



INDIANA STATE BOARD OF EDUCATION

TO: State Board of Education

FROM: Board staff

RE: Final Board vote on A-F rule language

DATE: April 29, 2015

Board staff recommends that the Board vote to approve the final version of the A-F rule. The final version makes two categories of changes: (1) technical changes (grammar, punctuation, etc.), and (2) substantive changes based on public comment.

Public comment is attached and summarized. The substantive changes based on public comment are outlined in the attached Power Point presentation.

After the board votes, the rule will be sent to the Indiana Attorney General for approval.

The Board's vote will be its final vote on this rule.

TITLE 511 INDIANA STATE BOARD OF EDUCATION

Final Rule

LSA Document #14-447(F)

DIGEST

Adds [511 IAC 6.2-10](#) to modify the methodology or metrics, or both, that determine in which of the school accountability categories, "A" through "F" grading scale, schools and school corporations are to be placed. Effective March 1, 2016, applicable beginning in the 2015-2016 school year.

[IC 4-22-2.1-5 Statement Concerning Rules Affecting Small Businesses](#)

[511 IAC 6.2-10](#)

SECTION 1. [511 IAC 6.2-10](#) IS ADDED TO READ AS FOLLOWS:

Rule 10. Assessing School and School Corporation Growth and Performance

[511 IAC 6.2-10-1](#) Definitions

Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-8-4](#); [IC 20-31-10-1](#); [20-31-8-5.4](#)

Affected: [IC 20-18-2](#); [IC 20-19-2-14.5](#); [IC 20-26-13-3](#); [IC 20-26-13-6](#); [IC 20-31-2-8](#); [IC 20-31-8](#); [IC 20-32-4](#); [IC 20-32-5-2](#); [IC 20-36-3-2](#)

Sec. 1. The following definitions apply throughout this rule:

- (1) "Accountable year" means the school year being assessed.
- (2) "Achievement" means successful accomplishment of the proficiency goals established by the board.
- (3) "Achievement gap" means the difference in academic performance between subgroups.
- (4) "Advanced placement examination" or "AP exam" has the meaning set forth in [IC 20-36-3-2](#).
- (5) "Alternative assessment" means the alternative assessment instrument to the mandatory statewide annual assessment.
- (6) "Annual measurable objective" means the percentage of students who must be proficient in English/language arts and mathematics in a given year.
- (7) "Atypical school" means a school that lacks sufficient data points to calculate a final accountability category under this rule.
- (8) "Board" has the meaning set forth in [IC 20-18-2-19](#).
- (9) "College and career readiness" has the meaning set forth in [IC 20-19-2-14.5\(a\)\(1\)](#).
- (10) "College and career readiness assessment" means an assessment approved by the Board to measure college and career readiness.
- (11) "College and career readiness goal" means the goal established by the board for which a school receives full credit for college and career readiness.
- (12) "College credit" means credit awarded by a postsecondary institution accredited by an agency recognized by the Secretary of the U.S. Department of Education.
- (13) "Cumulative aggregate" means the number of eligible students in the accountable year and in each school year immediately preceding the accountable year until the minimum student count necessary to award points under this rule is reached.
- (14) "Department" has the meaning set forth in [IC 20-18-2-3](#).
- (15) "Eligible student" means a student who:
 - (A) was enrolled at the school for at least one hundred sixty-two (162) days in the accountable year;
 - (B) was tested on the mandatory statewide annual assessment, or the end of course assessment;
 - (C) was not a limited English proficient student who had been enrolled in schools in the United States for less than twelve (12) months; and
 - (D) obtained a valid test result.^[RCA(1)]
- (16) "English/language arts" means the subject area required to be tested under [IC 20-32-5-2\(1\)](#) on the mandatory statewide annual assessment.
- (17) "Feeder school" means an elementary school having any combination of kindergarten, grade 1, or grade 2.

- (18) "Grade" means data for a cohort of students who are at the same class level in the same year.
- (19) "Grade 10 cohort" means the class of students who are in their second year of high school.
- (20) "Grade 11 cohort" means the class of students who are in their third year of high school.
- (21) "Grade span" means the range of grades within the same school.
- (22) "Graduation cohort" means a class of students that is:
- (A) considered to have entered grade 9 in the same year; and
 - (B) expected to graduate three (3) years after completing grade 9.
- (23) "Graduation rate" has the meaning set forth in [IC 20-26-13-6](#).
- (24) "Growth domain" means the points awarded for scores of an eligible student on the mandatory statewide annual assessment administered in the accountable year, as compared with the scores of the same eligible student on the mandatory statewide annual assessment administered during the school year immediately preceding the accountable year.
- (25) "Growth to proficiency" means the expected annual growth toward a target in English/language arts and mathematics, as established by the board under this rule.
- (26) "Industry-recognized credential" means a certification or credential that is:
- (A) developed or supported by business and industry to verify student mastery of technical skills competencies in an occupational area that aligns with Indiana's economic sectors; and
 - (B) approved ~~under Indiana law~~ [by the department of workforce development](#)^[RCA(2)].
- (27) "International Baccalaureate examination" or "IB exam" means the examination created and administered by the International Baccalaureate, a nonprofit educational foundation headquartered at Route des Morillons 15, Grand-Saconnex, Geneva, CH-1218, Switzerland.
- (28) "Limited English proficient" as set forth in the definition provided in the No Child Left Behind Act of 2001, 20 U.S.C. 7801 (25) (2002), means an individual:
- (A) who is three (3) through twenty-one (21) years of age;
 - (B) who is enrolled or preparing to enroll in an elementary or secondary school;
 - (C) who was not born in the United States or whose native language is a language other than English;
 - (D) who is a Native American or Alaska Native, or a native resident of the outlying areas and:
 - (i) comes from an environment where a language other than English has had a significant impact on the individual's level of English language proficiency; or
 - (ii) is migratory, whose native language is a language other than English, and who comes from an environment where a language other than English is dominant; and
 - (E) whose difficulties in speaking, reading, writing, or understanding the English language may be sufficient to deny the individual:
- (i) the ability to meet the state's proficient level of achievement on state assessments described in 20 U.S.C. 6311(b)(3);
 - (ii) the ability to successfully achieve in classrooms where the language of instruction is English; or
 - (iii) the opportunity to participate fully in society.
- (29) "Mandatory statewide annual assessment" means the assessment required under [IC 20-32-5-2](#) and any alternatives to that assessment.
- (30) "Mathematics" means the subject area required to be tested under [IC 20-32-5-2\(2\)](#) on the mandatory statewide annual assessment.
- (31) "Multiple measures domain" means the points awarded for additional criteria as determined by the board, apart from performance and growth, by which school accountability is determined.
- (32) "Participation" means to complete and obtain a valid test result for the mandatory statewide annual assessment or the college and career readiness assessment option under this rule.
- (33) "Participation rate" means the percentage of students enrolled at the time of test administrations who completed the mandatory statewide annual assessment or the percentage of eligible students who completed the college and career readiness assessment option under this rule.^[RCA(3)]
- (34) "Performance and growth category" means the letter grade awarded to a school or school corporation as determined by the results of the mandatory statewide annual assessment, and other criteria as set forth in this rule.
- (35) "Performance domain" means the points awarded for the pass rate of eligible students on the English/language arts and mathematics portions of the mandatory statewide annual assessment.
- (36) "Pupil enrollment" has the meaning of "enrollment" set forth in [IC 20-26-13-3](#).
- (37) "Rate of improvement" means the number of students who, for each subject, did not pass the graduation qualifying exam (GQE) in grade 10 but passed the GQE by grade 12, divided by the number

