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Introduction

Educational equity has long been a shared responsibility of the federal government and individual states. The passage of the Every Student Succeeds Act (ESSA) last year marked a significant shift in the balance of power, though, giving states new authority and flexibility to deliver on the promise of public education in the way that works best for the communities they serve. States now have more power to fully align policies with their vision for the educational experience they want for every student.

Nowhere does this opportunity to put innovation to work in service of equity loom larger than in ESSA’s provisions on school accountability systems. Done right, accountability systems are among the most powerful tools at a state chief’s disposal to advance ESSA’s goals of “school quality and student success.” They should embody a state’s vision of an excellent education and definition of a great school, describe the shared goals that all schools should be working toward—and, crucially, help monitor whether the vision and goals are actually becoming a reality for all students in every corner of the state.

But strong accountability systems are about much more than a rating. They also provide valuable information to school and district leaders about how individual groups of students are performing, which can help guide school improvement efforts. And they give families a clear, comprehensive picture of every school that can help them make informed choices on behalf of their children.

These are the kinds of accountability systems state chiefs should be striving to create as they begin revising their current systems as required by ESSA. Getting accountability right means making smart choices about how to measure school success—after all, there’s plenty of truth in the adage that “what gets measured gets done.” And thanks to the new flexibility in ESSA, states will have more potential measures to use than ever before. With this opportunity comes new risks and challenges that state chiefs will need to be thoughtful about as they move forward. Too much too quickly in any system can complicate implementation or dilute the value of new measures. States will need to find the right balance of being bold and holistic while making smart choices that keep the focus on what’s most important.

Often overlooked, though, is the fact that how states go about making those decisions matters at least as much as the decisions themselves. State chiefs need to put time and thought into opening meaningful, two-way lines of communication with local communities; planning for smooth implementation; and assembling the right project team. Most importantly, they need to work with internal and external stakeholders to create a clear vision for public education in their state—a shared understanding of the results schools should deliver for all students—along with a theory of action for making that vision a reality. Without this foundation in place, states risk seeing their accountability systems crumble from valuable tools that genuinely support school and student success into a mere compliance exercise—and a missed opportunity for an entire generation of students.

ESSA requires school-based performance measures and not district performance measures so in this paper, we focus on the former. We do think it is critical for states to consider the role of districts in improving education quality and equity and so make recommendations in places throughout this paper about how states can ensure districts have a productive role as part of a state strategy.

In this working paper, we offer some guiding principles to state chiefs and state education agencies on both the process and the substance of the accountability systems they’re about to build. In Part 1, we suggest five principles for building the system:

1. Listen to and learn from local communities.
2. Anchor bold plans within the current educational landscape.
3. Build around a clear vision and theory of action.
4. Design the implementation, too.
5. Pick the right project team and strong leadership.
And in Part 2, we suggest that states include other indicators of school quality and student success accountability measures from three broad categories:

1. Consistently great teaching (especially equitable access to great teaching, a measure all states should include)
2. Healthy school culture
3. Access to opportunity

Our intent is not to provide a universal set of step-by-step instructions, since the context in every state is different. Instead, we hope our ideas will help state chiefs and their teams organize their thinking—whether at the start of the design process or to take stock of design efforts that are already in progress—about how to get from their current system to one that reflects voices from across their communities, advances educational equity, and makes a difference for as many students as possible.

Overview of ESSA accountability requirements

The accountability system requirements of ESSA are intended to reinforce ESSA’s underlying principle that all students are held to college and career ready standards while affording states flexibility in the measures of school quality and student success used to monitor and improve outcomes for all students. Under the proposed regulations published in May of 2016, key provisions and goals for the accountability systems include:

- States actively engage with their communities and stakeholders in the development of their state plan, including their accountability system;
- States set their own ambitious goals and measurements of progress toward academic outcomes;
- States use a multi-measure statewide accountability system that:
  - Includes indicators of academic achievement, graduation rates, academic progress, and progress toward English language proficiency and
  - Includes at least one additional indicator of school quality and student success. These indicators must measure the performance of all students in all public schools, differentiate so that they allow for comparison between subgroups, demonstrate variation across schools, and be measures of factors likely to increase graduation rates or academic achievement.
  - Weights the academic indicators “much greater” than the other indicators
  - Provides a comprehensive, summative rating for every public school
  - Enables the comparison of subgroups of students on each measure

NOTE: The list above includes only the requirements specific to state accountability systems (the focus of this paper). States are also required to include other elements in their broader consolidated plans, such as strategies and actions based on the information identified in the accountability system.
Part 1: Five Principles for Building the System

1. Listen to and learn from local communities.

Engaging with teachers, families, and other stakeholders is not only required by ESSA, but is critical to the success of any new accountability system. The more school communities feel that the system reflects priorities that matter to them—and the less they feel like the system has been imposed from on high—the more likely they will be to embrace it, and the greater positive change it can achieve. More to the point, engaging the people who will be implementing the system and the communities the system is designed to support is simply the right thing to do.

Authentic community engagement means starting and maintaining a genuine, ongoing two-way conversation, in which stakeholders have a real voice in values and priorities reflected in the system. This conversation should start long before the state begins considering specific accountability measures, and should continue into the actual implementation of the system. In particular, states should focus on understanding what matters most to stakeholders about the schools in their communities. Discussions centered on fundamental questions such as how parents know whether a school has been good for their child are crucial to developing a vision—and, eventually, an accountability system—that resonates with the community. What states hear in these conversations will feed into their theory of action (see design principle #3 below).

As with any meaningful engagement process, clear and well-planned communication is crucial. The Education Department’s release of draft accountability regulations and the beginning of the school year give states a perfect opportunity to clarify their goals for stakeholder engagement and ensure that their plans for revising their accountability systems actually reflect those goals. In particular, states should set clear expectations for how and when stakeholders can engage at every stage of developing the new accountability system, from the broader vision about great schools to specific measures—how the state will collect feedback, which aspects of the system are truly open for debate, and when interested stakeholders can expect an update on how their feedback influenced the design. States should make plans to take the conversation to stakeholders rather than expecting stakeholders to come to them—for example, by hosting forums in places of worship, community centers, or schools, or by hosting events in the dominant languages in each neighborhood.

The form, structure and approach to stakeholder engagement will look different in every state depending on the size of the state and other local factors. In a large state, for example, state leaders may be best served by establishing advisory committees in multiple regions, using statewide surveys to gather input and tailoring the engagement to local context. In smaller states, leaders may be able to effectively engage through a single statewide advisory committee and series of conversations with stakeholders. And, states will need to consider who to partner with in developing and carrying out various engagement activities.

