easy for stakeholders to understand. The state uses an A-F school-rating system and incorporates its schools in need of support into that same system. Having one, streamlined system for accountability is a strength of Oklahoma’s plan. Notably, the state includes science and a college- and career-ready indicator in its accountability system. This signals that Oklahoma is considering the critical importance of a well-rounded education for all students.

Oklahoma also has a strong system in place for supporting schools. The state has a promising focus on evidence-based intervention policies and a comprehensive and thoughtful plan in place to put them into action.

Lastly, the state did a commendable job of incorporating both local and national expertise and best practices into this plan. The commitment to stakeholder engagement throughout the process of developing the state plan is clear and laudable.

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

The overall uncertainty and lack of detail in Oklahoma’s plan makes it difficult to tell how attainable its long-term goals are. For example, Oklahoma hopes to arrive at its academic achievement goal by 2025 without including baseline data, interim targets, achievement indicator methodologies, etc. Oklahoma does not provide academic achievement targets because it is waiting on baseline data from the state’s new assessment, which will not be available until the end of the 2017-18 academic year. Similarly, it has not yet settled on a definition for how it will measure achievement in its accountability system, or how low-performing schools will demonstrate sufficient progress to exit improvement status.

While the state’s system for identifying schools is clear, the bar appears to be set very low for schools to show improvement. Schools are only required to improve on one of three important student achievement measures and can do so before a three-year implementation cycle ends. This is concerning because schools where many students are not being served well may not receive the support necessary to sustain improvements after a short period of time.

There is also concern that some student subgroups, including but not limited to students with disabilities, will not be well represented in Oklahoma’s accountability system. Oklahoma plans to assign students to only one subgroup, even if they might qualify for additional groups. This would undermine transparency and minimize the number of students included in other subgroups, and could mean many students who are low income and members of other subgroups are effectively rendered invisible. For example, if all of the students in a school who have a disability are also low income, the school may be erroneously perceived as meeting the needs of students with disabilities when this is not, in fact, the case.

Finally, Oklahoma’s proposed handling of the participation rate requirement does little to ensure that all students participate in assessments. Although the state may not have a problem with participation now, the proposed penalty of a “minus” after the letter grades does not provide a sufficient incentive for schools to ensure all students, especially historically low-performing subgroups of students, participate in state assessments.

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?



Oklahoma’s plan is aligned with the state’s eight-year strategic plan, with the vision that “every child deserves and must have the opportunity for a strong, competitive education that can lead to a productive and fulfilling life.” The pillars of the plan are strong—academic success, exceptional educators, and engaged communities. Goals include scoring in the top 20 states on NAEP, reducing the need for college remediation, improving graduation rates, improving access to early childhood education, and improving access to effective teachers. The state also expresses an interest in expanding the use of data in local schools.

Oklahoma’s goals include being “among the top 10 states for students graduating in the four-, five- and six-year cohorts.” To achieve this vision, the state sets an intermediate goal of all student subgroups reaching a 90 percent four-year graduation rate by 2025 and to rank in the top 10 states in terms of graduation rate.

The state does not provide long-term goal targets for achievement. The state says that because it is administering new assessments in the 2017-18 school year, it must “analyze the baseline data to establish concrete long-term goals that are both challenging and achievable.” With a reset in the state’s assessment cut scores and a resulting drop in proficiency rates (75 percent to 34 percent in 8th grade English Language Arts, for example), assessment results from 2016 and 2017 are not comparable. Oklahoma says that by 2025, the majority of all students will be expected to achieve a scale score that indicates their readiness for the challenges of college or career and that the goals must be far enough from the baseline such that each interim goal “is both statistically significant and meaningful.” Oklahoma should articulate a clear methodology for calculating goals once its new data come in. Without long-term goal targets, it is difficult to evaluate the ambition of the state’s goals and the alignment of those goals to a larger vision.

Oklahoma’s goals for English language learners do appear to be both ambitious and attainable, with differentiation for students based on their entry-level performance and their grade level. The state lays out a clear rationale for the goals around English language proficiency, in which one year of learning should result in one scale score of growth, so students who enter with a proficiency level of three would have three years to exit; a student entering with a proficiency level of one would have five years. This is based on the recommendations of a task force and English learner experts.

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?



