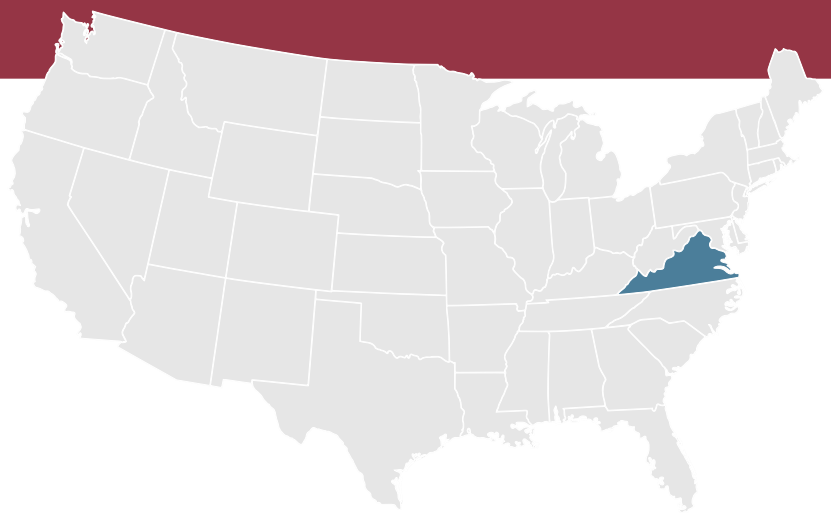


# An Independent Review of ESSA State Plans



## Virginia

### *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?

Virginia’s ESSA plan does a commendable job of creating a unified accountability system with coherence between its long-term goals, indicators, and identification criteria for low-performing schools, with a strong emphasis on academic indicators. The state’s aim of creating an accountability system that recognizes schools with students making progress toward proficiency, as well as those where students are already meeting grade-level expectations, is a worthwhile one. It also places particular emphasis on closing gaps in achievement and growth between each subgroup and all students by 2024.

In addition, Virginia stands apart for identifying high schools based on low graduation rates for all students as well as subgroups, and the state’s exit criteria for targeted support schools require sustained gains for subgroups based on meeting the state’s interim targets, making these goals meaningful.

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

Virginia’s plan has a number of areas for improvement. For example, the state does not indicate how it will provide a clear picture of school quality across its indicators to parents and the public, either through a dashboard of performance measures or overall school rating, and only appears to report which schools are identified for support. Without a clear reporting mechanism, student performance on each metric will not be understandable, clear, or transparent, and schools may not be able to understand why they were identified for improvement or what they need to do to show demonstrable gains.

Virginia’s key accountability indicator is an amalgamation of three measures: achievement, growth, and English language proficiency (which the state calls the “combined rate”). Because of the combined rate, the plan does not include stand-alone goals or an indicator tied to meeting grade-level expectations. And because Virginia uses the combined rate to measure student performance and identify schools, its limitations cascade throughout its accountability and school improvement systems.

Further, Virginia’s long-term goals, while laudable for expecting closure of achievement gaps, are uneven in their ambition and rigor, expecting little to no improvement from many groups of students, including the all-students category, over time. Many subgroups already have met Virginia’s goals, and the state could define a more compelling vision for student success toward college and career readiness.

Virginia’s plan also lacks any indication of the kinds of interventions or evidence-based practices it will use to support its low-performing schools. There are no clear principles for school turnaround, guidance or requirements for evidence-based activities, or theory of action underlying its school improvement processes, particularly for schools that fail to improve over time.

## 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?

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As a whole, Virginia’s plan lacks a vision and provides minimal information required to comply with the law’s requirements. Its targets and long-term goals are admirable in that they aspire to completely close gaps across subgroups by the 2023-24 school year, but that simplifies the fact that the resulting goals are completely unambitious for some student groups and, perhaps, overly optimistic for others.

Specifically, the goals expect 75 percent success in reading and 70 percent in math on a new “combined” performance rate (described below) and 84 percent on-time graduation, with corresponding goals of 85 percent for five-year and 86 percent for six-year graduation. However, some subgroups, including the all-students group, already meet the long-term goals for many indicators before the ESSA plan is even implemented. That’s because the goals aim to bring up the performance of lower-performing subgroups to meet the level of performance demonstrated currently by all students. For example, only 56 percent of students with disabilities currently graduate on time, and the long-term goal would increase that to 84 percent by 2023-24—a significant gain—but white students already meet the goal, and black students are just two points from it. Virginia does not provide analysis or a clear rationale for expecting such large gains from certain groups, but no further progress from others, creating an overall imbalance between goals that are ambitious and goals that are achievable.

