

A green, curved line representing a hill. On the hill, there are five black silhouettes of people walking from left to right. The first is a person in a wheelchair, followed by a person walking, a person walking, a person walking, and a person in a graduation cap and gown.

Indiana Department of Education

Glenda Ritz, NBCT
Indiana Superintendent of Public Instruction

MEMORANDUM

To: State Board of Education Members

From: Dr. Michele Walker, Interim Director of Accountability
Maggie Paino, Staff Legal Counsel

Subject: Accountability Options

Date: June 24, 2015

It is the goal of the Department to seek State Board of Education direction on a 2014-2015 accountability option for Indiana Schools that maintains an open and fair focus on accountability while providing common sense flexibility.

The Senate Appropriations Committee asked the Department to create a list of options regarding 2014-15 school year accountability. To date, the Department has held this conversation regarding accountability options with the United States Department of Education, the Governor, the Governor's staff, members of the legislature, State Board of Education staff and many external stakeholder groups, including the Indiana Chamber.

Through those conversations, twelve options for 2014-2015 accountability have been developed. You will note some options are allowable within the USED criteria for flexibility, some are not. Many options would require Indiana General Assembly action and others would not. However, all options require State Board of Education support since the Board has final approval of placement of school grades. The accountability flexibility the Department wants seek through State Board of Education action in September is called "Hold Harmless" (option #5 on the attached chart) which is aligned to the U.S. Department of Education ESEA Flexibility and state statutory requirements.

In preparation for this discussion, the following documents are attached for review:

- United States Department of Education Guidance Regarding Accountability
- Table of Options
- Explanations of Options



ESEA Flexibility Guidance Regarding Accountability Options during Standards/Assessment Transition

PRINCIPLE TWO AMENDMENTS

(ESEA Flexibility Renewal Process: Frequently Asked Questions, December 15, 2014; ESEA Flexibility Renewal Process: Addendum to Frequently Asked Questions, February 27, 2015)

1. Indicate that SEA will not assign schools a new grade based on the assessment administered in the 2014/2015 school year
2. Indicate that all LEAs will retain the grade assigned in 2014/2015 school year (grade based on 2013/2014 assessment) for the 2015/2016 school year, and the SEA will continue to implement appropriate interventions for focus and priority schools based on this continued grade during the 2015/2016 school year
3. Indicate that SEA will not recognize a new cohort of reward schools for the 2015/2016 school year while the SEA pauses the implementation of the grading system
4. Indicate that SEA will resume the annual assignment of school grades and annual recognition of reward schools based on the assessment administered in the 2015/2016 school year (resume during 2016/2017 school year)
5. Demonstrate that SEA will continue to meet ESEA flexibility renewal requirements regarding the identification of focus and priority schools and the requirement to report performance data for all students and student subgroups against AMOs from assessment administered in the 2014/2015 school year
6. Submit list of new focus/priority cohort with renewal request (based on 2013/2014 results—this is so SEA doesn't have to rely on only one year of data from the new assessment administered in 14/15)
 - a. FAQs state that an SEA cannot wait until after the 15/16 school year to identify the next cohort of F/P schools. The SEA may either identify the next cohort at the time it submits its renewal request or no later than January 31, 2016

PRINCIPLE THREE AMENDMENTS

(ESEA Flexibility Guidance for Renewal Process, November 13, 2014)

1. If requesting a one year delay in incorporating student growth based on state assessments into educator rating because of transition to new assessments in 2014/2015 school year, SEA should check assurances 15.b.i and 15.b.ii. Renewal guidance states that the SEA does not need to provide a narrative response to this item

TABLE OF OPTIONS TO CONSIDER FOR 2014/15 ACCOUNTABILITY

(APPLIES TO TRADITIONAL PUBLIC, CHARTER, CHOICE & FREEWAY SCHOOLS)