of graduates who did not pass the GQE in grade 10.

(38) "Receiving school" means an elementary school or a high school that has at least thirty (30) students who were enrolled in:

(A) a feeder school for at least one hundred sixty-two (162) days in the year preceding the year being assessed; and

(B) a receiving school for at least one hundred sixty-two (162) days in the year being assessed.

(39) "School" has the meaning set forth in [IC 20-31-2-8](#).

(40) "School corporation" has the meaning set forth in [IC 20-18-2-16](#).

(41) "School year" has the meaning set forth in [IC 20-18-2-17](#).

(42) "Small school" means the following:

(A) An elementary school that has fewer than thirty (30) students who:

(i) were enrolled for at least one hundred sixty-two (162) days in the year being assessed;

(ii) were assessed on the mandatory statewide annual assessment in English/language arts and mathematics;

(iii) obtained a valid test result; and

(iv) were not excluded based on being a limited English proficient student that had been enrolled in school in the United States for less than twelve (12) months.

(B) A high school that:

(i) does not have data sufficient to calculate a score for grade 12; and

(ii) has fewer than thirty (30) students in the grade 10 cohort who were:

(AA) enrolled for at least one hundred sixty-two (162) days in the year being assessed;

(BB) tested on the mandatory statewide annual assessment;

(CC) obtained a valid test result, and

(DD) not excluded based on being a limited English proficient student that had been enrolled in school in the United States for less than twelve (12) months.

(43) "State college and career readiness factor" means the quotient of:

(A) the total achievable college and career readiness rate, one hundred percent (100%); and

(B) the annual college and career readiness goal for the state as established by the board.

(44) "State college and career readiness participation factor" means the quotient of:

(A) the total achievable college and career readiness rate, one hundred percent (100%); and

(B) the annual college and career readiness participation goal for the state as established by the board with sufficient notice to the graduation cohort.

(45) "Subgroup" means a group of at least thirty (30) students that falls into at least one of the categories under 34 C.F.R. sec. 200.13(b)(7)(ii) (2015).

(Indiana State Board of Education; [511 IAC 6.2-10-1](#))

[511 IAC 6.2-10-2](#) Growth to proficiency table

Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-8-4](#); [IC 20-31-10-1](#)

Affected: [IC 4-22-2-21](#); [IC 20-31-8](#)

Sec. 2. (a) Growth domain points shall be based on a growth to proficiency table as approved and published by the board.

(b) Prior to taking final action to approve the growth to proficiency table, the board shall do the following:

(1) Provide public notice of the growth to proficiency table at least thirty (30) days prior to taking final action.

(2) Accept and consider public comment.

(c) In taking final action to approve the growth to proficiency table, the board shall establish the date the growth to proficiency table is to take effect.

(Indiana State Board of Education; [511 IAC 6.2-10-2](#))

[511 IAC 6.2-10-3](#) Placement of schools in categories; overall framework

Authority: [IC 20-19-2-8](#); [IC 20-31-4](#); [IC 20-31-8-4](#); [IC 20-31-10-1](#)

Affected: [IC 20-31-8](#)

Sec. 3. (a) The board shall place a school in an accountability category annually. With the exception of schools that qualify for and elect the application of section 10 of this rule, placement shall be based on the results of the mandatory statewide annual assessment and other criteria as set forth in this rule.

(b) Performance and growth categories shall be awarded by the letter grades A, B, C, D, and F. Placement in a category is determined by the weighted averages of the performance domain, growth domain, and multiple measures domain as set forth in this rule. The following scale shall be used to determine a school's performance and growth category placement:

- (1) 90.0 – 100.0 points = A
- (2) 80.0 – 89.9 points = B
- (3) 70.0 – 79.9 points = C
- (4) 60.0 – 69.9 points = D
- (5) 0.0 – 59.9 points = F.

(c) The accountability framework used to calculate a school's performance and growth category shall include the following designated domains, as set forth in this rule:

- (1) Performance.
- (2) Growth.
- (3) Multiple measures.

(d) The weights of the performance, growth, and multiple measures domains, as set forth in this rule, shall be awarded as follows:

- (1) Pupil enrollment percentage shall be determined for the grade spans with associated data:
 - (A) grade 3 through grade 8; and
 - (B) grade 9 through grade 12.

(2) The weight of the performance domain for a school or school corporation shall be the sum of the following:

(A) The product of the pupil enrollment percentage for grades 3 through 8 and one (1) of the following:

- (i) ~~Sixty-Fifty~~ percent (~~5060~~%) for a school with sufficient data points to calculate the growth domain.
- (ii) One hundred percent (100%) for a school lacking sufficient data points to calculate growth domain.

(B) The product of the pupil enrollment percentage for grades 9 through 12 and one (1) of the following:

- (i) ~~Twenty-four~~ percent (~~204~~%) for a school with sufficient data points to calculate the growth domain and multiple measures domain.
- (ii) ~~Sixty-Fifty~~ percent (~~5060~~%) for a school with sufficient data points to calculate the growth domain but lacks sufficient data points to calculate the multiple measures domain.
- (iii) ~~Forty-Fifty~~ percent (~~5040~~%) [RCA(4)] for a school with sufficient data points to calculate the multiple measures domain but ~~that~~ lacks sufficient data points to calculate the growth domain.
- (iv) One hundred percent (100%) for a school lacking sufficient data points to calculate the growth domain and multiple measures domain.

(3) The weight of the growth domain for a school or school corporation shall be determined by the following:

(A) The product of the pupil enrollment percentage for grades 3 through 8 and ~~fifty-forty~~ percent (~~5040~~%) for a school with sufficient data points to calculate the performance domain and growth domain.

