

Comparison of Select Accountability Components from the Every Student Succeeds Act and the Local Control Funding Formula

The recent enactment of the Every Student Succeeds Act (ESSA) introduces significant changes in federal accountability by allowing States to develop and implement accountability systems that meet minimum federal requirements and augment a State approach to technical assistance and intervention that will support continuous improvement. California is currently developing a statewide accountability system using a conceptual framework that is similar in many respects to the requirements proposed by ESSA. Many of the components of the developing state accountability system, such as the Local Control and Accountability Plan (LCAP) and the Local Control Funding Formula (LCFF) evaluation rubrics, will be the central drivers in California’s development of one coherent and comprehensive system that incorporates the federal accountability requirements. The table below describes select ESSA components on accountability in relation to the LCFF requirements. Given the enhanced discretion in ESSA for states to define accountability systems that meet minimum federal requirements, this comparison provides a preliminary review of ESSA to frame the discussion on aligning the federal requirements with California’s developing accountability system.

Timeline		
ESSA	LCFF	Comments
<p>The ESSA accountability system and related interventions will take effect in 2017–18.</p>	<p>The State Board of Education (SBE) must adopt the LCFF evaluation rubrics by October 1, 2016.</p>	<p>The ESSA State Plan will go into effect August 2017. Attachment 3 presents the timeline to support the planning and engagement strategies that will be used to develop the ESSA State Plan. Based on this timeline, the California Department of Education (CDE) will present the draft ESSA State Plan to the SBE no later than November 2016.</p>

Number of Indicators		
ESSA	LCFF	Comments
<p>Elementary and Middle Schools</p> <p><i>Academic Achievement</i></p> <ul style="list-style-type: none"> English language arts and mathematics in grades 3 through 8, inclusive Science assessed once in each grade span of 3–5 and 6–9 <p><i>English Proficiency</i></p> <ul style="list-style-type: none"> Progress of English learners (ELs) in achieving English proficiency <p><i>Another Academic Indicator</i></p> <ul style="list-style-type: none"> Other academic factor that can be broken out by subgroup (this could include growth on assessments) <p><i>At Least One Other Indicator</i></p> <ul style="list-style-type: none"> Additional indicator (e.g., student engagement and school climate/safety) 	<p>LCFF State Priorities for School Districts, Charter Schools, and County Offices of Education¹</p> <p><i>Basic:</i> degree to which teachers are appropriately assigned pursuant to <i>Education Code (EC)</i> Section 44258.9, and fully credentialed in the subject areas and for the pupils they are teaching; pupils have access to standards-aligned instructional materials pursuant to <i>EC</i> Section 60119; and school facilities are maintained in good repair pursuant to <i>EC</i> Section 17002(d). (Priority 1)</p> <p><i>Implementation of State Standards:</i> implementation of academic content and performance standards and English language development standards adopted by the state board for all pupils, including English learners ELs. (Priority 2)</p> <p><i>Parental involvement:</i> efforts to seek parent input in decision making at the district and each school site, promotion of parent participation in programs for unduplicated pupils and special need subgroups. (Priority 3)</p> <p><i>Pupil achievement:</i> performance on standardized tests, score on the Academic Performance Index (API), share of pupils that are college and career ready, share of ELs that become English proficient, EL reclassification rate, share of pupils that pass Advanced Placement exams with 3 or higher, share of pupils determined prepared for college by the Early Assessment Program. (Priority 4)</p>	<ul style="list-style-type: none"> Consistent with California’s accountability system, ESSA proposes multiple measures to assess more than just performance on standardized tests. Measures of growth to reflect continuous improvement are also consistent between ESSA and LCFF. What has yet to be determined is the methodology for weighting certain indicators more than others, and whether these weights must aggregate into one index or composite score. The State must determine the selection of the additional academic achievement indicator for elementary and middle schools. Growth scores on assessments is one example.

¹ The description of the LCFF state priorities and associated indicators and metrics is specified in *California Code of Regulations (CCR)*, Title 5 Section 15497.5 and *EC* sections 52060 and 52066. The state priorities are required for all LEAs where applicable and listed in the table in the order of priorities one through ten for discussion purposes.

