# An Independent Review of ESSA State Plans

## Wisconsin

#### Project Overview

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?

Overall, Wisconsin's plan is clear, well organized, and easy to understand. Schools will be held accountable for a short list of high-quality indicators, and the state has provided a clear explanation of how those indicators will be measured and combined into an overall rating system. While there are questions about whether the state's goals are too ambitious, the state has good intentions and aspirations behind them. The state has also done important work to engage stakeholders in the writing of its plan, including equity advocates.

Additionally, Wisconsin's plan indicates the inclusion of evidence-based interventions that schools may adopt. The state also deserves credit for its consideration of educational equity regarding school interventions as a part of its plan and emphasizing technical assistance, additional supportive strategies, and investments..

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

Wisconsin's plan largely continues processes and efforts it has been pursuing for the last several years. On the positive side, that means the state can point to stakeholder buy-in for decisions it is already implementing, such as how it defines the minimum size for a subgroup, its growth model, and its school intervention strategies. However, Wisconsin could have capitalized on opportunities provided by ESSA to move in new directions. For example, the state chose not to include science in its accountability system even though it will be testing students in it. And at the high school level, Wisconsin has not expanded its indicator list to look at measures of college and career readiness, despite identifying this as an urgent need for all students. Neither of these measures are required by ESSA, but they would seem to fit with Wisconsin's broader vision and help expand the definition of what it means to be a successful school.

Wisconsin's plan also lacks key details in other areas. It does not include a specific weighting for subgroups in its school rating process, despite a number of places in the plan where it discussed the importance of equity. Instead, it's relying on a back-end check to identify schools with low-performing subgroups, but it has not provided data showing the implications of its decisions. Ultimately, the accountability system may have little impact on schools beyond the very lowest performers.

Finally, Wisconsin's school improvement process may not be aggressive enough to dramatically change the trajectory of low-performing schools. The state's school improvement activities appear broad, and the supports and consequences outlined in the plan are not backed by strong evidence of success.

### **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?











Wisconsin's plan articulates aligned and ambitious long-term goals that intend to cut current achievement gaps in half in six years. The state's long-term goals for students are aligned to the state's expectation that all students graduate from high school ready for college and careers, an expectation that was mentioned throughout Wisconsin's plan. Importantly, the state's long-term goals take into account the performance levels of various subgroups. For example, the required annual increase in proficiency rates is 1 percentage point for white students and 4.2 percentage points for black students. The state provided historical performance suggesting that the annual progress expected going forward for black students and students with disabilities is roughly as much progress as they made in the last six years combined. However, a 1-percentage-point annual increase in proficiency rates across all students statewide may not be rigorous enough to ensure all students are college and career ready, which is a stated goal in Wisconsin's plan.

Wisconsin takes a similar approach to four-year graduation rates, with annual increases of 0.3 percentage points for white students (toward a six-year goal of 94.5 percent) but annual increases of 2.7 percentage points asked of black students (toward a six-year goal of 80.1 percent). The state deserves credit for including goals around a seven-year graduation rate that are similar in methodology but more ambitious for each group.

The state has also presented a well-thought-out plan for measuring English language proficiency. Students will have unique targets based on their age and entering level of English language proficiency, and the state has run historical data to decide on what level of progress is sufficient for students, depending on their age and proficiency level. The state plan also includes important information about how annual growth targets are calculated, which will increase transparency of English learner performance in the state.

**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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Wisconsin's plans includes a link to its state standards and to a council tasked with reviewing those standards, but it does not provide much information about the rigor of those standards and how the state determines whether its standards are aligned to college and career readiness. The state plan provides some information about the standards review process, which is helpful context; however, more information on this review process would also be helpful. Additionally, while the plan mentions the Wisconsin Student Assessment System, there is little information provided about it or how the state determines whether or not its assessments are aligned with its standards.