Oklahoma’s plan provides historical context for its current standards, which had to be rewritten after the state legislature repealed the Common Core standards in 2014. These new standards are the first time English language arts and math standards in Oklahoma have included vertical progressions in pre-k through 12th grade—an important aspect that allows instructors to have an understanding of where students should be performing in their grade and where they will be expected to go in future grades.

The state is committed to having national comparability in its assessments and closing the discrepancy between proficiency as defined by the state and proficiency as defined by NAEP (i.e. the “honesty gap”). As such, the state is setting cut scores for its assessments that align with NAEP, the SAT, and the ACT. Oklahoma’s new system of statewide summative assessments is aligned to the state’s standards. The state will use its statewide assessment for grades 3-8 and then require the SAT or ACT for its high school assessment, and will require districts to choose either the SAT or ACT. The state explains its reasoning for forcing districts to choose by saying that it “ensures that local districts can provide the commercial off-the-shelf college-readiness assessment that best fits their community and student needs,” but it’s not clear why the state couldn’t have chosen a default option to encourage greater consistency. Absent an independent review, we don’t yet know if the SAT and ACT are fully

aligned with Oklahoma’s state academic standards. While those tests offer many benefits, some of those key benefits may not extend fully to all students who require accommodations, and they may not receive college-reportable scores.

To ensure that the state does not exceed the 1 percent participation cap on alternate assessments and to address concerns regarding misidentification of students with significant disabilities, the state will analyze all available data regarding participation rates and learner characteristics of students participating in the alternate assessment. It is important to go beyond analysis and include monitoring and technical assistance as well. Additionally, the state could strengthen its plan by providing more information about its alternate achievement standards and aligned assessments for students with the most severe cognitive disabilities.

Based on 2015-16 data, 42,291 of Oklahoma’s English learners are Spanish speaking, which represents 6 percent of the total student population. Since Spanish-speaking students are the only group currently representing greater than 5 percent of the total student population, Oklahoma focused its efforts on providing oral language translations for its assessments into Spanish, and under Oklahoma’s new assessment contract, math and science assessments will be available to English learners in written Spanish translation.

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?



Oklahoma has chosen a simple list of high-quality indicators to include in its accountability system (academic achievement, academic growth, chronic absenteeism, postsecondary opportunities, graduation rates, and progress on English-language acquisition). Although Oklahoma has not yet finalized how it plans to measure student achievement, it is notable that Oklahoma plans to include science in those calculations, in addition to English language arts and math. This decision may help ameliorate concerns about curriculum narrowing and expand the scope of what schools focus on beyond reading and math.

Oklahoma’s postsecondary opportunity indicator is promising and aligned with the state’s goals. For this indicator, Oklahoma will begin by giving schools credit for students completing each of the following: AP classes; IB classes; dual (concurrent) enrollment in postsecondary courses; an approved, work-based internship or apprenticeship; and/or programs leading to industry certification. The state takes a very thoughtful approach in this area that should be a model for other states. Specifically, in the first year, this measure will include participation in these opportunities. In the second and third years, the state will move to crediting successful outcomes (e.g., move from rewarding enrollment in an AP course to rewarding the receipt of a score of 3 or higher on the AP test).

In addition, Oklahoma is proposing to incorporate four-, five-, and six-year graduation rates into its accountability system. Including extended graduation rates is commendable, and Oklahoma’s plan is bolstered by the fact that it places greater weight on its four-year rate to emphasize on-time completion. Moreover, in the accountability system, both for the state’s A-F Report Card and for designations of comprehensive and targeted support, the state will continue to use the federal four-year cohort graduation rate formula.

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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For elementary schools, achievement is weighted at 39 percent, growth is weighted at 33 percent, English language proficiency is weighted at 17 percent, and chronic absenteeism is weighted at 11 percent, which will create incentives for schools to care about both student proficiency and growth over time. In high school, achievement is weighted at 50 percent, English language proficiency 17 percent, and graduation rate, chronic absenteeism, and postsecondary opportunity at 11 percent each.

Oklahoma has not yet decided between two different options of how it will measure academic achievement. Under the first option, each student would have a scale score goal, based on his or her grade level and the particular group to which the student belongs (e.g., a 3rd-grade black student would have a different target than a 3rd-grade Hispanic student, and so on). This option would calculate the percentage of students who meet or exceed their target. Under a second option, the state would calculate each student’s distance from his or her target, and the school would receive the average of these distances. The second option is problematic because it would allow high-performing students to mask the results of low performers. Oklahoma’s plan would be stronger and more closely aligned to the state’s long-term goals if it chose the first option.

