

A STEP FORWARD OR A STEP BACK?

State Accountability in the Waiver Era



The Education Trust

TO THE POINT

- ▶ NCLB waivers have opened the door to innovation but also to a lot of backsliding when it comes to using accountability to close gaps and raise achievement for all students.
- ▶ Good accountability systems include ambitious, achievable expectations and they prompt meaningful action.
- ▶ Educators, advocates, and policymakers must ask serious questions about whether those elements are present in their state's system.

Under NCLB waivers, some states have set up thoughtful school-rating systems and some have expanded responsibility for school improvement. But in too many, performance against improvement and gap-closing goals doesn't matter and schools can get good ratings despite low performance for some groups.

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BY DARIA HALL

In 2002, No Child Left Behind ushered in sweeping changes in school accountability. Diverging from the federal government's long history of leaving this matter largely to the states, a Congress broadly dissatisfied with the slow pace of educational improvement stepped in with a new framework designed to set schools on a path to getting all students to "grade level" by 2014.

Moreover, instead of judging progress as they always had, on school-wide averages, states were required to evaluate schools based on the progress of all groups of students, including those who had for generations been shortchanged by our schools: low-income students, students of color, English-language learners, and students with disabilities. Thus, NCLB passage was not just a ground-breaking step in education policy, but also a major piece of civil rights legislation.

Virtually all observers — including critics of the law — applaud the attention NCLB focused on improving the achievement of students who had, for far too long, been poorly served by schools. Over time, however, even the law's staunchest supporters began noting its limitations and negative effects.

These flaws could and should have been fixed through a reauthorization. But despite several attempts, Congress couldn't agree on a new version of the law. Frustrated with the legislative gridlock and worried about the damage an outmoded law could do, U.S. Secretary of Education Arne Duncan granted waivers from key accountability provisions of NCLB to states willing to undertake certain reforms.

The waivers have sparked heated debate. But so far, there's been more heat than light.

This is the second phase of our ongoing analysis aimed at shedding more light on the waivers. (For our earlier analysis, see "Waivers: A First Look.") Our analysis compares the waivers with critical elements of a good accountability system and asks: What is

the *quality* of the plans put forward by the states and approved by the U.S. Department of Education? When given an opportunity, what kind of choices did states make? Did their plans preserve a focus on underserved students, while also mitigating the most widely acknowledged problems with NCLB?

Nobody can fully assess the new state systems until we have multiple years of data. But already, some patterns are clear. Some states worked proactively to integrate the performance of all student groups into school ratings that are more nuanced than those of NCLB, and some proposed thoughtful ways to expand responsibility for school improvement. In far too many states, though, performance against improvement and gap-closing goals doesn't matter much. Schools can get good ratings despite low performance for some groups and approaches to improving even the lowest performing schools are too timid.

By approving these plans, the U.S. Department of Education opened the door to some innovation. But it also allowed for a lot of backsliding on our national commitment to close gaps and raise achievement for all students.

We hope that the questions raised in this report — which can be asked and answered in every state granted a waiver — will spark conversation and action among all who believe that, done right, accountability is an important tool in the effort to raise achievement and close gaps.

PRIORITY ONE: AMBITIOUS, ACHIEVABLE EXPECTATIONS FOR RAISING ACHIEVEMENT AND CLOSING GAPS

Expectations matter. They give practitioners clear targets to work toward, and tell them what progress is sufficient. They give parents and community members a way to benchmark the performance of their local

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schools. And progress against goals allows policy-makers to assess the impact of their investments.

The following are five questions that educators, advocates, and policymakers in every waiver state ought to ask about expectations in the accountability system for which their state has been approved.

Question 1.1

Are there clearly defined, ambitious, achievable goals for student performance that apply to students overall as well as to groups of students (namely African-American, Latino, American-Indian, and low-income students; English-language learners; and students with disabilities)?