Wisconsin's plan defines a language other than English that is "present to a significant extent" as any language spoken by at least 20 percent of the state's English learner population. This captures Spanish, but the second most common language, Hmong, comes close at 16 percent. The state translates its assessments into Spanish, allows word-to-word dictionaries, or both. It could increase equity in access to the assessment by permitting the use of bilingual dictionaries for other native spoken languages as it does for Spanish.

Finally, the state could strengthen its plan by providing the steps it will take to ensure that it 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?



Wisconsin's plan includes a relatively short list of indicators to be included in the state's accountability system. For elementary schools, its system will include student achievement (English language arts and math), student growth, English language proficiency, and chronic absenteeism. The indicators are the same for high schools, except graduation rates replace growth.

For high schools, Wisconsin plans to weight graduation rates between 37.5 percent and 42.5 percent, depending on the English learner population at the school. This weight may be too high, especially since the accountability system does not include a specific measure related to college and career readiness for high school students. Moreover, the state plan averages the four- and seven-year graduation rates, which may not provide sufficient

incentive for schools to focus on on-time graduation. Additionally, Wisconsin chose not to include measures of college and career readiness; its plan would be stronger if it included measures along these lines (e.g., Advanced Placement participation and success, or a measure of postsecondary enrollment without the need for remediation).

Finally, Wisconsin will make a statistical adjustment to its indicators to "standardize" each of them and put them on comparative scales. This will allow Wisconsin to combine different indicators and acknowledge (positive or negative) outliers, but it may be confusing and hard to act upon. Wisconsin could strengthen its plan by describing how it will explain this system to parents and educators in the state.

**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?











Wisconsin will give equal weighting to both academic proficiency and growth, but the specific models it chose may not give sufficient incentive for schools to pay attention to students reaching the state's grade-level standards.

For its achievement indicator, Wisconsin plans to use an index for English language arts and mathematics. For students achieving at level 1, below basic, a school is awarded zero points. Students scoring basic earn 0.5 points, proficient 1 point, and advanced 1.5 points. While Wisconsin deserves credit for attempting to measure performance across a broad spectrum, it risks overemphasizing the highest levels of performance at the expense of masking other students. As an example, a hypothetical school with half of its students at advanced and half at basic would earn the same number of points as a school with all of its students meeting grade-level proficiency. Although this example may be extreme, Wisconsin should monitor its data to ensure that it is appropriately balancing higher-level performance with its grade-level expectations. In determining the academic achievement metric, the state's plan says it will average multiple years of data with "greater weight to more recent years' data," but it should specify how it would weight each year of data.

Wisconsin's growth model, Student Growth Percentiles (SGP), compares the progress students make against their similarly performing peers and converts those scores into percentiles. While this approach is relatively simple to calculate and interpret, it does not ensure students cover the content they need to master to stay on track toward mastery at graduation. Additionally, given that SGPs can be used across assessments and the fact that Wisconsin has few additional measures for high schools, the state seems to have missed an opportunity to include it as a measure for high schools.

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?











Wisconsin lowered its minimum subgroup size to 20 students a few years ago, and it plans to keep it at 20 for the purposes of ESSA. While Wisconsin decided to keep its subgroup size at 20 students as a result of stakeholder feedback, the state also provided data showing that higher percentages of schools and at-risk subgroups would be captured under an even lower group size, and the state may find opportunities to make improvements to its plan by lowering the subgroup size again.

Wisconsin says it will report indicator-level scores for each subgroup of students, but it does not mention including a distinct weight for subgroups in its school rating system. Instead, the state says it will identify schools with consistently underperforming subgroups if "any subgroup is in the bottom 10 percent of statewide performance for all students and in the bottom 10 percent of statewide subgroup performance across all indicators." However, it's unclear what this means exactly. For example, would Wisconsin identify the bottom 10 percent of each subgroup, or would it only look at the bottom 10 percent of all subgroups? Those would have different ramifications for schools in the state, but Wisconsin doesn't elaborate or provide any estimates of how many schools might be identified under its definitions.