States should develop concrete strategies that look to district, school and charter leaders as key partners in their engagement efforts, as these local leaders have the closest ties to their local communities and are best positioned to lead most of the direct engagement. This partnership with local leaders should include soliciting their input on the state’s overall stakeholder engagement strategy, as well as the accountability plan itself (since they will be key stakeholders themselves, responsible for many aspects of implementation). States should also plan to provide support that gives local leaders as much capacity as possible to connect with their communities. For example, states could think about assigning a point person to each LEA, providing high level guidance in the form of presentation templates or guiding questions, and creating a user-friendly online tool to report the feedback the LEA gathers. Done well, this partnership with local leaders will increase the quality and diversity of the input states can collect.

States should also look for opportunities to bring new voices into the conversation beyond well-established education groups (such as PTAs or school site councils). In many communities, organizations with the deepest roots have historically been underrepresented in conversations about education policy. For example, states may want to conduct special outreach to local chapters of culturally-based organizations (National Urban League, NCLR, etc.) or organizations that advocate for bilingual students or students with disabilities. States should also actively look for representatives from any relatively new constituencies—for example, organizations that advocate for a burgeoning refugee community in a
particular area. Students are another important stakeholder group (the most important one, in many respects) that often goes unrepresented in these kinds of discussions.

In states where the accountability system design is being led by a steering committee, the superintendent and project lead should add outside community representatives to the committee. States could also create a separate external steering committee that helps synthesize and funnel feedback to the internal project team.

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**IN FOCUS**

Engaging Stakeholders & Communities

Many states have already begun engaging their communities about accountability systems and other aspects of ESSA. Some are struggling to give stakeholders enough meaningful opportunities to help inform policy decisions, while others have taken promising early steps toward giving their communities a real voice in the development of new accountability systems.

In Hawai’i, the Department of Education launched a nine-month effort to collect input on the state’s strategic plan. In the first two months of this effort, HI DOE conducted more than 100 focus groups around the state, and gathered community input through an online survey, public comments at regularly scheduled meetings, and meetings with a broad array of stakeholders. To simplify participation, the state offered “community kits” for the public to host their own focus groups, and the HI DOE has engaged in a robust direct outreach and social media campaign to maximize awareness of the state’s review of their strategic plan. States that take a similar approach will want to ensure that they have sufficient staff prepared to participate and engage with stakeholders on a large scale and log all the feedback collected, and that they clearly define the purpose and scope in a way that can best inform the state’s planning and actions (while still making it clear the feedback is welcome).

In addition to soliciting input through a dedicated e-mail address, Illinois officials conducted a listening tour in April and May to solicit input in the development of the state’s plan to address ESSA accountability requirements. Attended by over 450 stakeholders at eleven sites, the tour sought input on a series of questions about student achievement, accountability, and how to improve coordinated services to schools and districts. A group of interested leaders and organizations has also begun convening to discuss ESSA and input they would like to provide to the state. States that take a similar approach to stakeholder engagement will want to ensure that while they are strategic about defining questions for stakeholders, they also allow room for broader input on the opportunities of ESSA and the state’s vision. And where organizations outside the state education agency are generating input or ideas, state leaders should articulate what input would be most valuable while welcoming support or new ideas.

The Council of Chief State School Officers (CCSSO) has also released a comprehensive stakeholder engagement guide that state chiefs and their teams should find useful in developing or refining their plans.¹

With all community meetings, listening tours or opportunities to address state boards, certain groups of stakeholders, including advocacy and professional organizations, have greater experience coordinating attendance by their members or supporters than the general public and certain communities. This can be an advantage to the state in obtaining a level of input, but states should consider the input received with this in mind and be intentional in their efforts to diversify participation so that it most closely reflects the families, students, and communities their schools serve.

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¹ The guide is available here: http://www.ccsso.org/Documents/2016/ESSA/GuideonESSASTakeholderOutreach.pdf
Key Questions to Answer

- What opportunities will stakeholders have to learn about and provide input on the accountability system?
- Who are the stakeholder groups, and who will be responsible for leading the relationship with each group?
- What person or group will be responsible for collecting feedback and synthesizing it for the project team?
- How will the state report back to stakeholders on how their feedback helped shape the system?
- What organizations/groups—especially those that have traditionally been underrepresented in education policy conversations—will the state make a special effort to engage?

2. Anchor bold plans within the current educational landscape.

Accountability systems need to walk a fine line between aspirational and practical. They should be bold enough to rally schools around ambitious goals and push them to reach new heights. At the same time, they need to be grounded in the reality of the state’s current education system—or else risk becoming impossible (or untenable) to implement.

Before selecting any accountability measures, states should conduct a comprehensive review of the systems, policies, and political forces that could directly or indirectly influence the design or implementation of the new accountability system. This process will allow the project team to map their ideal system—the one they’d build with unlimited resources, data, and political capital—to what’s possible today, while still leaving room to grow toward something more ambitious in the years to come.

Specifically, states should analyze five key areas:

1. The current accountability system: Reflecting on the successes and challenges of the current accountability system will help focus the discussion about how it might need to change to meet the state’s goals.

   Key Questions to Answer
   - What’s working about the current system in terms of its ability to advance the state’s vision?
   - What’s not working or needs to be reimagined?
   - Has the current system created any unintended incentives or consequences that need to be mitigated in the new system?
   - Are there any LEAs that have built strong, district-wide accountability systems or school report cards? What lessons can the state learn from those systems?

2. Student outcomes, progress & gaps: States need a clear understanding of trends in academic performance (overall and by subgroups) to ensure that new accountability systems are focused on improving outcomes for students—especially those most at risk of falling behind.

   Key Questions to Answer
   - What do progress and success look like at the school level in gains and over what time period and are student outcomes generally tracking toward where the state wants them to be?
   - How have student outcomes changed among subgroups identified under the current system?
   - Are there similarities among schools or subgroups that have improved, stagnated, or worsened?
   - What supports, interventions, or actions were undertaken by the state that can be connected to the changes in outcomes?
   - Have there been gaps in or underperformance among schools or sub-groups that were not identified by the current system as warranting intervention or additional supports?
• Which LEAs—or even clusters of schools across the state—are positive outliers in terms of student achievement? What is the state’s plan to help other LEAs learn from those successes?

3. Major initiatives: The new accountability system should be designed to help support and evaluate the success of the state’s major educational initiatives.

Key Questions to Answer
• What are the state’s top-priority initiatives, now and in the coming years (to the extent those are known)?
• How can the accountability system support those initiatives?
• Would linking the accountability system to any of these initiatives jeopardize their success?