Number of Indicators		
ESSA	LCFF	Comments
<p>High Schools</p> <p><i>Academic Achievement</i></p> <ul style="list-style-type: none"> English language arts and mathematics assessed one time in grades 9 through 12 Science assessed once in grade span of 10–12 <p><i>English Proficiency</i></p> <ul style="list-style-type: none"> Progress in achieving English proficiency <p><i>Another Academic Indicator</i></p> <ul style="list-style-type: none"> 4-year adjusted cohort graduation rate (states can add extended rate) <p><i>At Least One Other Indicator</i></p> <ul style="list-style-type: none"> Additional indicator (e.g., opportunity to learn and readiness for post-secondary) <p>Participation rate of 95% on state tests is a standalone measure</p>	<p>LCFF State Priorities for School Districts, Charter Schools, and County Offices of Education</p> <p><i>Pupil engagement:</i> school attendance rates, chronic absenteeism rates, middle school dropout rates, high school dropout rates, high school graduation rates. (Priority 5)</p> <p><i>School climate:</i> pupil suspension rates, pupil expulsion rates, other local measures including surveys of pupils, parents and teachers on the sense of safety and school connectedness. (Priority 6)</p> <p><i>Course access:</i> pupil enrollment in a broad course of study that includes all of the subject areas described in <i>EC</i> Section 51210 and subdivisions (a) to (i), inclusive, of Section 51220, as applicable. (Priority 7)²</p> <p><i>Other pupil outcomes:</i> pupil outcomes in the subject areas described in <i>EC</i> Section 51210 and subdivisions (a) to (i), inclusive, of <i>EC</i> Section 51220, as applicable. (Priority 8)</p> <p><i>Expelled pupils (for county offices of education only):</i> coordination of instruction of expelled pupils pursuant to <i>EC</i> Section 48926. (Priority 9)</p> <p><i>Foster youth (for county offices of education only):</i> coordination of services, including working with the county child welfare agency to share information, responding to the needs of the juvenile court system, and ensuring transfer of health and education records. (Priority 10)</p>	<ul style="list-style-type: none"> Under ESSA, the State must also determine at least one other indicator for elementary, middle, and high school. Under LCFF, LEAs may select local indicators in addition to the State priority indicators/metrics. What criteria should be used to make the final selection of metrics for the purpose of identifying highest need schools? For example, among the LCFF metrics, using state defined and state collected metrics is preferred when using these data for comparative purposes.

² *EC* section 51210 applies to the adopted course of study for grades 1 to 6, inclusive, in the following areas of study: English, Mathematics, Social Science, Science, Visual and Performing Arts, Health, Physical Education and other studies prescribed by the SBE. *EC* section 51220 applies to the adopted course of study for grades 7 to 12, inclusive, in the following areas of study: English, Social Sciences, Foreign language or languages, Physical Education, Science, Mathematics, Visual and Performing Arts, Applied Arts, Career Technical Education, Automobile Driver Education, and other studies prescribed by the SBE.