OPTION NUMBER	POTENTIAL OPTIONS	ALIGNED WITH US ED FLEXIBILITY GUIDANCE	FEDERAL ACTION REQUIRED <small>*waiver amendment</small>	IGA ACTION REQUIRED	ISBOE ACTION REQUIRED	STATE CONSEQUENCES APPLIED	FOCUS/PRIORITY INTERVENTION SERVICES APPLIED	DATA PROVIDED TO SCHOOLS
1	Assign No A-F grade for SY14/15 & carry over SY13/14 A-F grade	YES	YES	YES	YES	NO	YES	YES
2	Assign official A-F letter grade at state level for SY14/15 & seek federal flexibility	YES	YES	YES	YES	YES	YES	YES
3	Assign “unofficial” A-F letter grade at state level for SY14/15 & do not seek federal flexibility	YES	NO	YES	YES	NO	YES	YES
4	Adjust A-F 4.0 grading scale for SY14/15	NO	YES	NO	YES	YES	YES	YES
5	Assign the better A-F grade between SY13/14 & SY14/15 “HOLD HARMLESS”	YES	YES	NO	YES	YES	YES	YES
6	Assign the better A-F grade between SY13/14 & SY14/15 & modify/suspend state consequences	YES	YES	YES	YES	NO	YES	YES
7	Assign A-F grade for SY14/15 & modify/suspend state consequences	YES	NO	YES	YES	NO	YES	YES
8	Assign A-F grade for SY14/15 & modify significance of student test results within educator evaluation systems	YES	YES	NO	YES	YES	YES	YES
9	Lower cut scores on the SY14/15 assessment to mitigate the “drop effect” of the new assessment	NO	YES	NO	YES	YES	YES	YES
10	Assign A-F grade based on a 3 year average (SY12/13, SY 13/14, SY14/15)	YES	YES	NO	YES	YES	YES	YES
11	Make no changes & assign A-F grade for SY14/15	YES	NO	NO	YES	YES	YES	YES
12	Calculate A-F grade based on a 3 year average (SY 12/13, SY13/14, SY14/15) & assign the better A-F grade between SY13/14 & 3 year average	YES	YES	NO	YES	YES	YES	YES



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EXPLANATION OF ACTIONS:

- **Aligned with Federal Flexibility Guidance:** Concept aligns with the US Ed Guidance on Flexibility
- **Federal Action Required:** Indiana's ESEA flexibility will need to be amended to reflect any changes for SY14/15 accountability
- **IGA Action Required:** Indiana Code will need to be amended to reflect any changes for SY14/15 accountability
- **ISBOE Action Required:** ISBOE will need to agree to place the schools per the selected option/accept the IDOE's recommendations/findings due to adjustments outlined in the option
- **Consequences Applied:** IC 20-31-9 timeline would not be paused & the SY14/15 A-F letter grade will be included
- **Intervention Services Applied:** Federal intervention services for focus & priority schools will still be provided by the IDOE
- **Data Provided to Schools:** Schools will receive SY14/15 data for review

EXPLANATION OF PROPOSED OPTIONS:

- **OPTION 1: Assign No A-F grade for SY14/15 & carry over SY13/14 A-F grade**
 - The ISBOE will not place schools in any A-F category for SY14/15
 - Schools will retain the grade assigned for SY13/14 for federal purposes & IDOE will continue to implement appropriate interventions for focus/priority schools based on the continued SY13/14 grade
 - Schools will not be held to state intervention consequences based on the retained SY13/14 grade
 - SY13/14 A-F data will be utilized for educator evaluation systems
 - Only SY14/15 data only will be provided to schools; no grade will be calculated from SY14/15 data
 - **NOTE ON ACTION:** IGA will need to amend Indiana Code to permit no placement for SY14/15 and to modify/suspend state consequences; IDOE will need to amend the ESEA waiver to inform US ED of this change for SY14/15; ISBOE will ultimately have to approve of this option since it holds the authority to accept the IDOE's findings and place schools
- **OPTION 2: Assign official A-F letter grade at state level for SY14/15 & seek federal flexibility**
 - The ISBOE will place school in an A-F category based on the assessment administered during SY14/15
 - Schools will retain the grade assigned for SY13/14 for federal purposes & IDOE will continue to implement appropriate interventions for focus/priority schools based on the continued SY13/14 grade
 - Schools will be held to state intervention consequences based on the SY14/15 grade
 - SY14/15 A-F data will be utilized for educator evaluation systems
 - A grade will be calculated for SY14/15 and provided to schools and the public
 - **NOTE ON ACTION:** IDOE will need to amend ESEA waiver to inform US ED of this change for SY14/15