4. Data and human capital systems: Knowing what data is at the state’s disposal will help the project team decide which potential measures can actually be measured right now, and what data the state needs to begin collecting to make other measures possible in the long run.

Key Questions to Answer
• What data is already being collected for the current accountability system or for other initiatives?
• Which office is collecting the data?
• What other data sources/systems will become available in the near future?
• Is this data equally valid in all school environments—urban, suburban, and rural? Are there specific data sets that make more sense in some school contexts than others?

5. Governance structure and political constraints: The project team needs to understand whether any changes to the accountability system require approval outside the state education agency, so that they can prepare to navigate those processes and manage any ensuing challenges.

Key Questions to Answer
• Do any of the changes being considered to the accountability system conflict with statutes, regulations, board policies, or other governance structures?
• What is the exact mechanism for changing any formal policies that could potentially conflict with the new accountability system?
• What is the extent, source, and basis of any potential opposition to changing or adding those policies?

The project lead should consider involving staff beyond the project team in this analysis, to ensure that it captures the best and most informed thinking from across the agency (for example, staff in charge of educator effectiveness, interventions/turrounds, federal and state policy, data, district support, and relations with local boards and professional associations).

3. Build around a clear vision and theory of action.

Successful accountability systems flow from a state’s vision for what public education should look like—essentially, the results great schools should produce for students to ensure that they’re ready for college or a career. Setting this vision is ultimately the responsibility of the state chief, but it should be based on extensive input from teachers, school and school system leaders, students, families, and other stakeholders.

A strong vision statement should clearly define what school quality and student success mean in each state’s particular economic and cultural context, in a way that can actually be observed and measured. It should be paired with a clear theory of action about how the state can use its formal powers and informal leverage points to make the vision a reality for all students.
The role of the accountability system, then, is to monitor progress toward a specific set of outcomes for students, and to report on that progress in a way that’s transparent to the entire community—while still empowering individual districts and schools to use their discretion on how to best make that progress happen. Results from the accountability system can also help states continuously reevaluate and refine the theory of action itself.

**IN FOCUS**

*Building a Strong Theory of Action*

By itself, a vision statement is too vague to inform an accountability system or any other initiative. State chiefs need to ensure that their vision is specific enough to be actionable—that it spells out, for example, the essential qualities of a great education in their state and the hallmarks of schools that deliver it—and that it is paired with a clear theory of action. This theory of action should describe how particular actions the state takes (especially through the accountability system) will produce specific results that lead to particular outcomes for students. It may be easiest to think of the theory of action as a series of “if...then” expressions: “If we do X, then Y will happen; and if Y happens, then Z will occur for kids.”

States can start by answering four key questions (presented here with sample answers):

1. **What is our vision for students who have been educated through our public education system and how are we developing that vision?**
   a. **As state education leaders, it is our responsibility to articulate a clear and ambitious vision focused on opportunity for all students and to engage with communities to develop that shared vision of great schools and student success.**
   b. **We believe all students must receive an education that prepares them for post-secondary success and the choice of college or career paths.**

2. **What conditions must be present for that outcome to happen?**
   *All students and families must have access to:*
   a. Excellent teaching
   b. Rigorous & high quality courses
   c. Healthy learning environments
   d. Accurate assessment of learning

3. **How will we know these conditions are present?**
   a. A fair and accurate assessment of educator ability
   b. An audit or analysis of courses offered, their alignment with standards, and the quality of instruction
   c. A survey or other examination of the school culture, systems, and practices
   d. Regular assessment of student learning and access to robust data for all students

4. **What is the role of the state in driving, supporting, and ensuring these conditions?**
   a. Comprehensive educator effectiveness assessment systems that are used to improve teaching practices
   b. Systems, policies and practices that govern and monitor course offerings and instruction
   c. Instruments and support assessing school culture to inform improvement and monitor
   d. Requiring and providing necessary resources to ensure continuous monitoring of student learning
   e. Incentives and rewards for improvement and research-based best practices
   f. Interventions, supports, and consequences when schools are not yet preparing all students for success
   g. Engaging with communities to develop a shared vision of great schools and student success
   h. Transparency with families about school strengths and weaknesses
While each element will involve more detailed systems and actions than the abbreviated examples above, at its core, the theory of action flows naturally by arranging the answers to these questions in reverse order: If a state does everything in question #4 and monitors everything in question #3, then it will know and can ensure everything in question #2 and realize the vision articulated in question #1. Within each of these, states will have comprehensive plans of how they get from each element in #4 to #3 and from #3 to #2 and should have a theory of action for each.

States can then examine how the accountability system fits within each element of the theory of action. It’s likely that the accountability system will play some role in all elements, but exactly how the system contributes and whether it is a primary or secondary lever will be different for each element. For example, the accountability system may serve primarily to monitor the results of existing initiatives around educator effectiveness in some states, but in states where such initiatives don’t exist, the accountability system might serve more to create new requirements. Ultimately, though, the accountability system should be specifically designed to help states advance their theory of action and understand how well it’s working.

Similarly, states will need to consider the role, responsibility and appropriate accountability of each level of the school system from the classroom to district office, the SEA’s systems and state law or administrative code. While ESSA does not require district level accountability, LEAs inevitably play a critical role in creating quality schools and in setting the stage for student success. States should consider the role of district leaders when developing their school accountability systems, as well as additional policies and systems that directly address district and/or LEA accountability.

4. Design the implementation, too.

No matter how perfect the design, an accountability system is only as effective as its implementation. Sloppy, rushed, or inconsistent implementation can irreparably undermine confidence in the system among key stakeholders—rendering it a useless and potentially controversial compliance exercise instead of a valuable tool that encourages school improvement. Central to the solid implementation of an accountability system is planning that begins in the earliest stages of the design process. An implementation plan should focus on four main areas:

1. **Technical and operational issues:** As soon as all the measures for the system have been identified, the project team should begin assembling a plan for gathering, analyzing, and using the data that will feed into each measure.

   **Key Questions to Answer**
   - For each measure, which office or staff member is responsible for data collection and analysis? How will progress be monitored and the data used?
   - Are any additional systems or resources required to collect and analyze this data? If so, where will those resources come from? Do other state agencies need to be involved?
   - What data from the system or individual measures will be shared publicly, either because of federal/state requirements or because it helps advance the state’s vision? What are the legal, political, and communications considerations involved in sharing this data?
   - How will data from the system or individual measures be used (interventions, support, etc.), either because of federal/state requirements or because it helps advance the state’s vision?

