
Examination of Indiana's A to F School Accountability Model

First Implemented in 2012 for the 2011-12 School Year

Report requested by:

Indiana Speaker of the House Brian Bosma

Indiana Senate President Pro-Tempore David Long

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Section I: Introduction

During the 2013 legislative session, the Indiana General Assembly passed HEA 1427, subsequently signed into law by Governor Pence. Among other provisions, the legislation revised Indiana's K-12 school accountability statute. In particular, it codified the A-F grading scale first incorporated by the Indiana State Board of Education (ISBOE) into administrative rules in 2010. In addition, the legislation required the ISBOE to revise the state's accountability system to measure individual student academic performance and growth to proficiency.

In late July of 2013, a series of news articles raised public concerns about the final grade determinations of certain schools, released in October of 2012 and applying to the 2011-12 school year. Subsequently, on August 2, 2013, Speaker Bosma and Senate President Pro-Tem Long requested a review of the accountability system that was adopted by administrative rule in April, 2012 and its implementation for the first time during the 2011-12 academic year. A copy of the August 2, 2013, Bosma/Long letter detailing the scope of the review, and naming John Grew and Bill Sheldrake to lead the examination is found in Appendix A. The report provided hereafter is the product of the efforts undertaken in accordance with the August 2, 2013, request for review.

In accordance with the requests of Speaker Bosma and Senate President Pro-Tem Long Sheldrake and Grew conducted interviews with nearly 20 persons inside and outside of government – some of whom were involved in the system's development. In addition, representatives of educational associations and educational practitioners were interviewed. Through this process, Sheldrake and Grew were able to develop a narrative description capturing their understanding of the process of developing and implementing the accountability rule from early 2010 through October, 2012. The resulting narrative is included in the report.

To assist in accomplishing the tasks provided by the August 2, 2013, letter and to reach the conclusions included with this report, Sheldrake and Grew, along with the Indiana Legislative Service Agency staff de-

veloped a computer program of the new metrics to allow for independent simulations of the 2012 Indiana Department of Education [IDOE] results.

The following report includes sections addressing each of the tasks outlined in the August 2, 2013, letter. As a matter of context, background and reference for the issues explored, the report also includes several documents attached in an appendix.

Both Sheldrake and Grew wish to express deep appreciation to those who participated in the process and interviewees. Three entities deserve special mention. First, the Speaker of the House and the President Pro Tem of the Senate were honorable in requesting an independent study, providing resources to accomplish the task, and leaving those carrying out the task entirely to ourselves as we undertook the study. The Indiana Department of Education under Superintendent Glenda Ritz went out of its way in providing access to data and prompt assistance as we carried out this work. The staff at the Legislative Services Agency contributed many hours in programming and research. Thanks to all for their assistance.

Section II: Executive Summary

Summary of Process Undertaken

To gain an understanding relative to the accountability system, the authors conducted interviews with current and former IDOE staff who were involved in system development as well as representatives of educational organizations. Through these interviews, a narrative description of the process of developing and implementing the accountability rule from early 2010 through October, 2012, was prepared and is included in Section IV of the report.

Also key to the project was the ability to independently run results for the accountability system and its two models and compare output (school grades) to the final grades issued by the IDOE in October, 2012. With the assistance of Legislative Services Agency staff, a program was developed that permitted use of IDOE data to produce various reports that enabled the authors to determine if the 2011-12 grades were awarded in accordance with the Bennett administrative rule. This process and findings are detailed in Section V of the report.

Report Findings

- 1) The authors found that IDOE under-estimated administrative and technical challenges associated with developing the new administrative rule, computer programming and testing necessary to implement the new rule, and obtaining feedback relative to 2011-12 grades.
- 2) Because the Bennett administrative rule did not contemplate all of the numerous school configurations in place during 2011-12, it was necessary for IDOE to make certain interpretations including the decision to eliminate HS. scores from the Christel House Academy's grade. The authors found that this interpretation was consistently applied to 16 other schools which had analogous situations.
- 3) The removal of the EMS "subject matter growth caps" impacted the final scores and grades of 165 schools. According to former IDOE staff, language in the final approved rule intended that there be no EMS subject matter caps, however, these caps were erroneously included in the computer programming of the model. This mistake was discovered and corrected prior to the September 19, 2012 embargoed release of school grades and related data.
- 4) With regard to the final disposition of the grade for the Christel House Academy, the authors heard from both Dr. Bennett's critics and supporters that his focus on the Christel House Academy was because of its widely accepted reputation as an excellent school, which functioned as a quality control indicator. However, when the school's grade was initially found to be a C, Dr. Bennett expressed surprise and dissatisfaction. These expressions prompted an energetic response to find solutions to what was perceived to be an unfair and inaccurate result. From the emails, it is apparent that IDOE staff worked diligently, over a period of several days in an effort to respond to this situation. In the end, the Authors found that the two adjustments administered to determine Christel House Academy's final grade were plausible and the treatment afforded to the school was consistently applied to other schools with similar circumstances.
- 5) Although efforts were made by Dr. Bennett and his staff to interact with educational stakeholders and practitioners, a significant portion of the educational community did not understand or trust in the accuracy or fairness of the Bennett Rule's Metrics, did not believe that the metrics represented essential accountability constructs, and did not believe that the Rule treated different school formats [public, private, charter] equally and fairly.

- 6) IDOE's ability to finalize the accountability system, perform quality control simulations, and to produce final output was clearly compromised by the loss of several key technical staff beginning in summer, 2011 through summer, 2012.
- 7) In part due to the loss of key IDOE technical staff, there was inadequate time to complete final programming and perform quality control work, prior to release of each school's final grades.

Recommendations

- 1) Disposition of 2011-12 Grades: The grades issued for 2011-12 should be corrected for errors discovered relative to high school grades for several schools and IDOE should publicize various IDOE interpretations of the administrative rule that were necessary to make grade determinations in cases in which the rule did not provide complete clarity.
- 2) Reporting of 2012-13 Grades: As required by statute, IDOE should proceed with finalizing and reporting results for 2012-13 as quickly as possible after reasonably assuring school administrators and the public regarding the integrity of the test results. Adequate time should be provided for vetting preliminary results, for schools to file appeals, and for IDOE to review and respond.

For the 2012-13 school year and subsequent years until the new accountability system required by HEA 1427-2013 is implemented, state policymakers should consider not subjecting a school to state interventions described in IC 20-31-9-4 due to a sixth consecutive year of placement in the lowest category or designation of school performance.

- 3) Developing a Revised Accountability System Under HEA 1427-2013: The authors observe and recommend:
 - A. The authors observe that the recently announced memorandum of understanding between the Governor, the General Assembly, and the Superintendent for establishing a collaborative process for development of a new accountability rule is an excellent step towards increasing support by the educational community and the public.
 - B. The process of development of a new system should:
 - 1. Provide for extensive involvement by experts and practitioners from the education community.
 - 2. Provide for transparency in all decision-making.
 - 3. Result in development of a new system that is as simple as possible, more easily understood, and equitable.
 - C. In compliance with HEA 1427 - 2013, the new accountability system should incorporate measures that involve less reliance on standardized tests passage rates and more reliance on individual student growth based on criterion-referenced measures.
- 4) Further Recommendations regarding the Revised Accountability System:
 - A. Additional measures for the EMS model should be included, besides the two student test measures, that provide additional indicators of school performance.
 - B. Because of the complexity involved in implementing any new accountability system, the system should be piloted prior to implementation, if possible, permitting IDOE to solicit and receive extensive feedback from schools, adequately perform programming

tests, and evaluate policy components incorporated into the system.

- C. In order to ensure that the legislative branch has the capability to perform analyses on the new accountability system, LSA staff should be provided with ongoing access to all data and computer programming necessary for it to replicate results and respond to various inquiries from legislators about the system.

Section III: Accountability and Assessment in Indiana

PL 221 to the Bennett Accountability System

Key school accountability legislation was enacted during the 1999 session of the Indiana General Assembly. PL 221 (HEA 1750) established a school accountability program with the goal of initiating continuous school improvement. The bill also required the Indiana State Board of Education (ISBOE) to develop a method to assess and report school performance and included state interventions if school improvement was not achieved over a specified number of years. Also enacted during the 1999 legislative session was PL 146 (SEA 235), which established the Education Roundtable and charged the IDOE and the ISBOE with responsibility for adopting academic standards for every grade level (K-12) for specified subject matters.

During the 2013 legislative session, the Indiana General Assembly passed HEA 1427, which along with other provisions, revised Indiana's K-12 school accountability statute. In particular, it codified the A-F grading scale first incorporated by the Indiana State Board of Education (ISBOE) into administrative rule in 2010. In addition, the legislation requires the ISBOE to revise the state's accountability system to measure individual student academic performance and growth to proficiency. These revisions were enacted due to some concerns relative to implementation of the new accountability system that was first used to issue grades to schools for the 2011-12 academic year.

A legislative history of school accountability and related administrative rulemaking prepared by the Legislative Services Agency is attached in Appendix B.

What is the A-F Bennett Accountability Rule?

As described in detail in Section IV of the report, the Bennett accountability rule, adopted in April, 2012, involved more than a two year process of development and implementation. Under the rule, most schools are assessed for performance according to two standard models - an elementary and middle school (EMS) model and a high school (HS) model. The EMS model relies on measures of student passage rates on standardized English language arts (ELA) and math tests and also rewards schools for student growth. The HS model includes four measures. First, it measures passage rates on 10th grade end of course assessments (ECA) in English 10 and Algebra 1 as well as student growth in these subject matters. Second, it measures passage rates on both ECA tests by students who initially did not pass these tests in 10th grade, but do pass by graduation. Third, the model measures high school graduation rates. Fourth, the model measures college readiness based on four indicators.

The three primary configurations for evaluating schools are elementary/middle school, high school and combined school, but the administrative rule recognizes that some schools are not composed of standard grades and thus the rule addresses alternative models for some of these schools.

Section IV: Development and Implementation of Bennett Accountability System

Introduction

According to former Superintendent of Public Instruction, Dr. Tony Bennett, he first sketched out the elements for a new accountability system on a napkin and stated that a primary goal was to permit Indiana to be relieved of the accountability standards set out in the federal legislation, *No Child Left Behind* (NCLB). Specifically, Dr. Bennett desired that Indiana be subject to a single accountability system, not both a state and federal system – and one designed to Indiana’s needs. This was a primary motivation behind Indiana seeking and eventually being granted a waiver by the U.S. Department of Education.

Initial Development of the New Accountability System

Through insights gained from interviews with and information provided by current and former IDOE staff, the following discussion summarizes key Indiana Department of Education (IDOE) activities pursuing development of the new accountability system during 2010 through final adoption of administrative rule, 515 IAC 6.3-6-0.5 in April, 2012, and then through final implementation of the rule and release of grades under the new system in October, 2012.

Shortly after Dr. Bennett assumed the position as Indiana State Superintendent of Public Instruction, discussions ensued on development of a new accountability system. In addition to the desire to have a single accountability system (as discussed above), there was recognition that there were limitations to the then-existing state accountability system. In particular, reliance on test passage rates created an incentive for schools to concentrate on improving the academic success of students that were close to passage while pursuit of academic improvement by other students scoring at lower rates was not incented. Specifically, a school could more easily improve student test passage rates by concentrating its efforts working with those

students who did not pass the test, but scored close to passage. Thus, there was recognition that it was essential to incorporate a student growth measure into a new accountability system that would incent assess academic progress for all students.

After the initial conceptual framework for a new accountability system was outlined, the IDOE convened advisory work groups to assist with further development. Because it had been determined that the new system should include two separate models addressing elementary/middle school (EMS) and high school performance, two work groups were established. According to a list of participants provided by IDOE staff, the EMS work group was composed of a superintendent, principal, and a higher education policy expert while the high school work group was primarily composed of principals, the Director of the Indiana Association of School Principals, and a school corporation superintendent.

Jeff Zaring, long-time Indiana State Board Administrator, led the initial system development work, having also assumed responsibility for a new accountability office within IDOE. The two work groups met periodically during initial system development providing input and advice to IDOE on development of the accountability system.

Meanwhile, during spring, 2010, the IDOE and the Indiana State Board of Education (ISBOE) completed a revision to the original “PL 221 accountability rule” by essentially changing the nomenclature for characterizing a school’s performance from classifications ranging from “Exemplary” to “Academic Probation,” to letter grades “A to F”. In comments to the ISBOE at its May 5, 2010 meeting, Dr. Bennett stated that the change in nomenclature was intended to “...make our accountability system easy for communities to understand.” The ISBOE approved the new rule at its August 7, 2010 meeting.

Development of the new accountability system continued throughout 2010 and ISBOE meeting minutes note that there were several briefings provided by the Superintendent and IDOE staff throughout the year. Following the 2011 legislative session, Jeff Zaring retired and Molly Chamberlin assumed the role of accountability officer and responsibility for developing the new accountability system. Chamberlin and her staff continued development of both the EMS and HS models and began internal simulations of school results during spring, 2011. The first step of the process involved translating initial administrative rule drafts for the new accountability system into a “logic document”. This process involved preparing a narrative to describe the step by step model of calculating a school’s grade based on student data reported by schools and maintained by IDOE in a large data base. The next step involved translating the logic document into computer software which would then produce computer-generated individual school grades under the proposed system.