Oklahoma is proposing to use a relatively simple measure of progress called a “value table,” which gives students credit for advancing performance levels. This model is not as precise or sophisticated as some other alternatives, but the upside is that it provides clear, upfront signals to students, parents, and teachers about what constitutes sufficient growth in a given year. While not explicitly a growth-to-standard model, this growth measure does reward schools that are able to move students from one category of performance to another. The downside of this model is that it creates rigid cut points at the borders of the performance levels, and schools may choose to focus on students right on the cusp of a given level. Oklahoma has mitigated against this to some degree by creating multiple levels that will capture a broad range of performance. Oklahoma should think about implementing a growth model that would reward schools for moving students for any growth they make, even if the students don’t move from one performance level to another.

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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Oklahoma deserves credit for using a low subgroup threshold of 10 students. This is a relatively low number that will provide transparency by ensuring that more students are captured in the state’s accountability system. However, this low threshold is compromised by the fact that Oklahoma will only assign each student to a single subgroup for the state’s achievement measure. This system could mask the performance of certain subgroups of students, and prioritizing the “economically disadvantaged” subgroup will result in fewer students being placed in subgroups based on race, ethnicity, disability, or English learner status. Oklahoma does, however, deserve credit for reporting performance of students with an incarcerated parent.

Although Oklahoma will prevent schools with low-performing subgroups from receiving an A in the school-rating system, this may be insufficient to ensure that overall school ratings reflect the performance of disaggregated subgroups. At the very least, Oklahoma should consider dropping any school’s letter grade if they have very low-performing subgroups (e.g. drop an otherwise B school to a C if they have low-performing subgroups). Additionally, some peers felt that Oklahoma should consider including a specific weight for each disaggregated group of students to strengthen its A-F letter grades.

For targeted support schools, the state will identify schools where a subgroup “is in the bottom 5 percent on two or more indicators.” This approach could ignore schools with very low performance in only one category, or where a school is just outside the 5 percent threshold. Without seeing more data, it’s difficult to know how many schools this rule might identify.

Moreover, Oklahoma’s proposed consequence for failing to meet the 95 percent participation requirement does not create a strong deterrent. A school that fails to meet the requirement will receive a “minus” after its summative letter grade, but this system could still allow schools to decide that they’d rather have a high summative letter grade with a minus (by not testing some of their students) than a lower summative letter grade with no minus (by testing all of their students).

Oklahoma administers English language arts and mathematics assessments to recently arrived English learners while excluding those test scores from accountability in their first year. It will use the year-one test scores as a baseline, then include these students’ scores in the accountability system as part of the growth indicator in year two. Finally, in year three, test scores for recently arrived English learners will be fully incorporated into all accountability measures.

It is noteworthy that Oklahoma is focusing on providing more professional development for parents and teachers who work with students with disabilities.

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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Oklahoma’s A-F school-rating system provides stakeholders with a single, clear, summative rating to understand school performance. The letter grade rating provides simplicity in school identification, with elementary and middle schools that earn an F identified for comprehensive support. For high schools, the same criteria will apply, with graduation rates as an additional consideration. Oklahoma says high schools with a four-year graduation rate of 67 percent or lower will be automatically identified as needing comprehensive support.

Targeted support identification is based on subgroup performance (if a subgroup is in the bottom 5 percent on two or more indicators in the accountability system). Additionally, schools that are identified for targeted support for three consecutive years due to lack of improvement with the same student group will be deemed “chronically low-performing.” It may be worth considering whether the criteria for this should be limited to lack of improvement with the same student group or lack of improvement among any student group.

Because the state is newly implementing more rigorous standards and assessments, it is in the process of calibrating the new A-F accountability system. In the baseline year (2017-18), Oklahoma will calibrate its A-F accountability system so that approximately 5 percent of schools will receive an F and 5 percent will receive an A. This will allow the state to focus its limited resources on its worst performing schools, however, it is also possible that this type of forced calibration may mask underperforming schools and subgroups of students, and it also sends a counterproductive message that only a limited number of schools can serve all students well.

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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Oklahoma has a nine-point school improvement framework tool that is used to guide school intervention policies. The state plan has a very promising focus on evidence-based intervention policies, including different tiers of evidence that can be used to evaluate different intervention options. The emphasis on evidence-based options is balanced by a respect for the importance of local decision-making and the need to tailor intervention approaches to individual school needs.