2. **Communications:** The project team should create a plan for clearly explaining the new accountability system to LEAs and school communities more broadly, with a focus on managing expectations about what the changes mean for them, soliciting and incorporate feedback from stakeholders (especially educators) on the implementation of the system, and shaping the larger conversation about the state’s vision and goals for public education.
Key Questions to Answer

- How will the state communicate with LEAs about the timeline for rolling out the new system, what they will be expected to do differently, and what support they will receive?
- How will the state help families and members of the wider community—including those who don’t follow education policy closely or don’t speak the community’s dominant language—understand how the new system will contribute to a better school experience for students?
- How can communications efforts during the implementation phase build on the project team’s stakeholder engagement work during the design phase?
- How will the project team ensure that all offices within the state education agency understand the goals of the new system and their role in implementing it?
- How will the project team know whether the broader community understands the goals of the new system?
- How will the state ensure that advocates in the community who focus on the needs of particular subgroups (e.g., low-income students, students with disabilities, English language learners) are clear on the impact the new system will have for their communities?

3. Investing and supporting LEAs: Implementing a new accountability system is not the sole responsibility of the SEA. In fact, there is an equally critical role for district and local leaders and a variety of stakeholders. In addition to engaging with these leaders throughout the design process on what is included in the system, states should have a clear plan for supporting those who will be responsible for the actual implementation of the system. As mentioned previously, while this paper is specifically about school accountability systems, given the important role of LEAs, states will also need to consider the appropriate levers or systems for driving district level change—which may include other, aligned systems that hold districts accountable for those factors more appropriately in their control.

Key Questions to Answer

- How will the state help LEAs connect the accountability system to their own vision, goals, and priorities?
- Do the data collection and reporting requirements of the new system feel realistic for most LEAs given their current resources?
- Who at each school district will be responsible for overseeing implementation and compliance with the requirements of the new system? What training will they need on the measures, data systems, or reporting requirements?
- Are local officials equipped with the communications and messaging needed to effectively share information with their school leaders, teachers, and community and respond to concerns?
- Do other elected or appointed local officials have a role to play in communicating about the system or obtaining necessary resources?

4. Continuous improvement: As the new accountability system is implemented, the state should expect to make changes in response to unforeseen challenges or opportunities to improve the system, as well as the planned incorporation of long-term measures identified during the initial design process. Some changes could be relatively narrow, like deciding to collect a certain piece of data from a different system or report it in a different way. Others may be broader, like adopting a new measure based on feedback from the field or changes in state priorities. To accommodate both kinds of changes, the implementation plan should include a clear process for regularly taking stock of what’s working with the new system and what needs to be improved, devising solutions in collaboration with internal and external stakeholders, and implementing the improvements.

States should also consider creating a working group to monitor implementation and make adjustments as necessary, drawing on the project team and the stakeholder engagement process. In preparing for launch and during the early stages of implementation, this group may need to meet weekly. Once the system has been fully
implemented and initial challenges and stakeholder feedback have been addressed, the group should continue to meet at least quarterly to discuss and plan for both short-term improvements and longer-term enhancements to the system.

**Key Questions to Answer**
- How often will the state formally review the structure of the accountability system? Who (internally and externally) will be involved in the review?
- What are the circumstances under which the state would add or remove measures from the system?
- How will the state monitor the fidelity of the data used in the accountability system (including an analysis of other indicators of school quality and student success measures against student outcomes)?

5. Pick the right project team and strong leadership.

Before tackling the question of what should change about their accountability systems, states first need to identify who will be involved with—and lead—the project internally. An initiative with so many interconnected parts requires a project team with a clear leader and representatives from all offices that will play a role in making the accountability system work.

The **project lead** should be someone the state chief trusts to manage a complex project, and who has a high-level understanding of how offices across the agency function (in isolation and with each other); is fluent in the underlying issues related to school accountability (data systems, assessments, educator effectiveness, etc.); and will be seen as a trusted partner by districts, parents, business leaders, and the wider community. This person will set and manage expectations for the project, and act as the liaison between the project team and the state chief, other state agencies, and external partners. This person will also play a critical role in breaking down silos that too often exist between offices within the SEA: clarifying roles, integrating efforts, and leveraging of strengths across the agency to avoid unintended duplication or gaps in information sharing.

The project lead should assemble a **project team** that includes staff members from across the organization. This team should include a specific owner for each of six critical lines of work:

1. **Project management**: The project lead can opt to be the primary project manager, or can enlist someone else to handle day-to-day coordination, as well as ensure milestones are being met.

2. **Accountability measures**: Measures in the accountability system will draw on the work and expertise of several offices, but one person should be responsible for guiding this part of the design process. This person can expect to facilitate meetings to determine what measures should be included and how they should be implemented, and should be able to engage with detailed questions (such as, “Can this measure really be used in the way we want to use it?” or “Which subgroups will we be breaking out for the measure?” or “Where will we get the data we need for that measure?”).

3. **Stakeholder engagement**: One person should be responsible for designing and executing a plan to engage with educators, community leaders, elected officials, and families throughout the design and implementation of the system. This should be somebody who has credibility with important stakeholders and is able to effectively communicate the state’s vision and goals for the accountability system, gather feedback on behalf of the project team, and help stakeholders understand how that feedback shaped the system.

4. **Implementation**: Implementing an accountability system effectively requires planning for implementation from the earliest stages of the design process—and this should be one person’s clear responsibility. This person will prepare offices that will play a role in implementing the new system; coordinate support for districts during the rollout phase; anticipate potential barriers to effective implementation; and work with the right people to find solutions to those problems.
5. Communications: It’s critical that states explain the changes to their accountability systems clearly, especially in light of the controversy that tends to surround them. A representative from the agency’s communications office should be part of the project team from the beginning and should be in charge of crafting a strategic communications plan to help build understanding and support for the new system. The plan should address inter-agency communications to keep all offices informed about the project; inter-governmental communications throughout design and implementation; and a public relations strategy (including media engagement and direct public communications). This person will also support the stakeholder engagement lead in creating any public-facing materials.

6. Financial & Resource Allocation: Developing, implementing and managing the ongoing operation of an accountability system has significant financial and resource allocation implications. It’s important to have a clear understanding of where the resources will come from to support the development process, to improve data systems, and to support districts in implementing the new system. A senior member of the agency who is involved with the internal budget and with budget appropriations should be engaged from the onset to inform the team of what is possible and to advocate for any additional resources or shifts in resources.

In identifying the project team and leaders for each line of work, the project lead should generally look to the office or person who leads a particular strand of work for the agency as a whole: in other words, the heads of educator effectiveness/evaluation, interventions/turnarounds, data systems, professional development, agency budgeting, district support services, government relations, family engagement, and communications. However, every state context is unique, and the project lead should consider the appropriate level of involvement needed from different offices within the agency.