Molly Chamberlin left the IDOE (along with the primary computer programmer working on the new accountability system) in summer 2011 and was succeeded by Jon Gubera. Under Gubera, final accountability system development, which included a number of revisions to the EMS and HS models, took place throughout the remainder of 2011, and culminated in presentations to the ISBOE at its October 5 and November 7 meetings. At the October meeting, IDOE staff provided the ISBOE with a detailed explanation of both the EMS and HS models. ISBOE members provided feedback and requested that certain revisions be made to the models. IDOE staff incorporated these revisions in revised models that were presented to the SBOE during the November 7 meeting, which were approved, along with proposed administrative rule language.

Throughout 2011, while the accountability office was continuing development of the EMS and HS models, IDOE attorneys worked on language for a revised administrative rule for the new accountability system. With ISBOE approval of a proposed rule at its November 7, meeting, the public comment period was

initiated and IDOE sought and obtained electronic comments via its website and through email, and provided an opportunity for public testimony at a public hearing held on January 17, 2012. During the public hearing, more than 30 persons testified, nearly all expressing concerns with the proposed rule. In addition, numerous comments were submitted electronically. IDOE summarized comments into numerous categories and tabulated the number of responses received in each category as detailed in Appendix C.

Subsequent to the public hearing, only a few changes were made to the proposed rule. Most concerns expressed by those that provided testimony at the hearing were not addressed with revisions. A final version of the rule was approved by the ISBOE at its February 8, 2012 meeting. After completing the process of review by the Indiana Attorney General’s office, the rule was approved by the Governor’s office on April 16, 2012.

On February 9, the day after the ISBOE approved the final accountability system rule, the U.S. Department of Education approved IDOE’s application for a waiver from the accountability standards set out in federal legislation commonly called *No Child Left Behind*.

IDOE attempted to afford schools the opportunity to assess how they might be graded under the new accountability system. On January 27, 2012 IDOE issued a memo announcing the release of simulated results for the new accountability system using prior year (2010-11) student data. While the memo stated a number of caveats regarding the simulation, it said that the effort was intended to provide schools with a close approximation of results under the new accountability system. On March 2, IDOE also announced that it had developed a “workbook” that was intended to permit schools to calculate its approximate grades under the new model, which had by then been formally adopted by the ISBOE.

Implementation of the Final Rule and Publication of School Grades for 2011-12

Implementation of the rule involved the translation of the rule into a “logic document” and then translating that document into scripts, or computer programming language. Unfortunately, beginning with the departure of Molly Chamberlin in summer, 2011, and continuing through summer, 2012, IDOE lost several key technical staff that had been involved in early development of the computer logic and scripts. In order to complete final computer programming during summer, 2012, contract specialists were employed by IDOE.

As with development of any new system, it was necessary for IDOE to produce many trial runs of the system to ensure consistency with the rule and the integrity of results produced. As reported by Gubera, “As models are run and as ambiguities, inconsistencies, conflicts, or gaps are identified, the team first reexamined the logic and finally the scripts to resolve any issues. Identified errors were corrected and results updated prior to and during the embargoed preliminary release of results to schools and corporations.” IDOE explained that were at least five major system issues that were identified requiring resolution by the IDOE team working on the accountability system during the summer, 2012:

- First, there was a vendor issue involving missing IMAST test results.
- Second, growth scores for a large number of students (primarily 4th grade) at a number of schools required re-running the growth model.
- Third, it was discovered that some old end of course assessment (ECA) results from prior Graduate Qualification Exam (GQE) results were missing and needed to be located.
- Fourth, the issue of the elimination of the subject matter growth caps (4.00 points limit) was discovered, as explained in Section V.
- Fifth, additional ambiguities were found with the rule relative to unusual school configurations.

On September 19, 2012 Gubera issued a memo to superintendents and school principals announcing that embargoed preliminary grades for schools under the new accountability system for the 2011-12 year were posted on the IDOE’s secure website, the *Learning Connection*. Schools were able to access student level data to determine how the school’s various scores and final grades were determined and were able to raise questions and issues regarding the results with the IDOE staff.

In the September 19 memo, schools were instructed that they could file appeals of grades through October 3. On October 2 IDOE issued a memo extending the appeals filing deadline to October 24. From September 19 through October 29, IDOE reviewed and responded to all such inquiries and appeals and made revisions it deemed appropriate. At its October 30, 2012 meeting, the ISBOE approved final school scores and grades for 2011-12, which were then publicly released.

Section V: Evaluating the 2012 Accountability System and Results

The A to F Accountability Model developed by the DOE under Dr. Bennett [the “Model”], is both a rules based system expressed in words but also a quantitative system, which, in order to be implemented must be expressed mathematically and implemented in a computer program. Because the mathematical outworking of the New Rule was challenged as difficult to understand and because the actual programming of the model was a challenge to the DOE during the rollout of the grades in 2012, the Authors requested that the Legislative Services Agency’s staff undertake the activities of accessing the student data from the DOE and construct a computer program of the model to ensure that the results provided by DOE in October of 2012 were an accurate expression of the legislation and administrative rule.

The Model was developed on the DOE computer, with data access provided to LSA staff, using MS Sequel. LSA staff worked with DOE to ensure that all student data changes, many of which had been approved as a result of school appeals in the fall of 2012, were expressed in the dataset available to LSA for making the computations.

The output from the student analysis was aggregated by school and entered into MS Excel spreadsheets to undertake the school by school comparisons and to compute each school’s grades. In addition, DOE provided grade configuration data for School Years 2010-11, 2011-12, and 2012-13. This was analyzed to determine which schools were undergoing transitions – adding grades or in other ways changing configuration. A list of these schools is presented in Table B, below.

School Year 2011-12 Implementation

DOE finalized the Model with respect to the rules in January of 2012 and began translating the language of the administrative rule into a set of logic statements that could be used to guide programmers in constructing the actual computer application of the Model. The Model utilizes student data with approximately 400 records per student, with a total student population of around 1.1 million each year.

Table A - Schools and Enrollments by Type

School Types and Configurations	No. of Sch's in 2011	Student Enrollment in 2011	No. of Sch's in 2012	Student Enrollment in 2012	No. of Sch's in 2013	Student Enrollment in 2013
Elementary/Middle School	1,633	726,456	1,637	734,302	1,653	742,089
Traditional	1,386	665,965	1,397	670,000	1,393	668,685
Charter	43	15,365	45	20,133	44	23,761
Private	204	45,126	195	44,169	215	49,271
Other	-	-	-	-	1	372
High School	280	289,412	277	285,595	280	283,381
Traditional	244	272,668	245	270,008	244	265,856
Charter	6	1,700	7	2,529	6	2,811
Private	29	14,749	24	12,761	29	14,248
Other	1	295	1	297	1	466
Combined School	141	72,507	140	72,198	137	68,942
Traditional	107	59,103	107	58,292	103	53,723
Charter	9	5,237	9	5,289	9	5,559
Private	22	7,130	21	7,581	22	7,858
Other	3	1,037	3	1,036	3	1,802
Not Graded	86	16,223	73	4,823	118	12,315
Traditional	47	13,529	44	3,094	45	5,237
Charter	3	336	4	301	13	1,605
Private	36	2,358	25	1,428	60	5,473
Other	-	-	-	-	-	-
Total	2,140	1,104,598	2,127	1,096,918	2,188	1,106,727

This report evaluated with special interest, the changes that have been reported in the media and were alleged to have assisted Christel House Academy. Those two changes in treatment are:

- 1) A change in evaluation category from Combined School to Elementary/Middle School. This change in treatment meant that Christel House Academy and any other school to which this change was applied, would only be graded on their Elementary/Middle School performance.
- 2) The removal of the “subject matter growth caps” in calculating the Math and ELA scores for their EMS grade.

The project team ran the model without the above changes and with those changes to make the following determinations.

- 1) Were the changes actually made?
- 2) Did the changes result in the “reported” differences in grades?
- 3) Were the changes applied uniformly across the school population?
- 4) Was there a reasonable justification for the changes in treatment?

Configuration Change

Christel House Academy was initially being treated as a Combined School, because in the 2011-12 school year, it had added a 10th grade level. In other words, it moved from a grades K through 9th school to a grades K through 10th school from 2011 to 2012. The project team found 16 other schools that added one or more high school grade levels in the 2012 school year. However, because the High School evaluation requires 4 data measurements, only one of which is the 10th grade ISTEP test, Christel House Academy and the other 16 schools had incomplete data sets, which would cause an unfair determination of high school performance. As a result, DOE determined in 2012 to evaluate these schools only as EMS schools.

Removal of the Growth Caps

In the calculation of a school's grades for ELA and Math there is a growth factor which may be applied and which is explained in Appendix D. This factor credits the school with moving its students' scores on the ELA and Math portions of the ISTEP upward, even though those students may not yet have achieved their required grade level proficiency. The computerized version of the Model retained a cap at "4.0" through the Model's implementation phase [late summer or early fall of 2012] even though DOE had determined and the rule reflected that determination to remove the subject matter growth caps. Some schools, particularly those drawing significant students from urban environments, were helped by the removal of the caps.

Table B - 2012 Configuration Modifications with DOE Rationale

School	Grade	Grade Configuration 2012	Configuration 2011-12		Rationale
	Configuration 2011		Treatment in 2011-12	Final Grade	
Anderson Preparatory Academy	6th-10th in 2011	K-12th in 2012	EMS	D	Missing HS data
Career Academy at South Bend	n/a	7th-12th	EMS	F	First year school
Christel House Academy	K-9th in 2011	K-10th in 2012	EMS	A	Missing HS data
Christian Academy of Madison	n/a	PK-10th	SEMS	B	Too few students; Missing data
Cornerstone College Prep Sch	n/a	PK-12th	EMS	F	First year school
East Chicago Lighthouse	K-8th in 2011	K-9th in 2012	EMS	D	Missing HS data
Eman Schools	PK-10th in 2011	Missing Data in 2012	EMS	A	Missing HS data
Gary Lighthouse Charter School	K-10th in 2011	K-11th in 2012	EMS	F	Missing HS data
Gateway Woods School	n/a	5th-12th	SEMS	NULL	Too few students
Hammond Acad of Science & Tech	6th-9th in 2011	6th-10th in 2012	EMS	F	Missing HS data
Heritage Christian School	n/a	PK-12th	EMS	A	Missing data
Hoosier Acad Virtual Charter Sch	1st-6th in 2011	K-12th in 2012	EMS	F	Missing HS data
Indiana Connections Academy	1st-8th in 2011	K-12th in 2012	EMS	D	Missing HS data
Indiana Math & Science Academy	K-11th in 2011	K-12th in 2012	EMS	B	Missing HS data
Indpls Lighthouse Charter School	PK-10th in 2011	PK-11th in 2012	EMS	C	Missing HS data
International School of Columbus	7th-10th in 2011	7-11th in 2012	EMS	B	Missing HS data
LEAD College Prep	5th-9th in 2011	5th-10th in 2012	EMS	F	Missing HS data
Monument Lighthouse Charter Schl	K-8th in 2011	K-9th in 2012	EMS	D	Missing HS data
New Tech Institute	9th only	9th-10th	9-10 model	D	Id'd as a HS 9-10 only model
Richmond Academy	PK-11th in 2011	Missing Data in 2012	Not Graded		Missing data
The Bloomington Project School	K-8th in 2011	K-9th in 2012	EMS	C	Missing HS data
West Gary Lighthouse	K-9th in 2011	K-10th in 2012	EMS	F	Missing HS data
Willowglen Academy	n/a	6th-12th	SEMS	NULL	Too few students; Missing data

The project team computed all schools' grades with the caps in place and with them removed. At the EMS level, 165 schools saw an increase in their letter grades as a result of removing the caps. For the HS level, because there were other metrics besides the subject matter scores, the caps' removal made for fewer differences. Three high schools received higher letter grades. A listing of these schools, both EMS and HS is provided in Appendices E and F.

Although the removal of the HS caps is consistent with the treatment of growth caps of the EMS schools, the rule with respect to the HS calculation is clear in requiring the subject matter caps to be in place. While IDOE's decision did not affect many schools, it is an administrative issue that should be reviewed for HS grading in future years.

In regard to the Combined Schools, the cap was not an issue, as the rule is clearer with regard to the elimination of the caps for both the subject matter calculation and the EMS and HS averaging calculation. In the case of Combined Schools there was no question of changed administration of the rule

Section VI: Disposition of Christel House Academy Grade

Due to the publication of news reports regarding the initial determination of the grade awarded to the Christel House Academy and the final determination of the school's grade, it is essential to discuss this matter in great detail.

There were two interpretations of the administrative rule that resulted in the initial Christel House Academy "C" grade being changed to an "A" in the final grade determination. First, a cap on the EMS ELA and math scores was eliminated. Second, because Christel House Academy's high school metrics were incomplete, a determination was made to treat it solely as an Elementary/Middle School.

Elimination of EMS ELA and Math Scoring Cap

DOE personnel informed the authors that in earlier versions of the EMS model, a scoring cap of 4.00 was applied to both the ELA and math subject matter growth factors. The reasons given were, first that schools should be recognized for student achievement gains and be permitted to claim the entire amount of bonuses earned for student growth. A contrary view was that outstanding performance in one subject matter should not be permitted to overshadow poor performance in another subject matter.

