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

Below are summaries of the changes requested by the U.S. Department of Education (ED) to the Every Student Succeeds Act (ESSA) State Plan (State Plan), organized by topic. Each summary includes the rationale, implication and ESSA State Plan section reference for each proposed revision. Staff propose revisions to the State Plan related to the following topics: Measures of Interim Progress, Indicators (Chronic Absence and College/Career), N-Size, Educator Equity Data and School Identification.

The comments provided by the ED generally concerned technical clarifications to the policy decisions reflected in the April 2018 version of the State, rather substantive changes to the underlying policy. All but two, Indicators and School Identification, are minor clarifications. The presentation to the State Board of Education will focus on these two proposed changes.

## Overview of Accountability Items

### Measurements of Interim Progress

States must establish measurements of interim progress (MIPs) for the indicators with long-term goals (academic achievement, graduation rate, English learner proficiency). The tables included in the April 2018 version of the Every Student Succeeds Act (ESSA) State Plan (State Plan) provide the statewide baseline data for all students and student groups on these indicators. The final heading in the associated tables read “Approximate Status After Three Years”. Feedback from the ED included the comment, “…because the California Department of Education (CDE) set approximate MIPs, it has not met this requirement.”

California has added, and the ED has approved, the following language in the relevant State Plan sections to clarify the data provided in the final column of the tables displaying the MIPs. The following example comes from Section 4.iii.a.3, and is similar to other relevant sections. Due to the addition of this language, “Approximate” has been removed from the associated tables throughout the State Plan.

**Revised Language:** “…The tables below display statewide baseline data for all students and each student group, <begin delete> ~~and~~ <end delete> the approximate average annual improvement necessary over the seven-year period for each student group to meet the long-term goal <begin add>, and the projected Status after year 3 if the student group makes the average annual improvement necessary over the seven-year period for each student group to meet the long-term goal and is therefore on track to meet the long-term goal. <end add> The tables show that many student groups would need to make significantly more progress than higher performing student groups to reach the statewide goal within seven years.”

**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

## Indicator-specific Issues

### Chronic Absence Indicator

Chronic Absence Indicator (Issue 1 of 2): The ED expressed concern that California had not provided a five-by-five grid for this indicator in the State Plan. California cannot create a five-by-five grid without a second year of data, which will be available in November 2018. California proposes to address this issue by revising the section to state that California will not use the indicator for meaningful differentiation until the State Board of Education (SBE) creates a five-by-five grid and submits an amendment reflecting that five-by-five grid.

Chronic Absence Indicator (Issue 2 of 2): California included a link to DataQuest, in order to demonstrate California’s existing data related to chronic absenteeism.

**Revised Language Section A.4.iv.b:** Chronic absenteeism will serve as an additional academic indicator for grades K–8, given its strong correlation with future academic attainment. There is wide agreement among researchers that students who are absent 10 percent or more of the school year, including excused and unexcused absences, are at greater risk of reading below grade level and dropping out of high school (Ginsburg, Jordan, and Chang, 2014; Balfanz and Byrnes, 2012; Ginsburg and Chudowsky, 2012).

In addition, this indicator will be especially important for schools that only serve students in grades K–2. A study in California found that only 17 percent of children chronically absent in both kindergarten and grade 1 were proficient readers by the end of grade 3, as compared to 64 percent of their peers who attended school regularly (Bruner, Discher, and Chang, 2011). This research, along with review and approval of the indicator by the CDE’s Technical Design Group, will allow chronic absenteeism to serve as a valid and reliable academic indicator.