The state chief and project lead should also work together to determine whether the project lead will have sole oversight of the project or will be part of larger internal steering committee. Having a single leader could make the design process more efficient, but a committee can bring diverse points of view and a wider range of expertise to the table. Which approach is best for a particular state largely depends on the scope of the changes being contemplated and inter-agency dynamics. Whatever its structure, though, it’s crucial that this team—which can be fewer than five people if one person oversees multiple strands of work—coordinates and communicates regularly about progress and challenges.

**PITFALL TO AVOID**

States often skip thinking through the project team entirely when tackling complex initiatives. A subtler but no less costly mistake, though, is bringing representatives from all the relevant offices to the table just once at the start of an initiative—or a handful of times throughout the process—instead of making them part of a long-term project team. One-time or ad hoc meetings aren’t enough to achieve the level of coordination required to design and implement an accountability system well—and are a recipe for big problems down the road. In fact, it’s essential that the project team prioritizes meeting regularly during planning and development, and continue to meet regularly even after the initial design and rollout of the system, to help oversee ongoing improvement and the incorporation of new measures over time.

**Key Questions to Answer**

- Who is the project lead?
- Will this person be the sole leader, or part of a steering committee?
- Who will lead each strand of work (see sample worksheet below)?
<table>
<thead>
<tr>
<th>Item</th>
<th>SEA Lead</th>
<th>Supporting Team</th>
<th>Key Responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Management</td>
<td></td>
<td></td>
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<td>Accountability Measures</td>
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<td>Stakeholder Engagement</td>
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<td>Financial and Resource Allocation</td>
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Part 2: What to Measure

Among the more significant changes in ESSA is the increased flexibility given to states around which measures to include in their accountability systems. In particular, states have almost total discretion over which (and even how many) other indicators of school quality and student success measures to include to supplement the required direct measures of student achievement, as long as they can demonstrate how those measures link to the law’s goal of measuring “school quality and student success.”

Selecting these measures gives states one of the best opportunities they will have in the coming years to advance their theory of action and their larger vision—because what the accountability system measures is what schools will focus on most closely. As a practical matter, these choices, built on the groundwork laid during the design process, will essentially become a state’s working definition of a “great school.” More than any other part of the process, this one will determine whether a state emerges with a system that reflects the values of their communities and gives more students a fair shot at a great education.

As we discussed in Part 1, states should use the design of their new system as an opportunity to map out their ideal system of the future and then map that against what is possible and appropriate today. In selecting measures, states may want to begin to collect data on some measures that will not yet have significant or any weighting as a means to test measure or indicator efficacy and to monitor factors that are important to overall school level success. Critically, states will need to consider the appropriate balance of a holistic picture of school quality and student success with the need for simplicity, transparency and accessibility. This balancing act will lean to limiting the number of factors weighted in the accountability system, but states can and should collect data on other factors whose purpose is to function as part of a system of continuous learning. Through this process, states may find factors, over time, that are better predictors of student success that can be added or substituted into the accountability system in the future, as well as factors that may continue to sit outside the accountability system but are worth pursuing through other reporting systems and/or policies.

The “right” mix of other indicator measures for the purposes of accountability—and, at least in the long run, states should include several measures—will ultimately depend on each state’s unique context and theory of action. However, we believe all states should strongly consider including three categories of measures, because of their strong connection to school quality and student success:

- **Consistently great teaching:** Nothing a school can do for its students matters more than giving them great teachers. Research and experience have proven it time and again. **We believe every state should include the most important measure in this category: equitable access to effective teachers.**

- **Healthy school culture:** Culture—the environment in which teachers teach and students learn—is critically important because it has such a large impact on almost every aspect of a school, from instruction to behavior. It even shapes students’ expectations for how they interact with the world outside school, and how the world interacts with them. Research has also shown that a school’s culture can be a leading indicator of teacher retention and student achievement. States should explore multiple measures that collectively paint a clear picture of school culture—ideally to roll out with the initial redesign of their systems, but if not, to phase in over time.

- **Access to opportunity:** States should consider adding additional measures, such as course access and post-secondary completion rates, which focus schools on creating equitable opportunities for all students.

In the following pages, we offer a menu of specific measures states could consider in each of these categories, all of which focus on important factors that contribute to school quality and student success. **These lists are not intended to be exhaustive or prescriptive, but rather a starting point** to help states find a collection of measures that advance their theory of action while keeping the focus squarely on school quality and student success.

Many of these measures will require new data or new ways of gathering and using information. Some present varying levels of challenges for SEAs to address or consider, including how to disaggregate data, particularly in smaller schools, and some may be better utilized for data collection purposes for the time being. During the process of selecting
measures, however, both challenges and potential solutions should be considered so that over time states can build toward the system that truly captures what is important for all students to succeed. Ultimately, the system should be used to press school leaders to think boldly and creatively about how they utilize and support their teachers, the kind of school culture they create, and the equity of opportunities given to their students.

**IN FOCUS**

Selecting Specific Measures

Any potential accountability measure should satisfy several criteria:

- Is the measure (or combination of measures) linked to school quality and student success? In other words, does research or experience suggest a clear link to student achievement or a leading indicator of student achievement?
- Can the measure meet the disaggregation requirements in the statute?
- Does the measure help monitor the state’s theory of action by focusing on at least one of the results the state wants schools to produce for students?
- Does the state have (or can it reasonably create) the data systems and collection processes to implement the measure in a way that creates accurate and meaningful differentiation among schools?
- Can the state avoid or mitigate damage the measure might cause to a key initiative (by stirring up public controversy, for example), or any potential unintended consequences/incentives (e.g. inaccurate inputs, overly burdensome requirements at the local level or inflation stemming from the stakes to be attached)?
- Can the state implement the measure in a way and with such weighting that doesn’t unduly penalize schools or districts for factors they can’t directly control?

Based on the collection of measures that clears these hurdles, states can design their “ideal” system (as discussed in the previous section). They can then determine which measures should be implemented right away, and which would be better saved for future years—because the necessary data is not yet available, for example, or simply to avoid overwhelming schools with too many new measures at once without sufficient time to build buy-in. It’s important, however, that states still develop specific plans for implementing any measures they plan to incorporate later, and integrate these plans into the continuous improvement cycle for the system as a whole.

**Category #1: Consistently Great Teaching**

**AVAILABILITY:** Measures and data should be available in all states.²

**ACTION:** All states should plan to include at least one measure from this category now, especially one relating to equitable access to great teachers.