For example, if a school only scored 2.00 on the ELA test but earned a 5.50 on the math test. The application of the cap to the growth factor would yield a combined score of 6.00, and the school would receive a B. However, if the cap is removed on the math score the combined score would yield 7.5, and the school would receive an A. The first viewpoint prevailed and the ELA and math scoring caps were eliminated from the EMS model.

Unfortunately, the decision to eliminate the ELA and math scoring caps was not implemented and the caps were inadvertently left in the EMS modeling software until late summer, 2012.

It seems plausible that the intense final review of the accountability system taking place during early to mid-September that followed the initial determination that Christel House Academy earned a grade of C, resulted in the discovery that the computer program should not have included the EMS subject cap and it was revised to eliminate it.

Elimination of the High School Score

The Christel House Academy along with approximately 20 other schools were transitioning from one grade configuration to another. Christel House had been a K through 9th grade school in 2010-11, and added a 10th grade in 2011-12. Christel was becoming a Combined School – which is the configuration for a single school with both elementary/middle grades as well as high school grades. This requires all of the data elements for an EMS and for a HS, however Christel House Academy was missing three of the four HS elements. Christel House and the other schools in a transition phase had only the 10th grade subject matter scores. Because of the missing HS data, it was determined to treat Christel House and the other transition schools as solely EMS schools, to be evaluated on their complete dataset for EMS. The list of schools given special accommodation or treatment due to the missing data for either HS or other reasons is provided in Table B.

In summary, the combination of the removal of the subject matter growth caps for EMS schools, and the change in treatment of Christel House Academy [and other transitioning schools] raised the grade from a "C" to an "A".

Authors' Conclusions

From a review of the emails in early September, it is clear that Dr. Bennett was keenly interested in learning the grade for the Christel House Academy as soon as it was finalized. (Through our interviews, we learned that Dr. Bennett had been under considerable pressure to design an accountability system that was

not deemed harsh to charter schools or urban schools. In response to such concerns, he repeatedly stated that Christel House Academy, which was widely viewed as a successful charter school in an urban environment, would do well under the new system.) When the school's grade was initially determined to be a C, it was a surprise to Dr. Bennett and senior DOE staff. The efforts to "raise the Christel House grade" was, according to a wide range of testimony, both an attempt to save the credibility of the New Accountability Model and a desire to treat a recognized good school fairly. Any further motivations underlying these actions are beyond the scope and documentation of this report.

Section VII: Findings and Recommendations

Findings

- 1) The authors found that IDOE under-estimated administrative and technical challenges associated with developing the new administrative rule, computer programming and testing necessary to implement the new rule, and obtaining feedback relative to 2011-12 grades.
- 2) The New rule did not contemplate the many school configurations and the incomplete data status of schools that were transitioning from one configuration to another. The accommodations made to Christel House Academy were consistently applied to at least 16 other schools which had analogous situations. [Schools, including Christel House Academy, with some high school grades, but not complete high school metrics, were graded on their EMS scores alone.]
- 3) In discussions with school administrators and other education stakeholders going back to at least mid-2011, the subject matter growth caps were debated as either unfairly penalizing some schools or hiding mediocrity in others. According to DOE management staff, the removal of the growth caps was indicated by the language of the final approved rule, but erroneously not implemented in the computer programming of the model. This mistake was found in the final weeks prior to the embargoed release of the grades' data to the schools on September 19, 2012.
- 4) With regard to the final disposition of the grade for the Christel House Academy, the authors heard from both Dr. Bennett's critics and supporters that his focus on the Christel House Academy was because of its universal reputation as an excellent school, which functioned as a quality control indicator. However, when the school's grade was initially found to be a C, Dr. Bennett expressed surprise and dissatisfaction. These expressions prompted an energetic response to find solutions to what was perceived to be an unfair and inaccurate result. From the emails, it is apparent that IDOE staff worked diligently, over a period of several days in an effort to respond to this situation. In the end, Authors found that the two adjustments administered to determine Christel House Academy's final grade were plausible and the treatment afforded to the school was consistently applied to other schools with similar circumstances.
- 5) Although efforts were made by Dr. Bennett and staff to interact with educational stakeholders and practitioners prior to the release of the final grades on October 31, 2012 a significant portion of the educational community expressed the following:
 - A. Did not believe that the New Rule's metrics accurately or fairly reflected a school's performance.
 - B. Did not believe that the New Rule treated different school formats [public, private, charter] equally and fairly.
- 6) Due to the staff turnover discussed in the subsection above, there were limitations to IDOE's technical capability, including computer program code development, to complete work necessary to produce grades for 2011-12. IDOE's ability to finalize the accountability system, perform quality control simulations, and to produce final output was clearly compromised by the loss of several key technical staff beginning in summer, 2011 through summer, 2012.
- 7) In part due to the loss of key IDOE technical staff, there was also inadequate time for final implementation of the accountability system from final adoption of the administrative rule in spring, 2012 to the October 30 release of 2011-12 academic year grades. There simply needed to be more time to

complete final programming and perform quality control work, prior to release of each school's final grades. Some of the quality control work was still being performed after the release of embargoed data on September 19. Thus, this work was ongoing while schools were reviewing and submitting questions and appeals

Recommendations

1) Disposition of 2011-12 Grades

- A. The grades issued for 2011-12 should be corrected for errors discovered relative to high school grades for several schools.
- B. Before publishing grades for 2012-13, IDOE should publicize various interpretations of the administrative rule that IDOE found necessary to make grade determinations in cases in which the rule did not provide complete clarity.

- 2) Reporting of 2012-13 Grades: As required by statute, IDOE should proceed with finalizing and reporting results for 2012-13 as quickly as possible after reasonably assuring school administrators and the public regarding the integrity of the test results. Adequate time should be provided for vetting preliminary results, for schools to file appeals, and for IDOE to review and respond.

For the 2012-13 school year and subsequent years until the new accountability system required by HEA 1427-2013 is implemented, state policymakers should consider not subjecting a school to state interventions described in IC 20-31-9-4 due to a sixth consecutive year of placement in the lowest category or designation of school performance.

3) Developing a Revised Accountability System Under HEA 1427-2013

Given the changes passed in HEA 1427 enacted in 2013, with the brief time span available to make revisions to the new accountability system, we recommend the following.

- A. The authors believe that visible steps or measures to ensure a closer interaction between the Indiana General Assembly and the Indiana DOE and the Governor's Office are necessary for increasing the educational

community's and the public's acceptance of the new system. We believe that the recently announced memorandum of understanding between the Governor, the General Assembly, and the Superintendent for establishing a collaborative process for development of a new accountability rule is an excellent step.

- B. The process of development of a new system should be based on:
 - 1. Extensive involvement by experts and practitioners from the education community
 - 2. Transparency in all decision-making by the SBOE and IDOE throughout the development process and final adoption of the revised rule.
 - 3. Ultimately, the new system should be as simple as possible, more easily understood by the school administrators and the public, and equitable in its treatment of various schools with widely varied socio-economic student populations.
- C. In compliance with HEA 1427 - 2013, the new accountability system should:
 - 1) Incorporate less reliance on proficiency (standardized tests passage rates) and more reliance on individual student growth.
 - 2) Incorporate model(s) that measure student growth based on criterion-referenced measures (or a combination of peer-referenced and criterion-referenced measures) that measure a student's progress to proficiency.

4) Further Recommendations regarding the Revised Accountability System

- A. The authors have received a significant amount of testimony stating that there should be additional measures for the EMS model and that other measures of school performance besides test results be included.

- B. Because of the complexity involved in implementing any new accountability system, the system, if possible, should be piloted for an initial year. This would permit IDOE to solicit and receive extensive feedback from schools, adequately perform programming tests, and evaluate policy components incorporated into the system. As appropriate, revisions should be recommended and adopted to further enhance the system and improve its integrity and public acceptance.
- C. Finally, it is essential that the legislative branch should be assured that it has the capability to perform analyses on the new accountability system. Specifically, LSA staff should be provided with ongoing access to all data and computer programming necessary for it to replicate results and respond to various inquiries from legislators about the system.

Appendix A

Charge



**STATE OF INDIANA
INDIANA GENERAL ASSEMBLY**

200 W. WASHINGTON STREET
THIRD FLOOR STATE HOUSE
INDIANAPOLIS, INDIANA 46204

**Brian C. Bosma
Speaker of the House**

Phone: (317) 232-9605
Email: H88@iga.in.gov

**David C. Long
President Pro Tempore**

Phone: (800) 382-9467
Email: S16@in.gov

August 2, 2013

Mr. John Grew, Executive Director,
State Relations and Policy Analysis
Indiana University
101 West Ohio Street, Suite 1776
Indianapolis, Indiana 46204

Mr. William Sheldrake, President and Founder
Policy Analytics LLC
One North Pennsylvania Street, Suite 530
Indianapolis, Indiana 46204

Dear John and Bill,

As you know, Indiana has received national attention this week due to the concerns with the A-F metric for grading Indiana's schools. As you may also know, the Indiana General Assembly, during the 2013 legislative session, expressed its concerns about this same issue when it passed House Enrolled Act 1427. In that bill, we required the State Board of Education to "go back to the chalkboard" on the A-F metric and to come up with a new metric, one based on achievement and growth, by November 15, 2013.

Since then, however, the issue has been brought to the forefront in negative ways and our concerns about the previous assessment system are increasing. We write to you today to ask you to undertake a critical task - to examine the previous A-F metric, by completing the following tasks:

- Assessing the previous A-F assessment tool;
- Determining its validity;
- Ascertaining the fairness of previous grades given to schools;
- Determining whether manipulations of the system occurred; and
- Making recommendations to the State Board of Education and/or the General Assembly as to what next steps may be appropriate.

We realize how challenging a task this is. We also understand that you will need some resources to accomplish it. As the Chairman and Vice Chairman of the Legislative Council, we will support you in any way we can – with staff and financial resources. We also need to have your assessment completed by Labor Day. Given the gravity of the situation, we feel this research merits immediate attention.

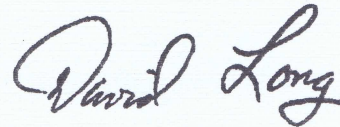
Mr. John Grew
Mr. William Sheldrake
August 2, 2013
Page 2

Thank you for considering our request to serve the citizens of Indiana in this manner. Your input will be so important to the families and, most importantly, to the students of our state.

Sincerely,



Brian C. Bosma
Speaker of the House
118th General Assembly



David Long
President Pro Tempore, Indiana Senate
118th General Assembly

cc: Minority Leader Scott Pelath
Minority Leader Tim Lanane

Appendix B

Legislative History of School Accountability in Indiana

LEGISLATIVE SERVICES AGENCY
Office of Bill Drafting and Research
200 W. Washington Street, Suite 301
Indianapolis, Indiana 46204-2732
(317) 233-0696
(317) 232-9511 (FAX)

MEMORANDUM

To: William Sheldrake, John Grew

From: Allen Morford

Re: Legislative history of school accountability in Indiana.

Date: August 27, 2013.

You asked for a legislative history pertaining to Indiana's school accountability laws and administrative rules. Below, please find a timeline summarizing relevant legislation and administrative rules.

Legislative History

1999

P.L. 146-1999 (SEA 235-1999) - Establishes the education roundtable. Requires the Indiana Department of Education (IDOE) develop , and the Indiana State Board of Education (SBOE) to adopt, academic standards for every grade level from kindergarten through grade 12 for English, mathematics, social studies, and science. Requires the academic standards to be clear, concise, and jargon free.

P.L. 221-1999 (HEA 1750-1999) - Establishes a school accountability program for targeted and continuous school improvement. Requires each school and school corporation to develop an annual strategic and continuous school improvement plan. Requires the IDOE to use ISTEP scores, performance indicators developed by the education roundtable, and a school corporation's annual performance report to assess the improvement of each school in the school corporation. Requires the SBOE to develop categories of school improvement and place each school in a category. Provides a series of interventions for schools that do not show improvement based on the number of years that improvement is not demonstrated. Provides for creation of a system of recognition and financial awards for schools that demonstrate improvement.

2001

P.L. 100-2001 (SEA 165-2001). Provides that the requirement for a series of interventions for schools that do not show improvement based on the number of years that improvement is not demonstrated does not apply to charter schools. Amends the law concerning Indianapolis Public

Schools (IPS) to make the provisions concerning student standards, improvement, and accountability consistent with provisions applicable to other school corporations.

2005

P.L. 1-2005 (HEA 1288-2005) - Recodifies Title 20.

2013

P.L 286-2013 (HEA 1427-2013) Provides that the state board may require assessments in addition to ISTEP assessments for secondary students. Provides that the state board shall establish a number of categories using an "A" through "F" grading scale, to designate performance based on the individual student academic performance and growth to proficiency in each school. Provides that, not later than November 15, 2013, the state board shall establish new categories or designations of school performance which must be based on a measurement of individual student academic performance and growth to proficiency and may not be based on a measurement of student performance or growth compared with peers.

Administrative Rules

2002

LSA Document #01-163(F)

Notice of Intent Published: 24 IR 2726

Proposed Rule Published: August 1, 2001; 24 IR 3765

Hearing Held: September 5, 2001, September 6, 2001

Approved by Attorney General: February 1, 2002

Approved by Governor: February 14, 2002

Filed with Secretary of State: February 20, 2002, 10:55 a.m.