Good accountability systems set improvement and gap-closing expectations that are both **ambitious** (meaning that meeting them would significantly improve achievement and equity statewide) and **achievable** (meaning that they are based on evidence of what kind of improvement is possible).

The accountability provisions of No Child Left Behind were certainly ambitious, and they set a powerful new expectation in this country: In order to be considered a successful school, you have to be successfully educating all students. But because the law's performance goal — 100 percent proficiency by 2014 — was not based on real data indicating how much improvement we can make and how fast, many felt it was arbitrary and unattainable.

Understanding that, the Department of Education was also keenly aware of the states' weak record of goal setting prior to NCLB.¹ So it gave states three options of new goals for raising achievement and closing gaps on state assessments:

- 1) Reduce by half the difference between current proficiency rates and 100 percent, overall and for each student group, within six years.

- 2) Achieve 100 percent proficiency by 2020.

- 3) Achieve another "equally ambitious" goal.

Nearly half the states receiving waivers chose some version of the "cut the gap in half" achievement goal. The idea for this goal originated at The Education Trust after extensive analysis of data from multiple states to identify rates of improvement and gap closing that meet the "ambitious but achievable" test.² This goal requires improvement for all groups of students, and promotes gap closing by demanding faster improvement from those groups starting farthest behind.

Only Arizona chose the 100 percent proficiency by 2020 goal, while Louisiana opted to retain the NCLB goal of 100 percent by 2014.

Among states that chose to develop their own "equally ambitious" goals, some opted to benchmark against achievement in their top-performing schools. For example, Colorado and Wisconsin have identified performance in the schools currently in the top 10 percent of achievement statewide and set a goal that all schools, and all groups, would get to that level of performance within six years. In those states, getting all schools to the level of the current top performers would represent improvement overall and meaningful gap closing. This is a practice worth consideration by other states, especially when they make the transition from old to new, more rigorous assessments.

Question 1.2

Are there clearly defined, ambitious but achievable goals for high school graduation rates that apply to students overall as well as to groups of students (namely African-American, Latino, American-Indian, and low-income students; English-language learners; and students with disabilities)?

Good accountability systems couple achievement expectations with graduation-rate expecta-

Looking Beneath the Labels: The Case of Virginia

It's important to note that the "cut the gap in half" framework, like any other framework, can be misused. For example, the waiver plan approved for Virginia included a set of accountability goals that used the cut-the-gap-in-half language but did not, in fact, expect gap closing for the state's low-income students and students of color.³ This problem was caught by equity advocates within the state and, thanks to their work, the U.S. Department of Education required Virginia to change its achievement goals. There are still questions about the rigor of these new goals, but at least now they expect gap closing.⁴

tions. Without achievement goals, there could be pressure to graduate students with meaningless diplomas. But without grad-rate goals, there could be pressure to raise achievement by pushing lower performers out of school.

In contrast to the clear direction on achievement goals, the Department of Education didn't explicitly ask states to identify their graduation-rate goals for students overall or groups of students.⁵ This was a glaring oversight, especially in light of years of hard work on the part of advocates, researchers, and policymakers to get to a place where all states are calculating accurate graduation rates and all schools are being held accountable for raising grad rates, overall and for each group of students.⁶

Fortunately, some states articulated their goals for raising graduation rates and narrowing gaps anyway. For example, Arkansas, Connecticut, Delaware, Georgia, and Maryland used versions of the cut-the-gap-in-half framework to set graduation-rate goals for students overall and for student groups.

Many states, however, didn't clearly articulate their graduation-rate goals.

During the waiver approval process, advocates and congressional leaders raised significant concerns about graduation-rate accountability.⁷ In response, the Department of Education recently clarified that, for those states that were not expressly approved for new grad-rate goals in their waiver application, the Adequate Yearly Progress (AYP) goals from NCLB still hold.⁸

This was an important, if overdue, step. But because they're not always addressed in the actual plans, concerned parties in every waiver state should press for clarity on how goals for raising graduation rates and closing grad-rate gaps will factor into their state's school-rating systems.