Over the last decade, there’s been a growing appreciation of the power of great teaching. Research and experience have proven beyond any doubt that learning from great teachers—or even one great teacher—can benefit students in ways that reverberate for the rest of their lives. Students who get to learn from even one exceptional teacher during their K-12

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² Many states have data from their educator effectiveness systems. As part of their educator equity plan, all states are required to have means of ensuring equitable access to effective teachers.
career are more likely to attend college, earn a higher salary, and save for retirement. In other words, great schools rest on a foundation of great teaching. On a more practical level, this category is almost certain to align with any strong statewide vision for public education, and can be measured with data most states either already collect or will need to collect to satisfy other provisions of ESSA.

That's why we believe consistently great teaching should be a cornerstone of any accountability system. We strongly recommend that every state include at least one measure from this category—and, specifically, that they consider including a measure around the equitable distribution of great teachers.

**IN FOCUS**

**Defining “Great” Teaching**

Any measure of consistently great teaching depends on two things: a common, statewide definition of great teaching, and a way for every school to accurately identify great teachers and distinguish them from others. States with a teacher evaluation system that already meaningfully differentiates teacher performance can use evaluation results as the basis for these measures. In states without a meaningful evaluation system, or where using evaluation ratings for school accountability purposes isn't possible, leaders should still clearly define teacher effectiveness for the purposes of accountability measures as the demonstrated ability to ensure that students meet challenging state academic standards. They should also spell out the kinds of evidence schools should use to identify great teachers, ensuring that objective measures (like data on student progress or data gathered from student surveys) supplement more subjective ones (like classroom observations) wherever possible. Ultimately, accountability measures around teacher quality are useless if schools can’t accurately and meaningfully differentiate teacher performance.

**Recommended Measure: Equitable Access to Excellent Teachers**

Whether all students are getting the same opportunity to learn from great teachers is one of the most important questions a state can ask about the quality of its schools. Research has long shown that students who need great teachers the most—low-income students and students of color, who tend to face the greatest academic challenges—are least likely to get them. This is an issue ESSA already requires states to report on outside the context of accountability systems, which means all states should be able to include it as measure for other indicators of school quality and student success. Accountability systems can and should help spotlight the all-too-common inequities in access to excellent teachers and encourage districts to address them—and it’s why this is the one specific measure we strongly urge all states to include in their systems.

**What to Measure**

Beginning in 2015, through its Excellent Educators for All Initiative, the U.S. Department of Education began calling for states to create plans to ensure that all students have a chance to learn from great teachers. In particular, the Department’s May 2016 proposed regulations require states to report annually on any instances where ineffective teachers are disproportionately teaching minority students in Title I schools, and create a plan to remedy these gaps.

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States should incorporate their equity plans into their accountability system, using the data to help districts create time-specific goals for closing gaps in equitable access to effective teachers.5

Key Considerations:
States should ensure that their definitions of effective teachers are based on objective measures of a teacher’s impact on student learning whenever possible. ESSA eliminates Highly Qualified Teacher requirements, which previously forced states to consider teachers’ qualifications and experiences as proxies for performance in the classroom—something they should no longer do. Although ESSA’s educator equity plan still requires some consideration of “out-of-field” and “inexperienced” teachers, these provisions need not be included for purposes of a state’s accountability system.

### IN ACTION

**A Teacher Equity Plan in Tennessee**

Tennessee's equity plan provides an example of how a state can use data already being collected to ensure more equitable access to highly effective teachers.6 Tennessee defines and measures its distribution of highly effective teachers using the results of teacher evaluations that include objective measures of student growth and achievement. Notably, Tennessee’s use of The Tennessee Value-Added Assessment System (TVAAS), which measures the impact schools and teachers have on students’ academic progress, empowers the state to pinpoint equity gaps down to the school level—a level of detail that can help state, district, and school officials quickly identify struggling schools or groups and position state and district leaders to suggest strategies to address those gaps.7

### Potential Measure: Retention of High-Performing Teachers

Retaining as many great teachers as possible is a critical part of giving more students the quality of instruction they need and deserve. Yet in a 2012 study (*The Irreplaceables*), TNTP found that many schools struggle to retain high-performing teachers that they should be able to keep, and usually replace these teachers with others who are less effective.8 States can help hold schools accountable for taking common-sense steps to keep their best teachers in the classroom—steps as basic as actually telling these teachers they're doing a great job and asking them to return for another year.

**What to Measure**

Districts could be required to report on teacher retention rates by effectiveness level, and could propose their own goals for the retention rate of high-performing teachers that the state approves. We recommend setting goals at the district level because district leaders have the best understanding of past retention trends and the factors that affect retention in their communities. Goals should take this information into account: for example, a goal to retain 80 percent of high-

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5 The Education Trust has published a useful guide for creating equitable access plans: [https://edtrust.org/resource/achieving-equitable-access-to-strong-teachers/](https://edtrust.org/resource/achieving-equitable-access-to-strong-teachers/).

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7 In 2016, Tennessee had to suspend the administration of their new TNReady test, one of the sources of data for TVAAS, when the test's developer's online platform suffered a network failure. The collection and use of value-added data will resume going forward, but the decision to pause left a short-term gap in certain data. As with all systems or policies, states may need to make temporary or long-term adjustments in response to factors outside of their control and other developments in the field.

performing teachers wouldn’t help a district where the rate is already 90 percent, but may be too ambitious for a district that currently retains 60 percent of its best teachers.

Key Considerations
Including this measure could create momentum for reforming many of the current obstacles to retaining top teachers, like quality-blind layoff rules and compensation systems that provide almost no recognition for outstanding classroom performance. In the short run, though, it’s important that retention goals don’t penalize district and school leaders for policies they can’t directly control.

Potential Measure: Access to Professional Development That Works
Helping teachers improve their instruction could significantly boost the overall quality of teaching in schools and districts. That’s why most school systems already devote a huge amount of time and resources to professional development and other teacher improvement efforts. Yet as research by TNTP and others has shown, there’s no evidence that any current approach to professional development consistently helps teachers become more effective. States can help push districts and schools to try new approaches to teacher improvement and focus their investment on efforts that show the most evidence of improving teacher performance.

What to Measure
In the long run, states should work with districts to set targets for the percentage of teachers who improve their performance from year to year. Because so little is known about how to actually help teachers improve, though, states may initially want to focus on encouraging policies and systems that allow for greater innovation in professional development, paired with a focus on tracking the results. For example, states could set requirements for an inventory of their current teacher improvement efforts, assess the extent to which each one is helping teachers improve in a measurable way, and what decisions are made at the district versus school level. Goals in subsequent years could revolve around whether districts are adjusting their professional development spending on initiatives that are producing the most promising results.