Adds 511 IAC 6.2-6 to establish criteria and procedures for assessing school improvement, establishing categories or designations of school improvement, and placing schools in categories or designations of school improvement as required by IC 20-10.2-5. Effective 30 days after filing with the secretary of state.

LSA Document #01-212(F)

Register Page Number 25 IR 2231

Notice of Intent Published: 24 IR 3100

Proposed Rule Published: August 1, 2001; 24 IR 3769

Hearing Held: September 6, 2001

Approved by Attorney General: February 1, 2002

Approved by Governor: February 15, 2002

Filed with Secretary of State: February 20, 2002, 9:43 a.m.

Amends 511 IAC 6.1 concerning provisions for a transition from the performance-based accreditation system to the system of accountability for school performance and improvement created by IC 20-10.2. Effective 30 days after filing with the secretary of state.

2003

LSA Document #02-264(F)
Register Page Number 27 IR 162
Notice of Intent Published: 26 IR 65
Proposed Rule Published: February 1, 2003; 26 IR 1719
Hearing Held: March 6, 2003
Approved by Attorney General: August 14, 2003
Approved by Governor: August 25, 2003
Filed with Secretary of State: August 26, 2003, 4:15 p.m.

Amends 511 IAC 6.2 to bring the school accountability system into alignment with the federal No Child Left Behind Act of 2001. Adds definition of adequate yearly progress and expectation of 100% proficiency of all students and identified groups of students in 2013-2014. Establishes intermediate goals and annual objectives. Identifies student groups for purposes of reporting and determining adequate yearly progress. Requires schools to assess 95% of students in identified groups on ISTEP+ tests. Adds alternate means of demonstrating adequate yearly progress for student groups. Defines "full academic year" for purposes of determining if students are included in making decisions about adequate yearly progress. Adds provisions to implement the statutory requirement to assess school corporation improvement. Effective 30 days after filing with the secretary of state.

2010-2011

LSA Document #09-995
20100407-IR-511090995PRA
Notice of Intent: 20100106-IR-511090995NIA
Proposed Rule: 20100526-IR-511090995PRA; 20100407-IR-511090995PRA
Hearing Held: July 9, 2010
Approved by Attorney General: September 1, 2010
Approved by Governor: September 8, 2010
Filed with Publisher: September 8, 2010, 11:38 a.m.

Amends 511 IAC 6.1-1-11 to change the label of "academic watch" to the label of "D" and the label of "academic probation" to the label of "F". Amends 511 IAC 6.1-1-11.5 and 511 IAC 6.1-1-13.5 to parallel the label changes made in 511 IAC 6.1-1-11. Amends 511 IAC 6.2-6-5 to change the label of "exemplary progress" to "A", the label of "commendable progress" to "B", the label of "academic progress" to "C", the label of "academic watch" to "D", the label of "academic probation" to "F" and to require the state board to collaborate with stakeholders to determine the feasibility of separating AYP from state accountability determinations and to revise the criteria used to place schools in school improvement and performance categories. Amends 511 IAC 6.2-6-6.1 to parallel the label changes amended in 511 IAC 6.2-6-5. *NOTE: LSA Document #09-995, posted at 20100407-IR-511090995PRA, was recalled by the Indiana State Board of Education and resubmitted for publication.* Effective January 1, 2011.

2012

LSA Document #11-51(F)

20120516-IR-511110051FRA

Notice of Intent: 20110126-IR-511110051NIA

Proposed Rule: 20111214-IR-511110051PRA

Hearing Held: January 17, 2012

Approved by Attorney General: April 5, 2012

Approved by Governor: April 16, 2012

Filed with Publisher: April 16, 2012, 3:45 p.m.

Adds 511 IAC 6.2-6-0.5 to establish definitions for the rule. Amends 511 IAC 6.2-6-4 to establish school performance and improvement categories, the placement of schools and school corporations in categories, and growth percentages and passing rate targets. Adds 511 IAC 6.2-6-5.1 to establish the metric for calculating the performance and improvement category grade for elementary and middle schools open four years or more. Adds 511 IAC 6.2-6-5.2 to establish the metric for calculating the performance and improvement category grade for elementary and middle schools open three years or less. Adds 511 IAC 6.2-6-5.3 to establish the metric for calculating the performance and improvement category grade for high schools, end of course assessment scores, graduation rate scores, and college and career readiness scores. Adds 511 IAC 6.2-6-5.4 to establish the metric for calculating the performance and improvement category grade for elementary feeder schools. Adds 511 IAC 6.2-6-5.5 to establish the metric for calculating the performance and improvement category grade for high school feeder schools. Adds 511 IAC 6.2-6-5.6 to establish the metric for calculating the performance and improvement category grade for small elementary and middle schools. Adds 511 IAC 6.2-6-5.7 to establish the metric for calculating the performance and improvement category grade for small high schools. Adds 511 IAC 6.2-6-5.8 to establish the metric for calculating the performance and improvement category grade for school corporations. Adds 511 IAC 6.2-6-5.9 to establish procedures and requirements for receipt of new accountability baselines for school changes due to opening, reopening, reconfiguring, or redistribution of students. Repeals 511 IAC 6.2-6-5 and 511 IAC 6.2-6-6.1.

I hope this information is helpful. Please feel free to contact me if you have any additional questions.

Appendix C

IDOE Summary of Comments on Proposed Rule



Indiana Department of Education

151 W. Ohio St.
Indianapolis, Indiana 46204

MEMORANDUM

Public Comment Summary and Agency Response Table

Category	Summary	Corresponding Public Comment Numbers			Rationale
		Public Hearing	Online Forum	Via Email	
Bell Curve/Norm referenced focus is inappropriate	<p>By utilizing a bell curve for growth, the metric will result in 34% percent of students being labeled as high growth, and 34% of all students being labeled as low growth. This will occur irrespective of students’ actual achievement level. Even in a year in which all students achieve at a high level, due to the curve, a fixed number will be labeled low growth and a fixed number will be labeled low growth.</p> <p>The metric should be criteria/criterion based. Schools should be given concrete goals and aim to achieve them.</p>	2, 3, 4,5 8, 9, 10, 11, 12, 13, 14,16 18,20, 22, 24. 25, 31, 33, 26, 27 34, 36,	6, 8, 11, 15, 13, 16, 20, 25, 25, 26, 28, 31, 33, 34, 35, 36 , 37, 39, 45, 46, 43, 48, 49, 50, 56, 57, 58, 61, 65, 66, 70, 72, 73, 74, 75, 76, 80, 81, 83, 85, 95, 117, 118, 110, 120, 121	5, 6, 7, 8, 12, 13, 18, 20, 21	<p>A consistently argued shortcoming of the old accountability model was that it only focused on absolute performance measures, or how many students passed the assessments which created an atmosphere of focusing primarily on the “bubble kids” (those near passing or just above passing). This approach led to less focus on students not residing in the bubble. With the inclusion of the Indiana Growth Model, now all students count because each one has an equal opportunity to show high growth regardless of how far they lie from the proficiency bar. The new model strikes a balance between the old and new methodologies for measuring student and school success. The new model first measures how many students annually pass the assessments, and rewards schools if they have an increase in the percentage of students that do pass, making the first part of the measure a criterion-based metric rewarding absolute performance AND improvement. The second part of the model incorporates each student’s growth to provide an opportunity for schools to earn bonus points when a substantial number of students demonstrate high growth. Every student has an equal chance to demonstrate high growth and there is no limit to the number of students at a school that may achieve the criteria. The great value of adding the growth model to accountability is to serve as a functional safeguard for students previously marginalized by providing a level playing ground for all students, regardless of current academic ability to demonstrate growth. Additionally, because the targets for schools to receive the possible bonuses or deduction are a set criteria for three years for each subgroup</p>



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					on both E/LA and math (e.g. 42.5% of the bottom 25% student subgroup must meet high growth targets in E/LA to receive the bonus point), schools will have concrete goals to aim for and subsequently achieve in a criterion fashion.
Reliance on cohort calculations are inappropriate	Relying on cohort calculations results in schools that serve nontraditional populations, such as students who have previously dropped out of high school and high special education populations, to receive lower grades than they should because the students are not part of their original cohort.	7, 17, 17, 31, 34	120	5	The graduation rate calculations must conform to federal requirements. As such, the exemption clause for Certificate of Completers needs to be removed from the calculations while keeping all other aspects in place.
Calculations penalizes schools with high number of low SES students, high number of SPED students, and high number of transient students	<p>The current metric provides bonus points for students who take the SAT/ACT/AP/IB exams. These exams cost students money. As a result, low-income students do not have access to the exams, and the schools who serve high numbers of these students do not have access to the bonus points and are penalized and/or discriminated against.</p> <p>The model includes too much focus on proficiency and too little focus on growth</p> <p>The model does not include workkeys as a measure of College and Career Readiness, which leaves out an entire subset of students. The failure to include these students penalizes schools with high SES students, who are more likely to opt for career and technical education rather than academic honors diplomas.</p>	5, 12, 13, 14, 31, 32,33, 34, 63, 52, 67, 106	6, 8, 11, 16, 21, 18, 28, 29, 34, 39, 47, 57, 52, 88, 105, 111, 120	1, 2, 4	<p>Indiana pays for all Advanced Placement and International Baccalaureate exams taken by low SES students (defined as any student that qualifies for Free or Reduced lunch). Additionally, state law prohibits public universities from charging any Free or Reduced lunch student course fees for a dual credit course taken at the high school.</p> <p>SAT and ACT score results are not part of the model.</p> <p>The new model strikes a balance between assessing student performance and growth.</p> <p>For the first time ever, the model recognizes students on a career path. In the College and Career Readiness part of the model, schools earn recognition for students that achieve success in Career and Technical Education (CTE) courses and earn college credit. They also receive credit for students that earn an Industry Certification.</p>
Adding a cap to	Schools will high special education and English	1	52, 47		There is no cap on the number of students that may participate



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the number of students taking alternative assessments is not appropriate	Language Learners will be penalized by this.				in the alternative assessments, including ISTAR, IMAST and Las Links. However, under federal accountability regulations no more than one percent of student proficiency scores on the ISTAR assessment may count towards proficiency calculations for corporations and no more than two percent for IMAST. These caps need to be included in the rule. Additionally, federal regulations only allow LEP students that have been in school in the United States for less than 12 months to be exempted from proficiency calculations. This too needs to be added to the rule.
Attempt to privatize education	The metric lead to more turnaround schools and since the state is outsourcing turnaround to private companies, the A-F metric ultimately denigrates local control	11, 23, 33	10, 18, 23, 25, 30, 41, 49, 65, 66, 68, 69, 72, 105, 120	1, 6, 7, 8	There is no evidence that there would be more turnaround schools when the new methodology is utilized in the 2011-12 academic year.
Rescore data should be used in calculation	The metric has high stakes attached and should include rescore data for accuracy	1, 27, 31	11		Federal regulations require that final school categories be made in a timely manner so parents may exercise school choice if a school qualifies to do so. When available and requested, rescore data are used in the calculations.
Rule should not be retroactive	IDOE should not apply the rule retroactively because schools were not	1, 26, 27	67, 119	9	The rule is not applied retroactively.
Too complicated to be effective,	The proposed metric is so complicated that it fails to be transparent and fails to provide guidance to schools. Not only are schools unable to understand the metric but it does not provide guidance to parents because it is too difficult for a parent to understand the underlying basis for a school's grade.	5, 10, 16, 23, 24, 29, 31, 32, 33	11, 16, 22, 49, 55, 77, 84, 119, 124		The old model was criticized for not measuring enough of what schools actually do. For example, the old model only accounted for 10 th grade cohort results to determine the high school categorical placement. The new model incorporates other measures, such as graduation rate and college and career readiness, to better assess a school's performance; both of those measures take into account what students also achieve in grades 9-12, instead of just grade 10.



