# Attachment 1: Overview of Title I Accountability Items and Matrix of the U.S. Department of Education’s Resubmission Elements Cross-Referenced with California’s Consolidated ESSA State Plan

**Overview of Accountability Items**

**Status and Change (Long-Term Goals & Indicators)**

In general, the U.S. Department of Education (ED) interpreted that indicators for which states must establish long-term goals (academic achievement, graduation rate, English learner proficiency) can be based on current year only. The proposed revisions to the Every Student Succeeds Act (ESSA) State Plan address this interpretation of statute by treating the Status component of the relevant indicator on the California School Dashboard (Dashboard) as the required ESSA indicator, with the goal set relative to Status. The Change component of the Dashboard indicator is treated as an additional academic indicator or indicator of student success, as described below. These two indicators combine to provide a color-coded performance level for the relevant Dashboard indicator. As a result, there is no material impact on the Dashboard, the cut-scores for Status and Change for the relevant Dashboard indicators, the way that Status and Change are combined using the five-by-five grids to determine color-coded performance levels within the California Model, or how the color-coded performance levels differentiate performance for local education agencies (LEAs) and schools.

#### Academic Achievement Indicator

In order to meet the ED’s interpretation of the federal statute, the CDE proposes to adjust the academic achievement indicators to include Smarter Balanced Assessment Consortium (SBAC) results for English language arts (ELA) and mathematics for grades three through eight (3–8) and grade 11. For the purposes of the ESSA State Plan, the academic achievement indicator consists only of the “Status” component of California’s Academic Achievement Indicator on the Dashboard for grades 3–8. As described below, the Change component of California’s Academic Achievement Indicator on the Dashboard for grades 3–8 is categorized as additional academic indicators for grades K-8. For grade 11, the Academic Achievement Indicator includes both Status and Change, as authorized by ESSA, Section 1111(c)(4)(B)(i).

The California Department of Education (CDE) proposes no changes to the College/Career Indicator (CCI); as described below, the CCI would serve as an indicator of student success.

Additional conforming revisions are proposed to reflect that the CDE will need to conduct technical review in light of the proposed revisions to the academic achievement indicator to include Grade 11 assessments.

**Implication (Grades 3–8):** This has no material impact on California’s existing accountability system and Dashboard.

**Implication (Grade 11):** Grade 11 SBAC results would be included in the Academic indicator for English language arts and math for the 2018 Dashboard, unless the State Board of Education (SBE) elects to use this indicator only for school identification under the ESSA.

**ESSA State Plan Sections:** A.4.iii.a.1, A.4.iv.a, A.4.iv.b, A.4.iv.e, A.4.viii

**Matrix item numbers:** 1, 7, 8

#### Graduation Rate Indicator

The CDE recommends that for the purposes of the ESSA State Plan, the Graduation Rate consists only of the Status component of California’s Graduation Rate Indicator on the Dashboard. As described below, the Change component of California’s Graduation Rate Indicator on the Dashboard is categorized as a measure of student success for high schools.

**Implication:** This has no material impact on California’s existing accountability system and Dashboard.

**ESSA State Plan Sections:** A.4.iii.b.1., A.4.iv.c

**Matrix item numbers:** 3, 9

#### English Learner Proficiency Indicator

The CDE recommends that for the purposes of the ESSA State Plan, the English learner proficiency indicator consists only of the Status component of California’s English Learner Progress Indicator (ELPI) on the Dashboard. As described below, the Change component of California’s ELPI on the Dashboard is categorized as a measure of student success.

**Implication:** This has no material impact on California’s existing accountability system and Dashboard.

**ESSA State Plan Section:** A.4.iv.d

**Matrix item number:** 10

#### Other Academic Indicator for K-8

The CDE recommends that for the purposes of the ESSA State Plan, the Change component of California’s Academic Indicator for grades 3-8 serve as an additional academic indicator.

**Implication:** This has no material impact on California’s existing accountability system and Dashboard.

**ESSA State Plan Section:** A.4.iv.b

**Matrix item number:** 8

#### School Quality or Student Success Indicators

In addition to the Suspension Rate Indicator, the CDE recommends that the “Change” component for California’s Graduation Rate and ELPI are added as additional student success indicators.