(B) The product of the pupil enrollment percentage for grades 9 through 12 and one (1) of the following:

- (i) ~~Twenty-Sixteen~~ percent (~~2016~~%) for a school with sufficient data points to calculate the multiple measures domain.
- (ii) ~~Fifty-Forty~~ percent (~~5040~~%) for a school that lacks sufficient data points to calculate the multiple measures domain. [RCA(5)]

(4) The weight of the multiple measures domain for a school or school corporation shall be determined as follows:

(A) For graduation rate, the product of the pupil enrollment percentage for grades 9 through 12 and one (1) of the following:

- (i) Fifty percent (50%) for a school lacking sufficient data points to calculate the performance and growth domains.
- (ii) Thirty percent (30%) for the graduation rate for a school with sufficient data points to calculate

performance and growth domains.

(B) For college and career readiness, the product of the pupil enrollment percentage for grades 9 through 12 and one (1) of the following:

(i) Fifty percent (50%) for a school lacking sufficient data points to calculate performance and growth domains.

(ii) Thirty percent (30%) for a school with sufficient data points to calculate performance and growth domains.

(e) A school shall not be awarded a letter grade of A unless it reduces achievement gaps in each subgroup by:

(1) Meeting Annual Measurable Objectives in each subgroup, or

(2) Showing improvement in performance in each subgroup as compared to prior year, or

(3) Showing improvement in growth in each subgroup as compared to prior year.^[RCA(6)]

(e)(f) Schools that meet the criteria for a letter grade of A, but fail to reduce achievement gaps in each subgroup as required by subsection (e) of this rule, shall be awarded a letter grade of B.

(g) If a school has too few students for an accountability category to be calculated, its accountability category shall be "null". A null designation by itself may not be used to intervene in the school or to impose financial or other consequences.^[MB7]

(Indiana State Board of Education; [511 IAC 6.2-10-3](#))

511 IAC 6.2-10-4 Performance domain

Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-8-4](#); [IC 20-31-10-1](#)

Affected: [IC 20-31-8](#)

Sec. 4. (a) The performance domain shall consist of an English/language arts indicator and a mathematics indicator. A school's final performance domain category placement shall be determined based on the weighted average of the awarded performance indicator points. The weight of the English/language arts indicator shall be fifty percent (50%) of the performance domain, and the weight of the mathematics indicator shall be fifty percent (50%) of the performance domain. Grades shall be assigned in accordance with the following points scale:

(1) 90.0 – 100.0 points = A

(2) 80.0 – 89.9 points = B

(3) 70.0 – 79.9 points = C

(4) 60.0 – 69.9 points = D

(5) 0.0 – 59.9 points = F.

(b) The English/language arts indicator for performance shall be determined in accordance with the following:

(1) Points shall be awarded for grades 3 through 10, respectively, where data are available. Points shall not be awarded for grades 11 and 12.

(2) A school must have at least thirty (30) eligible students in the accountable year to obtain English/language arts points.

(3) If a school does not have at least thirty (30) eligible students in the accountable year, the school's English/language arts points will be based on the results of the mandatory annual assessments of a cumulative aggregate of eligible students.

(4) Points awarded for English/language arts shall equal the product of eligible students that passed the mandatory statewide annual assessment for English/language arts and the assessment participation rate as follows:

(A) If the assessment participation rate on the English/language arts portion of the mandatory annual assessments is greater than or equal to ninety-five percent (95%), then the participation rate shall be one (1).

(B) If the assessment participation rate on the English/language arts portion of the mandatory annual assessments is less than ninety-five percent (95%), then the participation rate shall equal the participation rate in decimal form.

(c) The mathematics indicator for performance shall be determined in accordance with the following:

(1) Points shall be awarded for grades 3 through 10, respectively, where data are available. Points

shall not be awarded for grades 11 and 12.

(2) A school must have at least thirty (30) eligible students in the accountable year to obtain mathematics points.

(3) If a school does not have at least thirty (30) eligible students in the accountable year, the school's mathematics points will be based on the results of the mandatory annual assessments of a cumulative aggregate of eligible students.

(4) Points awarded for mathematics shall equal the product of eligible students that passed the mandatory statewide annual assessment for mathematics and the assessment participation rate as follows:

(A) If the assessment participation rate on the mathematics portion of the mandatory annual assessments is greater than or equal to ninety-five percent (95%), then the participation rate shall be one (1).

(B) If the assessment participation rate on the mathematics portion of the mandatory annual assessments is less than ninety-five percent (95%), then the participation rate shall equal the participation rate in decimal form.

(Indiana State Board of Education; [511 IAC 6.2-10-4](#))

511 IAC 6.2-10-5 Growth domain

Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-8-4](#); [IC 20-31-10-1](#)

Affected: [IC 20-31-8](#)

Sec. 5. (a) The growth domain shall consist of an English/language arts indicator and a mathematics indicator. A school's final growth domain placement shall be determined based on the weighted average of the indicator points. The weight of the English/language arts indicator shall be fifty percent (50%) of the growth domain, and the weight of the mathematics indicator shall be fifty percent (50%) of the growth domain. Grades shall be assigned in accordance with the following points scale:

(1) 90.0 – 100.0 points = A

(2) 80.0 – 89.9 points = B

(3) 70.0 – 79.9 points = C

(4) 60.0 – 69.9 points = D

(5) 0.0 – 59.9 points = F.

(b) The English/language arts indicator for growth shall be determined in accordance with the following:

(1) Points shall be awarded for grades 4 through 10, and grade 12, where test data are available.

(2) Points shall be awarded to grades 4 through 10 based on the average of the scores of all eligible students in the top seventy-five percent (75%) and the bottom twenty-five percent (25%) of each grade as follows:

(A) A school must have at least forty (40) eligible students in the accountable year to obtain growth points for the top seventy-five percent (75%) and bottom twenty-five percent (25%) of students.

(B) The bottom twenty-five percent (25%) must contain at least ten (10) of the forty (40) students.

(C) If a school does not have at least forty (40) eligible students in the accountable year, the school's growth points shall be based on the results of the mandatory annual assessments of a cumulative aggregate of eligible students.

(3) Points shall be awarded to grades 11 and 12 in a manner equal to the rate of improvement of students on the mandatory statewide annual assessment between the student's grade 10 cohort year and the student's expected graduation year. A school must have at least ten (10) students in the graduation cohort identified as not passing the mandatory statewide annual assessment by the end of the student's grade 10 cohort year, and identified as passing the mandatory statewide annual assessment by the student's expected graduation year as follows:

(A) Rate of improvement from Grade 10 to Grade 12 shall be calculated as follows:

1. Subtract the percentage of students in Grade 10 that passed the English/language arts assessment from the percentage of this same cohort of students that passed by the end of Grade 12.

