## An Independent Review of ESSA State Plans

## Wyoming

**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 <u>here</u>.



## **Overall Strengths and Weaknesses**

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

Wyoming is leading with its aggressive reliance on growth in its accountability system. Wyoming's 50 percent reliance on growth and the use of Student Growth Percentiles (SGP) will be an outlier among states and will be watched by other states in terms of implementation and monitoring.

The state has selected a lower n-size (10) and couples it with an innovative "look back" approach to expand the potential number of students and schools identified for support and intervention. Wyoming's equity indicator for grade 3-8 schools is of particular note as it is weighted heavily in the accountability system and is a way to encourage schools to do as well as possible with students who need the most assistance.

In addition, Wyoming's high school indicators are well defined and outline multiple pathways for success beyond graduation. The weighting for indicators also focuses on academic performance and meaningfully counts English learners by heavily weighting the English language proficiency indicator.

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

Wyoming's plan has several critical issues. The plan is light on details and does not provide a framework to understand its vision for the state's students over the long term. The state has low achievement goals with arbitrary percentile rankings that it does not explain with historical data and that set out a long, 15-year vision for the success of all students. The state must continue to set goals that are ambitious and attainable for each subgroup of students, even when the subgroup is on track to pass the overall statewide goal.

The state has chosen to have one accountability plan for Title I schools and another for non-Title I schools. While this is not unprecedented, there is the risk that parents and other stakeholders will not know or understand the difference. In addition, Wyoming's system for identifying schools in need of improvement appears to meet the letter of the law, but the plan does not have enough specificity to know if it will adequately address the needs of Wyoming's schools and students. Moreover, the system of support for improvement schools is generic and weak. It allows for low-performing schools to choose their own intervention strategies without support from the state or district, unless the school continues to struggle for several years. The state should consider a more rigorous method for taking responsibility for helping its underperforming schools.

## **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?



Wyoming does not provide an overarching long-term vision for students in the state, and without any data to back it up, its goals and interim targets appear unambitious. The state has set a 15-year achievement goal of all students performing as well or better than schools that performed at or above the 65th percentile in reading and math during the 2015-16 school year. While this could be a good approach to setting feasible targets, Wyoming does not provide much historical or benchmark data to determine how ambitious it is. Absent more data, it appears unambitious. As an example, the long-term reading goal for high school students is set at 39 percent, meaning that 15 years from now, Wyoming could hit its goals even if 61 percent of Wyoming students are not proficient in reading. The same is true for its ACT goals for math and reading, where several student groups, especially white students, have no long-term goals at all.

The goals seem even more ambiguous given the fact that Wyoming is implementing a new assessment system in 2017-18.

Wyoming set a goal of six years for students to reach English language proficiency. Its long-term goal is that 44 percent of students will make acceptable progress toward English language proficiency in a given year, meaning less than half of English learners would not.

While Wyoming is focusing on goals being attainable, absent historical data the goals appear low for all students, and even lower for some subgroups of students. Additionally, even students who are relatively high performing should not be left out of the goal-setting process.

**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?



Wyoming adopted the Common Core State Standards in 2012 and uses its own assessment called the Proficiency Assessments for Wyoming Students (PAWS). The quality of the current assessment is unknown, as is a new statewide summative assessment will be used in the 2017-2018 school year. High school students

take the ACT for college readiness. Absent an independent review, we don't yet know if the ACT is fully aligned with Wyoming's state academic standards. And while offering the ACT as the state's official test offers many benefits, some of those key benefits may not extend fully to all students who require accommodations and may not receive college-reportable scores.

Wyoming uses WIDA ACCESS 2.0 to assess English language proficiency. This is a widely accepted, evidencebased assessment. The Wyoming statewide summative assessment is offered in Spanish audio. Grades 3-10 have a Spanish audio version for the mathematics and science assessments. For grades 9-10, there are Spanish text and audio options. The grade 11 assessment is mandated by state law to be a standardized college readiness exam, and this assessment has Spanish audio versions of the mathematics and science sections, as well as for general test directions. Linguistic accommodations such as side-by-side translations and pop-up glossaries are being explored as possible options for the new summative assessment in the 2017-2018 school year.

The state offers an alternate assessment that is aligned to alternate academic standards. Although Wyoming has not historically surpassed the 1 percent cap on alternate assessments for students with the most significant cognitive disabilities, it should strengthen its plan by ensuring that it has a process in place to continue meeting the cap going forward.