Further, Virginia proposes to set achievement goals using a new “combined rate” and thus lacks goals for students meeting grade-level standards. The combined rate includes proficiency and progress in English language arts and math, plus English language proficiency (ELP), in one metric, adding unnecessary confusion and inhibiting transparency. In the combined rate, schools receive full credit if a student: (1) scored proficient on state tests; (2) scored non-proficient but gained at least half a performance level (i.e., from a “low” Basic to a “high” Basic score); or (3) was neither proficient nor making growth in reading, but is an English learner who made an unspecified

amount of ELP progress (this does not apply in math). All three outcomes are treated equally, masking schools' strengths and weaknesses on each measure individually. Although the combined rate may serve an important purpose, as it seeks to give credit to schools where students are non-proficient but making progress in other areas, that purpose could be met in other ways. The combined rate does a disservice to students, particularly English learners, and ESSA specifically requires states to set achievement goals separately even if they use growth and other measures for accountability.

Virginia also does not yet have goals for progress toward ELP, as the state is waiting for another year of test data on the WIDA ACCESS 2.0. Finally, while not required by ESSA, Virginia should be commended for electing to set a goal and annual targets for chronic absenteeism. Unfortunately, the methodology suffers from flaws similar to that of other goals: Two subgroups already meet the goal of 10 percent, and many others are starting from a baseline of 11 percent. The plan would be strengthened by offering a rationale for how a one- or two-point decrease over seven years is a rigorous expectation.

**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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Virginia uses standards and assessments unique to the Commonwealth, with the exception of the WIDA ACCESS 2.0 assessment of ELP. Unfortunately, Virginia's ESSA plan does not discuss college and career readiness or postsecondary preparation as part of its overall vision for improving student outcomes, and does not indicate how the state has collaborated, if at all, with institutions of higher education to demonstrate how its standards and assessments are aligned with expectations for first-year college students. The plan could be strengthened with a clearer explanation of its standards and the process used to validate alignment.

Additionally, Virginia does not assess students in any language other than English, despite indicating that both Arabic and Spanish are present to a significant extent among the state's English learner population. While indicating that Virginia only provides English-language instruction and that stakeholders prefer to administer tests to English learners in their language of instruction, research indicates that English learners may be best served by being permitted to take content-area assessments in their native languages. The plan includes little discussion of the language needs Virginia students face, including any accommodations English learners are provided to fully participate.

Lastly, Virginia could strengthen its plan by providing more information about its alternate achievement standards and aligned assessments for students with the most severe cognitive disabilities, particularly 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?

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Virginia states it will use a minimal list of indicators in its accountability system (academic achievement, academic growth, progress toward English language proficiency, graduation rates, and chronic absenteeism). These indicators are clearly based on the state’s long-term goals and interim measures of progress, with strong alignment between the two.

However, achievement, growth, and English language proficiency are, in effect, combined into a single indicator in the plan: the combined rate. Although it is laudable that Virginia wants to recognize schools where students make progress toward proficiency, the combined rate means there is no clear measure capturing whether or not students are reaching the state’s grade-level standards, masks performance on each of the individual measures, and makes it unclear whether they will even be reported separately for transparency’s sake. As a result, meaningful differences between a school with a combined rate of 70 because two-thirds of its students made progress, and a school with a combined rate of 70 because two-thirds of its students met grade-level standards, could be lost. In addition, for English learners, this system may encourage schools to focus exclusively on making progress on ELP rather than on other academic content. While achieving ELP is an important goal, it should not take the place of development of content knowledge.

A simple list of indicators does have advantages, and chronic absenteeism is an evidence-based indicator that is correlated strongly with student learning. But Virginia may also want to consider ways to broaden its focus. For example, the state could consider including additional subject areas, such as science. Further, the inclusion of chronic absenteeism may not do enough to change the trajectory of the large percentage of students in subgroups who have to make dramatic improvements in order to graduate ready for college and careers. Virginia would also have a stronger plan if it placed greater emphasis on the four-year graduation rate (relative to extended-year rates) and considered additional measures of students’ college and career readiness, as many states have done.