LEAs reported chronic absence data to the state for the first time in CALPADS for the 2016–17 school year. Each LEA reported which students were chronically absent, which is defined in California Education Code Section 60901(c)(1) as “a pupil who is absent on 10 percent or more of the school days in the school year when the total number of days a pupil is absent is divided by the total number of days the pupil is enrolled and school was actually taught in the regular day schools of the district, exclusive of Saturdays and Sundays.” LEAs will report the second year of chronic absence data in CALPADS for the 2017-18 school year, which will allow the SBE to establish color-coded performance levels for this indicator <begin delete> ~~in time to be used for meaningful differentiation of schools for the 2018-19 school year, using the 2017-18 data as the baseline year for status for this indicator~~. <end delete> <begin add> Chronic absence data for the 2016-17 school year is available via the CDE’s DataQuest Web Site (<https://dq.cde.ca.gov/dataquest/DQCensus/AttChrAbsRate.aspx?agglevel=State&cds=00&year=2016-17>). <end add> The color-coded performance levels will be established using the methodology described in section v.a below, which is the methodology used to establish the five-by-five grids for other indicators that are included throughout this state plan and will therefore ensure meaningful differentiation among the color-coded performance levels. <begin delete> ~~Once approved, the five by five grids will establish the baseline performance levels for all students and student groups statewide and for schools.~~ <end delete> <begin add> California will not use this indicator for meaningful differentiation of schools until the SBE establishes a five-by-five grid and submits an amendment to the State Plan reflecting that five-by-five grid. <end add>

**Implication:** California will not use the indicator for meaningful differentiation until the SBE creates a five-by-five grid and submits an amendment reflecting that five-by-five grid.

### College/Career Indicator

College/Career Indicator (Issue 1 of 3): The ED expressed concern that California has not provided a five-by-five grid for this indicator in the State Plan. California cannot create a five-by-five grid without a second year of data, which will be available in November 2018. California proposes to address this issue by revising the section to state that California will not use the indicator for meaningful differentiation until the SBE creates a five-by-five grid and submits an amendment reflecting that five-by-five grid.

College/Career Indicator (Issue 2 of 3): The ED also raised concerns that the College Career Indicator (CCI) currently does not include students who take the alternate assessment (i.e., have significant disabilities). California will ensure that all students in the graduating cohort are included in the calculation for the CCI when California uses this indicator for meaningful differentiation of schools. This is consistent with the submitted version of California’s State Plan, which states on pages 57-58, “To determine how well schools have prepared students for postsecondary, the CCI evaluates *all students in the four-year graduation cohort*. The same calculation methodology is used for both the school level and the student group level.” (Emphasis added.)

College/Career Indicator (Issue 3 of 3): California included a footnote to the University of California’s web page which provides additional information about a-g completion.

**Revised Language Section A.4.iv.e:** The College/Career Indicator is an additional indicator of student success for high schools. The SBE is working to adopt performance standards (i.e., five-by-five grid) for the College/Career Indicator (CCI), which will occur prior to the initial year of school identification in 2018–19. The five-by-five grid will be established using the methodology described in section v.a below, which is the methodology used to establish the five-by-five grids for other indicators that are included throughout this state plan and will therefore ensure meaningful differentiation among the color-coded performance levels. <begin add> California will not use this indicator for meaningful differentiation of schools until the SBE establishes a five-by-five grid and submits an amendment to the State Plan reflecting that five-by-five grid. <end add>

The CCI is designed to include multiple measures in order to value the multiple pathways that students may take to prepare for postsecondary. The CCI currently has three levels (Prepared, Approaching Prepared, and Not Prepared) and is designed to allow new measures to be added when they become available. To determine how well schools have prepared students for postsecondary, the CCI evaluates all students in the four-year graduation cohort. The same calculation methodology is used for both the school level and the student group level.

In consulting with the CDE’s Technical Design Group, it was determined that the following measures were valid and reliable measures of college/career readiness. These measures are <begin delete> ~~proposed for inclusion (subject to SBE approval)~~ <end delete> <begin add> included <end add> in the Fall 2017 California School Dashboard release:

* Grade 11 CAASPP results in ELA and mathematics
* a–g Completion <begin add> [[1]](#footnote-1) <end add>
* Dual Enrollment
* Advanced Placement (AP) exam
* International Baccalaureate (IB) exam
* Career Technical Education (CTE) pathway completion

California added new data elements to California’s student-level data collection, the California Longitudinal Pupil Achievement Data System (CALPADS), in the 2016–17 school year. Once these new measures are collected and determined to be valid and reliable, they will be considered for inclusion in the CCI. These measures are:

* State Seal of Biliteracy
* Golden State Seal Merit Diploma
* Articulated CTE Pathways

For the CCI, “Status” is determined using the current CCI rate and “Change” is the difference between the current rate and the prior year’s rate.