**Implication:** This has no material impact on California’s existing accountability system and Dashboard.

**ESSA State Plan Section:** A.4.iv.e

**Matrix item numbers:** 9, 10, 11

**Indicator-specific Issues**

#### College/Career Indicator

The CDE recommends that the CCI be categorized as an indicator of student success for high schools. The calculation of the CCI will remain as adopted by the SBE, and the performance standards will be established prior to the initial year of school identification in 2018–19.

**Implication:** Grade 11 SBAC results would also be included in the Academic Indicator for ELA and math for the 2018 Dashboard, unless the SBE elects to use this indicator only for school identification under the ESSA.

**ESSA State Plan Section:** A.4.iv.e

**Matrix item number:** 7

#### English Language Proficiency Indicator

Despite significant stakeholder input and support for the current Dashboard indicator, the CDE recommends modifying the English language proficiency indicator to meet the ED reading of the ESSA Statute, in which only students who are English learners in the current school year can be included in the calculation.

Accordingly, the updated ELPI would be based only on performance of the English language proficiency test, currently the California English Language Development Test. The component of the current ELPI calculation that accounts for students reclassified the prior year, with a weighting factor for long-term English learners, would be removed.

**Implication:** If California does not obtain a waiver on this issue, the ELPI would be calculated differently in the Dashboard, unless the SBE elects to use the modified calculation only for school identification under ESSA.

**ESSA State Plan Sections**: A.4.iii.c.1, A.4.iv.d

**Matrix item numbers:** 5, 6, 10

**Weighting of indicators**

The CDE proposes revisions to these sections to conform with proposed revisions to the sections on long-term goals and indicators (the “Status and Change” issue described above). Together with the proposed revisions to the school identification sections, these revisions address ED feedback on this issue.

**Implication:** This has no material impact on California’s existing accountability system and Dashboard.

**ESSA State Plan Sections:** A.4.v.a & b

**Matrix item number:** 12

**School identification**

**Comprehensive Support**

Previous SBE discussions focused on the potential for using the identification of LEAs for differentiated assistance under the Local Control Funding Formula (LCFF) to address the ESSA’s school-level identification requirements. As noted in the January 2018 SBE agenda item on the ESSA, Item 5, Attachment 4 (<https://www.cde.ca.gov/be/ag/ag/yr18/documents/jan18item05a4.docx>), the LEAs receiving assistance based on the Fall 2017 Dashboard encompass more than 2,900 Title I schools that collectively serve more than 50 percent of California’s Title I students. The ED, however, interpreted the relevant statutory provisions to require states to identify individual schools based on specific performance criteria, such that identification of LEAs for support cannot itself address these requirements.

To meet ED’s interpretation of the provisions, the CDE proposes using the color-coded performance levels on Dashboard indicators to establish criteria for identifying at least the lowest performing 5 percent of Title I schools statewide for comprehensive support. The CDE’s recommendation of identification criteria, rather than an arbitrary five percent number, is an endeavor to align school identification under the ESSA with the identification of LEAs for differentiated assistance under the LCFF.

Based on current data, California would need to identify 303 schools in order to reach five percent of Title I schools statewide. The following are the results using the proposed performance criteria, based on the Fall 2017 Dashboard results:

* Schools with all red indicators = 42
* Schools with all red but one indicator of any other color = 153
* Schools with all red and orange indicators = 194 (red, orange, orange = 51; red, orange, orange, orange = 92; and red, red, orange, orange = 51)
* Schools with five or more indicators where the majority are red = 3

Using the proposed performance criteria, 392 schools would be identified, or approximately 6.2 percent of Title I schools statewide. (Note: These numbers will change for the 2018 Dashboard once the two new indicators, Chronic Absenteeism and College/Career, are reported with performance levels, so the SBE will likely wish to reevaluate the proposed performance criteria based on the updated data.)

Additionally, the CDE proposes using a three-year average for identifying high schools with a graduation rate below 67 percent for comprehensive support, rather than identifying high schools with a graduation rate below 67 percent for three consecutive years.

As noted, prior SBE discussions centered on how to align school-level identification under the ESSA with LEA assistance under the LCFF so that the LCFF’s focus on LEAs and student group performance remained the primary focus of California’s system of support for LEAs and schools. That goal was the basis for the inclusion of a “baseline methodology” in earlier versions of the State Plan. As a result of moving to an exclusively school-based methodology for identifying the lowest performing Title I schools, the CDE further recommends removing language about LEA assistance under the LCFF from the State Plan. The State Plan does not require a description of how the state will address ESSA’s school improvement requirements for identified schools. The details on how to do so under the current proposal can be developed with further stakeholder input between now and the initial identification of schools this fall. For example, the SBE could consider modifying the Local Control and Accountability Plan (LCAP) plan summary template to include school-level prompts so that school improvement requirements for LEAs with comprehensive support schools can be addressed through the LCAP process.

