



## **Comments on Washington's Second Draft of the State's Every Student Succeeds Act Plan**

The plan is at

<http://www.k12.wa.us/ESEA/ESSA/pubdocs/WashingtonESSARevisedConsolidatedPlan.pdf>. Comments are due by September 5, 2017. There is an online form for comments on very limited topics at <http://www.surveygizmo.com/s3/3744105/ESSA-Consolidated-Plan-Second-Draft-Comment-Form>. However, there is a place to upload a letter as part of the online form.

### **Minimum Subgroup Size (N size) page 20**

WA plans to use a minimum subgroup size of 20 for accountability purposes over a three-year period and 10 for reporting data. The better approach is to use an N size of 10 for all purposes, rather than make the data more confusing by using 20 combined over a three-year period for accountability.

WA provides a chart on page 21 regarding the impact of the N size on the percentage of students and the percentage of schools included in the accountability system for graduation rate. The chart shows a much higher percentage of students included than schools, which does not make sense. The chart should be reworked and made public. Also, WA should show the impact of various N sizes on accountability for assessment proficiency.

### **Long-term goals page 23**

The long-term goals for Math and English Language Arts (ELA) proficiency, as well as on time graduation rate (the 4-year adjusted cohort graduation rate-ACGR), are to reach 90% for every subgroup by 2027. We support setting the same goals for each subgroup. However, it is important for WA to commit that they will not adjust the interim targets down if they are not met—otherwise the long-term goal becomes meaningless. We wonder how such large increases in proficiency and graduation rate for groups of students who are further behind, such as students with disabilities, will occur without a focus on implementing Universal Design for Learning (UDL) and inclusive best practices in the plan.

It is important to note that the 4-year ACGR for students with disabilities has shown little improvement over the 5 years that states have reported the ACGR (See table below). Thus, the remarkable improvement planned for this group of students (3.2 percentage points annually) is unlikely to occur without dramatic changes to the instructional program.

**4-Year Adjusted Cohort Graduation Rate (ACGR), Children with Disabilities**

State	2010-2011	2011-12	2012-13	2013-14	2014-15
WA	56	58	55	67	58

### Indicators page 30

Indicators are the measurements used to annually meaningfully differentiate between schools for purposes of determining which schools should be identified as needing targeted or comprehensive support and improvement. Most of the indicators and their measures are required by ESSA (achievement, growth, graduation rate and English language proficiency), others are left to state discretion (at least one indicator of School Quality or Student Success, referred to as the non-academic indicators). Although the School Quality or Student Success (SQSS) indicator(s) are supposed to be linked by evidence to improved academic outcomes, they are not direct academic indicators.

#### Growth measure for Other Academic Indicator

To measure growth, WA plans to use student growth percentiles (SGP). SGP describes a student’s academic progress from one year to the next compared to Other students with similar prior test scores (called academic peers), when the tests are actually designed for comparing students to performance standards in a specific subject area. Use of SGPs is highly questionable as reported in the research brief, Why We Should Abandon Student Growth Percentiles, by the Center for Educational Assessment at the University of Massachusetts Amherst ([https://www.umass.edu/rempe/pdf/CEAResearchBrief-16-1\\_WhyWeShouldAbandonSGPs.pdf](https://www.umass.edu/rempe/pdf/CEAResearchBrief-16-1_WhyWeShouldAbandonSGPs.pdf)). Growth towards the standard is a preferable measure for public reporting and as a metric in the state’s accountability system regarding student growth.

#### Graduation Rate Indicator

WA intends to primarily use the 4-year ACGR, but will include an upward adjustment for schools that graduate relatively high percentages of students in the extended timeframe. It would be important to know how much of an upward adjustment will be provided and how the term “relatively high percentages” is defined. This provision could skew the data and weaken the focus on 4-year graduation from high school. Also, the plan does not describe how the graduation rate data for subgroups will be used in this indicator.

### **Identifying Schools for Targeted Support and Improvement** page 45

ESSA requires states to identify for Targeted Support and Improvement (TSI):

- Any school with one or more consistently underperforming subgroups
- Any school in which one or more subgroups of students are performing at or below the performance of the “all students” group in the lowest performing 5% of Title I schools (referred to as low- performing subgroups).

### Schools with Consistently Underperforming Subgroup(s) page 47

WA will define consistently underperforming subgroup as any subgroup whose multiple measures score falls below the threshold set by the “all students” group for comprehensive support and improvement identification (the lowest 5% of Title I schools). This is the criterion for schools with low-performing subgroups, not consistently underperforming subgroups. Subgroups should not have to perform as poorly as low performing subgroups to be identified as consistently underperforming—otherwise there was no point in Congress distinguishing between the two categories of schools. We recommend that a consistently underperforming subgroup be defined as a subgroup that has not met, or is not on track to meet, the state-defined long- term goals or interim measures for that subgroup for two consecutive years.

### Schools identified for Additional Targeted Support (schools with a low-performing subgroup or subgroups) page 50

WA’s plan says any school that has two or more subgroups whose multiple measure score falls below the threshold for comprehensive support and improvement will be identified for Additional Targeted Support. This violates ESSA, which requires that a school in which “any subgroup of students” performs at the level of the all student group in the lowest 5% of Title I schools must be identified for additional targeted support. One, not two subgroups, is all that is needed.

### **Annual Measurement of Achievement-95% Participation Requirement** page 51

ESSA requires that at least 95% of all students in the assessed grades (and at least 95% of each subgroup - including the disability subgroup) must be included in the state’s annual assessments. It is important to keep in mind the impact of the participation rate requirement on students with disabilities. A “non-punitive” approach would likely led to widespread exclusion of historically underperforming subgroups-similar to the situation that existed prior to the No Child Left Behind Act (which was replaced by the Every Student Succeeds Act).

We are pleased that the WA plan explicitly states that it will calculate academic achievement (proficiency rates) according to ESSA, which requires the denominator for the achievement calculations to be the number of students participating in the assessments or 95 percent of all students, whichever is greater. WA should also make it clear that this rule applies to subgroups as well.

Unfortunately, WA does not comply with ESSA's other requirement related to the 95% participate rate rule, which is that a school's failure to meet the requirement must be factored into the annual meaningful differentiation of schools process. It is not sufficient for WA to point out that the impact on the achievement calculation affects accountability or to say that a failure to meet the requirement must be addressed in the school improvement plan. WA must factor the failure of schools to meet the requirement into the differentiation process.

### **UDL and Inclusion**

In the first draft there were references to UDL and Assessment, as well as references to UDL as part of providing a well-rounded education to all students. Except for UDL appearing in the acronym chart, all references to UDL have been removed. Multi-tiered systems of support (MTSS) is mentioned in a number of places, but MTSS cannot be done well without UDL to ensure that students have meaningful access to the curriculum content and can accurately demonstrate what they have learned. There is also no mention to inclusive best practices in the plan as a way to improve learning for and school conditions for students with disabilities.

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