**Implication:** California will not use the College/Career Indicator for meaningful differentiation of schools until the SBE establishes a five-by-five grid and submits an amendment to the State Plan reflecting that five-by-five grid.

**N-size**

The ED asked for additional information related to support for schools with small n-sizes who do not receive a color on the Dashboard in order to specify that these schools will be identified for comprehensive or targeted support under the ESSA.

**Revised Language Section A.4.v.c:** For schools that are so small that they do not receive a color-coded performance level on the Dashboard (approximately 100 schools in 2017-18), the CDE will review their performance data and other relevant information annually <begin add> and shall identify them for comprehensive support and improvement or targeted support and improvement assistance based <end add> on any identified performance issues.

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

**Educator Equity Data**

The Equity Data: The ED asked that California change the way the state reports the educator equity data to focus on Title I schools rather than all schools statewide. California updated the data tables accordingly.

**Revised Language Section A.5:** Please refer to the data tables on pages

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

**School identification**

#### Comprehensive Support

Staff recommend revisions to this section to conform to the revisions to the sections on Chronic Absence and the College/Career Indicator clarifying that California will not use those two indicators until the SBE approves five-by-five grids and submits an amendment to the State Plan reflecting the five-by-five grids.

**Revised Language Section A.4.vi.a:** Consistent with the system of meaningful differentiation described in sections A.4.v.a and A.4.v.b above, California will use the color combinations that schools receive on California School Dashboard indicators to identify the lowest performing 5 percent of Title I schools statewide for comprehensive support.

The selection criteria for the selection of at least the lowest performing of 5 percent of Title I schools is based on all of the following criteria:

* Schools with all red indicators;
* Schools with all red but one indicator of any other color;
* Schools with all red and orange indicators; and
* Schools with five or more indicators where the majority are red.

Based on simulations completed using the fall 2017 Dashboard data, these business rules result in the selection of at least 5 percent of Title I schools statewide. Under this approach, performance on a single indicator is not determinative of selection among the lowest performing 5 percent of Title I schools.

The Chronic Absence Indicator and College/Career Indicators will receive color-coded performance levels <begin add> in the future <end add> <begin delete> ~~for the first time on the 2018 Dashboard~~ <end delete>, increasing the number of indicators for which schools can receive color-coded performance levels. Accordingly, when the color-coded performance levels for those indicators become available <begin delete> ~~prior to the initial identification of schools for the 2018-19 school year~~ <end delete>, the SBE will need to review the business rules, or color combinations, used to identify the Title I schools in greatest need of assistance for comprehensive support.

#### Targeted Support and Improvement and Additional Targeted Support and Improvement

The ED stated that California must identify schools for additional targeted support in the 2018-19 school year and that the criteria for such identification must be whether a school has a student group that, on its own, meets the criteria used to identify at least the lowest performing Title I schools statewide. The ED confirmed that California may identify schools for additional targeted support from among schools with one or more “consistently underperforming” student group, consistent with the April 2018 version of the State Plan. But the ED clarified that this is permissible only if California has identified schools with one or more “consistently underperforming” student group in the 2018-19 school year.

The April 2018 version of the State Plan California defined “consistently underperforming” student group as a student group that meets the criteria used to identify at least the lowest performing Title I schools statewide in three out of four consecutive years, which aligns with the timeline for certain local educational agency assistance provisions under the Local Control Funding Formula.

It is not possible to apply this definition in the 2018-19 school year because California will not have three years of valid Dashboard data. Under the ED’s clarified interpretation of the statute, California would therefore not be able to identify schools for additional targeted support and improvement in 2018-19 from among schools that have a “consistently underperforming” student group, and would instead have to apply the criteria to all schools statewide based on the 2018 Dashboard. California will, however, have two years of valid Dashboard data (Fall 2017 Dashboard and the 2018 Dashboard).