Identification for Technical Assistance and Intervention		
ESSA	LCFF	Comments
<p>Identification of Lowest Performing LEAs for Intervention</p> <ul style="list-style-type: none"> • Must “meaningfully differentiate” all schools and subgroups in state; more “substantial” weight on academic indicators • Must establish methodology for identifying schools for comprehensive support and improvement that are at least- the lowest-performing 5 percent (of Title I schools) and all high schools graduating less than 2/3 of students • Identification of students must start in 2017–18 and occur at least once every three years 	<p>Identification for Technical Assistance</p> <ul style="list-style-type: none"> • For school districts, <i>EC</i> Section 52071 specifies that if an LCAP or Annual Update is not approved by the county superintendent of schools or if a local governing body requests assistance, then the county superintendent of schools shall provide technical assistance. Using the evaluation rubrics, the county superintendent shall provide technical assistance to any district that “fails to improve pupil achievement across more than one state priority...for one or more pupil subgroup identified pursuant to Section 52052.” • For county offices of education, <i>EC</i> Section 52071.5 specifies that if an LCAP or Annual Update is not approved by the SPI, or the county board of education requests assistance, the SPI shall provide technical assistance. Using the evaluation rubrics, the SPI shall provide technical assistance to any county office that “fails to improve pupil achievement across more than one state priority...for one or more pupil subgroup identified pursuant to Section 52052.” • For charter schools, <i>EC</i> Section 47607.3 specifies that the chartering authority shall provide technical assistance, using the evaluation rubrics, to the charter school if the charter school “fails to improve outcomes for three or more pupil subgroups identified pursuant to Section 52052, or, if the charter school has less than three pupil subgroups, all of the charter school’s pupil subgroups, in regard to one or more state or school priority identified in the charter pursuant to subparagraph (A) of paragraph (5) of subdivision (b) of Section 47605 or subparagraph (A) of paragraph (5) of subdivision (b) of Section 47605.6, in three out of four consecutive school years.” 	<ul style="list-style-type: none"> • Once the indicators have been determined, the state must define the methodology to assign more weight to the academic factors when using performance on the indicators to differentiate LEAs. • How will the state assign weights within a multiple measures system for identification without creating a composite or single index score?

Identification for Technical Assistance and Intervention		
ESSA	LCFF	Comments
	<p>Identification for Intervention</p> <p><i>EC</i> Section 52072 specifies that the SPI may, with the approval of the SBE, identify school districts in need of intervention if a district meets both of the following criteria:</p> <p>(1) The school district “did not improve the outcomes” for three or more pupil subgroups identified pursuant to <i>EC</i> Section 52052 or, if the school district has less than three pupil subgroups, all of the school district’s pupil subgroups, in regard to more than one state or local priority in three out of four consecutive school years.</p> <p>(2) The CCEE has provided advice and assistance to the school district pursuant to <i>EC</i> Section 52071 and submits either of the following findings to the SPI:</p> <p style="padding-left: 40px;">(A) That the school district has failed, or is unable, to implement the recommendations of the CCEE.</p> <p style="padding-left: 40px;">(B) That the inadequate performance of the school district, based upon the evaluation rubrics, is either so persistent or acute as to require intervention by the SPI.</p> <p>(A parallel set of conditions is set forth in <i>EC</i> Section 52072.5 for county offices of education and similar conditions in <i>EC</i> Section 47607.3 for charter schools that also include possible revocation of a charter school)</p>	<ul style="list-style-type: none"> • Beyond the identification and weighting of indicators to identify the needs for intervention, what are the state and local goals from which to evaluate performance to determine the needs for technical assistance? • Should the new accountability system also include identification to support continuous improvement, such as acknowledgement for improvements (e.g., California Distinguished Schools) and providing service and support (e.g., serving as an exemplary peer provider through the CCEE)?

Technical Assistance and Intervention		
ESSA	LCFF	Comments
<p>Intervention- Comprehensive Support and Improvement</p> <p>States must annually notify LEAs of schools that are identified for comprehensive support; LEAs must develop and implement a comprehensive and support improvement plan that:</p> <ul style="list-style-type: none"> • Is informed by all indicators in the statewide accountability system, including student performance against state goals • Includes evidence-based interventions • Is based on a school-level needs assessment • Identifies resource inequities to be addressed • State must approve plan and monitor intervention 	<p>Technical Assistance</p> <p><i>EC</i> sections 52071 and 52071.5 specifies that the technical assistance may include, among other things, any of the following:</p> <ul style="list-style-type: none"> • Identification of LEA strengths and weaknesses in regard to the applicable state priorities, including a review of effective, evidence-based programs that apply to the LEA’s goals; • Assignment of an academic expert or team of academic experts to assist the LEA in identifying and implementing effective programs designed to improve the outcomes for all pupil subgroups identified in <i>EC</i> Section 52052; • Solicitation of another LEA to act as a partner to the LEA in need of technical assistance; and • Request that the SPI assign the CCEE to provide advice and assistance to the LEA (or in the case of the SPI, assign the CCEE to advise and assist the COE). <p>Intervention</p> <p><i>EC</i> sections 52072 and 52072.5 specifies that school districts and county offices of education identified as needing intervention, the SPI may, with the approval of the SBE, do one or more of the following:</p> <ul style="list-style-type: none"> • Make changes to an LCAP adopted by the governing board of the school district. • Develop and impose a budget revision, in conjunction with revisions to the LCAP, that the SPI determines would allow the school district to improve the outcomes for all pupil subgroups identified pursuant to <i>EC</i> Section 52052 in regard to state and local priorities. 	<ul style="list-style-type: none"> • ESSA primarily focuses on schools while LCFF is LEA-directed. • The LCFF designs a multi-tiered system of support that includes the COE, the CCEE, and the SPI/CDE. • What is the role of the state systems of support in ESSA? • What are the similarities and differences between the ESSA comprehensive support and improvement plan and the LCAP?