Finally, Virginia indicates it may modify its graduation rate calculation to permit students with significant cognitive disabilities tested on alternate assessments (i.e., up to 1 percent of students) who earn Applied Studies Diplomas to be counted in the four-year rate. If Virginia pursues this option, it should take care to ensure the Applied Studies Diploma does not lower expectations for these students and that it conforms with the law’s provisions regarding state-defined alternate diplomas to ensure they are standards-based and aligned with the requirements for a regular high school diploma.

**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?



Virginia includes a student achievement and a student growth measure in its combined rate, signaling a commitment to value both proficiency and progress. But the state’s “combined rate” creates a set of incentives that are not present in other states that keep these indicators separate. At the systems level, the combined rate will likely give school and district leaders an incentive to prioritize both student growth and achievement. However, schools get “credit” if students achieve either proficiency or growth, so it may not create adequate incentives to emphasize both at an individual student level.

In addition, because the combined rate double-counts those students who attain proficiency after scoring non-proficient the previous year, there is an extra incentive for schools and educators to increase their focus on so-called “bubble kids.” It is undoubtedly important for students to meet grade-level standards and for schools to help students reach proficiency, but Virginia’s approach may miss opportunities to encourage growth beyond that standard toward college and career readiness, as growth is not calculated for already-proficient students. If a school has high proficiency rates, it has little incentive to care about growth, except for those students who are closest to the proficiency cut point.

Finally, Virginia’s growth calculation gives credit for non-proficient students who move half of a performance level (e.g., from a “low” Basic score to a “high” Basic score), but also permits schools to receive credit for students showing progress on alternative growth measures approved by the state board of education. Virginia provides no specifics about measures that have been approved, their validity or reliability, or how the state ensures comparability if multiple metrics are used to determine student progress—details that should be added to the plan.

**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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In Virginia, individual subgroup performance against the state’s goals is considered when determining which schools are identified for targeted support, and the proposed criteria place a strong emphasis on student achievement or progress. Although each subgroup is considered individually in making these determinations, Virginia will continue to only examine subgroups in which at least 30 students are enrolled in the school. While this number is higher than in many other states, Virginia does combine three years of data to determine if there is a sufficient number of students in a subgroup, and the plan includes data demonstrating how its minimum group size of 30 over three years results in similar inclusion of subgroups as a minimum group size of 10 in a single year. Still, the data reveal that a significant percentage of schools are not held accountable for English learners or Asian or Hispanic students. Virginia could consider moving to a lower minimum group size, which still provides an appropriate balance between reliability and validity, inclusion of subgroups, and protection of privacy.

Virginia’s plan also lacks rigor and specifics in its strategy to ensure participation in state testing. The state says merely that schools failing to meet the 95 percent requirement must “develop a plan,” and schools that do not meet the requirement for three or more years will be required to implement “additional actions and interventions as appropriate.” The Commonwealth should strengthen its plan by offering additional details and actions for schools that fail to meet the participation requirement to ensure that the validity of assessment results isn’t compromised by low participation rates among all students or any subgroup of students.

Lastly, the state is proposing to include former English learners in the subgroup for accountability purposes, but does not indicate for how long a period of time they will be included. In addition to clarifying this timeline, the state should monitor its data to ensure it is not masking the performance of students who are still receiving services, since exiting students tend to have higher performance. This is especially important because of the problematic inclusion of English learners in the combined rate, who will be fully “counted” in the numerator (and schools will receive full credit) for making progress toward ELP without actually achieving or growing on academic content.

**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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Virginia identifies four categories of schools: comprehensive support, targeted support, additional targeted support, and non-identified. These determinations are based on the state’s goals and targets, giving them real significance in the accountability system. But it is unclear how—or if—performance on each indicator will be presented on report cards to help educators, parents, and the public understand performance in context, especially given the use of a combined rate that aggregates results on three of the five indicators into a single metric. Virginia should consider providing a summative rating and/or a dashboard of each indicator separately to provide a clearer snapshot of school quality. In addition, the methodology for identifying schools is complicated and relies on relative rankings using the combined rate. While this approach strongly emphasizes academic outcomes, it does not provide schools with clear, predetermined performance expectations up front, and it is ambiguous whether high schools can be identified for any reason other than low graduation rates.

