## An Independent Review of ESSA State Plans



## Project Overview

n 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.



## **Overall Strengths and Weaknesses**

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

Tennessee's plan is robust, transparent, and comprehensive. The state set a clear vision for reform that offers a comprehensive and ambitious plan and theory of action. The state aligns district and school accountability systems that rely on high-quality indicators. Tennessee's inclusion of a ready-to-graduate indicator focuses on students demonstrating college and career readiness, which goes beyond just earning a high school credential.

Tennessee's accountability system assigns considerable weight to subgroup performance. Finally, the state provides a clear continuum of supports and interventions ranging from district-led support to the achievement school district, and the state's plan outlines a variety of structures that will help the state pilot new opportunities, identify promising practices, share them across the state, and engage continually with stakeholders.

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

Tennessee outlines a variety of structures to continue to engage stakeholders throughout implementation, which will be important because the plan includes some complex elements that may be a challenge for parents, policymakers, and school leaders to understand. For example, there are multiple measures for demonstrating proficiency, growth, and graduation, which may make it difficult to compare results schoolto-school and year-to-year.

Additionally, the state is proposing to continue combining the scores of black, Hispanic, and Native American students into one "BHN" subgroup. The state provides compelling data behind its use of this combined group, but it appears inconsistent with the requirements of ESSA to capture any low-performing group. Regardless, Tennessee will need to continue to monitor its data to ensure that some groups of students don't compensate for lower-performing groups. Finally, the plan lacks detail on how the state and districts will support those schools identified with low subgroup performance, including how those schools will demonstrate sufficient progress for those groups.

## **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?











Tennessee has established clear overarching goals to improve academic performance, graduation rates, and performance on college entrance exams, and to ensure the majority of graduates earn some form of postsecondary credential. However, there is some concern that corresponding proficiency goals and interim targets may be overly ambitious and not clearly aligned with the state's broader long-term vision.

Tennessee's goals are structured such that students who are behind are required to make more progress. The same is true for the state's graduation goal, which is set at 95 percent for all students and each student subgroup. Due to upcoming changes in state assessments, Tennessee will be revising its goals after the 2016-17 school year. Tennessee should also be commended for including science among its statewide goals.

**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?











Tennessee's standards and assessments have undergone significant changes in recent years. In fact, the state will implement new English-language arts and math standards in 2017-18. Science and social studies will follow in the subsequent two years. Since Tennessee's new standards and tests are still an unknown commodity, the plan outlines a rigorous standards review process and timeline for the standards to be implemented in classrooms and the schedule for the assessments aligned with the standards.

Additionally, the state has worked with representatives of higher education to certify its assessments are aligned with expectations for first-year college students.

Tennessee will use the WIDA assessments for its English-learner students, which allows the state to learn from other states. The state included a description of its alternate achievement standards and targets and gave a general sense of the students for whom these standards were developed. The plan would be strengthened, however, if Tennessee described its process to meet the 1 percent cap on alternative 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?











Tennessee selected a variety of different indicators that are related to long-term student success and are aligned with its goals of improving students' postsecondary success. The plan also clearly conveys the alignment between the district accountability framework and the school accountability framework.

But while the indicators appear strong on the surface, the actual calculations are complicated and at times unclear, and ultimately may result in a lack of transparency and comparability across schools. It is problematic that many of the state's indicators, such as achievement, ready to graduate, and chronically out of school, can be met in multiple ways and have different expectations for each school and student subgroup. For example, two schools could earn the same grade for proficiency even though the schools have very different proficiency rates because those schools have different proficiency targets. This makes comparisons from school to school and year to year difficult.

Given how difficult it will be for parents to compare schools, Tennessee has taken steps to consider how it will communicate to parents and other stakeholders whether a school was evaluated based on absolute performance or growth toward targets. The state should also make clear what that means for student success and how to think about comparisons between schools.

Tennessee should be commended for including district-level accountability, but the state could do more to clarify how the district-level grades interact with school-performance grades. More could also be done to clarify the consequences of low district performance. Tennessee should also be commended for including different indicators that will be reported as transparency measures. Those indicators will help to provide parents and stakeholders with a more holistic view of school performance.

For its graduation indicator, the state makes very clear that students who receive a special education diploma, certificate of completion, or any other degree or certificate not fully aligned with the state's academic content standards are not counted in the four-year or extended-year graduation rate. The state will also require a 95 percent participation rate for all students and for each subgroup, and will use the participation rate as a very rigorous accountability indicator. Schools receive an automatic "F" on the achievement indicator if the 95 percent figure is not reached, a strong rule that other states should consider emulating.