Question 1.3

Does the performance of students, overall and of each group of students, against achievement and graduation-rate goals **matter** in school ratings?

Simply having goals isn't enough. They have to matter. This starts with incorporating performance

against these goals into the rating or grading systems that send signals about how schools are doing.

The waiver guidelines, though, don't require states to base accountability determinations, even in part, on whether schools meet their improvement and gap-closing goals. In other words, even though states must have goals, those goals don't have to count. Needless to say, this guidance opened the door to incoherent systems that send mixed messages about what schools should be aiming for and how they're doing on behalf of all students.

Some states avoided this pitfall and incorporated performance against goals into their school determinations. In Minnesota, for example, the percentage of students overall and student groups making their cut-the-gap-in-half achievement goals is a

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meaningful component of the "Multiple Measure Rating" at the center of the new system.

But many states took advantage of the Department of Education's signals in the waiver guidelines and have set up systems in which performance against overall and group achievement goals doesn't factor at all into a school's accountability rating. One example of this trend is found in New Mexico, which has goals based on getting all schools and groups, within 10 years, to the level of performance currently found in the top 10 percent of schools. But meeting these goals doesn't factor into the A-F letter grades that each school gets under the system. So it's possible for a school in New Mexico to miss its achievement goals for Latino, Native, low-income, or any other group of students and still receive an "A" rating.

When goals for raising achievement and closing gaps are not factored into accountability ratings, as is the case in New Mexico and so many other states, the importance of these goals is greatly watered down, if not negated altogether. Why would a school work hard to meet goals if they don't count in the state's school-rating system?

By allowing this disconnect between goals and school determinations in so many states, the Department of Education has allowed many

states to render gap-closing goals for individual student groups next to meaningless.

Question 1.4

If states aren't using subgroup performance in their rating system, are they using "supergroups"? If so, what might this mean for the performance of individual groups of students?

Many states have chosen to hold schools accountable not for the individual groups of students targeted by NCLB (low-income students, students from major racial and ethnic groups, students with disabilities, and English-language learners) but for the performance of "supergroups" instead.

This is a trend that has serious implications for equity and needs to be closely examined. At least two important questions should be asked.

Who's in the supergroup?

Understanding the impact of using supergroups requires first knowing who's in them.

Some states use student performance, instead of demographics, to build their supergroup. For example, Arizona, Florida, Indiana, Michigan, and New Mexico all make school determinations based in part on the performance of the lowest performing students in the school.

The logic of this focus is appealing. Every school has lower performers, and there's considerable overlap between that group and the subgroups targeted by NCLB.

There are, however, big risks here. Conflating "closing the achievement gap" and "moving low-achieving students" can send the dangerous message that gap-closing is only about raising the floor. This ignores the urgent need to close gaps at the high end of the achievement spectrum, too. (To be sure, a similar problem existed with NCLB, especially in those states with low-level standards and assessments.)

Instead of creating a supergroup out of low performers, other states combine some or all of the groups enumerated in NCLB into one supergroup. In Arkansas, for instance, school determinations are based in part on the performance of a "Targeted Achievement-

Gap Group" that includes low-income students, students with disabilities, and English-language learners. Kentucky's "Gap Group" combines black, Latino, American-Indian, and low-income students, students with disabilities, and English-language learners.

By combining individual subgroups into a larger supergroup, states are able to get around one of the problems associated with NCLB-style accountability: Schools with small numbers of students in any group often escaped responsibility for that group of students because the sample was considered unreliable for accountability purposes. By combining multiple small groups into a bigger supergroup, more schools are accountable for the performance of the smaller groups than they were before — and more of the students in those groups are included in accountability as well.

But there are big risks here, too. By putting groups together, it's important to ask whether we are recreating the problem that subgroup accountability was meant to address in the first place: averages masking very different performance among different groups.