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<p>Should include qualitative data</p>	<p>Quantitative data only show so part of the picture of what happens within schools. A-F should include qualitative measures. Qualitative measures may help indicate whether social pathologies have been or are being overcome. Examples of qualitative measures such as students' goal setting, attitudes, participation, teamwork abilities, and discipline concerns. Other examples mentioned included: creativity, patience, commitment, perseverance, citizenship, extracurricular involvement, parent engagement, and trustworthiness.</p>	<p>8, 12, 16, 17, 18, 25</p>	<p>9, 17, 25, 30, 54, 56, 65, 78, 79, 80, 82, 86, 88, 92, 93, 95, 108, 109, 111, 113, 115, 123</p>	<p>3, 7, 14, 15, 16, 17</p>	<p>The list of possible qualitative measures to be considered for use are endless and would typically only represent specific or clusters of schools which would not allow for valid and consistent measure of school success across the state.</p>
<p>Fails to appreciate intervening variables</p>	<p>Students have varying levels of achievement on tests for reasons beyond actual knowledge. Tests provide only a snapshot of a student's ability to perform on a test on a particular day. Some students have extreme test anxiety and some have factors in their lives that problematize their performance on a given day, such as whether they have had breakfast, whether a parent just lost his or her job and the student is uneasy, and some students have not had a bed in which to sleep in a safe home.</p>	<p>8, 12, 16, 17, 25</p>	<p>6, 21, 41, 52, 57, 60, 72, 77, 96, 97, 102, 111, 120, 122, 123, 126</p>	<p>3</p>	<p>While individual students may have particular circumstances on test day the aggregate student population of a school does not. As such, such individual student anomalies are accounted for in the model by basing on all results on the aggregate. Additionally, the minimum student count is 30 for a school to be eligible for a performance scores to ensure the result it valid and reliable.</p>
<p>Should do test runs and gather data before finalizing a rule so that SB OE can determine</p>	<p>The real impact of the new metric combined with the new legislation is not yet known. After a metric is finalized, the state should do a test run to find out the impact of it on schools and after the collection of the data determine whether to put the metric into regulation.</p>	<p>12, 28, 30, 34</p>	<p>7, 8, 11, 17</p>	<p>4, 7, 39, 69, 115</p>	<p>A sample run of how schools might have performed in the 2010-11 school year was provided in the aggregate to the State Board at the Nov. 2011 meeting, and the school and corporation level results were released statewide on Jan. 27, 2012.</p>



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MEMORANDUM

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whether the aims of the category designation are really fulfilled.					
The statute allows for categories of "improvement" not "performance"	The language in IC 20-31-8-3 states that "the state board shall establish categories of improvement that a schools makes in performance of the measures determined by the board with the advice of the education roundtable." The current calculation is not about improvement but rather is a yearly snapshot of performance designation that does not consider improvement of a school from year to year.	4, 5, 9, 11	66, 68, 74, 125	12	The current calculation is based primarily on performance and improvement. School grades rise when more students pass the assessments. The proficiency scale is divided into 5 percentage point scales to recognize annual improvement. For example, if a school has 78% of student pass the assessments in 2011 they receive 2.50 points on the scale. If the same school increases the percentage by two points (improves) which means they now have 80% of students pass the assessments in 2012 then they receive 3.00 points. This improvement on proficiency measure is applied annually.
Provides inaccurate picture of performance and/or creates misperception of successful learning that is occurring in schools	Some schools were denied higher grades due to the performance of a very few students who, in the anecdotes provided, had good cause to not participate. Examples included students who had been arrested, Also, performance on the NAEP test showed Indiana students performing better than students in NY and FL; yet, this metric results in more schools in Indiana receiving Ds and Fs than the schools that received Ds and Fs in NY and FL, which were the states that led the path for Indiana's adoption of A-F category designations. A-F focuses on ELA and Math, and therefore it does not show student performance in science, social	1, 4, 9, 10, 13, 14, 17, 25, 26, 28, 29, 30, 34, 36	8, 9, 18, 26, 29, 37, 86, 90, 91, 99, 103, 112, 114	5, 11, 16, 21	Annually, schools are allowed to appeal for specific instances when a student may be considered to be excluded in the school's performance calculations. Each appeal is independently reviewed based on the evidence provided by the school and a decision is made accordingly. For example, a school that provides evidence in an appeal that a student was incarcerated during the time of the exam would be granted an appeal approval and the student would be removed from the performance calculation.



Indiana Department of Education

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Indianapolis, Indiana 46204

MEMORANDUM

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	<p>studies, foreign language, the arts, and/or physical education.</p> <p>One way to improve on this issue is to allow schools to earn higher than 4.0 on ELA and Math.</p>				
Growth Model is good for students but is an inappropriate measure of schools' performance	The utility of the growth model is providing a different lens through which to see a student's progress. It is particularly useful for students who do not show high achievement on standardized tests, but who do indicate gains in achievement overall.	4, 10, 25	121		Schools showing high growth for students are successfully moving these students closer to the proficiency bar or beyond it, and the model therefore recognizes and rewards those achievements.
GRAD rate should include waivers and general diplomas	General diplomas have a purpose and diplomas earned with waivers also serve a purpose. To penalize schools for students who achieve these diplomas is inappropriate and sends a mixed message.	13, 14, 31	11, 16, 28, 34, 36, 39, 50, 52		The graduation rate calculation incorporates all diplomas types which includes waivers and general diplomas. The penalty for awarding too many of these diplomas (over 33%) begins in the 2014-15 school year and may be waived if a certain percentage of those same students also earn an Industry Certification.
The built-in changes are inappropriate	The language provides for changes in the measures in future years. This is inappropriate because it creates a moving target. The college and career readiness measure is shown to be a .1 now but is provided to change to .3 in 2014-15. However, if the board wants the measure to change to have a weight of .3, then schools should have more time to make program adjustments. Three years would be more feasible to make such program adjustments.	13, 14			The changes to college and career readiness are incremental in nature and will be decided annually with advance notice given to schools. The mark must hit .30 by 2014-15 signaling to schools that college and career readiness success must be focused on by schools and grown annually. The metrics do not change, just the weight it contributes to the overall high school grade.
Approach to growth model is inappropriate	Three years of data for growth is inappropriate. Using quantitative data only for growth is inappropriate.	5, 13, 14, 25	11		Utilizing three years of growth data creates a reliable and valid projection of annual growth for each student. Annual improvements in the number of students scoring



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	<p>The approach to growth is flawed for ISTAR and IMAST students. It ignores improvements on ISTAR, IMAST, and ISTEP reading.</p> <p>Model is flawed because the model used to grade and determine the score for each student is most reliable at the “cut” score. As you move away from that score, each successive score contains more and more error, with the most error at the tails. By looking at how the students performed on any one score and using only those scores in combination with a normed curve to determine high, medium, and low growth, you are making very precise decisions on a flawed, error loaded number, unless it happens to be the “cut” score.</p> <p>Model is too difficult for lowest achieving schools to show success. The school would have to show massively high growth (i.e. the school would have to show 80% of its student in English and 80% of its students in math) in order for the school to gain two points in each subject.</p>				<p>proficient on ISTAR and IMAST are part of the total proficiency calculations (ISTEP, ISTAR and IMAST combined).</p> <p>The target for schools to receive the high growth bonus for its two subgroups (bottom 25% or top 75%) on E/LA or math is around 40% for each (not 80%), and every student has an equal chance to demonstrate high growth.</p>
Appeal deadline should not be in summer break	The appeal deadline for category designations is in the summer when school administrators and other employees are not in the school and are often on vacations. This effectively denies these schools the opportunity to appeal.	19			Final scores are not available until July based on the timing of the assessments and final categories must be finalized by August thereby requiring that the appeal window must be in late July/early August.
A-F metric development should be a	The state should allow teachers and administrators to participate in the development of the A-F metric and the measure that it emphasizes.	18, 20	3, 16, 19	21	The development of the new A-F model was a two-year long process that involved various stakeholders throughout the process including a committee made up of school officials



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partnership	The board should establish a task force of experts, including psychometricians and education experts to create an innovative and just accountability system.				representing both Elementary/Middle and High schools.
Current metric will have unintended consequences that penalize students who are not high achieving and who attend schools with high populations of students who are not high achieving	The unfortunate reality of this metric and teacher evaluation is that teachers will begin to begrudge students who are not high achieving and who have learning challenges. This is not student-centered and will have negative effects on students. One negative effect will be anxiety on students who feel the most at-risk for low scores. It also creates instability	16, 17, 25, 32	7, 21, 57, 47, 114, 116, 120	21	The incorporation of the Indiana Growth Model is present to combat this very issue. Every student counts equally on the growth model and has an equal chance to demonstrate high growth therefore it is in every teacher and school's interest to work equally hard with every student.
If IDOE is going to implement, then IDOE needs to increase/improve technical assistance	Schools seeking guidance about how the metric worked did not receive returned calls or emails. One superintendent stated that it took 15 hours to calculate the school's score, and that they still were not confident of its accuracy. Also, the data on the learning connection is not in a form that easily translates into the metric. The IDOE keeps changing the metric and therefore is unable to provide the needed technical assistance.	101, 26, 30	16		Starting in the late fall with the State Board of Education initiation of the approval of the new A-F methodology, IDOE staff traveled throughout the state to explain the new model. To date, the in-person connection has been over 1,000 teachers, principals, superintendents, community members and other educational stakeholders. The current rule has been made available to the public since Nov 7, 2011. Lastly, school and corporation level grades and the calculations were released statewide on Jan. 27, 2012.
A-F misleading characterization of school	Businesses who consider locating to a community look at the quality of schools when making decisions. If schools that actually do a good job with	5, 28, 37	9, 11, 29, 56		The new A-F model better captures a school's performance across multiple measures. Any school receiving a less favorable grade will hopefully initiate a community conversation about



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quality will negatively impact business development	their students are penalized for high special education or ELL students, then those businesses gain a false negative impression of the school quality and may choose to locate elsewhere.				how to improve which may lead to greater community involvement and foster greater success.
Teachers have conflicting requirements between assessments and curriculum standards	Teachers are required to teach areas beyond Math and English, yet those are the only subjects considered in the metric. Science, social studies, foreign language, and the arts take up time and energy for students and teachers but any gains in those areas go unacknowledged. This deemphasizes the importance of areas other than ELA and Math.	10, 17, 18, 19, 34, 35,	8, 9, 20, 29, 39, 59, 80, 86, 87, 91, 94, 99, 103, 105, 106, 107, 108, 115	6, 14, 21	Success in other subjects, such as Science and Social Studies, is predicated by a student’s ability to perform well in English and math. Additionally, the high school model includes graduation success and a college and career readiness measure that includes courses in numerous subjects.
Applauds	Applauds the model for holding schools accountable for performance.	15	71		

Appendix D

Basic Step by Step Explanation of the Metric

Simple Explanation of Indiana A-F Accountability System

Elementary & Middle School (EMS) Model

A School's grade is based on English/Language arts and math test results and various adjustments according to the following steps:

1. *Preliminary* scores for both English/Language Arts (ELA) math tests are based on the percentage of a school's students that passed ISTEP+, IMAST and ISTAR. The preliminary score is determined using a proficiency grading scale awarding a grade for a given passage rate:

90.0 – 100% = 4.00 points

85.0 – 89.9% = 3.50

80.0 – 84.9% = 3.00

75.0 – 79.9% = 2.50

70.0 – 74.9% = 2.00 points

65.0 – 69.9% = 1.50

60.0 – 64.9% = 1.00

0.00 – 59.9% = 0.00

2. A school's preliminary score for both ELA and math may be raised or lowered based on student academic growth:

- a. The preliminary score is raised by 1.00 if at least 42.5% of the school's lowest performing students on ISTEP+ (the bottom 25%) score high growth on the ELA test and for the math test, at least 44.9% of students score high growth.
- b. The preliminary score is raised by 1.00 if at least 36.2% of the school's remaining students on ISTEP+ (the top 75%) score high growth on the ELA test and for the math test, at least 36.2% of students score high growth.
- c. The preliminary score may be lowered by 1.00 if 39.8% or more of all students taking ISTEP+ score low growth on the ELA test and for math test, less than 42.4% of students score low growth.

3. A school's score will also be lowered by 1.00 if student participation in testing is:

- a. Less than 95% of their lowest performing students (bottom 25%) take ISTEP+
- b. Less than 95% of their remaining students (top 75%) take ISTEP+, ISTAR, and IMAST.

4. To determine the final grade for an EMS, sum the ELA and Math grades and divide by two.

High School (HS) “A-F” Model

The high school grade is determined by calculating scores on four weighted measures:

1. English 10 End of Course Assessment (ECA) – weighted at 30%
2. Algebra I ECA – weighted at 30%
3. Graduation Rate – weighted at 30%
4. College & Career Readiness – weighted at 10%

The steps in determining the high school score are as follows:

1 & 2. Determining English10 and Algebra I ECA Scores:

- a. Schools receive a *preliminary* score based on the percentage of their students in the 10th grade cohort that passed the ECA or ISTAR. The same proficiency grading scale (above) for Ems ELA and math is used to determine the preliminary score (e.g. a 90% passage rate = 4.00 points).
- b. The preliminary score is raised by 0.50 if there is at least a 10.3 percentage point improvement in the English passage rate and by 0.50 if there is at least a 17.1% percentage point improvement in the math passage rate (from the 8th grade passage rates for ISTEP+, IMAST or ISTAR to the 10th grade ECA or ISTAR).
- c. The preliminary score is lowered by 0.50 if there is -0.1 percentage point or greater decline in the English or math passage rate (from the 8th grade ISTEP+, IMAST or ISTAR to the 10th grade ECA or ISTAR).
- d. The preliminary score shall be raised by 0.50 if at least 59.3% of students taking English or 62.8% of students taking math tests that did not pass the ECA or ISTAR in 10th grade do so by graduation.

3. Determining the Graduation Rate Score:

Schools receive a *preliminary* score based on their four-year graduation cohort rate. A proficiency grading scale (same as that used for EMS ELA and math) is used to determine the preliminary score (e.g. a 90% or higher passage rate = 4.00 points). For school years prior to 2014-15, the preliminary score is the final graduation rate score.

Note: Beginning with the 2014-15 school year, the preliminary score will be adjusted as follows:

- a. The preliminary score is raised if 34.4% or more students receive non-waiver Honors Diplomas.
- b. The preliminary score is lowered if 32.8% or more students receive general or waiver diplomas.
- c. The preliminary score is raised if 13.2% of students that did not graduate within four years do so in five years.

4. Determining the College & Career Readiness Score:

Schools receive a score based on the percentage of graduates who receive at least one of the following:

- a. a passing score (3, 4, or 5) on an AP exam; or
- b. a passing score (4, 5, 6, or 7) on an IB exam; or
- c. three (3) verifiable college credits from the Priority Liberal Arts or CTE course lists; or
- d. a IDOE approved industry certification.