The state has developed a strong set of evidence-based interventions and a sound process for ensuring understanding and adoption of the interventions by schools. Particularly promising components include training educators to meaningfully use data to improve learning and improving the instructional capacity of teachers

through professional learning that is aligned to the school’s needs as identified by the data. The interventions include co-teaching, tiered instruction, Teacher Leader Effectiveness (TLE), professional learning communities, Response to Intervention (RTI), Positive Behavior and Supports (PBIS), professional development in project-based learning, and English learner strategies.

The process will include regular in-person school visits by the state’s school support team (based in part on strong stakeholder feedback encouraging a close relationship between struggling schools and the state department of education), trainings around leadership development and data inquiry, a needs assessment aligned to the state’s Nine Essential Elements of School Improvement, providing a list of approved evidence-based interventions, training and partnering with schools to use the needs assessment to develop evidence-based practices, providing professional development that matches evidence-based practices to locally identified needs, and allocating school improvement dollars, which will be determined using a formula allocation in combination with a competitive grant.

Because schools that have hired an outside professional development provider have had the greatest gains in the past, the state allows schools to use these dollars to bring in a national provider or work with independent consultants.

The focus on data is an essential ingredient for success of the intervention process, with the state providing training and support in the collection of data and review of it. The state recommends that all schools implement components of the Assessment in Data Literacy Outreach program and the Oklahoma Data Inquiry Project.

Oklahoma will allocate the seven percent of federal funds dedicated for school improvement activities through a combination of formula allocations and competitive grants, but the plan does not provide many specifics on how those would be allocated. Additionally, the state has indicated it will not take the 3 percent optional set-aside for direct student services, which would have provided an additional opportunity for the state to align its school improvement activities with its statewide goals.

Still, it is clear that the state is making a big investment in intervention and support of struggling schools and has developed a well-thought-out process and set of interventions that hold promise.

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?

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Oklahoma is proposing what appears to be a low bar for schools to exit improvement status. Schools would not have to wait to the end of the designated three-year cycle to exit comprehensive support status. Instead, schools could exit comprehensive support at any time during the three-year cycle when student performance is no longer in the bottom 5 percent, the school’s four-year graduation rate is at or above 67 percent, or the school improves

the performance of chronically low-performing student groups such that the student group surpasses “similarly situated student groups in schools in the bottom 5 percent.” Overall, this criteria is problematic because a school that improves on one of these measures could still be in need of support, and one or two years does not allow time for schools to receive the support they need to sufficiently demonstrate sustained progress.

It is a concern that a school can annually exit targeted support designation when the underperforming student group for which it was identified demonstrates “substantial” improvement on its ranking, such that the school climbs out of the bottom 5 percent for that particular student group. Oklahoma says it does not yet have data to suggest what “substantial improvement” will mean. The state’s plan says the threshold of substantial improvement “will be determined once the state has multiple years of data under the new accountability system and can empirically establish an expected rate of improvement that is both statistically significant and meaningful.”

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?

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Oklahoma clearly outlined its robust stakeholder engagement during the drafting of the ESSA plan and its accompanying eight-year strategic plan, “Oklahoma Edge,” which included developing a vetting process for feedback to ensure that feedback was reviewed by the appropriate relevant parties and duly considered. The state engaged a diverse group and clearly articulates where it incorporated feedback throughout the plan.

Oklahoma held a series of luncheons across the state that included stakeholder breakout sessions and polling of a survey that was completed by a broad range of stakeholders. The superintendent also has in place 13 advisory councils that provided feedback and a Committee of Practitioners. After releasing the initial draft, the superintendent held a series of town halls that drew nearly 1,000 attendees. This was followed by another survey, presentations to tribal associations, and a summit with tribal leaders.

The plan states that school designations will occur every three years and that the state department of education will re-evaluate the designation cycle at the end of 2020-2021 to ensure that the needs of schools are being met—and that if the evidence supports the need for earlier support and intervention, a modification to the ESSA plan will be sent to the U.S. Department of Education for approval. Oklahoma could further strengthen its plan by being clear about how it’s going to leverage its stakeholder engagement and school support strategies to create a culture of continuous improvement that will provide the information necessary to update its plan and improve its system.