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Nevada has a promising approach to balancing the benefits and risks of supergroups. The state employs a supergroup comprised of low-income students, students with disabilities, and English learners only as a backup when there are fewer than 10 students in one of these groups in a school. Wisconsin is using a similar approach.

How does supergroup performance count?

Beyond knowing who's in supergroups, understanding their impact also requires knowing how supergroup performance factors into school determinations.

Florida and Indiana illustrate two very different approaches. Both states have a supergroup based on the lowest performing 25 percent of students in a school. In Florida, supergroup learning gains count for a quarter of an elementary school's letter grade. And, as an additional safeguard, schools that would otherwise get an A, B, or C can lose a full letter grade if not enough students in the supergroup make learning gains.

In Indiana, on the other hand, supergroup performance can get washed out. Supergroup growth counts for "bonus points" towards a school's A-F grade, and schools can also earn an equal number of "bonus points" for growth among the top-performing 75 percent of students, even if their low performers don't grow. This means schools can accomplish what they need to under the state's accountability system — raise their grades by two letters by 2019-20 — even if the students in the lower performing supergroup don't make their growth target and gaps between low- and high-performing students widen.

Any potential benefits of using supergroups are negated when the groups are poorly constructed or when their performance doesn't matter much. Advocates and researchers should use the data generated by new systems to understand how using supergroups impacts the students that federal law is meant to protect: low-income students, students of color, students with disabilities, and English-language learners.

Question 1.5

Beyond test performance and graduation rates, are overall and group performance on other important indicators weighed in the accountability system?

While critical, performance on state assessments and graduation rates are not the only important indicators of school performance, especially at the high school level. Accordingly, waiver guidelines allowed but did not require states to incorporate additional indicators in their systems.

Some states have included meaningful indicators of college and career readiness into their systems. In Idaho, for example, schools are held accountable for student participation and success in advanced coursework such as AP, IB, or dual enrollment, as well as their performance on the ACT, SAT, COMPASS, or ACCUPLACER college-placement tests. Kentucky is holding schools accountable for the percent of students who are college and career ready, as measured by EXPLORE in middle school and ACT, Work Keys, ASVAB, several Kentucky assessments, and industry certification in high school. Nevada is looking at a number of college- and career-ready indicators including remediation rates in state colleges.

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But many other states have not included measures beyond state tests and graduation rates. This is both surprising and troubling, given the near-consensus among educators, researchers, and policymakers about the importance of including multiple measures of school performance in accountability systems, especially for our high schools.

Advocates in waiver states need to understand whether their systems include measures beyond tests and graduation rates, and if so, which ones. When these kinds of indicators are included, they also need to understand how. Are schools accountable only for the performance of students overall or also for closing what are often wide gaps between groups?

PRIORITY TWO: PROMPTING MEANINGFUL ACTION

Getting the expectations right matters. But good accountability systems aren't simply about evaluating performance. They're about celebrating and rewarding schools that exceed expectations and acting when schools repeatedly fall short.

The following five questions are ones that educators, advocates, and policymakers in every waiver state ought to ask about the actions prompted by the accountability system for which their state has been approved.

Question 2.1

Are the actions taken in Priority and Focus schools likely to bring better results?

To prompt aggressive interventions in schools where students are farthest behind, the waiver requires states to identify two specific kinds of schools for concerted action: "Priority" schools, generally the lowest performing schools in the state, and "Focus" schools, those with the biggest achievement gaps and/or lowest performing groups of students.

For Priority schools, districts are required to implement interventions aligned with a list of "turn-around principles" outlined by the U.S. Department of Education.⁹ There are no specific requirements for actions to improve Focus schools.

It'll take both on-the-ground experience and several years of data to assess whether the Priority and Focus school interventions laid out in state plans actually work. But it is possible to assess state plans for their seriousness, as well as their attention to critical issues.

Effective Teachers and Leaders

While there are many pieces that need to be in place to support school improvement, none is more important than ensuring that the students who are struggling the most have access to the strongest teachers and school leaders.

