



A REVIEW OF CALIFORNIA'S FINAL ESSA PLAN

Under the Every Student Succeeds Act (ESSA), every state must develop a plan to provide a quality education to all students, hold schools accountable for how all students achieve, and identify and help schools that are struggling. It matters greatly how California designs its accountability system and supports school improvement. Getting this right means ensuring the most marginalized students in our education system get the opportunities they need to succeed; conversely, missing the mark could allow stubborn opportunity and achievement gaps to persist. In July 2018, the U.S. Department of Education approved California's ESSA plan. Now begins the work of implementing the plan.

In this brief we lay out what is in the state's final ESSA plan, what California is doing beyond the plan, and what else California's leaders must do to advance educational equity and excellence. We previously offered our take on the state's progress toward crafting a quality ESSA plan, looking at "five big things" in two briefs (published in [April 2017](#) and [June 2017](#)); this is the third in that series. Below, we look once again at five important things that matter to equity.

1. AMBITIOUS, LONG-TERM GOALS FOR STUDENT SUCCESS

What were we looking for?

While the plan was in draft form, we urged the state to identify numeric goals for each indicator on the California School Dashboard. We also wanted the Dashboard to show how much growth a school—and each student group within it—would need to make to reach goals, and we were looking for a school's progress toward goals to be made visible on the Dashboard. We also wanted to see the state incentivize schools to meet goals and disincentivize a consistent lack of progress. We looked for the state to define these things to encourage schools to not just stay out of the "bottom," but to work towards high performance.

What's there?

In the final plan, state leaders set concrete, long-term goals. The goals correspond with performance levels found on the California School Dashboard. The Dashboard colors code each school and district's performance on each indicator according to both its overall performance (called "Status") and its improvement from one year to the next (called "Change"). On the Status dimension, there are five possible levels ranging from "Very Low" to "Very High." The state set the long-term goal of "High" on the Status dimension for the four indicators included in the ESSA state plan, which are: English language arts, math, graduation rates, and English language proficiency. **See Figure 1 for an illustration of how this works, and Figure 2 for the actual goals.** The plan also provides calculations for the yearly growth necessary to meet these goals in seven years specific to student groups based on race/ethnicity, ability status, income level, and English learner status.

What else we'd like to see

The accountability system, as designed, sets long term goals, but it does not encourage schools or districts to reach these goals. That is, there are no incentives for them to make annual progress toward goals, nor are there consequences

for *not* reaching goals or for delivering mediocre or stagnant results. The California Department of Education (CDE) will identify and require improvement in the lowest performing schools, which is important - but *all* schools should be held accountable for making progress and closing gaps. In addition, we also urge the state to recognize schools making strong progress toward closing gaps and helping all student groups meet long-term goals.

Figure 1: Example of Goal: Graduation Rate (goal is area within the dotted line)

		Change				
Performance Level		Declined Significantly from prior year by 5.1% or greater	Declined from prior year by 1.0% to 5.0%	Maintained - declined or increased by less than 1.0%	Increased from prior year by 1.0% to 4.9%	Increased Significantly from prior year by 5.0% or greater
Status	Very High 95% or Greater	N/A	Blue	Blue	Blue	Blue
	High 90% to less than 95%	Orange	Yellow	Green	Green	Blue
	Medium 80% to less than 90%	Orange	Orange	Yellow	Green	Green
	Low 67% to less than 80%	Red	Orange	Orange	Yellow	Yellow
	Very Low Less than 67%	Red	Red	Red	Red	Red

Figure 2: Long-term Goals Included in California’s ESSA Plan

Indicator	Long-term Goal
English language arts academic achievement	The average student is 10 points above the “Standard Met” score on the Smarter Balanced test for grades 3-8 and 10 points above for grade 11
Math academic achievement	The average student is meeting the “Standard Met” score on the Smarter Balanced test
Graduation rate	90% of students graduate high school in 4 years
English language proficiency	At least 75% of English learners gained one or more performance levels on the assessment, and/or were reclassified as English proficient, in the most recent year

2. HOW EACH SCHOOL IS PERFORMING OVERALL, COMPARED TO OTHER SCHOOLS

What were we looking for?