Technical Assistance and Intervention		
ESSA	LCFF	Comments
<p>Intervention-Targeted Support and Improvement</p> <p>State must notify LEAs of schools where any subgroup is persistently underperforming for targeted support; schools must develop a targeted support and improvement plan that:</p> <ul style="list-style-type: none"> Includes all indicators in the statewide accountability system, including student performance against state goals Includes evidence-based interventions Is approved and monitored by the LEA Will result in additional action if unsuccessful after an LEA-determined number of years Identify resource inequities for subgroups 	<p>Intervention</p> <ul style="list-style-type: none"> Stay or rescind an action, if that action is not required by a local collective bargaining agreement, that would prevent the school district from improving outcomes for all pupil subgroups identified pursuant to <i>EC</i> Section 52052 in regard to state or local priorities. Appoint an academic trustee to exercise the powers and authority specified in this section on his or her behalf. 	<ul style="list-style-type: none"> What is the relationship between the school level plans, the ESSA Targeted Support and Improvement Plan and the Single Plan for Student Achievement (SPSA)? What is the role of the state in the Targeted Support and Improvement Plan?

Numerically Significant Subgroups		
ESSA	LCFF	Comments
<p>Definition of Student Group</p> <p>Includes minimum number of students for disaggregation of students by subgroup (e.g., n-size or sample size) that is universal and statistically sound</p> <p>ESSA State Plan must include achievement data disaggregated by subgroup that includes the following:</p> <ul style="list-style-type: none"> • Each major racial and ethnic group • Economically disadvantaged students as compared to students who are not economically disadvantaged • Children with disabilities as compared to children without disabilities • English proficiency status • Gender • Migrant Status 	<p>Definition of Student Groups</p> <p>EC Section 52052 specifies...numerically significant pupil subgroups at the school or school district, including:</p> <ul style="list-style-type: none"> • Ethnic subgroups. • Socioeconomically disadvantaged pupils. • English learners. • Pupils with disabilities. • Foster youth. • Homeless youth. • For purposes of this section, a numerically significant pupil subgroup is one that consists of at least 30 pupils, each of whom has a valid test score. • ...for a subgroup of pupils who are foster youth or homeless youth, a numerically significant pupil subgroup is one that consists of at least 15 pupils. <p>Note: “n” is defined as the sample size. For example, the “n-size” of 30 designates that a subgroup sample with 30 or more students may be included in the analysis that disaggregates data by subgroup.</p>	<ul style="list-style-type: none"> • Does the state want to report out a consistent “n-size” for all student groups? ESSA recommends the minimum number of students by subgroup is universal across all groups, LCFF requires an n-size of 30 for all subgroups except foster and homeless youth can be reported with a minimum number of 15. • Will the accountability system include consistent reporting of subgroups for all accountability components (e.g., not just achievement data)? • In what ways will the accountability system measure performance, equity, and improvement for all student groups? • Will there be a universal definition for proficiency in English for ELs that will meet the federal and state accountability requirements?

12-30-15 [State Board of Education and California Department of Education]