2. Multiply that value by 10.^{RCA(8)}

(A)(B) If a school does not have at least ten (10) eligible students in its grade cohort, the school's rate of improvement will be based on a cumulative aggregate of eligible students in its

graduation cohort.

~~(B)~~(C) Regardless of where a student in grade 10 took the mandatory statewide annual assessment under subdivision (3), the student's passing score in grade 12 shall apply to the points received by the school where the student graduates.

(4) The overall points for English/language arts shall be the sum of all applicable grade span points.

(c) The mathematics indicator for growth shall be determined in accordance with the following:

(1) Points shall be awarded for grades 4 through 10, and grade 12, where test data are available.

(2) Points shall be awarded to grades 4 through 10 based on the average of the scores of all eligible students in the top seventy-five percent (75%) and the bottom twenty-five percent (25%) of each grade as follows:

(A) A school must have at least forty (40) eligible students in the accountable year to obtain growth points for the top seventy-five percent (75%) and bottom twenty-five percent (25%) of students.

(B) The bottom twenty-five percent (25%) must contain at least ten (10) of the forty (40) students.

(C) If a school does not have at least forty (40) eligible students in the accountable year, the school's growth points shall be based on the results of the mandatory annual assessments of a cumulative aggregate of eligible students.

(3) Points shall be awarded to grades 11 and 12 in a manner equal to the rate of improvement of students on the mandatory statewide annual assessment between the student's grade 10 cohort year and the student's expected graduation. A school must have at least ten (10) students in the graduation cohort identified as not passing the mandatory statewide annual assessment by the end of the student's grade 10 cohort year, and identified as passing the mandatory statewide annual assessment by the student's expected graduation year as follows:

(A) Rate of improvement from Grade 10 to Grade 12 mathematics shall be calculated as follows:

1. Subtract the percentage of students in Grade 10 that passed the mathematics assessment from the percentage of this same cohort of students that passed by the end of Grade 12.

2. Multiply that value by 10.

[RCA(9)]

~~(A)~~(B) If a school does not have at least ten (10) eligible students in its grade cohort, the school's rate of improvement will be based on a cumulative aggregate of eligible students in its graduation cohort.

~~(B)~~(C) Regardless of where a student in grade 10 took the exam under subdivision (3), the student's passing score in grade 12 shall apply to the points received by the school where the student graduates.

(4) The overall points for mathematics shall be the sum of all applicable grade span points.

(Indiana State Board of Education; [511 IAC 6.2-10-5](#))

[511 IAC 6.2-10-6](#) Multiple measures domain

Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-8-4](#); [IC 20-31-10-1](#)

Affected: [IC 20-31-8](#)

Sec. 6. (a) The multiple measures domain shall consist of a college and career readiness indicator and a graduation indicator. The weight of the college and career readiness indicator shall be fifty percent (50%) of the multiple measures domain, and the weight of the graduation indicator shall be fifty percent (50%) of the multiple measures domain. Points shall be assigned in accordance with the following scale:

(1) 90.0 – 100.0 points = A

(2) 80.0 – 89.9 points = B

(3) 70.0 – 79.9 points = C

(4) 60.0 – 69.9 points = D

(5) 0.0 – 59.9 points = F.

(b) The college and career readiness indicator for the multiple measures domain shall equal the product of the college and career readiness achievement score and the college and career readiness participation rate score. The maximum college and career readiness score is one hundred (100.0) points as follows:

(1) The college and career readiness achievement score shall be the product of the college and career readiness achievement rate and the state college and career readiness factor as follows:

(A) The graduation cohort, excluding any students who did not graduate in four (4) years or less, shall be used in determining a school's college and career readiness achievement score.

(B) A school must have at least ten (10) students in the graduation cohort to obtain a college and career readiness achievement score. If a school does not have at least ten (10) students in its graduation cohort, the school's rate of improvement will be based on a cumulative aggregate of students in its graduation cohort.

(C) A school's college and career readiness achievement rate shall be based on the percentage of students described in this subsection who accomplished any of the following:

(i) Passed an AP exam with a score of 3, 4, or 5.

(ii) Passed an IB exam with a score of 4, 5, 6, or 7.

(iii) Earned three (3) college credits as defined in section 1 of this rule.

(iv) Obtained an industry- recognized credential as defined in section 1 of this rule.

(D) A school's college and career readiness factor is determined by dividing one hundred (100) by the expected college and career readiness goal as defined by the board.

(2) The college and career readiness participation rate score shall ~~equal the product of the college and career readiness participation rate and the college and career readiness expected participation factor~~ be determined only if: ~~a~~ school ~~must have~~ has college and career readiness assessment data available at grade 11 to receive a college and career readiness participation rate score as follows:^[RCA(10)]

(A) The grade 11 cohort who were enrolled in the school for at least one hundred sixty-two (162) days of the school year shall be used in determining a school's college and career readiness participation rate score.

(B) A school's college and career readiness participation percentage shall be based on the percent of students described in clause A who have participated in a college and career readiness assessment during the accountable year.

(C) If the college and career readiness participation rate is greater than or equal to ninety-five percent (95%), then the participation rate shall be one (1).

(D) If the college and career readiness participation rate is less than ninety-five percent (95%), then the participation rate shall equal the participation rate in decimal form.^[RCA(11)]

~~(B)~~(E) If no college and career readiness participation rate data is available then the college and career readiness indicator shall equal the college and career readiness achievement score.

(c) The graduation indicator for the multiple measures domain shall equal the sum of the graduation rate score and the five (5) year graduation rate score as follows:

(1) The graduation rate score shall be determined based on the percentage of students that graduated from high school in four (4) years or less as follows:

(A) A school must have at least ten (10) students in the most recently finalized graduation cohort to obtain a graduation rate score. If a school does not have at least ten (10) eligible students in its graduation cohort, the school's rate of improvement will be based on a cumulative aggregate of eligible students in its graduation cohort.

(B) A school with a graduation rate that is at least ninety percent (90%) shall receive one hundred (100) points. A school with a graduation rate less than ninety percent (90%) shall receive points equal to the school's graduation rate.

(2) The five (5) year graduation rate score shall be determined based on the difference in the four (4) year graduation rate and the five (5) year graduation rate for the graduation cohort. A school must have four (4) year graduation rate points available to receive a five (5) year graduation score as follows:

(A) A school must have at least ten (10) students in the most recently finalized graduation cohort to obtain a five (5) year graduation rate score.

(B) The graduation cohort immediately preceding the most recently finalized graduation cohort shall be used to determine a school's five (5) year graduation rate score.