The college and career readiness score is based on the percentage of students achieving one of the above activities using a different proficiency scale than above:

25.0 – 100% = 4.00 points

18.4 – 24.9% = 3.00

11.7 – 18.3% = 2.00

5.0 – 11.6% = 1.00 points

0.0 – 4.9% = 0.00

Determining a Final Grade for a High School

The school's final grade is determined by summing the weighted scores from steps 1-4 above.

Determining a School Corporation Combined Score

1. Determine the % of total school corporation students enrolled in EMS (grades 3-8) and H.S. (grades 9-12)
2. Multiply the % of EMS students by the average grade for all EMS schools
3. Multiply the % of H.S. students by the average grade for all H.S schools
4. Sum steps 2 and 3 to determine the combined score

Appendix E

Simulation of EMS Cap Removal

**Appendix E: Subject Matter Growth Cap Removed
Elementary-Middle School Results Comparison**

CORP _ID	CORPORATION_NAME	SCH_ID	SCHOOL_NAME	ELA	ELA	Math	Math	Overall	Overll	Grade	Grade
				Uncapped Points	Capped Points	Uncapped Points	Capped Points	Points Uncapped	Points Capped	Result Uncapped	Result Capped
0035	South Adams Schools	0017	South Adams Middle School	3.00	3.00	5.50	4.00	4.25	3.50	A	B
0125	M S D Southwest Allen County Schls	0046	Whispering Meadow Elem Sch	5.00	4.00	3.00	3.00	4.00	3.50	A	B
0225	Northwest Allen County Schools	0094	Oak View Elementary Sch	5.00	4.00	3.00	3.00	4.00	3.50	A	B
0235	Fort Wayne Community Schools	0134	Weisser Park Elem Sch	4.50	4.00	3.00	3.00	3.75	3.50	A	B
0235	Fort Wayne Community Schools	0189	Indian Village Elementary Sch	5.50	4.00	1.50	1.50	3.50	2.75	B	C
0235	Fort Wayne Community Schools	0221	Francis M Price Elem Sch	5.00	4.00	1.00	1.00	3.00	2.50	B	C
0235	Fort Wayne Community Schools	0239	Robert C Harris Elem Sch	5.50	4.00	3.00	3.00	4.25	3.50	A	B
0235	Fort Wayne Community Schools	0275	Arlington Elementary School	6.00	4.00	3.00	3.00	4.50	3.50	A	B
0365	Bartholomew Con School Corp	0363	W D Richards Elementary Sch	4.50	4.00	3.00	3.00	3.75	3.50	A	B
0365	Bartholomew Con School Corp	0369	Lillian Schmitt Elem School	5.00	4.00	2.50	2.50	3.75	3.25	A	B
0365	Bartholomew Con School Corp	0377	Taylorsville Elem School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
0515	Blackford County Schools	0485	Montpelier School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
0515	Blackford County Schools	0491	Blackford Junior High School	1.50	1.50	5.50	4.00	3.50	2.75	B	C
0615	Western Boone Co Com Sch Dist	0537	Thorntown Elementary School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
0665	Lebanon Community School Corp	0565	Harney Elementary School	1.50	1.50	4.50	4.00	3.00	2.75	B	C
0755	Delphi Community School Corp	0641	Delphi Community Elementary School	3.00	3.00	6.00	4.00	4.50	3.50	A	B
0875	Logansport Community Sch Corp	0709	Fairview Elementary School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
0875	Logansport Community Sch Corp	0711	Landis Elementary School	4.50	4.00	1.50	1.50	3.00	2.75	B	C
1405	Washington Com Schools	1105	Veale Elementary School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
1560	Sunman-Dearborn Com Sch Corp	1190	Sunman-Dearborn Middle School	3.00	3.00	5.50	4.00	4.25	3.50	A	B
1560	Sunman-Dearborn Com Sch Corp	1191	Sunman Dearborn Intermediate Sch	3.00	3.00	5.00	4.00	4.00	3.50	A	B
1600	South Dearborn Com School Corp	1165	Manchester Elementary School	3.00	3.00	4.50	4.00	3.75	3.50	A	B
1820	Garrett-Keyser-Butler Com	1331	Garrett Middle Sch	4.50	4.00	3.00	3.00	3.75	3.50	A	B
1895	Liberty-Perry Com School Corp	1377	Selma Middle School	1.50	1.50	5.00	4.00	3.25	2.75	B	C
1940	Daleville Community Schools	1405	Daleville Elementary School	3.00	3.00	5.50	4.00	4.25	3.50	A	B
2040	Northeast Dubois Co Sch Corp	1543	Celestine Elementary School	3.00	3.00	5.00	4.00	4.00	3.50	A	B
2110	Southwest Dubois Co Sch Corp	1587	Southridge Middle School	1.50	1.50	6.00	4.00	3.75	2.75	A	C
2120	Greater Jasper Con Schs	1575	Jasper Middle School	3.00	3.00	4.50	4.00	3.75	3.50	A	B
2260	Baugo Community Schools	1703	Jimtown Junior High School	0.50	0.50	5.50	4.00	3.00	2.25	B	C
2270	Concord Community Schools	1713	Concord Junior High School	3.00	3.00	4.50	4.00	3.75	3.50	A	B
2275	Middlebury Community Schools	1657	Northridge Middle School	3.00	3.00	6.00	4.00	4.50	3.50	A	B
2395	Fayette County School Corp	1897	Eastview Elementary School	2.00	2.00	5.50	4.00	3.75	3.00	A	B
2400	New Albany-Floyd Co Con Sch	1933	Hazelwood Middle School	3.00	3.00	5.00	4.00	4.00	3.50	A	B
2400	New Albany-Floyd Co Con Sch	1943	Slate Run Elementary School	3.00	3.00	5.00	4.00	4.00	3.50	A	B
2400	New Albany-Floyd Co Con Sch	1981	S Ellen Jones Elementary Sch	1.50	1.50	5.50	4.00	3.50	2.75	B	C
2725	East Gibson School Corporation	2237	Oakland City Elementary School	3.00	3.00	4.50	4.00	3.75	3.50	A	B
2735	North Gibson School Corp	2223	Brumfield Elementary	3.00	3.00	5.50	4.00	4.25	3.50	A	B
3005	Hamilton Southeastern Schools	2473	Fall Creek Elementary School	6.00	4.00	2.50	2.50	4.25	3.25	A	B
3005	Hamilton Southeastern Schools	2476	Fishers Junior High School	2.50	2.50	6.00	4.00	4.25	3.25	A	B
3005	Hamilton Southeastern Schools	2483	Thorpe Creek Elementary	5.00	4.00	3.00	3.00	4.00	3.50	A	B
3005	Hamilton Southeastern Schools	2490	Riverside Jr High	2.50	2.50	6.00	4.00	4.25	3.25	A	B
3030	Westfield-Washington Schools	2492	Shamrock Springs Elementary Sch	6.00	4.00	3.00	3.00	4.50	3.50	A	B
3030	Westfield-Washington Schools	2503	Westfield Intermediate School	2.50	2.50	5.00	4.00	3.75	3.25	A	B
3055	Sheridan Community Schools	2465	Sheridan Elementary School	1.50	1.50	5.00	4.00	3.25	2.75	B	C
3070	Noblesville Schools	2521	Noblesville East Middle School	2.50	2.50	6.00	4.00	4.25	3.25	A	B

**Appendix E: Subject Matter Growth Cap Removed
Elementary-Middle School Results Comparison**

CORP ID	CORPORATION_NAME	SCH_ID	SCHOOL_NAME	ELA	ELA	Math	Math	Overall	Overall	Grade	Grade
				Uncapped Points	Capped Points	Uncapped Points	Capped Points	Points Uncapped	Points Capped	Result Uncapped	Result Capped
3070	Noblesville Schools	2533	Stony Creek Elementary School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
3115	Southern Hancock Co Com Sch Corp	2563	Brandywine Elementary School	5.00	4.00	2.50	2.50	3.75	3.25	A	B
3125	Greenfield-Central Com Schools	2593	Greenfield Intermediate School	1.50	1.50	4.50	4.00	3.00	2.75	B	C
3145	Eastern Hancock Co Com Sch Corp	2582	Eastern Hancock Middle Sch	2.50	2.50	5.50	4.00	4.00	3.25	A	B
3190	South Harrison Com Schools	2663	Corydon Intermediate School	3.00	3.00	5.50	4.00	4.25	3.50	A	B
3315	Avon Community School Corp	2736	Avon Middle School South	3.00	3.00	6.00	4.00	4.50	3.50	A	B
3405	Blue River Valley Schools	2803	Blue River Valley Elem School	5.00	4.00	2.50	2.50	3.75	3.25	A	B
3460	Taylor Community School Corp	2893	Taylor Intermediate School	4.50	4.00	1.50	1.50	3.00	2.75	B	C
3625	Huntington Co Com Sch Corp	3029	Roanoke Elementary School	5.50	4.00	2.50	2.50	4.00	3.25	A	B
3945	Jay School Corp	3247	Redkey Elementary School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
3945	Jay School Corp	3285	West Jay County Middle School	2.50	2.50	6.00	4.00	4.25	3.25	A	B
3995	Madison Consolidated Schools	3327	Anderson Elementary School	3.00	3.00	6.00	4.00	4.50	3.50	A	B
4015	Jennings County Schools	3361	Graham Creek Elementary School	6.00	4.00	2.50	2.50	4.25	3.25	A	B
4015	Jennings County Schools	3385	Hayden Elementary School	2.50	2.50	6.00	4.00	4.25	3.25	A	B
4145	Clark-Pleasant Com School Corp	3425	Whiteland Elementary School	5.00	4.00	2.50	2.50	3.75	3.25	A	B
4205	Center Grove Com Sch Corp	3443	Center Grove Middle School North	2.50	2.50	6.00	4.00	4.25	3.25	A	B
4225	Franklin Community School Corp	3457	Franklin Community Middle School	2.50	2.50	5.00	4.00	3.75	3.25	A	B
4245	Greenwood Community Sch Corp	3479	Westwood Elementary Sch	5.00	4.00	3.00	3.00	4.00	3.50	A	B
4245	Greenwood Community Sch Corp	3483	Southwest Elem Sch	5.50	4.00	3.00	3.00	4.25	3.50	A	B
4415	Warsaw Community Schools	3607	Lakeview Middle School	2.50	2.50	5.00	4.00	3.75	3.25	A	B
4525	Westview School Corporation	3714	Shipshewana-Scott Elem School	2.50	2.50	5.00	4.00	3.75	3.25	A	B
4580	Hanover Community School Corp	3782	Lincoln Elementary School	5.00	4.00	2.50	2.50	3.75	3.25	A	B
4600	Merrillville Community School	3813	Merrillville Intermediate School	4.50	4.00	1.50	1.50	3.00	2.75	B	C
4615	Lake Central School Corp	3840	James H Watson Elem Sch	5.00	4.00	3.00	3.00	4.00	3.50	A	B
4660	Crown Point Community Sch Corp	3773	Dwight D Eisenhower Elem Sch	6.00	4.00	3.00	3.00	4.50	3.50	A	B
4700	Griffith Public Schools	4177	Griffith Middle School	1.00	1.00	5.50	4.00	3.25	2.50	B	C
4720	School Town of Highland	4283	Highland Middle School	3.00	3.00	5.00	4.00	4.00	3.50	A	B
4720	School Town of Highland	4303	Allen J Warren Elem Sch	4.50	4.00	1.50	1.50	3.00	2.75	B	C
4730	School City of Hobart	4325	Ridge View Elementary School	5.50	4.00	1.00	1.00	3.25	2.50	B	C
4945	LaPorte Community School Corp	4707	Indian Trail Elem Sch	3.00	3.00	5.00	4.00	4.00	3.50	A	B
5245	Frankton-Lapel Community Schs	5012	Lapel Middle School	3.00	3.00	5.00	4.00	4.00	3.50	A	B
5255	South Madison Com Sch Corp	5057	Pendleton Heights Middle Sch	3.00	3.00	4.50	4.00	3.75	3.50	A	B
5255	South Madison Com Sch Corp	5061	Pendleton Elementary School	5.50	4.00	2.00	2.00	3.75	3.00	A	B
5310	Franklin Township Com Sch Corp	5203	Lillie Idella Kitley Elementary	5.00	4.00	3.00	3.00	4.00	3.50	A	B
5330	M S D Lawrence Township	5277	Belzer Middle School	3.00	3.00	5.50	4.00	4.25	3.50	A	B
5330	M S D Lawrence Township	5294	Forest Glen Elem Sch	5.00	4.00	3.00	3.00	4.00	3.50	A	B
5350	M S D Pike Township	5358	Eagle Creek Elementary School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
5360	M S D Warren Township	5377	Lowell Elementary School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
5370	M S D Washington Township	5406	Crooked Creek Elementary Sch	3.00	3.00	5.00	4.00	4.00	3.50	A	B
5385	Indianapolis Public Schools	5531	James A Garfield Sch 31	1.50	1.50	4.50	4.00	3.00	2.75	B	C
5385	Indianapolis Public Schools	5577	Merle Sidener Gifted Academy	6.00	4.00	3.00	3.00	4.50	3.50	A	B
5385	Indianapolis Public Schools	5591	Rousseau Mc Clellan 91	4.50	4.00	3.00	3.00	3.75	3.50	A	B
5400	School Town of Speedway	5897	Carl G Fisher Elem School 1	3.00	3.00	5.00	4.00	4.00	3.50	A	B
5740	Monroe County Com Sch Corp	6172	Lora L Batchelor Middle Sch	2.50	2.50	5.00	4.00	3.75	3.25	A	B
5740	Monroe County Com Sch Corp	6181	Arlington Heights Elem Sch	4.50	4.00	3.00	3.00	3.75	3.50	A	B