Accordingly, staff propose modifying the definition of “consistently underperforming” to a student group that receives at least two color-coded performance ratings on California’s Dashboard indicators and, on its own, meets the criteria used to identify at least the lowest performing Title I schools statewide in two consecutive years (using the Fall 2017 Dashboard and 2018 Dashboard). Staff also recommend clarifying that schools will be identified for additional targeted support and improvement beginning in the 2018-19 school year and that schools will be identified every three years thereafter. When additional years of data become available, the SBE can revisit these sections and submit an amendment to the State Plan, as appropriate.

**Revised Language Section A.4.vi.e:** California’s definition of a school with one or more “consistently underperforming” student group” is a school in which any student group <begin add> both receives at least two color-coded performance ratings on California’s Dashboard indicators and <end add>, on its own, meets the criteria for being identified for comprehensive support pursuant to section vi(a) above in <begin delete> ~~three out of four~~ <end delete> <begin add> two <end add> consecutive years <begin delete> ~~(beginning with the 2018-19 2017-18 school year)~~ <end delete>. The methodology for identifying such schools is to determine whether any student group at a school has the color-coded performance levels on applicable indicators that match the color-coded performance levels used as criteria for identifying the lowest performing schools receiving Title I, Part A funds for comprehensive support in <begin delete> ~~three out of four~~ <end delete> <begin add> two <end add> consecutive years. California will identify schools with one or more “consistently underperforming” student group <begin delete> ~~(i.e., schools that meet the specified criteria in three out of four consecutive years)~~ <end delete> annually <begin add>, beginning in 2018-19 (based on data from the 2016-17 and 2017-18 school years) <end add>.

**Revised Language Section A.4.vi.f:** <begin delete> ~~Any school with a student group that meets the definition of “consistently underperforming” will be eligible for additional targeted support because the criteria used for the “consistently underperforming” definition are based on the criteria used to identify the lowest performing Title I schools for comprehensive support. These schools will be identified annually, with 2020-21 being the first year such schools can be identified based on the definition of “consistently underperforming.~~ <end delete>

<begin add> California will identify schools for additional targeted support from among the schools with one or more “consistently underperforming student groups, as specified in section vi(e) above. Schools with one or more “consistently underperforming” student group will be identified for additional targeted support if any student group at the school, on its own, meets the criteria used to identify the lowest performing Title I schools for comprehensive support, as specified in section vi(a) above. These schools will be identified for the first time in 2018-19, and then will be identified every three years thereafter. <end add>

**Implication:** Although the revisions to these sections move up the timelines of the identification process, the policy previously adopted by the SBE remains largely the same, as identification is based on multiple years of data. This has no material impact on California’s existing accountability system and Dashboard. For purposes of school identification under the ESSA, California will identify consistently underperforming schools beginning with the 2018-19 school year rather than 2019-20. Student groups with only one performance level (color), due to a small n-size, cannot be identified as consistently underperforming. Schools will be identified for additional targeted support and improvement every three years, rather than annually.