**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?



Wyoming articulated a simple list of indicators and provided clear explanations of how those indicators will be included in the state's system. It will include student achievement (English language arts and math), student growth, high school graduation rates, English language proficiency, an equity indicator for grade 3-8 schools, and postsecondary readiness for high school. While this is a strong, academic-focused list, Wyoming may want to consider adding more elements over time.

The state's equity indicator is a measure of academic growth for any student who scores in the bottom quartile in reading, math, or both. Students whose scores would place them below the identified statewide cut points are assigned to a consolidated subgroup, and a school's Equity score is based on the median growth of the consolidated subgroup. This is a variation on the growth metric that adds weight to the lowest-performing students. With the selection of this metric, Wyoming chose not to identify and use an additional indicator of school quality that measures something beyond academic performance. While the plan says the achievement and growth indicator will be "disaggregated for all subgroups," it's unclear whether this is just for reporting purposes or part of the accountability system.

The indicators for high school are similar to the grade 3-8 model, but include a postsecondary-readiness indicator. While this indicator sends a positive message about postsecondary readiness, the state should monitor its data to ensure all of the options presented within in it are comparable and have sufficient external checks on quality.

**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?



Wyoming's plan places a strong weight on student achievement and growth. In grades 3-8 the state gives equal weight—25 percent—to four indicators, of which two are growth and achievement. Additionally, the state's equity measure follows student growth for the bottom quartile of students, which adds weight to student growth. The weighting of indicators is sufficient to focus on academic progress. Of note, the incentive for schools to care about progress for all students may be countered by the low goals set for students and the lack of clarity on how all subgroups are weighted in the indicator.

The state proposes to include a simple measure of student achievement (percent proficient) and a normative growth model. Wyoming's growth model, called the 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. Wyoming deserves credit for adding extra weight, through the state's equity measure, on growth for low-performing students, and for pairing this type of growth model with a clean measure of achievement, but placing such a strong weight on SGP scores could dilute the benefits of having strong state standards if they play a smaller part in school ratings.

In high school, the state uses five indicators and gives them all equal weight—20 percent. Two of the five are growth and proficiency, and Wyoming deserves credit for including growth measures at the high school level.

**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?



Wyoming has several systems that place particular emphasis on all students, starting with a small n-size (used to determine if schools should be held accountable for the performance of subgroups) of 10 students. Although this will be difficult because Wyoming has many small schools, the state is going to great lengths to ensure that

all students are counted. With many schools having very small sub-populations, the state is using a "look back" approach to include more schools. This procedure "looks back" one year to see if the minimum n-size is reached. If the minimum n-size is not reached in that year, the look back will go back a second year. This is an innovative way of finding a balance between protecting student identification and maximizing the inclusion of all students in each subgroup. The state will also pair small schools together to increase reporting.

Wyoming plans to identify for targeted support any school with a subgroup in the lowest performing 10 percent, although the state's plan could be clearer on this front (i.e., it intends to identify the 10 percent of schools with the lowest-performing subgroup of black students, the 10 percent of schools with the lowest-performing subgroup of black students, the 10 percent of schools with the lowest-performing subgroup of students with disabilities, etc.) as opposed to identifying one composite group based on all subgroups. The former would be a stronger plan and would allow for more tailored interventions than one composite group, but the state could provide greater clarity about how this identification process will work and how many schools might be identified.

For schools with a sufficient number of qualifying students, the state's indicator for English language proficiency will count for 25 percent of grades 3-8 and 20 percent for high schools, which is significant.

In addition, Wyoming includes an equity indicator that composes 25 percent of grade 3-8 schools' scores. This equity indicator measures academic growth for any student who scores in the bottom quartile in reading or math or both, based on the prior year. A school's "equity" score is based on the median growth of this group of students. This indicator puts a focus on low-performing students, but does not specifically address the performance of student subgroups.

Wyoming also deserves credit for placing consequences on schools that do not meet the 95 percent participation requirement. All schools that do not meet the 95 percent threshold are docked one school performance level, which should provide a strong incentive for schools to include all students, and help preserve the integrity of the system.

