

## *Kansas Draft State Plan*

### *ExcelinEd Recommendations*

*August 31, 2017*

#### **NATIVE LANGUAGE ASSESSMENTS**

##### **Definition of languages other than English**

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*Kansas defines “languages other than English that are present to a significant extent in the participating student population” as any one language where more than five percent of the participating student population statewide speaks the identified language.*

**Based on U.S. Department of Education guidance, Kansas has defined at least the most populous spoken language.**

Kansas provides a strong data analysis at the state level and gathered appropriate stakeholder input, but could include regional or district level information to further support its definition.

#### **GOALS**

##### **Academic Achievement Goals**

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*Kansas set its long-term goal to have at the state, district, and school level, 75 percent of students scoring at proficient or higher by 2030. Interim check points to determine if the groups are exceeding, meeting, or below the interim goals are set every three years until 2030.*

**ExcelinEd endorses the use of percent proficient or higher and the same endpoint for Kansas’ long-term academic achievement goals.** Kansas provided 2016 data by subgroup to demonstrate the annual increases are ambitious for each subgroup, not just on average for All Students. Increases for reading/ELA range from 19.3 for the Asian group to 80.3 for English learners. For math, the range is 20.4 for Asian students and 89.1 for students with disabilities. Kansas should review the goals with each interim check to ensure that they remain aspirational and attainable over the 13-year timeline.

##### **Graduation Rate Goals**

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*Kansas is setting a graduation rate goal for the four-year rates to increase to 95 percent by 2030 for All Students and all groups. Annual improvement rates are set statewide for each subgroup and applied consistently across all schools to achieve this goal. Interim check points to determine if the groups are exceeding, meeting, or below the interim goals are set every three years until 2030.*

**ExcelinEd endorses the use of only the four-year graduation rate.**

**ExcelinEd encourages Kansas to provide historical data by subgroup to demonstrate the annual increases and long-term goals are ambitious for each subgroup, not just on average for All Students.** Long-term four-year graduation rate increases range from 1.9 percentage points for the Asian group to 27.5 for American Indian or Alaskan.

### English Language Proficiency Goals

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*Kansas is transitioning to the Kansas-created KELPA2 assessment for measuring progress and English proficiency. Kansas provides an example of how students will demonstrate progress toward proficiency using a criterion based measure of improving API levels. Kansas also provides a narrative describing how a school will demonstrate the interim and long-term goal of 95 percent on track or proficient by 2030 have been met.*

**ExcelinEd endorses Kansas’ approach to measuring growth to demonstrate student English proficiency.**

Kansas should clearly explain how English learner proficiency will be included in 2017-18 school accountability given the lack of data and desire to have five years of data prior to making determinations. Providing additional information now will reduce the likelihood of having the plan returned for further detail.

## ACCOUNTABILITY

### Academic Achievement Indicator

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*Kansas proposes to calculate the Academic Achievement Indicator by determining the percent of students achieving a Level 3 or Above on the state assessments in Reading/ELA and Math. Level 3 is defined in Kansas as Grade-Level Proficiency.*

**ExcelinEd endorses the use of percent proficient and above when calculating the Academic Achievement Indicator.** Results for this indicator should also be reported by subject so users can understand how the students in the school performed on both reading/ELA and math.

It is unclear from the narrative how the academic achievement indicator will be represented for purposes of reporting. ExcelinEd encourages Kansas to report the percent of students proficient or higher for each subject as well as whether the interim target is met. While the narrative states the achievement indicator is an annual measure, the narrative also states that every three years the Exceeds/Meets/Below Expectations designation is calculated. Further clarification is needed on how these two pieces work together, what will the annual determination values look like and how they are reported.

### Another Achievement Indicator

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*Kansas proposes to measure academic gaps using the achievement-based Assessment Performance Index (API) - which splits the four performance levels into eight levels - for ELA and math. The API*

*awards more points to students for scoring at higher achievement levels so schools are incentivized to improve all students' performance during the year to achieve more points on the index. Kansas will then compare the API for all students at the school to the API of the subgroup to determine if the gap is within 1.5 standard deviations.*

**ExcelinEd is supportive of using a gap measure as Another Academic Indicator as it is measuring direct student outcomes.**

Kansas should also ensure that schools do not earn credit for 'bad' gap closure calculations where the reference group's, All Students, decreased performance closes the gap on the comparison group that remained level or even decreased slightly.

Kansas should have safeguards in place to ensure that schools that have small gaps because every group is very low performing (e.g., scores for FRL are 14 and All Students 16) are not rewarded and schools with larger gaps but much higher performance (e.g., scores for FRL are 65 and All Students are 75) are not penalized.

