Every Student Succeeds Act- Montana State Plan

Preliminary Feedback – Aurora Moore, NWCC

The following feedback is meant to be high-level to support the OPI in focusing on a few substantive areas to address. It does not provide suggestions/recommendations, but rather points out areas that peer reviewers might likely seek additional information or suggest changes. In general, the plan needs to be carefully read for typos, grammatical errors, and inconsistencies. This feedback does not address these issues.

Long-term Goals and Indicators

The law states that states must establish ambitious, state-designed long-term goals, which shall include measurements of interim progress. The current plan specifies that all schools and districts should aspire to improve every year on the required indicators, using the statewide average (SWA) as the bar. Some peer reviewers might argue that setting the goal for all schools at the statewide average (SWA) does not meet the definition of ambitious or long-term. For example, if the percentage of proficient/advanced students drops by 2 percentage points from 2019-2020, this would mean that the achievement goal would also therefore decline. The Montana state plan also includes a statewide goal for 2020 that is an increase from baseline of between 6 and 10 percentage points. This absolute goal provides a stable metric for the state as a whole to strive for, but is inconsistent with the language regarding the statewide average. Typically, these goals should be set based on a longer-term vision of overall performance for Montana. For example, if you believe that the current percent of students proficient/advanced in mathematics is too low, what is an ambitious target to attain in five years? Additionally, as noted on page 8, the data modeling projected smaller gains for economically disadvantaged students, children with disabilities and English learners; peer reviewers may question whether these goals addresses the spirit of the law, which is to accelerate performance for lower performing students.

The goals for English Learners are more specific, measurable and focused on growth. However, these goals may also not be ambitious enough. The goal of 52.5% of ELs growing by .5 on the composite score seems to suggest 48% of ELs won't grow at all.

Measures of interim progress (last section)

Peer reviewers might find the increments of interim progress to be too small. Indeed, such small increases may be simply statistical noise rather than indicators of actual progress.

Section 2: Consultation and Performance Measurement

2.2 System of Performance Management

In general, this section seems to reflect a minimal, compliance-oriented version of performance management. Peer reviewers may seek additional details about some components, such as school self-assessments (p. 18), what constitutes the "statewide system of support" (p. 18) and how, if at all, it is different from supports provided to schools identified for comprehensive and targeted improvement. It seems that the rubric for evaluating school improvement plans would also be an important part of this process, but it is not mentioned in this section. It may be helpful to differentiate between LEA and SEA responsibilities for monitoring and continuous improvement.

Section 4: Accountability, Support, and Improvement for Schools

4.1 Accountability System

A. Indicators- School quality/student success indicator

The law states that schools must select not less than one indicator of school quality or student success that allows for meaningful differentiation and is valid, reliable, comparable, and statewide. Suggestions in the law include student engagement, educator engagement, student access to and completion of advanced coursework, postsecondary readiness, school climate and safety, and any other indicator the state chooses that meets the requirements. The current plan indicates the OPI will use a school climate survey and a rubric that evaluates the viability of each improvement plan as measures of school quality. Regarding the use of a rubric to evaluate school plans, a peer reviewer would likely question whether school improvement plans are linked to student growth, as stakeholders claimed. They will also likely question whether plans are valid measures of school quality (especially if the school is being assessed on the plan itself and not the implementation of the plan). Finally, they would likely question whether a rubric could be used reliably by different evaluators to rate school quality. Reviewers might assume that the OPI has capacity to review all school plans, but this should be a consideration as well. Regarding use of a school climate survey, there are school climate surveys that have been validated by the US Department of Education, but it is not clear whether they have been validated for use in all types of schools (e.g., rural/remote or reservation-based schools). Ensuring reliable data from these surveys will require significant data collection at the school level. Regarding the weighting of the school quality indicator, it is possible that peer reviewers will interpret the 30% weight as not in keeping with the law.

D. Differentiation

The current plan indicates that Montana will develop a system of meaningful differentiation based on all indicators. Peer reviewers may seek greater explanation for how the academic progress indicator will be calculated.