A central component of ESSA accountability is the identification of schools that need additional support in order to improve. In previous drafts of the state’s plan, we were looking for the state to finalize how it planned to identify Comprehensive Support and Improvement (CSI) schools—those performing in the bottom five percent of schools statewide. (Under ESSA, the state must also identify high schools with a graduation rate lower than 67 percent as CSI

schools.) We were also looking for the state to develop a methodology for identifying Targeted Support and Improvement (TSI) schools, which are the schools with one or more “consistently underperforming” student groups. Finally, we urged the state to indicate on the Dashboard whether a school has been identified so stakeholders know the status of their schools and whether school and district leaders should be taking steps to improve them.

What’s there?

California’s plan now includes a methodology to identify CSI and TSI schools as well as plans for identifying a third category of schools, Additional Targeted Support and Improvement (ATSI) schools. Like the long-term goals, this methodology is based on performance on the California School Dashboard. If a school’s overall performance meets one of the criteria below, that school falls into the CSI category. If a school has one or more student groups meeting one of the following criteria it will fall into the TSI or ATSI categories:

- All red Dashboard indicators
- All red but one Dashboard indicator of any other color
- All red and orange Dashboard indicators
- Has ratings on five or more Dashboard indicators, the majority of which are red

What’s beyond the plan?

The CDE first identified CSI and ATSI schools in January 2019, and it will do so again in 2020 and every three years thereafter. The state will first identify TSI schools in 2020 and will do so annually thereafter. Typically, the state will identify CSI and ATSI schools every three years, however, they will identify schools both in 2019 and 2020 to align school identification with the three-year Local Control and Accountability Plan (LCAP) cycle. The state is also identifying schools in 2019 and 2020 because the state has introduced a new English proficiency assessment. Since this assessment will not yield sufficient data on how schools are serving English learners in 2019, the state will identify schools again in 2020.

What else we’d like to see

The CDE has published a [list of CSI- and ATSI-identified schools](#), as required by the ESSA law. This list is [available on the CDE website](#), but it is not very accessible to parents and other school stakeholders. We urge the state to provide notification to parents and other local stakeholders that their schools have been identified. For example, they could include on the California School Dashboard some indication that a school has been identified. We would also like to see the state require clear communication from district administrators to school stakeholders about opportunities for them to be involved in the improvement process with identified schools.

3. A MEANINGFUL PLAN FOR SCHOOL IMPROVEMENT

What were we looking for?

We wanted to see a detailed plan for how the state would provide assistance to identified schools, and we looked for assurances that families and the community would be involved in the school improvement process. We also wanted to see a description of the technical assistance that would be provided, defined exit criteria, and a clear indication of when interventions would be escalated. Further, we wanted to see a plan for how the state would use funds strategically to support the lowest-performing schools, assist schools that are consistently underperforming for one or more student groups, and to improve the ability of leaders and educators to more effectively serve vulnerable student populations.

What's there?

California's ESSA plan describes its emerging System of Support, which was developed under LCFF to support struggling districts, and which will be aligned with ESSA to enable districts to support low-performing schools. It features three levels of support:

1. Support for all districts (such as curriculum frameworks, professional learning networks, and toolkits),
2. Differentiated assistance for districts that need additional support, and
3. Rigorous intervention for districts with persistent performance issues.

To document their approach to improvement and ways to allocate resources, districts must develop improvement plans for CSI schools with stakeholder input, and the state must review and approve those plans. TSI and ATSI schools must also develop improvement plans with stakeholder input, which the district must review and approve.

Under California's plan, CSI and TSI schools have four years to meet the "exit criteria," which means they must raise achievement levels in order to no longer require comprehensive or targeted support. Districts with schools that fail to meet the exit criteria within four years will be required to partner with an external expert agency to conduct a "deep, comprehensive, evidence-based review" of the district and the school. Beyond engaging in these activities, the plan does not indicate next steps if schools still don't improve.

What's beyond the plan?

In California, the School Plan for Student Achievement (SPSA) will serve as the improvement plans for CSI, TSI, and ATSI schools. Instead of reviewing and approving each CSI school's SPSA, the state will require each district with CSI schools to describe the supports they are providing to those schools in the district's LCAP. County Offices of Education (COEs) will approve these LCAPs and recommend that the State Board of Education (SBE) also approve them, which will serve as state approval for CSI school plans.