For all identification categories, Virginia proposes first defining a set of eligible schools based on failure to meet state targets in either the prior year or on average over three years, excluding schools with improved performance by a set percentage from the prior year (keeping in place a version of No Child Left Behind’s “safe harbor” rule). Comprehensive support schools are identified once every three years. Once eligible schools are determined, they are rank-ordered on the combined rate, and the lowest-performing 5 percent of Title I schools are identified. Chronic absenteeism plays a minimal and unusual role—it will be used only if there is a “tie” in the rankings. Because Virginia does not provide details about how often this situation is likely to come up, it is unclear if chronic absenteeism will ever play a factor in identifying schools. Further, it is unclear if high schools could be identified based on the combined rate, as progress is not measured in high schools. Virginia does have a separate rule that any high school with a four-year graduation rate below 67 percent is identified.

Additional targeted support schools are identified in the same year, on the same timeline, and in a similar manner as comprehensive support schools, but by examining subgroups instead of all students. Because the same threshold used to identify schools for comprehensive support will be applied here, there are similar concerns with the methodology, and it is difficult to determine whether it will capture all schools with struggling subgroups. Virginia does not provide any data in its plan to explain how many schools its additional targeted support and targeted support methodologies will identify. In addition, Virginia’s definition of schools with consistently underperforming subgroups needing “targeted support” will identify a subset of schools already identified for “additional targeted support,” and is less likely to result in support for different, additional students.

On a positive note, Virginia has proposed separate criteria to identify schools with low subgroup graduation rates, which is admirable and goes beyond ESSA’s requirements.



**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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Virginia’s plan says very little about how the state supports struggling schools or what policies and frameworks it will establish for districts to ensure that interventions are evidence-based and rigorous. Although Virginia provided a few generic details regarding technical assistance for district staff to support low-performing schools, many of these offerings appear to be voluntary, and the state does not commit to providing support in specific areas—instead, offering a laundry list where assistance “may” be available. As a result, there are significant holes in how Virginia will support a coherent, thoughtful, and differentiated system of school interventions.

Further, the state does not appear to involve itself directly in helping schools improve, and there is no description showing that improvement efforts have had success in the past. Even in cases where “state-determined” interventions are required (because a school has lingered in comprehensive support for four years), a memorandum of understanding (MOU) between the district and state board of education on a corrective action plan is the main improvement vehicle, with technical assistance from the state agency to implement the plan. These are all process points. It is unclear what components the MOU or plan will have, and how these steps will ensure that the school implements new, more rigorous reforms that will help turn around the school.

Finally, the state provides little explanation for how it will allocate the 7 percent of federal funds dedicated for school-improvement activities and encourage districts to use these funds to support evidence-based activities aligned to the needs of low-performing schools. In fact, Virginia seems to indicate that it will ask schools for their plan to use these funds only after the funds have been awarded. This could be a powerful leverage point if the Commonwealth used the application process to encourage thoughtful, rigorous improvement strategies. Virginia’s plan also misses opportunities to address inequities between schools and districts by reducing the state’s role to periodically review resource allocation in districts with identified schools to a monitoring and compliance exercise, and to take advantage of the optional set-aside of funds for direct student services. The resource allocation review described in Virginia’s plan is limited to how districts are managing their portion of the 7 percent set-aside, rather than the broader distribution of federal, state, and local funds.

**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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Virginia’s exit criteria for additional targeted support schools are strong because they are linked to meeting the state’s interim performance targets and require two years of sustained progress. Schools must either meet their targets or make sufficient progress to qualify for safe harbor (a 10 percent reduction in the failure rate on state tests for two years in a row, or a 2.5 percent increase in graduation rates for two years in a row). These are clear and provide an upfront target for schools to meet.

On the other hand, Virginia’s exit criteria for comprehensive support schools are essentially the reverse of its identification criteria. The state is proposing to exit schools after two years if the school slightly improves its relative ranking, regardless of how much progress that particular school made. Under this approach, there are no safeguards to ensure that schools have made substantial changes that will lead to sustained improvements. Virginia could strengthen its plan, and provide better guidance to schools, by identifying upfront exit criteria that would require true, sustained gains. That said, the state’s proposal to require schools exiting comprehensive status to implement a sustainability plan for at least one additional year and to monitor these schools is laudable—and could help mitigate peers’ concerns that these schools will exit prior to making substantial 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?

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Virginia did not describe how the state will monitor ESSA implementation and ensure continuous improvement, lacking any comprehensive plans to continue to engage stakeholders or adjust its activities based on implementation. The plan also didn’t highlight any specific efforts to engage stakeholders thus far; the Commonwealth would be well served to more clearly articulate its processes for continuing engagement over time and could develop some sort of overarching stakeholder group that provides feedback and helps the state make decisions on the impact of the accountability system on school, district, and classroom practice at regular intervals.