(C) Five (5) year graduation rate points shall be equal to the five (5) year graduation rate.

(D) Five (5) year graduation improvement points are not required to calculate the graduation indicator of the multiple measures domain.

(Indiana State Board of Education; [511 IAC 6.2-10-6](#))

[511 IAC 6.2-10-7](#) Feeder schools

Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-8-4](#); [IC 20-31-10-1](#)

Affected: [IC 20-31-8](#)

Sec. 7. (a) A feeder school's accountability category shall be based on the performance domain only.

(b) A feeder school's performance domain shall be based on the English/language arts and mathematics scores of the receiving school or schools.

(c) If more than five (5) receiving schools are identified for the feeder school, the five (5) schools with the highest census of feeder school students will be used to determine the feeder school's performance domain.

(d) A feeder school's English/language arts score is the percentage of eligible students that have passed the English/language arts exam in the receiving school or schools multiplied by one hundred (100).

(e) A feeder school's mathematics score is the percentage of eligible students that have passed the mathematics exam in the receiving school or schools multiplied by one hundred (100).

(f) Grades shall be assigned in accordance with the following points scale: (1) 90.0 – 100.0 points = A
(2) 80.0 – 89.9 points = B
(3) 70.0 – 79.9 points = C
(4) 60.0 – 69.9 points = D
(5) 0.0 – 59.9 points = F.

(Indiana State Board of Education; [511 IAC 6.2-10-7](#))

[511 IAC 6.2-10-8](#) School corporations; performance category

grade Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-8-4](#); [IC 20-31-10-1](#)

Affected: [IC 20-31-8](#)

Sec. 8. (a) The board shall assign each school corporation an overall performance and growth category in accordance with section 3 of this rule.

(b) Not more than one percent (1%) of the total tested population of students in the corporation may be counted as proficient on the alternative assessment to the mandatory statewide annual assessment.

(Indiana State Board of Education; [511 IAC 6.2-10-8](#))

[511 IAC 6.2-10-9](#) School changes due to opening, reopening, reconfiguring, or redistributing students; new accountability baselines

Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-10-1](#)

Affected: [IC 20-31-8](#)

Sec. 9. (a) This section applies to schools that:

- (1) open;
- (2) reopen;
- (3) reconfigure; or
- (4) redistribute students.

(b) To obtain a new accountability baseline, a school described in subsection (a) must clearly demonstrate all of the following:

- (1) An increase or decrease of at least seventy percent (70%) in the student population from the previous year.
- (2) A significant change in educational philosophy, curriculum, or staffing.
- (3) A change is not being made to avoid accountability.

(Indiana State Board of Education; [511 IAC 6.2-10-9](#))

511 IAC 6.2-10-10 New schools

Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-10-1](#)

Affected: [IC 20-31-8](#)

Sec. 10. (a) Except as provided in subsection (b), this section applies to schools that have:

- (1) been open three (3) years or less; and
- (2) not elected application of section 3 of this rule.

(b) This section does not apply to a feeder school or a small school.

(c) Section 5 of this rule shall be the exclusive means used in determining the school's final accountability category.

(Indiana State Board of Education; [511 IAC 6.2-10-10](#))

511 IAC 6.2-10-11 Review of category placement

Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-10-1](#)

Affected: [IC 20-31-8](#)

Sec. 11. A school or school corporation may petition for review of its accountability category placement based on objective factors the school or school corporation considers relevant because the annual assessment data do not accurately reflect school performance, growth, or multiple measures, as applicable. Objective factors include significant demographic changes in the student population, errors in data, or other significant issues including, but not limited to, errors in the application of this rule to determine an accountability category.

(Indiana State Board of Education; [511 IAC 6.2-10-11](#))

511 IAC 6.2-10-12 Atypical schools

Authority: [IC 20-19-2-8](#); [IC 20-31-4-17](#); [IC 20-31-10-1](#)

Affected: [IC 20-31-8](#)

Sec. 12. (a) For each atypical school, the department shall, without waiting for a request from the board, immediately provide to the board the following information for the grade levels served and available data:

- (1) Grade levels served by the school.
- (2) Data available.
- (3) Available models with current sample data for reference.

[RCA(12)]

(b) Based on the findings of the department and any other information available to the board, the board shall determine the school's accountability category.

(Indiana State Board of Education; [511 IAC 6.2-10-12](#))



INDIANA STATE BOARD OF EDUCATION

Final A-F Rule

Recommended Changes per Public Comment

Overview of Changes

1. Growth and Performance Weights to be Equal
2. Accountability Category of “A” Shall Only Be Awarded if Achievement Gaps are Addressed.
3. Schools too Small to Receive an Accountability Category Shall Not Have Consequences Imposed.
4. Atypical School Options to be Provided

1. Growth and Performance Weights to be Equal.

- ▶ Grades 3-8
 - ▶ Performance: 50%
 - ▶ Growth: 50%
- ▶ Grades 9-12
 - ▶ Performance: 20%
 - ▶ Growth: 20%
 - ▶ Multiple Measures: 60%

1. How Change Affects 2013 and 2014 Data

	2013	2014	2013 60% Perf/ 40% Growth	2014 60% Perf/ 40% Growth	2013 50% Perf/ 50% Growth	2014 50% Perf/ 50% Growth
A	44%	54%	31%	40%	33%	41%
B	20%	20%	41%	38%	40%	38%
C	17%	16%	21%	14%	20%	14%
D	12%	6%	6%	4%	5%	5%
F	7%	4%	2%	3%	2%	3%

2. Accountability Category of “A” Shall Only Be Awarded if Achievement Gaps are Addressed.

- ▶ A federal requirement.
- ▶ Achievement Gaps will be met by schools
 - ▶ Meeting Annual Measurable Objectives for each subgroup, or
 - ▶ Showing improvements in performance in each subgroup, or
 - ▶ Showing improvements in growth in each subgroup.
- ▶ If Achievement Gaps not addressed a letter grade of B shall be awarded.

3. Schools too Small to Receive an Accountability Category Shall Not Have Consequences Imposed.

- ▶ Changes to rule should make this rare.
- ▶ If a school has too few students for a grade to be calculated, a grade of “null” shall be awarded.
- ▶ A “null” designation by itself may not be used to
 - ▶ Intervene in the school, or
 - ▶ To impose financial or other consequences.

4. Atypical School Options to be Provided

- ▶ Atypical schools should be rare with the new model
- ▶ If a school does happen to be atypical and not fit the currently described school configurations the department shall provide for the SBOE the following information:
 - ▶ Grade levels served by the school,
 - ▶ Data available,
 - ▶ Available models with current sample data for reference.
- ▶ The SBOE shall then determine the school's letter grade to accurately and fairly reflect the school's performance and growth.