**Appendix E: Subject Matter Growth Cap Removed
Elementary-Middle School Results Comparison**

CORP _ID	CORPORATION_NAME	SCH_ID	SCHOOL_NAME	ELA	ELA	Math	Math	Overall	Overll	Grade	Grade
				Uncapped Points	Capped Points	Uncapped Points	Capped Points	Points Uncapped	Points Capped	Result Uncapped	Result Capped
5845	South Montgomery Com Sch Corp	6229	Waveland Elementary School	3.00	3.00	5.00	4.00	4.00	3.50	A	B
5930	Mooreville Con School Corp	6373	Paul Hadley Middle Sch	1.50	1.50	5.50	4.00	3.50	2.75	B	C
5930	Mooreville Con School Corp	6385	North Madison Elem Sch	3.00	3.00	4.50	4.00	3.75	3.50	A	B
6065	West Noble School Corporation	6510	West Noble Elementary School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
6195	Spencer-Owen Community Schools	6605	Gosport Elementary School	3.00	3.00	4.50	4.00	3.75	3.50	A	B
6195	Spencer-Owen Community Schools	6617	Spencer Elementary School	5.50	4.00	2.00	2.00	3.75	3.00	A	B
6310	Turkey Run Community Sch Corp	6647	Turkey Run Elementary School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
6470	Duneland School Corporation	6927	Westchester Intermediate School	3.00	3.00	5.00	4.00	4.00	3.50	A	B
6510	East Porter County School Corp	6852	Washington Twp Elementary School	6.00	4.00	3.00	3.00	4.50	3.50	A	B
6530	Union Township School Corp	6845	Union Center Elementary Sch	5.00	4.00	2.50	2.50	3.75	3.25	A	B
6560	Valparaiso Community Schools	6891	Central Elementary School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
6560	Valparaiso Community Schools	6893	Flint Lake Elementary Sch	5.00	4.00	2.50	2.50	3.75	3.25	A	B
6560	Valparaiso Community Schools	6913	Memorial Elementary School	5.00	4.00	2.50	2.50	3.75	3.25	A	B
6895	Batesville Community Sch Corp	7229	Batesville Intermediate School	2.50	2.50	5.00	4.00	3.75	3.25	A	B
7150	John Glenn School Corporation	7457	Walkerton Elementary School	1.50	1.50	5.00	4.00	3.25	2.75	B	C
7175	Penn-Harris-Madison Sch Corp	7336	Virgil I Grissom Middle Sch	3.00	3.00	6.00	4.00	4.50	3.50	A	B
7175	Penn-Harris-Madison Sch Corp	7341	Madison Elementary School	3.00	3.00	6.00	4.00	4.50	3.50	A	B
7175	Penn-Harris-Madison Sch Corp	7361	Elm Road Elementary School	3.00	3.00	5.00	4.00	4.00	3.50	A	B
7215	Union-North United School Corp	7400	LaVille Elementary School	3.00	3.00	4.50	4.00	3.75	3.50	A	B
7385	North Spencer County Sch Corp	7767	Lincoln Trail Elementary Sch	5.00	4.00	3.00	3.00	4.00	3.50	A	B
7445	South Spencer County Sch Corp	7789	Luce Elementary School	3.00	3.00	6.00	4.00	4.50	3.50	A	B
7515	North Judson-San Pierre Sch Corp	7851	North Judson-San Pierre Elem Sch	2.50	2.50	5.00	4.00	3.75	3.25	A	B
7615	M S D Steuben County	7895	Angola Middle School	2.50	2.50	5.00	4.00	3.75	3.25	A	B
7645	Northeast School Corp	7921	Farmersburg Elementary School	1.00	1.00	5.00	4.00	3.00	2.50	B	C
7645	Northeast School Corp	7941	Hymera Elementary School	5.00	4.00	2.50	2.50	3.75	3.25	A	B
7775	Switzerland County School Corp	7987	Switzerland Co Middle Sch	1.00	1.00	6.00	4.00	3.50	2.50	B	C
7950	Union Co/Clg Corner Joint Sch Dist	8206	Union County Middle School	3.00	3.00	5.50	4.00	4.25	3.50	A	B
7995	Evansville Vanderburgh Sch Corp	8225	Cynthia Heights Elem Sch	6.00	4.00	1.50	1.50	3.75	2.75	A	C
8020	South Vermillion Com Sch Corp	8431	Ernie Pyle Elementary School	2.50	2.50	5.00	4.00	3.75	3.25	A	B
8030	Vigo County School Corp	8445	Honey Creek Middle Sch	1.50	1.50	4.50	4.00	3.00	2.75	B	C
8030	Vigo County School Corp	8517	Farrington Grove Elem Sch	5.00	4.00	2.50	2.50	3.75	3.25	A	B
8030	Vigo County School Corp	8537	Blanche E Fuqua Elem Sch	5.00	4.00	2.50	2.50	3.75	3.25	A	B
8050	M S D Wabash County Schools	8656	Southwood Elementary School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
8115	M S D Warren County	8729	WilliamSPORT Elementary Sch	3.00	3.00	6.00	4.00	4.50	3.50	A	B
8130	Warrick County School Corp	8777	Loge Elementary School	5.50	4.00	2.00	2.00	3.75	3.00	A	B
8305	Nettle Creek School Corp	8989	Hagerstown Elementary School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
8360	Centerville-Abington Com Schs	8982	Centerville-Abington Jr High Sch	3.00	3.00	5.00	4.00	4.00	3.50	A	B
8375	Northeastern Wayne Schools	8928	Northeastern Elementary Sch	3.00	3.00	4.50	4.00	3.75	3.50	A	B
8525	Frontier School Corporation	9113	Frontier Elementary	3.00	3.00	6.00	4.00	4.50	3.50	A	B
8565	Twin Lakes School Corp	9157	Oaklawn Elementary School	5.50	4.00	2.50	2.50	4.00	3.25	A	B
9200	Archdiocese of Indianapolis	A425	St Bartholomew School	6.00	4.00	2.50	2.50	4.25	3.25	A	B
9200	Archdiocese of Indianapolis	B035	St Gabriel Parochial School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
9200	Archdiocese of Indianapolis	B050	Holy Family School	6.00	4.00	3.00	3.00	4.50	3.50	A	B
9200	Archdiocese of Indianapolis	B060	Our Lady Of Perpetual School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
9200	Archdiocese of Indianapolis	B285	Saint Malachy School	6.00	4.00	3.00	3.00	4.50	3.50	A	B

**Appendix E: Subject Matter Growth Cap Removed
Elementary-Middle School Results Comparison**

CORP_ID	CORPORATION_NAME	SCH_ID	SCHOOL_NAME	ELA	ELA	Math	Math	Overall	Overall	Grade	Grade
				Uncapped Points	Capped Points	Uncapped Points	Capped Points	Points Uncapped	Points Capped	Result Uncapped	Result Capped
9200	Archdiocese of Indianapolis	B510	Pope John XXIII School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
9200	Archdiocese of Indianapolis	C445	Saint Monica School	5.50	4.00	3.00	3.00	4.25	3.50	A	B
9200	Archdiocese of Indianapolis	C545	Holy Name School	6.00	4.00	3.00	3.00	4.50	3.50	A	B
9200	Archdiocese of Indianapolis	C605	Our Lady Of Lourdes School	6.00	4.00	3.00	3.00	4.50	3.50	A	B
9200	Archdiocese of Indianapolis	C650	St Michael The Archangel School	4.50	4.00	1.50	1.50	3.00	2.75	B	C
9200	Archdiocese of Indianapolis	D335	Saint Joseph School	6.00	4.00	2.50	2.50	4.25	3.25	A	B
9205	Diocese of Gary	B755	Aquinas School at St Andrew's	4.50	4.00	1.50	1.50	3.00	2.75	B	C
9205	Diocese of Gary	B965	Saint John The Baptist School	5.50	4.00	1.50	1.50	3.50	2.75	B	C
9205	Diocese of Gary	C040	Saint Bridget School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
9205	Diocese of Gary	C110	Queen Of All Saints School	5.50	4.00	0.50	0.50	3.00	2.25	B	C
9205	Diocese of Gary	C145	Saint Joseph School	5.50	4.00	2.00	2.00	3.75	3.00	A	B
9205	Diocese of Gary	D065	Nativity of Our Savior School	5.00	4.00	2.50	2.50	3.75	3.25	A	B
9205	Diocese of Gary	D085	Saint Paul Catholic School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
9210	Diocese of Lafayette Catholic Sch	A470	Sacred Heart School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
9210	Diocese of Lafayette Catholic Sch	A790	Saint Lawrence School	6.00	4.00	3.00	3.00	4.50	3.50	A	B
9210	Diocese of Lafayette Catholic Sch	B155	Saint Paul Parish School	5.00	4.00	2.50	2.50	3.75	3.25	A	B
9210	Diocese of Lafayette Catholic Sch	B475	Saint Augustine School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
9210	Diocese of Lafayette Catholic Sch	C190	Saint Mary School	4.50	4.00	3.00	3.00	3.75	3.50	A	B
9215	Diocese of Evansville	B115	Holy Cross School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
9215	Diocese of Evansville	D370	St Bernard School	6.00	4.00	2.00	2.00	4.00	3.00	A	B
9220	Diocese of Fort Wayne	A104	St Joseph-St Elizabeth Campus 2	6.00	4.00	2.00	2.00	4.00	3.00	A	B
9220	Diocese of Fort Wayne	B020	St John Evangelist School	4.50	4.00	1.50	1.50	3.00	2.75	B	C
9220	Diocese of Fort Wayne	D260	Saint Anthony De Padua School	5.00	4.00	2.50	2.50	3.75	3.25	A	B
9220	Diocese of Fort Wayne	D285	Saint Matthew Cathedral School	5.00	4.00	3.00	3.00	4.00	3.50	A	B
9230	Lutheran Schools of Indiana	A205	Concordia Evangelical Lutheran Sch	2.50	2.50	5.00	4.00	3.75	3.25	A	B
9230	Lutheran Schools of Indiana	B465	Lutheran Central School	3.00	3.00	6.00	4.00	4.50	3.50	A	B
9380	Christel House Academy	5874	Christel House Academy	3.00	3.00	4.50	4.00	3.75	3.50	A	B
9400	KIPP Indpls College Preparatory	5860	KIPP Indpls College Preparatory	3.00	3.00	4.50	4.00	3.75	3.50	A	B
9665	Geist Montessori Academy	2572	Geist Montessori Academy	2.50	2.50	5.00	4.00	3.75	3.25	A	B
C224	Independent Non-Public Schools	C224	Liberty Christian Sch (7-8)	4.50	4.00	3.00	3.00	3.75	3.50	A	B

Appendix F

Simulation of HS Cap Removal

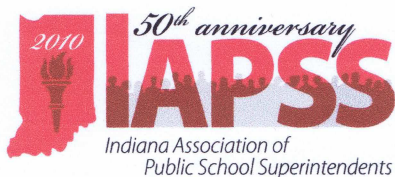
**Appendix F: Subject Matter Growth Cap Removed
High School Results Comparison**

CORP_ID	CORPORATION_NAME	SCH_ID	SCHOOL_NAME	ELA Uncapped Pts	ELA Capped Pts	Math Uncapped Pts	Math Capped Pts	Overall Pts Uncapped	Overall Pts Capped	Grade Result Uncapped	Grade Result Capped
1125	Clay Community Schools	0933	Northview High School	2.50	2.50	4.50	4.00	3.55	3.40	A	B
1180	Rossville Con School District	1021	Rossville Senior High School	2.00	2.00	4.50	4.00	3.55	3.40	A	B
5400	School Town of Speedway	5891	Speedway Senior High School	2.00	2.00	4.50	4.00	3.55	3.40	A	B

Note: The High School Accountability Metrics include the ELA and Math points, as well as graduation rate scores, and college and career readiness scores. Although the entire calculation including all of these elements was utilized for the simulation, only the subject matter growth cap differences are show here - with the results of the required calculation yielding the final grade.

Appendix G

Correspondence from Educational Organizations



IAPSS and ISBA Position on Student Achievement and School Accountability

The Indiana Association of Public School Superintendents (IAPSS) and Indiana School Boards Association (ISBA) have continually, directly and persistently over the years advocated for advancing higher student achievement based on a viable public school accountability system. Various initiatives have been legislated since 1987 as education-related advocates have striven to devise a workable program. The task, however, is not quite done since state policymakers continue to ponder how to establish a valid and fair assessment that can indicate student achievement in an accountable and understandable report.

With the controversy created by the recent revelations about Indiana's A - F grading system, the legislative leaders have provided the opportunity to revisit this concept for Indiana schools. As the catalyst, the technology testing issues and grade changing circumstance, offers the potential to revise Indiana assessments and school labeling to obtain an acceptable transparency within the process.

As a point of advocacy, the Associations perceive that there is a necessity to change the current system so that the public, taxpayers, parents, students and school officials can be assured that the Indiana public school accountability system is functioning for the right reasons.