- **OPTION 3: Assign “unofficial “ accountability letter grade at state level for SY14/15 & do not seek federal flexibility**
 - The ISBOE will not place schools in an A-F category based on the assessment administered during SY14/15
 - Schools will be assigned grade based on the assessment administered during SY14/15 that will be utilized for federal purposes & IDOE will implement appropriate interventions for focus/priority schools based on SY14/15 grade
 - Schools will not be held to state intervention consequences based on the SY14/15 grade
 - SY13/14 data will be utilized for educator evaluation systems
 - A grade will be calculated for SY14/15 and provided to schools but only used for federal purposes
 - **NOTE ON ACTION:** IGA will need to amend Indiana Code to permit no “official” placement for SY14/15 and to modify/suspend state consequences; ISBOE will ultimately have to approve this option since it holds the authority to accept the IDOE’s findings and place schools

- **OPTION 4: Adjust A-F 4.0 grading scale for SY14/15**
 - The ISBOE will place schools in an A-F category based on the assessment administered during SY 14/15
 - The ISBOE will adjust the current 4.0 grading scale outlined in administrative rule to adjust to the drop in performance
 - Schools will be assigned grade based on the assessment administered during SY14/15 that will be utilized for federal purposes & IDOE will implement appropriate interventions for focus/priority schools based on SY14/15 grade
 - Schools will be held to state intervention consequences based on the SY14/15 grade
 - SY14/15 data will be utilized for educator evaluation systems
 - A grade will be calculated for SY14/15 and provided to schools & the public
 - **NOTE ON ACTION:** ISBOE will need to amend its current language in its administrative rule to adjust the current 4.0 grading scale; IDOE will need to amend the ESEA waiver to inform US ED of this change for SY14/15; US ED informed IDOE that this is likely not a permissible action from the federal perspective; ISBOE will ultimately have to approve this option since it holds the authority to accept the IDOE’s findings and place schools

- **OPTION 5: Assign the better A-F grade between SY13/14 & SY14/15**
 - The ISBOE will place schools in the A-F category that results in the better grade for the school between the SY13/14 & SY14/15 grade
 - Schools will be held to state intervention consequences based on either the SY13/14 or SY14/15 grade, whichever is more favorable
 - The IDOE will implement appropriate interventions for focus/priority schools based on either the SY13/14 or SY14/15 grade, whichever outcome is more favorable
 - SY13/14 or SY14/15 data, whichever outcome is more favorable, will be utilized for educator evaluation systems
 - A grade will be calculated for SY14/15 and provided to schools but will only be disseminated to the public or used if it is more favorable than SY13/14 grade
 - **NOTE ON ACTION:** IDOE will need to amend the ESEA waiver to inform US ED of this change for SY14/15; ISBOE will ultimately have to approve this option since it holds the authority to accept the IDOE’s findings/recommendations and place schools

- **OPTION 6: Assign the better A-F grade between SY13/14 & SY14/15 & modify/suspend state sanctions**
 - The ISBOE will place schools in the A-F category that results in the better grade for the school between the SY13/14 & SY14/15 grade
 - The IDOE will implement appropriate interventions for focus/priority schools based on either the SY13/14 or SY14/15 grade, whichever outcome is more favorable
 - Schools will not be held to any state intervention consequences based on the A-F letter grade assigned for SY14/15
 - SY13/14 or SY14/15 data, whichever outcome is more favorable, will be utilized for educator evaluation systems
 - A grade will be calculated for SY14/15 and provided to schools but will only be disseminated to the public or used if it is more favorable than SY13/14 grade
 - NOTE ON ACTION: IGA will need to amend Indiana Code to modify/suspend state consequences; IDOE will need to amend the ESEA waiver to inform US ED of this change for SY14/15; ISBOE will ultimately have to approve this option since it holds the authority to accept the IDOE's findings and place schools