Sample of Comments

- ▶ 57 Comments to drop A-F accountability
- ▶ 59 Comments to pause A-F accountability
- ▶ 46 Comments to award low performance with high growth more points/not give extra points for high past performance, or to provide an opportunity for all students to earn full credit for growth points.
- ▶ 31 Comments to include growth such that there is a low correlation between performance and growth.
- ▶ 20 Comments to include individual growth.
- ▶ 18 Comments to weight growth and performance equally.
- ▶ 15 Comments to eliminate ISTEP+.
- ▶ 2 Comments that model is against public education.

Sample of Comments cont.

- ▶ Transportation costs related to school choice affect property values.
- ▶ Efficient use of funds.
- ▶ Need more local control; collaborate with local school boards, administrators, and teachers.
- ▶ Students who refuse to test, or simply turn in a blank test, should not be awarded a grade of “Did Not Pass,” and should not be counted as not passing in accountability. These students should receive a grade of “Undetermined” and be treated as not participating when calculating accountability. *(This was already part of rule, thus no change made.)*
- ▶ Students not evaluated should not be part of the calculation. *(This was already part of rule, thus no change made.)*
- ▶ Only those students who have attended the school being evaluated for the entire academic year should be included in the calculations. *(Rule uses students enrolled for 162 days, or 90% of school year, not days attended.)*
- ▶ Do not publish grades. Let parents make their own decisions about success of a school by publishing attendance rate, suspension rate, teacher experience, and graduation rate instead.

Questions?

Comment #	Requested Change	Change to be made	Category	Comments
1	comments to drop A-F Accountability completely		Accountability-general	2, 3, 4, 5, 9, 10, 12, 21, 22, 23, 26, 28, 29, 36, 37, 38, 41, 45, 46, 54, 55, 58, 61, 72, 74, 85, 86, 93, 94, 98, 99, 101, 102, 110, 113, 117, 122, 127, 136, 138, 139, 140, 141, 142, 143, 145, 147, 149, 151, 154, 156, 157, 158, 159, 175, 176, 182, 183, 184, 187
2	comments to pause A-F Accountability for 1 or 2 years.		Accountability-general	6, 19, 20, 21, 24, 27, 31, 33, 34, 35, 39, 40, 42, 44, 47, 48, 49, 50, 51, 52, 53, 75, 76, 77, 80, 81, 84, 88, 89, 96, 97, 112, 114, 115, 116, 118, 119, 120, 121, 123, 128, 130, 131, 132, 134, 152, 153, 174, 178, 179, 189, 191, 192, 193, 194, 195, 197
3	Transportation costs related to school choice affect property values.		Accountability-general	218
4	Efficient use of funds		Accountability-general	129, 163, 190, 200
5	ISTEP+ concerns regarding the new growth model, testing technology issues, and timing concerns are why accountability should be delayed for this year.		Accountability-general	34, 35, 39, 44, 47, 51, 53, 88, 155, 192, 197, 198
6	comments that model is against public education		Accountability-general	60, 104, 146, 203, 207
7	College and career ready assessment in May; frequency tables troubling that they will determine accountability grade. Previous accountability issues, year 5 implementation, year 4 had a graduating class, still assessed on 9-10 model. Not allowed to have bonus points on ECA growth. Arduous process regarding appeals.	The issue of having graduation rate always be a year in arrears has been discussed at length, but thus far we have not been able to find a solution that will not delay accountability results. Appeals process is in the process of being corrected such that issues witnessed this past year will no longer exist.	Accountability-general	193

8	Need more local control; collaborate with local school boards, administrators, and teachers.		Accountability-general	196, 197
9	The bill fails to maintain the core expectation that States and school districts will take serious, sustained, and targeted actions when necessary to remedy achievement gaps and reform persistently low-performing schools. The bill fails to identify opportunity gaps or remedy inequities in access to the resources and supports students need to succeed such as challenging academic courses, excellent teachers, and principals, after school enrichment or expanded learning time, and other academic and non-academic supports.	Language will be added to identify a school may not receive a letter grade of A unless achievement gaps in each disaggregation category are being addressed.	Achievement Gaps	80
10	Students who refuse to test, or simply turn in a blank test, should not be awarded a grade of "Did Not Pass", and should not be counted as not passing in accountability. These students should receive a grade of "Undetermined" and be treated as not participating when calculating accountability.	This change should be made.	Blank Tests/ Participation	59
11	Students not evaluated should not be part of the calculation.	This change would not be supported by USDOE	Blank Tests/ Participation	125
12	Only those schools who have attended the school being evaluated for the entire academic year should be included in the calculations.	Current performance is only based on students enrolled for 162 days, or 90% of the school year. Need to be sure this is also used for growth. Participation is based on all students enrolled at time of testing. Believe this is required by USDOE.	Blank Tests/ Participation	158

13	Do not publish grades. Let parents make their own decisions about success of a school by publishing attendance rate, suspension rate, teacher experience, and graduation rate instead.		Drop A-F Grades and Use Other Metrics	5
14	Unless Grade 12 Improvement can be included as a bonus, it should be entirely left out. The current language and sample calculations provided would negatively impact schools who did not have a percentage of students passing by the end of Grade 12. For schools serving the most struggling populations, or large populations of students with special needs, this may prove to be impossible. Even high performing schools with 90% passing by the end of Grade 10 would struggle to close the gap.	Grade 12 improvement should only be included as a bonus, with no more than 10 additional points to be added.	Grade 12 Improvement	62
15	Please provide a bonus option for ECA proficiency increases between 10th and 12th grade. It adds an incentive for schools with initially low passage rates to increase graduates without a waiver diploma. Reducing waiver diplomas has been a priority of the state for awhile.	Grade 12 improvement should only be included as a bonus, with no more than 10 additional points to be added.	Grade 12 Improvement	188
16	Within the Growth domain, the current language does not clearly specify the weighting between the Observed Growth points and the Improvement 10 to 12 points. Language should be updated to clearly reflect the balance of data between the two grade spans.	Update weighting language to ensure balance.	Grade 12 Improvement	168

17	<p>Specifically for grade 10 to grade 12 growth (or improvement), there needs to be better clarity on how this is calculated and then added to the final growth score. The percentage of grade 12 students who are proficient at the end of grade 12, and who were not proficient at the end of grade 10, should be added to the respective content overall growth score. The ability of schools to get students proficient from 10th to 12th grade is extremely difficult given these are the lower performing students. High Schools should be rewarded for continuing to develop the CCR skills of these students so they are eligible to graduate. We need to be sensitive to the area of growth/improvement for high schools given the high level of change occurring as we shift back to a GQE test with content yet to be determined. High schools continue to raise graduation rates and decrease the number of students needing remediation for higher education and this demonstrated improvement should be recognized and rewarded in the school grade model.</p>	Clarify improvement from Grade 10 to Grade 12.	Grade 12 Improvement	161
18	<p>The draft rule language is absent any reference to calculating the growth for the entire school. It is also absent how the final points are awarded for all growth indicators. This is true for grades 4-12. This section needs clarification and greater specificity.</p>	Clarify growth calculation for entire school and how final points will be awarded.	Growth calculation	161