Florida has one of the most solid plans for addressing this in its Priority schools, with very explicit criteria. Districts in Florida can only employ teachers in Priority schools if they meet several criteria, including at least a "satisfactory" evaluation rating. And to work

at a Priority school, principals must have a record of increasing student achievement in similar schools.

Time will tell whether the state enforces these provisions — and whether they help. But Florida has a history of intervening when ineffective teachers are concentrated in low-performing schools and the state's waiver plan is serious on these issues.

Many other state plans, though, are vague at best when it comes to ensuring there are effective teachers and leaders in Priority schools. And no state has articulated a clear plan for addressing teacher assignments within Focus schools to ensure students who need the most support are placed with the strongest educators.

Clear Roles and Responsibilities for States and Districts

Another key element to look for in state waiver plans is whether there are clearly defined roles and responsibilities for states *and* districts in supporting school improvement. Without these, states are essentially telling schools that have struggled for years to fix themselves.

Rhode Island's plan lays out a thoughtfully sequenced improvement process for Priority schools that makes state and district roles clear. The process starts with a state-led, diagnostic needs analysis covering important indicators like district spending patterns, school-level data on teacher evaluation results, absences, and performance, and measures of school climate. After reviewing the findings with state representatives, districts are then responsible for basing their Priority school intervention and support plans on the diagnosed needs.

Massachusetts has taken district responsibility a big step further than have most other states. There, a district's performance rating is based on the designation of its lowest performing school. In other words, a district is only as strong as its weakest link. This is a powerful statement about the importance of every school, not just district averages.

And to support school improvement, Massachusetts has identified not only research-based interventions for low-performing schools, but also the characteristics of effective districts in supporting and sustaining these interventions. Districts with a Priority school have to demonstrate to the state that they have the capacity to support that school's

turnaround efforts, including how they allocate people, time, and money. And they are responsible for identifying any district policies and practices that are likely to stand in the way of the turnaround plan and showing how they will remove these barriers.

Again, only time will tell how these efforts will work. But advocates should understand what actions their states expect from low-performing schools, and how those schools will be supported by both the state and the district. Plans with clearly defined state and district roles hold a lot more promise than the plans that leave responsibilities vaguely defined, and schools potentially on their own.

Options for Students in the Lowest Performing Schools

NCLB required states to guarantee school choice for students attending schools that failed over multiple years to meet their improvement targets. The number of students exercising that right was never large, but that promise was nevertheless considered important by many, including civil rights organizations.

In its waiver guidelines, though, the Department of Education did not insist that states continue to meet the choice requirement. Beyond states that already have broad choice laws (including Minnesota, Indiana, Florida, and Georgia) only a handful of states chose to preserve public school choice, even for students in their lowest performing schools. Arizona, Colorado, Michigan, New York, Oklahoma, and South Carolina offer choice to students in Priority schools. But most other states don't give students in Priority schools the option to transfer to other, higher performing schools.

Question 2.2

Are the criteria for exiting Priority and Focus status rigorous?

As important as it is to get improvement efforts right, it's equally important to establish criteria for how to know if those efforts are working. Educators in Priority or Focus schools need to know what it will take to get out of that status. And administrators and policymakers need a way to know whether improvement resources are being used effectively. So states were asked to identify "exit criteria," or the level of performance required to get out of Priority and Focus status.

Most states identified exit criteria that, if met, would signify meaningful improvement. But states vary in how clear the signals are of what kind of improvement is expected.

Some states, including Arkansas, Connecticut, and Washington, have built coherence into their systems — and are providing Priority and Focus schools with very clear signals of what the expectations are — by using their reading and math achievement goals as exit criteria. In these states, schools have to meet all of their goals for multiple years in order to get out of Priority status. And schools have to meet their goals for low-performing groups for multiple years in order to get out of Focus status.