The bases for the Associations' positions on school accountability are embedded in the legislative resolutions adopted by the memberships of each. The IAPSS legislative resolutions as sorted reads:

"Maintain a Commitment to the Public Schools

.....Progress in increasing student achievement in the public schools must be the primary objective of the General Assembly and State Superintendent of Public Instruction and should not be deferred to institutions such as charter schools or private schools where standards are lower than those promulgated upon public schools.....

Balance Mandates with Time and Funding

.....Legislation to impose additional responsibilities on the public schools should focus on support for increased student achievement without adding additional regulations and should include relief from existing statutes and regulations that do not advance towards increased student achievement.....

Coordinate and Support Existing Accountability Measures

.....Many levels of government have imposed new regulations and requirements on the public schools when resources for the public schools were more stressed. Additional legislation to impose any mandates on the public schools should be coordinated with state and federal legislation already in place and should be accompanied with the resources of time and/or funds to accomplish the tasks assigned including support for professional development. K-12 education statutes and administrative rules almost always have a fiscal impact....."

And, the ISBA has the following resolution:

"State Accountability Model and Student Achievement

The ISBA supports a State Accountability Model that is clear, definable, and accurate and does not present significant questions about its reliability and validity or uses data to manipulate "grades" for schools. Because the

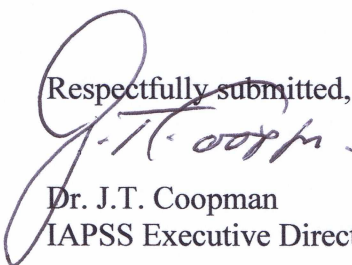
current State Accountability Model presents serious flaws in its foundation, it is important to guarantee to public school officials that the model will be improved to provide an accurate assessment of the education being delivered to students. It is also imperative that a system be adopted that gives parents the clarity that enables them to make accurate comparisons between schools regarding student achievement.”

With these resolutions, the Associations advocate for systemic change in the Indiana accountability system. Our position is that Indiana needs to focus on individual student performance and growth, not on labeling schools based on narrow indicators such as just English and mathematics and cohort groups that change annually. Therefore, these suggestions are offered:

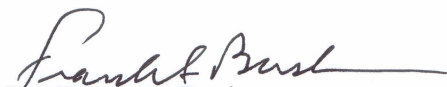
- The Associations **value accountability** and want a system in place that makes sense to improve education in Indiana while rebuilding trust with Indiana schools.
- The General Assembly should appoint a **Commission** to review and revise the current accountability system or direct the Education Roundtable to conduct the study and recommend to the State Board of Education the necessary changes to have a valid and fair assessment that can be reported clearly and concisely.
- The collaboration within the process should be enhanced with several **education-related organizations** and **groups solicited** to offer recommendations on improving the current system.
- The examination of the process should include a thorough review of the **cut-off scores** to determine their applicability to labeling schools.
- The **A-F grading** should be repealed and replaced with a system that places schools in categories such as by urban/suburban/rural or enrollment or leagues, allowing comparisons of similar socio-economic and geographical areas rather than a statewide comparison.
- The **transparency** within in the process must be unquestionable.
- The need for **early intervention** for students without acceptable academic growth must be devised.
- The **professional development** provided for staff must be expanded and applicable to teaching conditions that influence learning for students with lower academic performance.
- The testing system that is built must measure student growth, such as **NWEA**, which also has metrics for teachers to use with the data to modify instructional strategies to improve student learning. Since many Indiana schools already use NWEA, the cost to taxpayers would be minimal and could actually save money, if adopted statewide.
- The **turnaround schools’** standards need to be a reviewed and adjusted so that the application of state intervention is useful and timely.
- Lastly, a fundamental tenet must be understood; that is: **parents are interested in how their child is performing in school**, not how schools and districts across the state are doing.

Once the state accountability system is assessed and determinations are made for adjustments, which we believe will be necessary, then a reformatted system can be created. The components of a revised system should include, but not be limited to, a useful assessment, responsible cut-off scores for placement, meaningful indicators for categories, establishment of a new labeling system and the repeal of A-F grading for schools.

Respectfully submitted,



Dr. J.T. Coopman
IAPSS Executive Director



Dr. Frank A. Bush
ISBA Executive Director

8/20/2013



**Indiana
State
Teachers
Association**

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August 28, 2013

Bill Sheldrake
John Grew
A-F Accountability Task Force
State House
Indianapolis, IN 46204

Dear Bill and John,

I hope this finds you well. Here are just a few thoughts on behalf of ISTA in response to your inquiries concerning:

- (1) Creating a school accountability framework that is fair and effective; and
- (2) Engaging meaningful practitioner input into these kinds of policy discussions in the future.

Some of the concepts/ideas/suggestions are taken from the document that I forwarded to you last week based upon discussions entered into back in 2010 among the various K-12 stakeholder groups (ISTA, IAPSS, ISBA, IFT, Principals, Urban Schools Association, etc...) Since I was not the manager at ISTA at the time, I am not totally sure if the above list of groups captures all that participated—but suffice it to say that most of the public K-12 stakeholder groups worked together.

Also, I did reach out to our field professionals to see what insights they could share. One issue that was brought to me was the issue of timing—how we align all of this while Common Core is on a “pause” and with no identified assessment instrument tied to Common Core. It seems as though a lot of work may go into a new A-F system now that may have to look different in a year.

Anyway, I need to add that ISTA was and continues to be supportive of accountability measures. You probably remember that ISTA was a key player in the development of the state’s accountability laws dating back (at least) to the A+ program in 1987 and certainly with regard to PL 221 (1999). Overall, the accountability system must be accountable, itself, to principles of logic, fairness, and consistency.

Here are some criteria to consider for the substance of a recommendation:

- (1) The single letter grade labeling is too simplistic. The standard line to defend this: “everyone knows what an ‘A’ is...everyone knows what an ‘F’ is.” That is probably as over-generalized as it may be unfair to students, schools, districts, taxpayers, parents, and whole communities. None of us would like to be judged this way in our own work. Service work of any kind is more complex than that.

To encourage better practitioner participation in K-12 policy:

I believe I mentioned in our meeting that the last time professionals in the field felt as though they had a “voice” in policy-making was with REPA 1 (teacher re-licensure rule overhaul). Back then, there was a professional standards board (PSB) as well as a state board of education (SBE) and so the SBE did have to work alongside another body. Practitioners made up a good percentage of the PSB and it convened regional hearings with ample notice wherein stakeholders could be heard on the various iterations. The entire PSB showed up to those hearings in person and asked questions and learned. The participation rate was excellent. My recollection was that there was a considerable amount of give-and-take and the final result, a comprehensive new rule of teacher licensure and re-licensure, emerged. That was sometime in 2009-2010.

NOTE: About a year and one-half later, the SBE began movement on REPA 2—another complete overhaul of teacher licensure/re-licensure—highly unprecedented. Generally speaking, there are many years between comprehensive overhauls of licensure rules, but when REPA 2 discussions began the SBE no longer had to work with the PSB because in the intervening year, the legislature eliminated the PSB and gave sole authority over licensure issues to the SBE. The SBE never actually passed REPA 2 because it failed to comply with the state’s administrative rule-making process. I believe the SBE tried two or three times to no avail and finally, on the last day of the 2013 session, language was included in the budget bill amending Indiana’s Transition to Teaching program criteria, essentially permitting an individual to become fully licensed to teach in Indiana (5 year license, renewable) without having to take a single methods (pedagogy) course. I don’t believe there was a single hearing on this topic during the 2013 General Assembly.

That said, the framework used to develop REPA 1, while strained at times because the DOE/SBE was not working in concert with the PSB, worked. Oftentimes, the best public policy comes from hard work—negotiations, compromise, open-mindedness, and taking the time necessary to complete the task.

The folks on the front lines know better than I do what they need. I rely upon their input to inform and guide me in my communications. I would suspect that a state board of education, a governor’s office, a legislature, and a department of education would benefit from that kind of information as well.

On behalf of the members of ISTA, thank you for taking on this important work.

Sincerely,



Gail Zeheralis
Government Relations Director

August 25, 2013

Mr. John Grew, Executive Director,
State Policy Relations and Policy Analysis
Indiana University
101 West Ohio Street, Suite 1776
Indianapolis, IN 46204

Mr. William Sheldrake
Policy Analytics LLC
One North Pennsylvania Street, Suite 530
Indianapolis, IN 46204

Dear John and Bill,

In response to your request to submit written comments, I offer the following observations, many of which I am sure will duplicate comments made during our phone discussion of August 20, 2013.

During the first A to F school and school district rating system, I organized the primary education associations to prepare for the public hearing. The result, after multiple meetings, was a suggested school-rating model based on growth in student achievement. The organizations that cooperatively developed and agreed to support the model were: ISTA, IFT, IASP, ISBA, and my own organization, IAPSS, which I was serving as Executive Director at the time (from 2004 – 2012).

Dan Clark, ISTA, and I presented the model at the hearing. I don't recall if any State Board of Education members were in attendance – they rarely had any members attend the public hearings. I don't remember Dr. Bennett attending any of the required hearings, but Jeff Zaring represented the IDOE and ran the hearing, as he typically did as the State Board's officer.

As was usual at these hearings, I don't remember any questions being asked. I did follow up several times by phone and email with Mr. Zaring in the weeks following the hearings on behalf of our coalition, and didn't get a response as to whether or not our model was being reviewed or considered in any way. I still believe we were on the right track, and for such a disparate group, made significant concessions to propose the plan we submitted.

After the adoption of the first A to F rule, many concerns existed – primarily based on the lack of a growth measure that made sense at all levels. Results seemed to point to problems in school configurations (grade level make-up at all levels, especially at the middle grades and high schools). Most importantly for what followed, it was continually stressed by IDOE and the State Board that “we needed to give the A to F ratings a chance,” and evaluate the impacts after we had some years of results to evaluate. This last approach is what created so much confusion when the second A to F revision suddenly appeared.

Many involved had experienced such an approach during the severe changes to educator licensure under REPA 2. Changes continued to seemingly ignore input from professional educators as well as from experts in the field, including our state educator training

institutions. IAPSS again organized the public school education associations and included Deans of Indiana colleges and universities that had teacher education programs. After hours of hearings at the Indiana State Museum, many of our recommended changes were incorporated into REPA, only to be thrown out a year later when REPA 2 was adopted. REPA 2 was basically the first IDOE REPA proposal. The changes that were instituted after our group's testimony were ignored (and ultimately deleted) in REPA 2. Again, Jeff Zaring, Pat Mapes, and some legal staff from IDOE were present at the hearings for IDOE and the State Board.

At the public hearing on the second A to F (the revision under investigation), IAPSS joined every other group and individual that testified. I remember about 32 speakers in all. All who testified were opposed to the revisions to A to F, version 2, primarily for three reasons:

1. It had been said that the first A to F would be evaluated after being given time to collect comparisons to evaluate.
2. The model still appeared to lack a growth-driven format.
3. It appeared to many that although the revision seemed to slightly favor better scores for secondary schools, it appeared it would have a more negative impact on elementary schools than the A to F model first adopted.

During the first REPA and A to F planning, Dr. Bennett primarily used his handpicked advisory groups. For 50 years, IAPSS had a State Superintendent's Advisory Committee, comprised of member superintendents from each of the eight IAPSS districts that covered the entire state. These members represented every corner of Indiana, and were appointed or elected to represent their district. They communicated with and served as an advisory council for all previous State Superintendents.

These committee members had several concerns about both REPA and A to F, but Dr. Bennett's main communications were with his personally-chosen representatives, ones he had invited to meet with him and were not elected or appointed from all areas of the state. The IAPSS State Superintendent's Advisory Committee reported to all members after every meeting – no reports ever came from Dr. Bennett's privately chosen group. Dr. Bennett's relationship with our association improved greatly after Todd Houston left as his Chief-of-Staff.

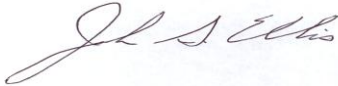
In my opinion, from conversations with superintendents, teachers, principals, and patrons of our schools, the A to F fiasco, coupled with the unrelated testing errors and delay of results, have destroyed the credibility of Indiana's school and school district grading system. It appears that if two of the IPS schools recently taken over had been treated the same as was the Charter School in question, those schools would not have failed either and should not have been turned over to a take-over agent.

I support the need to improve schools for all children, and do not support schools that refuse to change or have created a culture of failure. We need to address how to make tough judgments and not back down from them. Concerns need to be faced honestly with a focus on improved performance of all groups of students, not aimed at some mythical

average that never existed in the first place. Let us focus on how to make the growth happen with highly qualified and trained professionals in classrooms, those trained to lead our school buildings, and trained districts administrators. We need to begin by finding a means to focus on best practices from solid, vetted, research and leave behind the ignorance and failure of quick fixes based on political sound bites.

Thank you for your service to Indiana's children at a critical juncture on our state's path to real change that impacts real needs of all the children and young adults we serve.

Sincerely,

A handwritten signature in cursive script, appearing to read "John G. Ellis". The signature is written in dark ink on a light-colored background.

John G. Ellis, PhD
Indiana Superintendent (1984 – 2004)
Executive Director, Indiana Association of Public School Superintendents (2004 – 2012)
Assistant Professor, Department of Education Leadership
Ball State University (2012 – Present)