**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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Tennessee's plan clearly values both growth and proficiency. Every school, even high-achieving ones, have growth and proficiency targets, and even the growth measure tracks student progress toward grade-level standards. The state's achievement measure is a hybrid where schools will get credit for either the absolute performance of their students or the percentage of students meeting annual proficiency targets, whichever is higher. However, the flipside of setting different annual targets for each school and subgroup is that it could be confusing to educators and parents.

Still, the state places such a strong value on these two indicators that they are the only measures used to identify the 5 percent of the lowest-achieving schools in the state. This strong focus on proficiency and growth will ensure schools focus on helping all students improve across the performance spectrum.

**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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Tennessee's accountability system weights 40 percent of each school's overall grade on subgroup performance, which is significant. However, in both its school-rating system and in its identification of schools in need of targeted support, Tennessee proposes combining the scores of black, Hispanic, and Native American students into one "BHN" subgroup. Because those students are distributed unevenly across the state, Tennessee provides data suggesting that the combined BHN subgroup would allow the state to capture 43,000 black, Hispanic, and Native American students who would otherwise not be counted under its accountability system.

While these numbers are impressive, ESSA requires states to identify a school with any low-performing subgroup as a school in need of targeted support and improvement. Moreover, there is a relatively large disparity in performance among the three groups included in the combined BHN group. For example, while the overall reading proficiency in Tennessee is 30.4 percent, reading proficiency is 15.7 for African-Americans, 22.9 for Hispanic, and 33.8 percent for Native Americans. In light of these differences, Tennessee should continue to monitor its data to ensure that some groups of students don't compensate for lower-performing groups. The state could strengthen its plan by limiting its use of the combined group only to cases where individual subgroups did not meet the minimum n-size requirements on their own.

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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Tennessee proposes a system in which schools receive an A-F grade for each indicator and a single, clear summative rating for the school. Every three years, the state will identify "F" schools as comprehensive support and improvement schools. The state will identify targeted support schools in two ways. First, it will capture the lowest 5 percent each of its combined "BHN" subgroup, economically disadvantaged students, English learners, and students with disabilities. In addition, all schools given a "D" rating overall will also be identified. Schools can be identified for multiple categories, and the state estimates that approximately 13-14 percent of schools will be captured through one of these definitions.

Tennessee should be applauded for creating an A-F system that will provide clear school labels for parents, and the state deserves credit for weighting subgroups at 40 percent of a school's rating. The state's use of its combined subgroup in identifying targeted support schools does not appear to comply with ESSA's requirements (see above). On the other hand, Tennessee has provided data showing that this approach has helped narrow achievement gaps in recent years.

**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?











Tennessee's school supports and interventions for comprehensive support schools are thoughtful and have potential for high impact. Tennessee details its prior commitment to its lowest-performing schools and appropriately emphasizes how it will build on this prior approach. Tennessee appears to have based its theory of action and the supports on data from its previous interventions, as well as broader research.

The state proposes a school-improvement strategy with multiple tiers of support and multiple state authorities to drive dramatic improvement in the lowest-performing schools and districts. The continuum ranges from district-level interventions, such as the iZone model for newly identified schools, to membership in the state's Achievement School District for those schools that fail to improve.

Tennessee should be commended for planning to distribute its 7 percent set-aside dedicated for schoolimprovement activities through a competitive grant process. The state will award federal school-improvement funds to those districts committed to interventions with the strongest evidence base.

Tennessee should also be applauded for including a description of how it will recognize high-performing and high-growth schools.

Tennessee could continue to strengthen its plan by being clearer about how schools with low subgroup performance will receive supports to improve. Comprehensive support and improvement schools receive a continuum of interventions and supports that increase in intensity over time, while the supports aimed at targeted support schools lacked the same level of specificity.

**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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Tennessee should be applauded for the rigorous exit criteria it has established for a subset of its very lowestperforming schools, including schools in the Achievement School District. Tennessee will not exit a school from this subset of schools if it has entered one of the more extensive interventions until the school has completed the full length of the intervention.

On the other hand, the exit requirements for targeted support and improvement schools are clear but not particularly rigorous. A school can exit this status if it is not identified on the list the following year for the subgroup for which it was identified for improvement, which could allow schools to bounce in and out of identification without making any real improvement.

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?











Tennessee has been a national model in stakeholder engagement and the development of statewide vision for educational improvement. The state has a process in place for reviewing and collecting data on the progress of schools. The state offers a clear vision for reform with support and intervention strategies in place to drive toward achieving the state's goals. The state's plan outlines a variety of structures that will help the state pilot new opportunities, identify promising practices, share them across the state, and engage continually with stakeholders. Some of the strategies include successful practices, such as student advisory councils, Tennessee Education Research Alliance, and a Migrant Education Program parent advisory council.