In designing California's System of Support, the CDE, COEs, the California Collaborative for Educational Excellence (CCEE), and the SBE have organized stakeholder planning groups to ensure that efforts to improve districts are coordinated and collaborative. The CCEE is providing grants to selected COEs with expertise in a variety of areas to serve as lead agencies to provide assistance to struggling districts. The CCEE and CDE have selected county offices of education to lead efforts around community engagement, equity, early math, school climate, and English learner support. The CCEE has also selected seven geographic leads and various Special Education Local Plan Areas (SELPA) to serve as leads around special education support.

CDE leaders have determined that the almost \$129 million in federal funds set aside for local school improvement will be allocated to districts based on the number of schools identified as CSI within each district. Districts will receive the same amount of money for each CSI school. Therefore, the more CSI schools in a district, the more improvement funds the state will allocate to that district. To receive these improvement funds, districts must complete an application, but it is not competitive so any district that completes an application for improvement funds will receive them. Districts can use these dollars to fund any activities that support improvement for ESSA-identified schools. However, districts cannot use improvement funds to hire permanent staff.

What else we'd like to see?

We would like to see the state play a stronger role in providing oversight and monitoring of COEs' CSI improvement plan approval process. For example, the SBE may need to play a more active role in directly reviewing and approving CSI school plans—especially in counties that provide lax oversight.

We would like to more clearly see how support will flow from COEs, to districts, to schools. It is not yet apparent to us that the theoretical framework of the System of Support is translating into action or meaningful changes in practice at the local level. In addition, the CDE and COEs should require that districts choose improvement strategies and interventions with evidence that they can work in their particular context—including for their student populations. Further, we would like to see all COE lead agencies infuse family and stakeholder engagement strategies in their efforts, not just through the community engagement leads. Over time, it would be helpful for the state to share examples of how districts and schools have implemented changes resulting in improved and more equitable outcomes for students.

4. A PLAN TO ADDRESS RESOURCE INEQUITIES

What were we looking for?

Resource inequities exist where there are historical, systemic barriers to opportunities for academic success that disparately impact low-income students and students of color. To break down these inequities, state and local leaders must provide different schools with different levels of resources based on need. In the state's plan, we were looking for a definition of resource equity upon which state leaders would base their approach to identifying whether inequities exist within districts. We were also looking for the state to commit to reporting per-pupil expenditures by school site and provide guidance on how these expenditures should be reported. We also wanted the state to explain how expenditure information and other local data could be used to support equitable access to resources in CSI, TSI, and ATSI schools.

What's there?

California's ESSA plan says that the state will support COEs in their work with districts to identify and properly allocate resources toward school improvement. The plan mentions, in noncommittal language, that the state may do some of, but is not limited to doing, the following:

- Review CSI schools' improvement plans for resource inequities;
- Provide guidance on how to address resource inequities in the development and approval of improvement plans for TSI schools;
- Review applications for Title I funding for resource inequities for districts with a significant number of CSI and TSI schools;
- Review resource inequities for a select number of districts as part of the state's monitoring of federal education programs; and
- Provide assistance to districts through the second level of the System of Support to identify and resolve resource inequities.

What's beyond the plan?

While the ESSA law requires states to report per-pupil school site expenditures, it does not require states to explain in their plans how they will meet this requirement. However, CDE staff have explained that they would not require districts to follow a uniform method of reporting these expenditures for districts across the state. Instead, the CDE [has provided guidance](#) to districts on developing their own methods for reporting school site expenditures. This approach to meeting

this ESSA reporting requirement makes it difficult to compare how schools and districts are choosing to spend dollars at the school level and may undermine the intent of the law.

What else we'd like to see

The resource allocation section of California's plan provides very little detail on the concrete steps the state will take to ensure districts use resources in equitable ways that support historically marginalized students who aren't yet achieving at high levels. The CDE should further explain and firmly commit to identifying resource inequities and supporting districts in addressing them. For example, we'd like to see the state provide a clear definition of resource inequities and describe what data it will direct COEs and districts to use in assessing whether they exist. The state could also provide concrete action steps and guidance to COEs and districts on how to remedy resource inequities.

We believe the state should establish a common methodology for reporting per-pupil school site expenditures rather than merely providing guidance. Nevertheless, the state still has an opportunity to ensure that expenditure information is as accessible as possible to school stakeholders. Currently, the CDE plans to report this data on the ESSA-mandated district report cards; however, it is unclear where they will put these report cards on the complicated, tough-to-navigate CDE website. We urge the state to make this information broadly accessible. For example, they could house this data on the Dashboard, where parents and other school stakeholders can easily find and use it.