**NOTE:** *On page 29 the performance levels are ordered backwards. At the top, associated with API levels 7 and 8, should be performance level 4 and at the bottom, performance level 1 should be associated with API levels 1 and 2.*

*Kansas proposes to use the four-year adjusted cohort graduation rate as the graduation rate indicator.*

**ExcelinEd endorses Kansas' use of only the four-year adjusted cohort graduation rate.**

It is unclear from the narrative how the graduation rate indicator will be represented for purposes of reporting. ExcelinEd encourages Kansas to report the percent of students graduating in four years as well as whether the interim target is met. While the narrative states the graduation rate indicator is an annual measure, the narrative also states that every three years the Exceeds/Meets/Below Expectations designation is calculated. Further clarification is needed on how these two pieces work together, what the annual determination values will look like and how they will be reported.

### **English Language Proficiency Indicator**

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*Kansas will measure the progress in students achieving English Language progress and proficiency on the state-developed KELPA2 using improvements in the API to determine if students are exiting at the average speed to proficiency based on the long-term goal of 95 percent progressing or proficient.*

**ExcelinEd endorses the use of criterion based improvement but more information is needed on how the indicator will be calculated and reported annually.**

## School Quality and Student Success Indicator

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*Kansas proposes a School Quality and Student Success Indicator that would measure the decrease in the percent of students at API levels 1 and 2 (the lowest achievement levels). Schools will earn an Exceeds Expectations if less than 5 percent of students are scoring at API levels 1 and 2, a Meeting Expectation if at 5 percent and a Below Expectations if greater than 5 percent.*

**ExcelinEd endorses the use of a measure of decreasing the percent of students at API levels 1 and 2 for the School Quality and Student Success Indicator. This is a strong measure because it's based on student learning outcome and focuses on the lowest-performing students.**

Kansas should provide historical data to demonstrate that 5 percent is an aspirational target that will differentiate among schools.

As with Academic Achievement and Graduation Rates indicators, it is unclear from the narrative how the School Quality and Student Success Indicator will be represented for purposes of reporting. ExcelinEd encourages Kansas to report the percent of students scoring at API levels 1 and 2 and separately for reading/ELA and math, as well as whether the interim target is met. While the narrative states the School Quality and Student Success Indicator is an annual measure, the narrative also states that every three years the Exceeds/Meets/Below Expectations designation is calculated. Further clarification is needed on how these two pieces work together, what the annual determination values will look like and how they will be reported.

## General Comments

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### *Minimum N*

Kansas will use the minimum N size of 30 students for accountability and 10 for reporting. **ExcelinEd endorses this N size.**

### *Summative Ratings*

Kansas explains that it will consider each of the five indicators in the plan, including the A+ index, to differentiate schools using three levels. It is not clear from the plan narrative how these indicators will be calculated and if a summative score, rating or risk index will be assigned to each school, or only schools with certain scores.

### *Weighting of Indicators*

Kansas explains that it will weight the overall risk index at 60 percent to the API and 40 percent to the proportional risk factors in order to identify the highest overall risk index schools as CSI. It is unclear how the risk factors of chronic absence, percent EL, cumulative poverty, and suspended/expelled will be computed and aggregated. Appendix B was referenced for more details, but not provided in the draft.

Understanding how the risk factors are calculated and combined with the API will show the intent of using risk factors. Without an example calculation, the narrative does not provide enough detail to determine if schools with high poverty, chronic absence, suspensions/expulsions, and many ELs, will be more or less likely to be identified as a CSI school if the API is identical.

## SCHOOL SUPPORT AND INTERVENTIONS

### Identification and Exit of Comprehensive Support and Targeted Support Schools

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#### *Identification of Schools for Comprehensive Support*

Without a clear understanding of the *Academics+* methodology, it is difficult to determine how schools will be identified for comprehensive support.

#### *Exit Criteria: Comprehensive Support Schools*

Kansas' schools identified as comprehensive support schools may be eligible to apply to exit after two years of working with the Kansas Learning Network by providing evidence of school improvement funds being utilized for evidence-based interventions; improvements in the rate of suspensions, expulsions, and chronic absence; and progress in English language arts and math proficiency, or graduation rates.

**ExcelinEd recommends that Kansas consider increasing the rigor of its comprehensive support exit criteria in two respects.** First, Kansas should require schools to show real, sustained improvement prior to exiting. Under the current draft, it appears that schools can exit as long as they show “improvement” or “progress” on an applicable indicator. In other words, schools could exit simply by showing a reduction in chronic absenteeism or suspensions. Such a low bar fails to set ambitious goals for these struggling schools and could lead to schools “bouncing” in and out of comprehensive support year after year. Instead, for example, Kansas should consider requiring that schools increase – and maintain – their achievement and growth at the 10<sup>th</sup> percentile. Second, Kansas should consider requiring schools to remain in comprehensive support status for at least 3 years. This will help ensure that schools can receive the sustained support and interventions required for successful school turnaround.

#### **Distributing School Improvement Funds and Technical Assistance**

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It appears that Kansas plans to distribute its federal school improvement funds through a formula.