**Targeted Support**

The CDE also recommends revisions to the subsections on targeted support. SBE members expressed concern about data presented at the January 2018 showing the potential impact on the scope of targeted support if California used an “expanded baseline methodology” to identify schools for comprehensive support. The proposed revision would define a “consistently underperforming” student group as any student group whose performance on the Dashboard indicators meets the criteria used to identify the lowest performing Title I schools for comprehensive support in three out of four consecutive years, rather than in a single year. The timeline in the proposed definition aligns with the timeline for certain LEA assistance provisions under the LCFF, including eligibility for technical assistance for charter schools (*Education Cod*e Section 47607.3). The CDE recommends revisions to other subsections on targeted support to conform to the “consistently underperforming” definition.

**Implication:** This has no material impact on California’s existing accountability system and Dashboard.

**ESSA State Plan Section:** A.4.vi

**Matrix item number:** 14, 15, 16

**Exit Criteria**

CDE recommends updating the sections describing the exit criteria for comprehensive support and for additional targeted support to clarify that schools meet the exit criteria only if their Status has not declined on the relevant indicators.

**Implication:** This has no material impact on California’s existing accountability system and Dashboard.

**ESSA State Plan Sections:** A.4.vi.c, A.4.viii.a, A.4.viii.b

**Matrix item numbers:** 17, 18

**Measurements of Interim Progress**

States must establish measurements of interim progress for the indicators with long-term goals (academic achievement, graduation rate, English learner proficiency). The tables included in the January 2018 version of the State Plan provide the statewide baseline data for all students and student groups on these indicators. The CDE recommends adding to those tables, two columns that show the average annual improvement and a midway benchmark to meet the goal within the seven-year period, calculated for all students and each student group.

When staff initially proposed a seven-year period for meeting the ESSA’s long-term goals, the proposed indicators, goals, and measurements of interim progress were based on the five-by-five color-coded grids, which are based on Status and Change, for the relevant Dashboard indicators. The SBE intends to update the color-coded grids at least every seven years to reflect overall progress statewide as LEAs, schools, and student group performance improves and more attain the Green performance level over time. The seven-year period was a natural timeframe for the ESSA goals to align with this continuous improvement framework. In light of the ED’s interpretation of the statutory provisions, the proposed approach for addressing these ESSA requirements has shifted. Rather than being based on Status and Change and grounded on performance standards that the SBE will update at least every seven years, the current approach is based on static targets. The SBE may therefore wish to reconsider whether the seven-year period for meeting the long-term goals for these indicators remains appropriate.

**Implication:** This has no material impact on California’s existing accountability system and Dashboard.

**ESSA State Plan Sections:** A.4.iii.a.2, A.4.iii.a.3, A.4.iii.b.3, A.4.iii.b.4

**Matrix item numbers:** 2, 4

**N-size**

CDE recommends adding language to this section identifying the ongoing support and programmatic oversight provided to small schools that have fewer than 30 students for any Dashboard indicator (and therefore receive no color-coded performance levels).

The State Plan removes the reference to the alternative school model, which is under development and subject to final SBE action. California will update, as appropriate, pending final SBE action this fall.

**Implication:** This has no material impact on California’s existing accountability system and Dashboard.

**ESSA State Plan Section:** A.4.v.c

**Matrix item number:** 13

## Matrix of the U.S. Department of Education’s Resubmission Elements Cross-Referenced with California’s Consolidated ESSA State Plans