Also of note: the plan indicates that schools without sufficient numbers of students will lose the points for that particular indicator. This seems that it would unfairly penalize schools for not having English learners, for example.

One interpretation of the law is that meaningful differentiation of schools does not depend on having a single summative indicator, but rather that a "dashboard" type approach where each indicator is shown against the statewide average or the average for similar schools would suffice as meaningful differentiation. This may be something to revisit with stakeholders.

E. Participation Rate

The word "targeted" support has a specific meaning under the law regarding support for schools with a significant gap in performance between subgroups of students. A peer reviewer might question the use of the word "targeted" in this context. Suggest providing a more specific description of the intervention.

4.2 Identification of Schools

A. For comprehensive support

The plan states "annual determination, using the accountability indicators, will be made for all public schools each year, but the ranking to determine the lowest performing 5% will occur every three years." This is confusing; suggestion replacing the word "determination" with "differentiation," which is what the law requires. The OPI may wish to consider how it will address the possibility that the schools in the bottom 5% remain relatively stable.

B. For targeted support

Regarding the identification of schools for targeted support, peer reviewers might question whether the method of comparing subgroup performance to the performance of schools in the bottom five percent meets the intent of the law, which is to address achievement gaps within schools. As written, schools with large achievement gaps may not be identified if the average performance of the subgroup is higher than the average performance of the lowest performing schools.

4.3 State support and improvement for low-performing schools

In general, peer reviewers might have questions about the state's overarching "theory of action" for improving low-performing schools and whether the strategies indicated are sufficient to address persistent low performance. The plan indicates that OPI will provide regional trainings for school leadership teams on multi-tiered systems of support utilizing the Montana literacy plan and the Montana math plan, as well as grants to schools to improve MTSS in literacy and math. Peer reviewers might wonder if multi-tiered systems of support and the Montana literacy and math plans are aligned to root causes of low student performance in low performing schools.

B. Technical assistance regarding evidence-based interventions

Peer reviewers may wish to see greater detail about the interventions described, and some indication that the strategies and interventions are evidence-based. For example, they may want to know about the Striving Readers' strategies and the "culturally relevant" strategies that were part of the Schools of Promise initiative. They may wish to know whether those strategies are already in the What Works Clearinghouse and what other strategies the OPI may be recommending.

Peer reviewers may also seek greater explanation of what intensive support from the 3 person OPI team might look like, and how that differs from "more technical assistance from OPI, both programmatic and fiscal." They may also want more information about how the OPI will analyze accountability indicators, plans and funding supports to determine what is working, what is not and what changes need to be made. How will the OPI plausibly link changes in outcomes to changes in inputs? Recommend using caution about using language such as "have proved" as peer reviewers may wish to see evidence (p. 29).

Section 5: Supporting Excellent Educators

A. Resources to Support State-level Strategies

This section of the plan broadens to include overall school improvement processes and strategies. Reviewers may find this confusing. Suggest clarifying the link between school improvement plans and professional learning strategies.

5.3 Educator equity

It is possible that this will no longer be a requirement under the new USED. If so, will Montana plan to continue this work?

Section 6: Supporting All Students

P-12 Continuum

Preschool development grant- peer reviewers may or may not be familiar with the grant and may want a few more sentences of detail on what Montana's grant has put into place, and/or how this work will continue in the absence of continued federal funding.

In general, this section is comprised of a list of different types of things: partnerships, policies, programs, documents and entities. Some of these are activities, and some of these are goals. Peer reviewers may wish to know how these things fit together to support students across the P-12 continuum to understand the broader vision for student supports under Title IV and ascertain if there are gaps. Peer reviewers may wish to know how many teachers and/or students are supported by the various initiatives. Some of these programs were in NCLB but

not included in ESSA (e.g., Math Science Partnerships); peer reviewers may wish to know which programs will continue and how under the transition to ESSA.

D. Use of Technology

Are there efforts to increase access to computer science courses in high school?

Peer reviewers might question online ACT prep as a strategy to increase technology use.