- **OPTION 7: Assign A-F grade for SY14/15 & modify/suspend state sanctions**
 - The ISBOE will place schools in an A-F category based on the assessment administered during SY14/15
 - The IDOE will implement appropriate interventions for focus/priority schools based on the SY14/15 grade
 - Schools will not be held to any state intervention consequences based on the SY14/15 grade
 - SY14/15 data will be utilized for educator evaluation systems
 - A grade will be calculated for SY14/15 and provided to schools and the public
 - NOTE ON ACTION: IGA will need to amend Indiana Code to modify/suspend state consequences

- **OPTION 8: Assign A-F grade for SY14/15 & modify/suspend state definition of significance of student test results within education evaluation systems**
 - The ISBOE will place schools in an A-F category based on the assessment administered during SY14/15
 - The IDOE will implement appropriate interventions for focus/priority schools based on the SY14/15 grade
 - Schools will be held to any state intervention consequences based on the SY14/15 grade
 - SY14/15 data will be utilized for educator evaluation systems but "significantly inform" will be adjusted to mitigate the impact of SY14/15 assessment results
 - A grade will be calculated for SY14/15 and provided to schools and the public
 - NOTE ON ACTION: IDOE will need to amend the ESEA waiver to inform US ED of this change for SY14/15; IDOE & ISBOE will need to issue guidance to the field

- **OPTION 9: Lower cut scores on the SY14/15 assessment to mitigate the "drop effect" of the new assessment**
 - Cut scores will be lowered for the SY14/15 assessment only to adjust to the drop in performance
 - The ISBOE will place schools in an A-F category based on the assessment administered during SY14/15
 - The IDOE will implement appropriate interventions for focus/priority schools based on the SY14/15 grade
 - Schools will be held to any state intervention consequences based on the SY14/15 grade
 - SY14/15 data will be utilized for educator evaluation systems
 - A grade will be calculated for SY14/15 and provided to schools and the public
 - NOTE ON ACTION: The ISBOE will need to approve of the adjusted cut scores; US ED informed IDOE that this is not a permissible action from the federal perspective

- **OPTION 10: Assign A-F grade based on a three year average (SY12/13, SY 13/14, SY14/15)**
 - The ISBOE will place schools in an A-F category based on the average scores of SY12/13, SY13/14 and SY14/15 & this average will be the official grade for SY14/15
 - The IDOE will implement appropriate interventions for focus/priority schools based on SY14/15 grade, as averaged over three years
 - Schools will be held to any state intervention consequences based on the SY14/15 grade, as averaged over three years
 - Data averaged over SY12/13, SY13/14 & SY14/15 will be utilized for educator evaluation systems
 - A grade will be calculated for SY14/15 and provided to schools and the public
 - **NOTE ON ACTION:** IDOE will need to amend the ESEA waiver to inform US ED of this change for SY14/15; ISBOE will ultimately have to approve this option since it holds the authority to accept the IDOE's findings and place schools

- **OPTION 11: Make no changes & assign A-G grade for SY14/15**
 - The ISBOE will place schools in an A-F category based on the assessment administered during SY14/15
 - The IDOE will implement appropriate interventions for focus/priority schools based on the SY14/15 grade
 - Schools will be held to any state intervention consequences based on the SY14/15 grade
 - SY14/15 data will be utilized for educator evaluation systems
 - A grade will be calculated for SY14/15 and provided to schools and the public
 - **NOTE ON ACTION:** Action would be to maintain status quo

- **OPTION 12: Calculate A-F grade based on a 3-year average (SY12/13, SY13/14, SY14/15) & assign the better A-F grade between SY13/14 & 3-year average**
 - The ISBOE will place schools in the A-F category that results in the better grade for the school between the SY13/14 grade & the 3-year average grade
 - The IDOE will implement appropriate interventions for focus/priority schools based on either the SY13/14 or 3-year average grade, whichever outcome is more favorable
 - Schools will be held to any state intervention consequences based on the A-F letter grade assigned
 - SY13/14 or 3-year average data, whichever outcome is more favorable, will be utilized for educator evaluation systems
 - A grade will be calculated for SY14/15 based on a 3-year average and provided to schools but will only be disseminated to the public or used if it is more favorable than SY13/14 grade
 - **NOTE ON ACTION:** IDOE will need to amend the ESEA waiver to inform US ED of this change for SY14/15; ISBOE will ultimately have to approve this option since it holds the authority to accept the IDOE's findings and place schools