Advocates should understand what actions their states expect from low-performing schools, and how those schools will be supported by both the state and the district.

In South Carolina, on the other hand, to exit Priority status, schools have to be out of the bottom 5 percent of schools for multiple years and have "value-added growth that is at least one standard error above the mean growth rate statewide." Value-added growth doesn't figure into the accountability system in any other way, and schools won't know from one year to the next how much one standard error above the mean will be, so they won't have clear goals to target.

Question 2.3

What happens if, after receiving support, Priority and Focus schools don't improve?

Our nation has a long track record of investing money and energy into low-performing schools but not acting when results don't change for stu-

dents.¹⁰ Despite this well-documented tendency, the U.S. Department of Education didn't require states receiving waivers to articulate a course of action for schools that miss exit criteria year after year.

Nevertheless, a few states, including Michigan and Tennessee, have followed Louisiana's lead and are developing state-run "turnaround zones" for Priority schools that, even after receiving support and intervention, still don't improve.

Others, like Colorado, have set explicit time-frames for Priority schools that don't improve to undergo significant governance changes or, in some cases, to close altogether.

But in a number of other states, not meeting Priority exit criteria only brings more improvement planning. The same is true of almost all states when it comes to Focus schools not meeting exit criteria.

Given the Department of Education's clear focus on school turnaround, the approval of state plans with only the vaguest notions about what will be done when schools can't or won't improve is rather surprising. Advocates must be vigilant to ensure that students don't continue to languish in schools that clearly are not serving them well.

Question 2.4

What about underperforming schools that are not identified as Priority or Focus?

As important as Priority and Focus schools are, they represent only a fraction — usually about 15 percent — of the Title I schools in a state. It's critical that all schools in which any group of students is underperforming have the incentive to improve and the support to do so.

Some states have developed promising mechanisms to respond to consistent low performance by any group.

In New York, for example, any district with a school that is not Focus or Priority but has low subgroup performance, large gaps, or has failed to meet goals for any subgroup on the same accountability indicator for three consecutive years must do the same comprehensive needs assessment as Focus and Priority schools. The results of the needs assessment drive creation of a Local Assistance Plan that must, among other things, describe the resources

and professional development that will be provided to the school, and an implementation timeline.

New Mexico is working to leverage district responsibility to support underperforming groups by reviewing district data annually to identify jurisdictions where more than half of the student groups are missing their goals for multiple years. These districts will be responsible for interventions on behalf of the underperforming groups, and the state will review their budgets to ensure they specifically target the needs of low-performing students.

It's critical that all schools in which any group of students is underperforming have the incentive to improve and the support to do so.

Time will tell whether these processes drive actual improvement. But the plans that New York and New Mexico have in place are much clearer about the roles, responsibilities, and improvement mechanisms than many other state plans, where non-Priority, non-Focus schools that are nonetheless underperforming for groups get little more than a passing mention.

There's a very real risk that, in some states, students in large swaths of schools won't get the support and attention they need.

Question 2.5

Are there meaningful incentives for Reward schools that are serving all students well?

Good accountability systems aren't just about finding and fixing underperformance, they're about motivating exemplary performance, too. Thus the waiver guidelines ask states to recognize high-performing and high-progress "Reward" schools.

In virtually every state, Reward schools get public recognition. Some states are also providing their Reward schools with financial awards, increased flexibility, and the opportunity to share effective practices.

Hard-working, successful schools deserve these things and more. But if we are to stay focused on improving the achievement of all our children, it's critical that only schools successfully serving all groups of students be identified for rewards.

Some states have built high group performance into their Reward school criteria. In New Jersey, for example, to be considered a high-performing Reward school, not only does a school need an overall proficiency rate and graduation rate of at least 90 percent, it also has to meet its cut-the-gap-in-half goals for all groups, *and* each group has to be among the top 10 percent of performers for that group statewide.