**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?



Wyoming appears to have two separate school identification systems, one for the state's accountability model and a separate system for the purposes of identifying schools for comprehensive and targeted support under ESSA, which could be confusing for stakeholders and be an impediment to school improvement. For the state's accountability model, schools will be assigned to a performance category each year based on their selected indicators. Each indicator has three target levels: below target, meets target, exceeds target. Wyoming's ESSA plan does not explain which indicators are included in this system, the thresholds for each performance category, or how the state will calculate which schools are assigned to each category. Having three performance categories removes nuance and may make it hard to meaningfully differentiate between schools. Moreover, it is not clear how the state will use these "performance levels." Will they report on the performance levels? Will the performance levels help the state to identify and distribute supports? The state does not provide details. Additionally, it is not clear how the weighted index will produce a combined score to give a clear overall sense of school performance.

Wyoming will also identify for comprehensive support the lowest-performing 5 percent of Title I schools based on all of the accountability model indicators. High schools that fail to graduate less than or equal to one-third of their students will also be identified for comprehensive support.

As discussed above, Wyoming plans to rank all of the state's schools from highest to lowest for each subgroup beginning in the 2019-2020 school year and every third year thereafter. Although there are some questions about how this will work in practice, it's potentially a way for the state to ensure it is identifying low performance in each of its subgroups. Additionally, when the combined score places subgroups below the bottom 5 percent of all schools for the all-students group, the school will be identified for additional targeted support and improvement.

**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?



Wyoming provides basic information about how the state will support schools placed in improvement status. The plan vaguely references locally selected interventions. When failing to meet exit criteria, schools will have to choose interventions that meet the requirements for strong or moderate evidence, but the state would have a stronger plan if it required all low-performing schools to pursue interventions with strong or moderate evidence immediately after being identified.

The state will only step in to conduct an annual review of effectiveness of the interventions if the school fails to meet exit criteria. If schools fail to improve over time, they will be required to fully implement the "Multi-Tiered System of Support (MTSS)," a school-wide framework similar to Response to Intervention. There is little information provided about MTSS and how that process will work, or how stakeholders will be included. The plan also does not provide any details or evidence that this system has been successful in Wyoming.

School districts that have a majority of schools identified for comprehensive or targeted support will be required to implement MTSS throughout the district, and will be required to participate in leadership training and other district supports, such as performance data reviews, to enhance capacity to improve individual schools. There is no additional information provided on that process, who will participate, and what the timeline will be.

Wyoming does not provide details on how it plans to use the 7 percent of federal funds intended for school improvement activities, including whether it will award those funds by formula or through a competitive process. Additionally, the state should indicate if and how it intends to provide direct student services using the optional 3 percent set-aside, which provides an additional opportunity for the state to align school improvement activities with its statewide goals.

Overall, Wyoming's plan is too vague on what supports will be provided to schools, how/if those supports are evidence based, and what success the state has had with those interventions.

**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?



Wyoming applies normative ranking systems to exit schools in need of improvement. Title I schools whose combined score on the indicators for the all-students group places them above the bottom 10 percent of all Wyoming Title I schools for two consecutive years will be exited from comprehensive support and improvement. While this is stronger than a school simply no longer being identified, it's unclear if this goal would represent real, sustained progress. The state does not articulate exit criteria for schools that were identified for comprehensive support based on graduation rate. Schools remaining in comprehensive support and improvement for four consecutive years will be required to implement more rigorous interventions defined by the state. There is little detail about what those interventions are, if they are evidence-based, or if they've proven effective for turnaround in Wyoming schools previously.

For targeted support schools, each subgroup must be above the bottom 10 percent on the combined score for two consecutive years. Because of the emphasis on the combined score, this could lead to a situation where a subgroup still struggles to meet one indicator but performs well enough overall to exit support. Schools remaining in additional targeted support and improvement for four consecutive years will be identified for comprehensive support and improvement.

These exiting procedures are normative, so it may not be that a school has necessarily improved, but rather that other schools have slipped in performance, thus forcing schools out of improvement status that could still use support and attention from the state and/or district.

**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?



Wyoming's plan makes several references to stakeholder engagement around the formation of the plan. Stakeholders include school leaders, parents, and teachers. However, it lacks details on future plans for continued stakeholder engagement. The plan has little mention about how it will monitor improvement efforts over time. It will be revisited after the state rolls out its new assessment in order to create new baseline scores for the state's goals and indicator weights.