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

| **ESSA State Plan Section** | **U.S. Department of Education Resubmission Comments (June 11, 2018)** | **Page Numbers: Attachment 2** |
| --- | --- | --- |
| A.4.iii.a.2: Academic Achievement Measurements of Interim Progress | Within its resubmitted State plan, CDE identified measurements of interim progress (MIPs) for Academic Achievement through language stating "approximate status after three years." The statute requires that the State set long-term goals and MIPs for Academic Achievement. Because CDE set approximate MIPs, it has not met this requirement. | Pages 29-39  Appendix A Pages 135-140 |
| A.4.iii.b.3: Graduation Rate Measurements of Interim Progress | Within its resubmitted State plan, CDE identified MIPs for Graduation Rate through language stating "approximate status after three years." The statute requires that the State set long-term goals and MIPs for Graduation Rate. Because CDE set approximate MIPs, it has not met this requirement. | Pages 39-47  Appendix A Pages 140-143 |
| A.4.iii.c.2: Progress in Achieving English Language Proficiency Measurements of Interim Progress | Within its resubmitted State plan, CDE identified MIPs for Progress in Achieving English Language Proficiency through language stating "approximate status after three years." The statute requires that the State set long-term goals and MIPs for Progress in Achieving English Language Proficiency. Because CDE set approximate MIPs, it has not met this requirement. | Pages 47-50  Appendix A Pages 143-145 |
| A.4.iv.b: Other Academic Indicator for Elementary and Secondary Schools that are Not High Schools | The ESEA requires a State to describe an indicator for public elementary and secondary schools that are not high schools (i.e., the Other Academic indicator) that includes a measure of student growth, if determined appropriate by the State, or another valid and reliable statewide academic indicator that allows for meaningful differentiation in school performance. While COE indicates that it will use chronic absenteeism as its Other Academic Achievement indicator for K-8 schools and secondary schools that are not high schools, it does not provide sufficient information as to how the indicator is calculated (i.e., how the performance levels are determined) and how it will meaningfully differentiate among schools in California. As a result, it is unclear whether the statutory requirements are met. | Pages 51-52 |
| A.4.iv.e: School Quality or Student Success Indicator(s) | The ESEA requires a State's accountability system to annually measure, for all students and separately for each subgroup of students, one or more indicators of each School Quality or Student Success that allow for meaningful differentiation in school performance, and are valid, reliable, comparable, and statewide. In the description of the college and career indicator (CCI), CDE notes that students who take the alternate assessment aligned with alternate academic achievement standards would not be included in this indicator. As a result, COE does not meet the requirement for this indicator to include all students. In addition, CDE does not provide sufficient information to determine whether the indicator meaningfully differentiates among schools nor does it sufficiently describe how the indicator is calculated (i.e., how the performance levels are determined). CDE must also clarify if this indicator will be utilized in the 2018-19 school year.  For high school identification, CDE also proposes to use chronic absenteeism as a School Quality or Student Success indicator; however, it is unclear if this indicator will be utilized in the 2018-19 school year. Additionally, while generally permissible as a School Quality or Student Success indicator, the same concerns noted above about the inclusion of chronic absenteeism as an Other Academic indicator apply to chronic absenteeism as a School Quality or Student Success indicator. This includes a lack of sufficient information as to how the indicator is calculated (i.e., how the performance levels are determined) and how it will meaningfully differentiate among schools in California. As a result, it is not clear that the statutory requirements are met. | Pages 54-58 |
| A.4.vi.f: Targeted Support and Improvement Schools—Additional Targeted Support and Improvement Schools | The ESEA requires a State to describe in its State plan its methodology for identifying schools for additional targeted support and improvement (ATSI) in which any subgroup of students, on its own, would lead to identification for comprehensive support and improvement (CSI), using the same methodology as used for identifying schools for CSI. CDE identifies a methodology for identifying schools for ATSI as any school with a student group that meets the definition of "consistently underperforming." While CDE may identify schools for ATSI from among the schools identified as having one or more consistently underperforming subgroup, it must use the same methodology as CDE uses to identify schools for CSI.  It is unclear whether CDE will identify schools for ATSI by the beginning of the 2018-2019 school year, consistent with the Secretary's April 2017 Dear Colleague letter that provided additional flexibility. CDE notes that it will begin identifying schools for ATSI in 2021, noting that is the first time the State will have schools with consistently underperforming subgroups from which to identify schools for additional targeted support. While in the future CDE may identify schools for additional targeted support from among the schools identified as having one or more consistently underperforming subgroup, once those schools have been identified, schools must first be identified for additional targeted support in the beginning of the 2018-19 school year. | Page 65 |

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

1. Additional information about the a-g subject requirements is available on the University of California’s Web site: <https://www.ucop.edu/agguide/a-g-requirements/>. [↑](#footnote-ref-1)