Others, however, are sending the message that a school can be exemplary so long as group performance isn't at the bottom. In Washington state, for example, high-progress Reward schools are identified based on overall averages, with the caveat that they can't be in the bottom 10 percent of overall performance or the bottom 20 percent of group performance.

CONCLUSION

Accountability systems don't raise achievement or close gaps. Only the hard work of teachers and students can do that. But well-designed accountability systems are important tools in the effort to promote equity and raise achievement.

To counteract possible backsliding, it's critical for advocates and citizens in every waiver state to do a thorough, clear-eyed assessment of these new accountability systems. Certainly, these are complicated systems with many moving parts. But it's important to ask of each plan as a whole: What signals does it send to our schools and their surrounding communities? Does our new system contain clear, ambitious, achievable expectations for raising achievement and closing gaps? Does it prompt meaningful action on behalf of students?

At every level — national, state, and local — those who care about improvement and gap closing need to ask serious questions about state accountability systems now, and look carefully and critically at the results as new data become available. Where what we find points toward equity and achievement, it should serve as a model for state and federal policy going forward. Where it points toward stagnation or worse, we must work for needed changes. ■

NOTES

1. The Education Trust, "Goal Setting Under ESEA (1994-2007): How the States Responded," (Washington, D.C.: The Education Trust, Nov. 10, 2011).
2. For more information on the rationale and data supporting the "cut the gap in half" goal framework, see Natasha Ushomirsky, Daria Hall, and Kati Haycock, "Getting it Right: Crafting Federal Accountability for Higher Student Performance and a Stronger America," (Washington, D.C.: The Education Trust, September 2011).
3. The goals the U.S. Department of Education originally approved for Virginia sought to reduce by half the differences between proficiency rates at the highest and lowest performing schools for a given student group. These goals did not necessarily demand more progress on behalf of groups that started farther behind than they did for those that started out farther ahead. So even if the goals were met, gaps between groups would not necessarily narrow.
4. Virginia's revised math goals aim to get all students, including all groups of students, to 73 percent proficient by 2016-17. Meeting these goals would close gaps in the state. Since these goals are based on a brand-new assessment, it is too soon to judge their rigor. Virginia will set new goals for reading after implementing new, revised reading tests in 2013.
5. It's important to note here that the Department of Education did not waive the NCLB requirement that states set targets for "continuous and substantial" progress on the cohort graduation rate toward a single goal, overall and for all groups of students.
6. For example, see Daria Hall, "Getting Honest about Grad Rates: How states play the numbers and students lose," (Washington, D.C.: The Education Trust, June 2005); Anna Habash, "Counting on Graduation: An agenda for state leadership," (Washington, D.C.: The Education Trust, October 2008); National Governors Association, "Graduation Counts: A Compact on State High School Graduation Data," (Washington, D.C.: July 2005); and 34 CFR Part 200.19 (Washington, D.C.: Government Printing Office, July 7, 2011).
7. Rep. George Miller (D-Calif.), Letter to U.S. Secretary of Education Arne Duncan, Sept. 21, 2012.
8. U.S. Secretary of Education Arne Duncan, Letter to Chief State School Officers, Nov. 26, 2012.
9. These principles include improving teacher and leader effectiveness, providing proven school leaders with operational flexibility, expanding time for instruction and teacher collaboration, using data, improving school culture, and engaging family and community.
10. For example, see The Education Trust-West, "Keeping the Promise of Change: Why California's chronically underperforming schools need bold reform," (Oakland, Calif.: The Education Trust-West, May 2010).



ABOUT THE EDUCATION TRUST

The Education Trust promotes high academic achievement for all students at all levels — pre-kindergarten through college. We work alongside parents, educators, and community and business leaders across the country in transforming schools and colleges into institutions that serve all students well. Lessons learned in these efforts, together with unflinching data analyses, shape our state and national policy agendas. Our goal is to close the gaps in opportunity and achievement that consign far too many young people — especially those who are black, Latino, American Indian, or from low-income families — to lives on the margins of the American mainstream.



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