19	Mildly Mentally Handicapped students with Iqs from 56-69 should not ge judged by the same standards as those students within the normal range of IQ. They should show growth, but it will not be the same growth.		Growth calculation	7, 118
20	While how students in a given school are performing on ISTEP+ is clearly an important metric (and may be shared with the public in a variety of ways), it is a very poor metric if the intent is to decribe what schools or teachers have contributed to learning. To calculate the contribution schools/teachers have made, it is eassential to measure a beginning point, an ending point, and a calculation of growth. How growth is calculated and whether all students should make the same amount of growth are debatable topics; however, the fact that growth ought to be the metric as opposed to performance is not (at least in the measurement community) debatable. To that end, the system should weight growth 100% and performance 0%. As the weighting of performance increases above 0%, the validity of the system will decrease.		Growth calculation	164, 173, 186

21	Consider the impact a 0 has on grading. Giving a "0" makes a huge impact on the average score and is not good practice.	Zero points will only be awarded for students who are not passing ISTEP+ and making low growth, which is an indication of going backwards, not that they grew, just not enough.	Growth calculation	14
22	requests to include individual student growth		Growth calculation	8, 27, 32, 33, 34, 35, 39, 44, 48, 49, 50, 51, 53, 66, 67, 73, 106, 111, 152
23	requests to include growth such that there is a low correlation between performance and growth		Growth calculation	15, 16, 17, 32, 32, 82, 93, 94, 95, 103, 105, 106, 109, 111, 124, 133
24	requests to weight growth 50% and performance 50%, or equally.		Growth calculation	15, 32, 63, 64, 65, 67, 163, 171, 172, 181a, 182b, 185, 214, 216
25	requests to award low performance with high growth more points/not give extra points for high past performance. Or to provide an opportunity for all students to earn full credit for growth points.		Growth calculation	25, 83, 100, 103, 104, 105, 107, 109, 112, 124, 135, 144, 162, 163, 179, 185, 186, 199, 215, 216
26	Norm reference problem for pass plus students. Need system that rewards each pass plus student with the maximum points from year to year. Problem using peer comparisons; not against sliding scale. Values table/draft rules, do not meet the needs based on peer comparisons.		Growth calculation	214, 215
27	Can SBOE explain how baseline calculation for growth scores be determined?	This will need to be part of communication to the field as we move forward.	Growth calculation	112, 205

28	4th grader scores 571, then in 5th grade scores a 571, why is that not considered growth? The same student who scores the same on a harder test is showing improvement/growth.	Acutally, since a "vertical scale" is used, such that scores in one grade can be compared with scores in another, a student who scores the same value in two years has not shown growth, and has actually shown a lack of growth and has gone backwards, since some increased score, even small, is expected.	Growth calculation	211
29	Seems to be a bell curve, what are benefits if the result is negative?		Growth calculation	198
30	IREAD testing - if student misses one day of testing, student will be retained in current grade level.	Not exactly accurate. School should make every effort to make up missed test within testing window, and should set the testing schedule so that a make-up day is available at the end, but also, a summer retest option is available for students who do not complete the test during regular March window.	IREAD-3 general	192
31	comments to eliminate ISTEP+		ISTEP+-general	2, 11, 30, 56/57, 70, 78, 133, 137, 150
32	IB exam should be dropped due to low overall performance.		Multiple Measures	125

33	Please consider adding a process for tech certification approval for accountability in the rule. Currently, theIDOE list is quite outdated, narrow, and does not reflect regional labor force needs. The process for update is unwieldy and slow. Describing a process and timeline for approval of certifications for accountability as well as encouraging broadness of the list by rule may be a possible solution.	Align tech certification approval with Adult Ed process and work with DWD to institute a process that will allow for new certifications to be in the process for approval year round.	Multiple Measures	188
34	The revised accountability system should reflect additional metrics to measure school success. From a High School perspective, the accumulation of credits could be considered as an additional indicator. Students that are on-track with high school credit accumulation or recovering credits could be awarded accordingly	Concern that it will be too easy for schools to game system with the awarding of credits in non-core areas.	Multiple Measures	166
35	While the proposed system effectively measures current student performance and growth, the reduction of remediation is not addressed. Additional consideration should be given to including a metric reflecting the reduction of remediation required at each grade level.	Incorporate metric for giving credit for schools requiring less remediation of students. Not sure what that metric would be or if even possible.	Multiple Measures	167

36	<p>When considering the participation percentage for the CCR grade 11 test, IASP would recommend setting this level at either 90 or 95%. This reflects the percentage levels already in use (or being recommended) and allows for those students who are not able to participate in one of the CCR tests in grade 11. Schools that achieve the percentage of students in this category should then be awarded full credit in the matrix. If a 100 point scale is being used, then schools would receive 100 points; this also mirrors what is being recommended in this draft rule.</p>	<p>Include language so that 95% participation on Grade 11 CCR tests is awarded full credit, similar to how participation is included in performance category.</p>	Multiple Measures	161
37	<p>Within the Multiple Measures domain, the current language does not specify the goal rate for grade 11 college and career ready participation. Similar to the participation factor in the Performance domain, a threshold of 95% should be established. If the participation rate is greater than or equal to the 95%, then a factor of 1 is used. If the participation rate is less than 95%, then the participation rate in decimal form should be used as the factor.</p>	<p>Include language so that 95% participation on Grade 11 CCR tests is awarded full credit, similar to how participation is included in performance category.</p>	Multiple Measures	165
38	<p>Appreciate dialogue with DOE and 11th grade test. Extremely concerned with 11th grade test, concern that no goal rate set.</p>	<p>Include language so that 95% participation on Grade 11 CCR tests is awarded full credit, similar to how participation is included in performance category.</p>	Multiple Measures	204