5. A PLAN THAT ADDRESSES EDUCATOR EQUITY

What were we looking for?

ESSA requires districts to describe how they will identify and address any disparities that result in low-income students and students of color being more likely than other students to be taught by ineffective, inexperienced, or out-of-field teachers. We were looking for the state to define *effective* teaching and to lay out a meaningful plan for ensuring that students in low-performing and high-poverty schools have access to effective teachers. We also wanted to see a plan for improving teacher recruitment, induction, and retention.

What's there?

California's ESSA plan says that by spring 2019, it will annually track data on equitable access to ineffective, out-of-field, and inexperienced teachers, and it will annually report on the state's progress toward eliminating teacher equity gaps. The CDE has defined "ineffective teacher" as one who is: (a) misassigned (credentialed in a subject other than the one s/he is teaching), or (b) teaching without a credential. An "out-of-field teacher" is one who has not yet demonstrated competence in the subject area s/he is teaching, such as a teacher holding a limited assignment permit. An "inexperienced teacher" is one who has two or fewer years of teaching experience.

What's beyond the plan?

The CDE's Promoting Equitable Access to Educators (PEAT) program will provide resources and tools to support districts and COEs to analyze equity data, recruit and retain teachers, conduct a root cause analysis, and engage stakeholders. However, it is unclear what the state will do about continuing teacher equity gaps if districts don't improve. In addition, the CDE and the California Commission on Teacher Credentialing (CTC) entered into a data sharing agreement, which created the State Assignment Accountability System (CalSAAS). Once CalSAAS becomes operational in 2019, it will serve as a platform for county offices of education and districts to communicate and address misassignments.

What else we'd like to see

Although the state has now defined “ineffective teacher,” the definition is broad, and it holds an underlying (and faulty) assumption that any teacher who is teaching a subject in which s/he is credentialed is effective. The state must define the qualities of an “effective teacher.” As part of its support to districts, the state should share strategies to improve teacher recruitment, support, and retention to ensure that every student has access to quality educators. In addition to sharing resources, the state should identify and make a list of experts who can help districts with teacher equity plans and articulate what supports it will provide if districts continue to struggle.

Further, the state should gather stakeholder input on other data points to collect in CalSAAS or in another data system to provide a clearer picture of California’s teacher workforce, such as teacher quality, working conditions, teacher attendance, teacher turnover, the degree of preparedness teachers feel they received from their educator preparation programs, and the number of students impacted by each educator misassignment. The CDE and CTC have scheduled [over 20 trainings](#) at COEs across the state in spring 2019 regarding the CalSAAS. These trainings should include community stakeholders. Finally, the state should make CalSAAS data available and understandable to the public, such as through a link on the California School Dashboard, and support districts to make sense of their local data and use it to improve.

CONCLUSION

California now has a plan for how it will meet the requirements of the Obama-era federal education law, the Every Student Succeeds Act. But a plan is an empty promise if not followed with meaningful implementation, sufficient resources, and tangible and decisive action. As California’s state and education leaders look ahead to what’s next, we urge them to partner with community stakeholders and lead with equity and a firm commitment to guaranteeing every child—and particularly our most vulnerable and marginalized—the strong schools, great teachers, adequate resources, and opportunities they need for success in school, college, and life.

For more information

- The Education Trust–West’s accountability resources: <https://west.edtrust.org/equity-accountability-what-you-need-to-know/>
- The Education Trust’s resources on ESSA: <https://edtrust.org/issue/the-every-student-succeeds-act-of-2015/>
- The Education Trust–West’s LCAP Watch: <https://west.edtrust.org/resource/lcap-watch/>
- California’s final ESSA state plan: <https://www.cde.ca.gov/re/es/documents/essastateplan2018.pdf>
- The CDE’s list of schools identified for support and improvement: <https://www.cde.ca.gov/sp/sw/t1/csi.asp>
- CCEE’s Resource Collection: <https://ccee-ca.org/resource-collection.asp>
- The CDE’s System of Support Webpage: <https://www.cde.ca.gov/sp/sw/t1/csss.asp>
- The CDE’s Comprehensive Support and Improvement Webpage: <https://www.cde.ca.gov/sp/sw/t1/csi.asp>
- The CDE’s One System resources: <https://www.cde.ca.gov/eo/in/onesystem.asp>
- The CDE’s Promoting Equitable Access to Teachers Webpage: <https://www.cde.ca.gov/pd/ee/peat.asp>

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