Wisconsin is proposing to include students who are former English language learners in the English learner subgroup. Since exiting students tend to have higher performance, the state should monitor its data to ensure it is not masking the performance of students who are still receiving services. The state plan should also include information about how long recently exited ELs will be included in the English learner subgroup. Wisconsin will give English language proficiency a slightly higher weight in schools with higher concentrations of English learners (10 percent versus 5 percent of a school's rating). On the other hand, Wisconsin's ESSA plan explicitly references its State Systemic Improvement Plan under the Individuals with Disabilities Education Act. This plan focuses on increasing literacy rates for students with disabilities. Including it in the state's ESSA plan demonstrates a commitment to educating all students, and to integrating and aligning state improvement efforts.

Finally, Wisconsin would strengthen its plan by explaining what will happen to schools in the event their overall participation rate or the participation rate of any particular subgroup falls below 95 percent.

**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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Wisconsin has articulated a method for identifying schools with very low overall performance, but it could provide greater clarity for how it will identify other schools in need of improvement. The state will rank schools based on the indicators mentioned above, and then identify the bottom 5 percent of schools for comprehensive support. Similarly, the state says it will identify for comprehensive support any high school with a graduation rate below 67 percent, but it doesn't specify whether this would be based on the state's four- or seven-year graduation rate.

Additionally, as explained above, Wisconsin's system does not provide sufficient detail about how student subgroups factor into identification for improvement. Without this information, the accountability system could mask the performance of student subgroups. Moreover, schools with low-performing subgroups can linger as targeted support schools for six years, which seems to be too long to wait to elevate additional support structures.

Finally, Wisconsin's decision to include a category of "Schools of Recognition" is commendable, but it's not clear how it would be identifying those schools and if that process aligns with its newly proposed system.

**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?



Wisconsin's plan includes a list of rigorous, research-based interventions that may be used to support schools. The state also deserves credit for school improvement strategies that are based on providing additional supports and technical assistance, which the state refers to as "implementation science," rather than attempting to influence change through prescribed, punitive actions.

However, the state says it is against "overly prescriptive" interventions, and there's a risk that without guidance from the state, districts may use strategies that are not based on sound evidence. The state could help address this concern by including more information about how interventions for comprehensive support schools will differ from those in need of more targeted support. Additionally, the state has not mentioned how it plans to use the 7 percent of federal funds dedicated to school improvement activities, or if and how it intends to provide direct student services using the optional 3 percent set-aside.

If low-performing schools continue to struggle, the state has the power to direct interventions, such as: employing a standard, consistent, research-based curriculum throughout the district; implementing a system of academic and behavioral supports and early interventions for students; providing additional learning time; or implementing changes in administrative and personnel structures and monitoring the school district's finances. However, Wisconsin does not lay out criteria for how it would decide which interventions it would direct and when it might employ them.

**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?



Wisconsin states that comprehensive and targeted support schools will exit improvement status if they no longer meet the reason for their identification, if the school demonstrates "sustained progress toward the long-term goals," and if the school demonstrates "evidence of systems, structures, and/or procedures that ensure sustained and sustainable high-quality improvement planning and practices." These could be the foundation for strong exit criteria, but the state does not give a definition of sustained progress and what that would look like, or an explanation for how the state would determine if the school had sustainable practices in place. Moreover, since Wisconsin is using a normative identification system where schools are compared with each other, an identified school could jump in the rankings if other schools regress, even without improving its own performance.

**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?



Wisconsin seems to have conducted a number of stakeholder engagement processes over the last 10 years. This suggests that there is sufficient buy-in and processes for feedback and continuous improvement. The state should be commended in particular for gathering feedback from equity advocates through the State Superintendent's Equity Council.

However, the state plan does not lay out a clear plan for what engagement will look like going forward during the implementation process. Especially for the school improvement activities, it would be helpful to include more information about how the community and schools will provide feedback to the state, and how the state will learn from its own efforts, during the implementation process.