Key Considerations
• States should ensure that goals don’t penalize schools or districts for trying new approaches to professional development. It’s fine if a district tries a new approach that doesn’t pan out; the goal is to encourage districts to stay focused on the results of new initiatives and only scale up those that are really working. As better data on what’s working becomes available, states should consider revising goals around this measure accordingly, including considering whether the data collected is appropriate for accountability purposes.

• Because many states and districts currently have limited information about the connection between specific professional development offerings, teacher performance, and student outcomes, and because schools may have limited agency over much of the development offered, states can collect data and begin setting goals even without assigning weighting in accountability systems to this measure. As more information and better data become available and schools have more control over the professional development offered, states should revisit inclusion of the measure and its role in accountability. If included in the future, this measure shouldn’t stand on its own as the sole indicator of “consistently great teaching,” since it doesn’t directly measure whether enough students have access to teachers who are already effective.

Potential Measure: Teacher Diversity
Recent studies suggest that students are better off when they have opportunities to learn from teachers with a variety of backgrounds and personal experiences. That’s why schools should strive to build a teacher workforce that’s not only effective, but reflects true racial, ethnic, gender, and other types of diversity. States can help make this happen by using the accountability system to help monitor and increase focus on teacher workforce diversity.

What to Measure
States could use existing baseline data on teacher demographics to set diversity goals at the school and district levels. Alternatively, they could simply require that schools report on teacher diversity across a number of dimensions (race, ethnicity, and gender, for example, along with retention rates broken out in the same way) and create a plan for improving or maintaining the diversity of their staff.

Key Considerations
- States that choose to include this measure should make it one of several in the "consistently great teaching" category. In particular, it should not replace measures of teacher effectiveness, such as the one concerning equitable access we recommend above.
- District-level trends, while important, may mask discrepancies at the school level. To the extent that it is feasible, states should also focus on trying to pinpoint accurate trends in teacher diversity at the school level so that the information collected is as useful as possible in creating and supporting diverse teams of teachers in schools across the state.

Category #2: Healthy School Culture

AVAILABILITY: Measures available in some states and from third parties. Some data available but may not yet exist in all schools.

ACTION: States should work aggressively to implement some measures now, and begin building others to allow for a broad assessment of this category in the future.

A school’s culture goes a long way toward determining what kind of experience students and teachers have every day. And a healthy school culture—one that helps everyone in the school community reach their full potential—is another important precondition for school quality and student success. For example, several studies have linked specific elements of school culture to student achievement, including one 2011 analysis that attributed 50 percent of the variation in school effectiveness to cultural factors. In recent years, studies by TNTP have shown that school culture can be a valid leading indicator of both teacher retention and student achievement. Furthermore, our conversations with teachers and students across the country have made it clear that a healthy school culture can help promote rigorous academics.

States can use their accountability systems to help schools reflect on their current culture and focus on ways to make it stronger. To build an accurate and complete understanding of each school’s culture, states should expect to include multiple perspectives and measures in this category—a combination that aligns with their theory of action and collectively creates a strong link to school quality and student success. Below, we suggest a few measures states might consider as a starting point, but our list is by no means exhaustive. States will likely find that they can begin implementing this category right away, but those without the capacity to collect sufficient data in time should still consider incorporating it in the future.

School culture is fundamentally about relationships—between the adults who work there and the students they serve, between school staff and the students’ parents and caregivers, and among the students themselves—and the extent to which those relationships are supporting the outcomes the state defines as the hallmarks of great schools. It’s important for states to examine the many facets of those relationships. For example, have principals invested teachers in clear expectations for great instruction? Do teachers hold clear and consistently high expectations for students? Do they have access to professional development opportunities that help them improve their teaching? Do they feel that their working environment is safe and secure?

On the other side of the equation, do students believe that their teachers and school leaders respect and care about them? Do they feel challenged enough in school? Do they believe their school serves a real purpose in their life? Do they feel safe? Is there a positive peer culture among students, and do they have meaningful opportunities to be leaders in their classrooms and within the school?

Parents and guardians are also a vital part of school culture, and can provide valuable perspectives on everything from the quality and regularity of communication exchanged with their child’s teachers (or the school generally) to the opportunities they have to participate in and contribute to their children’s learning. For example, do parents feel welcomed when they come to campus. Are they fully informed about how their kids are doing in school?

Potential Measure: School Culture Surveys
One of the best ways to assess a school’s culture is to ask the right questions of the people who spend the most time there: teachers and students. Culture surveys are an opportunity to ensure that all schools are working to create the conditions most likely to promote great teaching and learning. These surveys also provide valuable data that can be used beyond the accountability system—in particular, to give school leaders concrete ideas for improvement based on what’s working in similar schools. They can also become a key component of a statewide effort to engage with students, teachers, families, and other stakeholders.

Our own research suggests that teacher surveys focused on a school’s instructional culture—the clarity and consistency of the vision for effective teaching and the commitment to help teachers improve their instruction—are an especially powerful indicator of student achievement in schools of all types. We’ve also found that student surveys can provide a useful perspective on many aspects of school culture.

It is important to note, however, that the information generated from any survey is only as useful and as valid as the quality of the instrument itself and the state’s capacity to collect and analyze the data. States should explore piloting multiple measure survey systems and analyze data to consider incorporating and attaching weighting in the future once confidence in the instrument(s) and state capacity has been established.

What to Measure
Implementing different forms of school culture measures could involve surveying all teachers annually about their school’s culture, surveying students about their experience in the class and school community, asking parents specific questions about their interactions with the school and leaders, or a combination of all three. States could report key results and trends over time of these surveys, in aggregate, in a way that’s easy for stakeholders to understand, and

require schools to set goals for improvement based on their individual results (along with a plan for monitoring progress).

Potential Measure: Chronic Absenteeism

Great instruction only matters if students are actually in classrooms to benefit from it. As many as 7.5 million students across the country miss 10 percent or more of the school year—and research has shown that lower attendance rates among poor and minority students are a major contributor to the achievement gap. Since ESSA already requires reporting on chronic absenteeism in Title I schools, states will already have a solid basis for incorporating this data into their accountability systems.

What to Measure

States could set goals around reducing chronic absenteeism, likely by comparing schools to others with similar demographics (to account for mobility rates and long-term absences that can vary dramatically from community to community). This will likely require creating a standard “need index” for all schools statewide, and comparing chronic absenteeism among schools with similar index scores. At a minimum, district and charter leaders should have a plan to support highly mobile students to prevent them from falling through the cracks or being excluded from data in accountability measures.