39	Section 6, part B to grade 11 deadline, would exclude seniors from being considered.	Grade 12 students are included in separate section. Grade 11 students only refers to participation in college career readiness assessment. CCR at Grade 12 includes the performance of these students on a College and Career Ready assessment.	Multiple Measures	177, 193
40	We have a multiple measures section of accountability for high school students which has no performance or growth ranking but only a participation portion figured into high school accountability. The current proposal gives high schools points towards an A-F model for students simply taking a test. The results do not matter in the current proposal, which is a waste of student seat time and tax payer resources to create and grade a test. I believe as we move forward in our discussion on the testing portion of accountability we need to look at areas to reduce required testing time and how to more equally balance a performance model for grades 3-8 and our high school model.	Grade 11 participation on a CCR assessment will be determined if an assessment is made available. This is included to promote the administration so that schools may provide remediation if necessary. This is not deemed to be punitive to schools if performance is not up to par. Growth will be part of the high school model once the new Grade 10 test is included.	Multiple Measures	68

41	I am worried about the definition of industry certification. It says "approved under Indiana law" or something like that. The problem is that there is nothing in IN law that defines who approves the list, this is in the current AF that we're replacing so it will be put in a place where there is no one defined to approve. I would suggest keeping it "as approved by the department" so as not to cause confusion.	This is being changed to "as approved by the department of workforce development," just like it will appear in the new Adult Accountability rule.	Multiple Measures	1
----	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------	-------------------	---

42	<p>As part of the NCLB waiver renewal process, Indiana is required to address "closing gaps" in performance and graduation for subgroups in the accountability system. Indiana is placing additional focus on closing achievement gaps. Schools that are not demonstrating that gaps in subgroup performance and graduation are closing cannot be awarded the highest accountability designation in the state. In order to provide a metric for measuring gap closure, the Department has reviewed best practice in other states as well as engaged the accountability stakeholder advisory group. A primary focus on selecting this metric was to ensure urban and low income schools do not experience bias in the calculation. For this reason, the Department has recommended the use of Annual Measurable Objective in each subgroup. A school who receives the highest category rating through the accountability calculation should either meet the Annual Measurable Objectives for each subgroup or show that the gap is closing through growth or achievement increases. Any school not meeting these criteria should not be placed in the highest level category.</p>	<p>Schools not meeting AMO as a way of indicating they are closing the "gaps" will not be awarded the highest grade of A, and will be dropped back to a B. If AMO is not met, other measures such as school being able to show that few students failing than previous year by subgroup should also be considered.</p>	Overall grade calculation	169
43	<p>The rule should be clarified to clearly state that if a school with a smaller student enrollment does not fit into an A-F letter grade category, then the school can be placed in a "null" or "no letter grade" category.</p>	<p>Clarity about small "n" size language and the inability to calculate grades should be included.</p>	Overall grade calculation	180

44	The proposed rule should be further clarified to state that in the event a school is placed in a "null" or "no letter grade" category, the school shall in no way be penalized or have additional requirements placed on the school or suffer any adverse consequences.	Clarity about not penalizing schools that receive a "null" grade should be included.	Overall grade calculation	180
45	Schools with a small student population should not be penalized because of the size of their student enrollment with regard to the assigning of an A-F letter grade or being placed in a "null" or "no letter grade" category.	Schools with small n-sizes that receive a "null" grade should not be penalized.	Overall grade calculation	144, 212, 213
46	Consequence for class size less than 30 students. Resource deficient; but want to serve those students whose parents choose to attend the school.		Overall grade calculation	209
47	For the past 4 years our school has received an A on its reportcard. Last year we were a 4 star school. This year however we received a null grade. The reason, we became a high school. Therefore we were changed to the small high school model. To continue to receive a grade we must have 30 kids in 10th grade. Since our high school is still small we may not get 30 in high school any time soon. We would like to receive a grade based only on our elementary and middle school if enough students are not enrolled in high school.	The new model should account for this, but language could be added to confirm that a grade results based on grade spans that do include a large enough count.	Overall grade calculation	69
48	Schools who do not meet new school definition, schools with speciality situations, any schools that do not fit neatly into rubric, could they be reviewed by third party committee?	The new model will continue to include language for Atypical Schools which will be reviewed separately by the SBOE.	Overall grade calculation	213

49	Range of quality teachers; so much of what teachers do cannot be measured in this system		Overall grade calculation	217
50	A-F System does not appear to be genuine. Include the numerical score with the letter grade.		Overall grade calculation	218
51	Success with 5 point scale, rather than new proposed scale as we look at standards. Problem with scale of 100 is there is not equal intervals for students; students at the bottom will continue to be at the bottom because a greater gap to move. Tied to teacher effectiveness, even more reason to analyze.	Research supports the use of a 100 point scale in that it is actually better than the use of the 5 point scale. With the 5 point scale, a school who has a performance of less than 60% passing is simply awarded 0 points, with a 100 point scale, the same school receives points based on that percentage below 60. So 45% passing is awarded 45 points, not 0 points. Some points is better than no points.	Performance	201
52	Put a metric that covers poverty into the A-F grading formula		Poverty Metric	48, 87, 92, 95, 108, 116
53	Giving our schools grades on A-F without taking into account the poverty that some kids live in does a disservice to the schools, teachers, and the very students who are struggling because of poverty.		Poverty Metric	18, 71, 109, 160, 175
54	Something to consider is how schools differ in their makeup...number of low income students, number of IEP students taking the test, and number of ILP students taking the test. These factors must not be overlooked when grading schools and teachers.		Poverty Metric	87, 93, 94, 139

55	Please consider all children when you are determining the various formulas for A-F grading of school districts. Please create a formula that balances out discrepancies between impoverished areas and high social economic areas.		Poverty Metric	43, 79, 95, 121, 126, 170
56	Model needs to be level playing field; believer in accountability and measurements. Equal accountability; measure growth of disadvantaged students; balanced to the lower performing student.		Poverty Metric	148, 199, 208
57	Student personal challenges are not measured in the current proposed growth model.		Poverty Metric	13, 199, 217
58	Flaws in proposed model. Marion has highest poverty rate in state of IN, Model is keeping disadvantaged at disadvantage.		Poverty Metric	202, 204
59	Model applauds haves; have-nots will continue to increase.		Poverty Metric	18, 92, 203
60	Concern regarding equity of all students in current model.		Poverty Metric	18, 91, 205
61	Against proposed model; data suggests our community will be penalized with proposed new model.		Poverty Metric	13, 204, 207
62	Fear communities like Marion will be punished by current model, Pass plus versus low performing students.		Poverty Metric	206, 208, 210
63	Federal and State government do not lower standards due to demographics in healthcare; but like a school system, we must serve all patients who come through the door.		Poverty Metric	120, 210

64	If public schools are to be rated using the A-F scale I also think private schools should be held accountable to the same rating scale.		Public and private to be evaluated in same manner	25, 90
----	-----------------------------------------------------------------------------------------------------------------------------------------	--	---------------------------------------------------	--------