| **Item Number** | **ESSA State Plan Section** | **U.S. Department of Education Resubmission Elements (February 14, 2018)** | **Page Numbers: Attachment 3** |
| --- | --- | --- | --- |
| 1 | A.4.iii.a.1: Academic Achievement Long-term Goals | CDE included additional tables that showed baseline data for all students and each student subgroup and added long-term goals for high school students. However, both are inclusive of the change component. ESEA Section 1111(c)(4)(A)(i)(I)(aa) requires that these goals are solely measured by grade-level proficiency in the year for which accountability determinations are made. | 23-32 |
| 2 | A.4.iii.a.2: Academic Achievement Measurements of Interim Progress | CDE noted that the State would ensure that LEAs report their measurements of interim progress through the required LEA report card. ESEA section 1111(c)(4)(A) requires that a State establish *State-designed* measurements of interim progress toward the long-term goals for all students and for each subgroup of students. | 32  Appendix A 139-143 |
| 3 | A.4.iii.b.1: Long-term Goals for Four-year Adjusted Cohort Graduation Rate | CDE included additional tables that showed baseline data for all students and each student subgroup. However, the data are inclusive of the change component. ESEA Section 1111(c)(4)(A)(i)(I)(bb) requires that these goals are solely measured by graduation rate in the year for which accountability determinations are made. | 39-42 |
| 4 | A.4.iii.b.3: Measurements of Interim Progress | CDE noted that the State would ensure that LEAs report their measurements of interim progress through the required LEA report card. ESEA section 1111(c)(4)(A) requires that a State establish *State-designed* measurements of interim progress toward the long-term goals for all students and for each subgroup of students. | 42  Appendix A 143-146 |
| 5 | A.4.iii.c.1: English Language Proficiency Long-term Goals | CDE still identified long-term goals and measurements of interim progress for English learners in terms of both status and change. The ESEA requires a State to identify and describe ambitious long-term goals and measurements of interim progress, including baseline data, for English learners, for increases in the percentage of such students making progress in achieving English language proficiency, as defined by the State and measured by the assessments described in subsection (b)(2)(G). | 46-50 |
| 6 | A.4.iii.c.2: Measurements of Interim Progress | CDE noted that the State would ensure that LEAs report their measurements of interim progress through the required LEA report card. ESEA section 1111(c)(4)(A) requires that a State establish *State-designed* measurements of interim progress toward the long-term goals for progress in achieving English language proficiency. | 50  Appendix A 146-148 |
| 7 | A.4.iv.a: Academic Achievement Indicator | CDE still proposed to include measures in addition to grade-level proficiency on statewide assessments in its Academic Achievement indicator, including both change and measures within the CCI. For the Academic Achievement indicator required under ESEA section 1111(c)(4)(B)(i)(I), a State may include only a measure of proficiency on the annual assessments. The CCI proposed by CDE may be included as a School Quality or Student Success indicator. Additionally, CDE noted that the participation rate will not affect the calculation and determination of color-coded performance levels on the Academic Achievement indicator. ESEA section 1111(c)(4)(E)(ii) requires that a State calculate the Academic Achievement indicator by including in the denominator the greater of 95 percent of all students (or 95 percent of students in each subgroup, as the case may be) or the number of students participating in the assessments. | 51-54 |
| 8 | A.4.iv.b: Other Academic Indicator for Elementary and Secondary Schools that are Not High Schools | This item was resolved by the January 2018 resubmission of the Every Student Succeeds Act (ESSA) State Plan. | Not Applicable |
| 9 | A.4.iv.c: Graduation Rate Indicator | CDE was not measuring graduation rates for all students and each student subgroup based only on the graduation rate in the year for which accountability determinations are being made. ESEA section 1111(c)(4)(B)(iii) requires that the Graduation Rate indicator include only measures based on the four-year and, at a State’s discretion, extended-year adjusted cohort graduation rate for the year for which accountability determinations are being made. | 55 |
| 10 | A.4.iv.d: Progress in Achieving English Language Proficiency Indicator | CDE includes in its Progress in Achieving English Language Proficiency indicator not only students who were reclassified in the current year but also students who were reclassified in the prior year, meaning that they were not English learners in the year for which accountability determinations are being made. Section 1111(c)(4)(B)(iv) of the ESEA requires a State to include in this indicator only those students currently classified as English learners. Note that ESEA section 1111(b)(3)(B) provides a narrow exception that permits students previously identified as English learners to be included in the subgroup of English learners only for purposes of measuring the performance of English learners on the statewide reading/language and mathematics assessments for purposes of the State-determined accountability system. | 55-57 |
| 11 | A.4.iv.e: School Quality or Student Success Indicator(s) | This item was resolved following the January 2018 resubmission of the ESSA State Plan. | Not Applicable |