12 Independent validation has been conducted by RAND (Yuan and Schweig, 2016: http://www.rand.org/pubs/working_papers/WR1138.html) and the American Institutes for Research (Condon, Greenberg, Swanlund, and Dubois, 2011).


Key Considerations
It’s important not to penalize schools and districts simply for serving a student population with a historically high mobility rate, or equate mobility with truancy or chronic absenteeism. States that choose to include (or even just monitor) this measure need to be sure that they’re clearly identifying the circumstances of their student population and addressing causes of chronic absenteeism. Measures of chronic absenteeism should also not be confused with simply measuring attendance rates, which do not actually provide information about which students are frequently absent or about chronic absenteeism rates among specific subgroups.

Potential Measure: Equitable Disciplinary Policies
Inequities in school discipline have come into much sharper focus in recent years—most notably, the fact that African-American and Latino students are much more likely than their peers to be suspended or expelled for any given infraction, which costs them crucial learning time and can fuel the school-to-prison pipeline. More broadly, an overreliance on punitive disciplinary actions—especially those that involve law enforcement officials—is often a symptom of a problematic school culture in which teachers aren’t able to do their best work and many students are disengaged. States can use their accountability systems to help focus schools on striking a better balance between maintaining safe environments and high expectations for behavior, while minimizing punitive interventions and applying their disciplinary policies equitably.

What to Measure
States could focus on the extent to which different subgroups receive more severe punishment than their peers for similar infractions. A starting point could also be to require districts and schools to create a plan to track the fairness of their disciplinary policies, focusing especially on suspensions, expulsions, and the involvement of law enforcement officials. States could set parameters around these plans: For example, they could require districts to offer training to help teachers and school leaders address more disciplinary infractions without the help of law enforcement.

Key Considerations
States that choose to include a measure on discipline need to ensure that schools and districts can track and report the necessary data in a way that’s not overly burdensome. They also need to think carefully about the incentives their measures may create to underreport certain kinds of incidents.

Category #3: Access to Opportunity

**AVAILABILITY:** Data for some measures available in most states or from third parties, but instruments or data for some measures may need further development.

**ACTION:** States should work aggressively to implement some measures now, and begin building others to incorporate in the future.

ESSA’s flexibility around other indicators of school quality and student success measures gives states a chance to think creatively about ways to focus districts and schools on the broad goal of creating equity and access to opportunity for all students. The exact measures states include in this category will vary depending on local priorities and available data, and some states may not be able to implement this category right away. However, state chiefs shouldn’t be afraid to pilot several measures and defer the decision on which ones to use for stakes (as part of the continuous improvement cycle for the system as a whole).

**Note:** States should view measures in this category as important supplemental indicators of student success. Because they don’t directly measure the success of currently enrolled students, though, they should not stand alone as the only other indicators of school quality and student success measures in an accountability system.
Potential Measures

- **Course access**: Do all students have access to the same variety and quality of courses—including advanced placement, STEM, art and music, and career and technical education—that could lead to college credit? Focus on measures of access, quality and student success overall and by subgroup.

- **Quality of instruction/instructional materials**: Are classroom assignments and overall instruction consistently aligned to college- and career-ready standards? Are schools using curricula aligned to rigorous state standards that have been backed by research or independent third parties?

- **Post-secondary (college and CTE) acceptance/persistence rates**: How many students are graduating from high school truly ready for success in college or a high-quality post-secondary Career and Technical Education (CTE) program? Focus on year-over-year growth in acceptance and persistence rates, overall and by subgroup.

- **Post-secondary employment above poverty**: How many students are graduating from high school with the skills they need to earn a living wage?

As states consider the measures above, they would also be well served to explore efforts to address Equity in School Funding and Integration. While these are primarily in the control of district (or state) leadership, they have a tangible effect on school quality and student success. As states find ways to address these issues at the state and district level and increase the degree of influence that school leaders are able to have through school-level actions, states may then want to consider including them as additional measures of access to opportunity.

- **Equity in school funding**: Are schools that serve students with the greatest challenges receiving the share of state and local funding they need to meet those students’ needs? In states that already have policies in place to ensure that high-poverty schools receive an equal share of all state and local funding (including money earmarked for teacher compensation), this measure could serve a monitoring role. For other states, this measure could serve as a first step to ensuring true funding equity.

- **Integration**: How many students have the opportunity to attend schools that integrate communities, are racially and economically diverse, and reflect the broad diversity of the state and country?

**Worksheet: Selecting Measures**

In selecting measures and determining the weighting for each one, states should check against the requirements in ESSA that:

- Every school receives a summative rating on a scale with at least three performance levels;
- Each indicator includes at least three performance levels;
- At least one other indicator of school quality is included that is shown to contribute to student achievement or graduation rates;
- Academic indicators are weighted significantly more than other indicators;
- Schools scoring in the lowest category for any indicator cannot get the same rating as a school scoring in the highest category.

States should also keep in mind that according to ESSA regulations, other indicators of school quality or student success cannot keep a school from being identified as underperforming if it would have been based on the required academic measures (unless the school is making significant progress in one or more of the academic measures). States will need to address this either in the determination of weighting across the academic and other indicator categories, or in their specific provisions for assigning summative ratings.
### OTHER INDICATOR MEASURES

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<thead>
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<th>Category</th>
<th>What is being measured?</th>
<th>How does it advance the state’s vision?</th>
<th>Where will the data come from?</th>
<th>Any negative incentives to consider?</th>
<th>Include now or later?</th>
<th>Connection to student learning and success?</th>
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<tbody>
<tr>
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#### Sample System with Weights

### ESSA REQUIRED

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<td>Academic Achievement</td>
<td>Proficiency in math and reading:</td>
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<td>• Overall, Subgroups</td>
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<td>English Language Proficiency</td>
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<td>State Test Participation</td>
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<td></td>
<td>• Overall, Subgroups</td>
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<td><strong>Elementary &amp; Middle Schools</strong></td>
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<tr>
<td>Student Growth or Other Academic Factor</td>
<td>Growth: Increase in percent of students proficient or above in math and reading</td>
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<tr>
<td></td>
<td>• Overall, Subgroups</td>
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<tr>
<td><strong>High Schools</strong></td>
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<tr>
<td>Graduation Rates</td>
<td>Percent of students graduating (4yr cohort adjusted)</td>
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<p>| <strong>Total</strong>                                     |                                                                         | 70         |</p>
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<td>Access to Opportunity</td>
<td>Equitable Access to Courses (AP, CTE)</td>
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**Total Weighting:** 30