**ExcelinEd encourages Kansas to distribute at least a portion of its school improvement funds by competitive grant.** Kansas should consider developing a competitive, transparent process for distributing federal school improvement funds that prioritizes those districts that commit to implement – on shorter timelines – proven, comprehensive interventions, such as replacing the principal and a significant percentage of staff.

In addition, the state could leverage its authority to review and approve school improvement plans to encourage districts to immediately adopt comprehensive reforms by refusing to approve improvement plans that are vague, protracted or do not fundamentally alter the operation of the school.

#### *Harnessing School Choice*

**Consider harnessing the power of school choice.** Kansas' draft states that the state will provide quality technical assistance related to school leadership, effective instruction, data usage and school culture through the Kansas Learning Network, Multi-Tier System of Supports (MTSS) and the Kansas Technical Assistance System Network (TASN). In ExcelinEd's view, this technical assistance is necessary – but not sufficient – to turn around the state's most struggling schools.

School choice gives families the freedom to leave persistently low-performing schools. Moreover, research shows that school choice, in combination with strong accountability, can have a positive effect on low-performing schools. Therefore, in conjunction with this technical support, Kansas should consider policies that advance inter-district and intra-district choice. For example, the state could help open new – or expand existing – high performing charters in districts serving many low-performing schools by creating an expedited process for high-performing charters to easily replicate or expand. KSDE could also work with the legislature to promote policies that attract more high-performing charter management organizations (CMOs) by ensuring equitable per pupil funding and pursuing startup funds under the federal Charter School Program.

### ***Vetting Providers***

**Kansas’ draft demonstrates a clear commitment to ensuring that schools and districts are implementing evidence-based interventions through strategic partnerships; the state should consider establishing a plan for formally vetting providers of evidence-based interventions.** Soon, providers of school interventions will be rushing into states and offering their services to districts and schools. Identifying the strengths and weaknesses of these many providers is incredibly important – but also quite onerous. Over the coming months, Kansas should set aside appropriate staff time and funding to establish a process for vetting providers and identifying the local needs that those providers are best equipped to meet. For example, Louisiana hosted a [School Redesign Summit](#) during which the state department of education helped connect low-performing districts with a pre-vetted set of providers.

### ***Direct Student Services***

It appears that Kansas will not reserve 3 percent of Title I funds to provide Direct Student Services.

**ExcelinEd encourages Kansas to consider setting aside these funds under the Direct Student Services provision.** Such funds could be used to provide a variety of services that could benefit the state’s students. For example, Kansas could run competitive grants to: target funds to expand enrollment in educational options, provide transportation to schools of choice, or – in combination with Title IV dollars – improve access to rigorous coursework at the district level.

### ***More Rigorous Interventions***

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Kansas schools identified as needing comprehensive support that have not met the exit criteria after 3 years will be provided with additional technical assistance from the Kansas Learning Network and the KSDE consultant assigned to the district.

**Kansas’ plan lists a series of TASN partners that will provide interventions, including the design and implementation of school improvement plans, teacher coaching and family training, for schools that fail to exit comprehensive support status after 3 years. These activities are essential to school improvement, but they are not sufficient.** Many of the schools that will be identified as comprehensive support under ESSA are the same schools that lingered in “restructuring” under NCLB and were in “priority status” under the ESEA waivers. Therefore, after an additional 3 years of extremely low performance by such schools, Kansas should consider more comprehensive interventions, including creating options for students who have been languishing in these schools for all those years.

For example, Kansas could consider restarting these schools as a charter or closing schools and enrolling their students in higher performing schools in the district – options that can be supported with federal

school improvement funds under ESSA. Families, particularly those in low-performing schools, are empowered by school choice to select the educational program that is best suited for their needs. Additionally, low-performing schools can be positively impacted by school choice, in combination with strong accountability.

***Note: Kansas gives an impressive list of partners, but it is unclear what role these partners will play in the implementation of interventions. Will they be the service providers or just provide technical support?***

### **Participation Rate**

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Under Kansas' draft plan, if a district, school, or subgroup misses the 95 percent assessment participation rate target for two consecutive years, the district will be flagged by the Kansas Integrated Accountability System (KIAS), which is the statewide accountability system. The KSDE will also provide ongoing technical assistance to the district in support of reaching the 95 percent participation rate.

**ExcelinEd recommends that Kansas consider more rigorous consequences for schools that fail to assess 95 percent of their students.** Assessment participation is essential because it preserves the integrity of the system and ensures that schools are being fairly and accurately evaluated. It prevents schools from only testing higher-scoring students and discourages them from excluding students who are likely to score lower. ESSA requires that states develop consequences for schools that fail to test 95 percent of students overall – or within any subgroup.

Kansas should consider a more rigorous consequence than flagging the district in KIAS and providing ongoing technical assistance. For example, the state could require that the school be identified for comprehensive or targeted support if the school fails to assess 95 percent of students overall – or within a subgroup – for 2 to 3 consecutive years.