| 12 | A.4.v.b: Weighting of Indicators | CDE contends that much more weight (i.e., 85.7 percent of the overall performance determination within California’s system of meaningful differentiation) is attributed to academics. However, this revision does not address the identified issue that the School Quality or Student Success indicator(s) could greatly outweigh all of the other indicators, given that a school could receive a rating of red on all academic indicators but not be identified for improvement because of a non-red rating on a School Quality or Student Success indicator. ESEA Section 1111(c)(4)(C)(ii)(II) requires that the academic indicators, in the aggregate, receive much greater weight than the School Quality or Student Success indicator(s), in the aggregate. | 64 |
| 13 | A.4.v.c: If Applicable, Different Methodology for Annual Meaningful Differentiation | CDE did not address the issue that schools with fewer than 30 students will not receive a performance color and that the State appears not to have a methodology that it will use to identify such schools for comprehensive or targeted support and improvement. | 65-66 |
| 14 | A.4.vi.a: Comprehensive Support and Improvement Schools—Lowest Performing | CDE noted that the state would begin its identification of lowest-performing LEAs based on the LCFF statute beginning in the fall of 2018 using the 2018 Dashboard results. The state plan highlighted that the state would look at the Title I schools in the lowest performing LEAs (according to the LCFF) rather than looking at the lowest performing schools overall. CDE explained on the December 21 call that there was no preferential treatment with respect to the identification of Title I schools within the LCFF, but did not insert this language into the revised plan, thereby still making it unclear how the lowest 5% of schools will be selected. | 66-69 |
| 15 | A.4.vi.b: Comprehensive Support and Improvement Schools—Low Graduation Rates | CDE did not update the language within this section of the plan and still indicates that it will identify for comprehensive support and improvement all public high schools with a graduation rate of less than 67 percent over each of the three consecutive years prior to identification (rather than in the most current school year alone or averaged over multiple years). | 69 |
| 16 | A.4.vi.e: Targeted Support and Improvement Schools—“Consistently Underperforming” Subgroups | This item was resolved by the January 2018 resubmission of the ESSA State Plan. However, staff have proposed revisions to this section in conjunction with the other school identification sections. | 70 |
| 17 | A.4.viii.a: Exit Criteria for Comprehensive Support and Improvement Schools | CDE updated its exit criteria so that a school identified for comprehensive support and improvement would need to improve its performance across indicators so that it no longer has a color combination that meets the criteria which caused it to be initially identified but did not explicitly identify the color combinations that would be permissible for exit in order to demonstrate that the school has made continued progress to improve student academic achievement and school success. | 72 |
| 18 | A.4.viii.b: Exit Criteria for Schools Receiving Additional Targeted Support | CDE updated its exit criteria so that a school identified for comprehensive support and improvement would need to improve its performance across indicators so that it no longer has a color combination that meets the criteria which caused it to be initially identified but did not explicitly identify the color combinations that would be permissible for exit in order to demonstrate that the school has made continued progress to improve student academic achievement and school success. | 72-73 |
| 19 | A.5: Disproportionate Rates of Access to Educators | CDE noted that the State is currently determining the process through which teacher mis-assignment data will be collected and that they would collect the data no later than spring 2019. ESEA section 1111(g)(1)(B) requires a State to describe how low income and minority children enrolled in schools assisted under Title I, Part A are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers.  *Please note the SBE took action on March 14, 2018, to amend this section.* | 81-86 |
| 20 | B.1: Supporting Needs of Migratory Children | This item was resolved by the January 2018 resubmission of the ESSA State Plan. | Not Applicable |
| 21 | C.2: Program Objectives and Outcomes | This item was resolved by the January 2018 resubmission of the ESSA State Plan. | Not Applicable |
| 22 | E.1: Entrance and Exit Procedures | The ESEA requires a State to develop standardized statewide entrance and exit procedures for English learners. CDE noted that the state legislature is considering additional legislation to define the implementation of the teacher evaluation and parent consultation criteria. While a state is not required to have these consultation criteria, if they are used as part of the exit procedures, the ESEA requires that they are standardized and statewide.  *Please note the SBE took action on March 14, 2018, to amend this section.* | 118-120 |
| 23 | H.1: Outcomes and Objectives | This item was resolved by the January 2018 resubmission of the ESSA State Plan. | Not Applicable |
| 24 | I.7.g: Assistance from Counselors | While CDE describes how counselors will be trained, it is not clear how homeless students will receive assistance from school counselors to advise such youths, and prepare and improve the readiness of such youths for college. The McKinney-Vento Act requires a State to describe how homeless youths will receive assistance from counselors to advise such youths and prepare and improve the readiness of such youths for college.  *Please note the SBE took action on March 14, 2018, to amend this section.* | 137-138 |

*Prepared by the California Department of Education, April 2018*