INTRODUCTION

In 1983, *A Nation at Risk: The Imperative for Educational Reform*, a report of President Ronald Reagan’s National Commission on Excellence in Education, identified pervasive academic underachievement and declining test scores in the U.S. (NCEE, 1983). The report ushered in the era of standards and accountability in public K-12 education. In response to the fear that American education was falling behind internationally and the increasing concerns about lagging school performance, expenditures for education were increased across the nation. The call for school reform was rampant, with advocates demanding that taxpayer dollars be put to good use in improving schools. Indiana first responded to such calls for change in 1987 with the “A+ Program” and, once again, with Public Laws 146 and 221 (PL 146 and PL 221) in 1999.

PL 221 not only instituted a revamped accountability system focused on rigorous academic standards, but also aligned the state assessment system to the new academic standards and allowed for progress monitoring at the student level. In addition, it held schools and school corporations accountable for student performance and improvement. However, since its passage and implementation, criticism of PL 221 has grown, due not only to the friction between it and the federal Adequate Yearly Progress (AYP) accountability system, but also to evidence that low-performing schools were not seeing hoped-for improvements. Public discussion of reforms to PL 221 began in 2009 with the first modifications receiving the approval of the State Board of Education (SBOE) in 2010. A major overhaul of the school accountability system was adopted by the Indiana State Board of Education on February 8, 2012.

The push for a standards and accountability system in Indiana began in 1987 with the educational reform efforts of Governor Robert D. Orr and H. Dean Evans, State Superintendent of Public Instruction, after the Indiana General Assembly passed legislation creating the “A+ Program.” The subject of great partisan debate at the time, the program created a performance-based system of accreditation and awards, added five days to the school year, established the Indiana Principal Leadership Academy, and implemented the Indiana Statewide Testing for Educational Progress (ISTEP) program (Gold, 1988). Much of the debate centered on the issues of performance-based accreditation and statewide testing. In 1990, a compromise was reached in which the core principles of the “A+ Program” stayed in place and funding was increased for new and existing programs (Cohen, 1990). However, the reforms did not last, at least in the way that legislators and educators had hoped.

In the late 1990s, various reform efforts were proposed in the Indiana General Assembly, only to fail before those legislative sessions ended. Finally, in 1999, accountability system reforms were advocated to the legislature; strongly backed by the Indiana Chamber of Commerce, the measures won support and became Indiana PL 146 and PL 221.
Though it has had less of a perceived impact on the Indiana K-12 education community in general, Public Law 146 was the first measure to be passed. The primary function of this piece of legislation was to create the Indiana Education Roundtable, which would make recommendations on educational matters to the Indiana State Board of Education. The Roundtable is chaired by the governor and the state superintendent, and its members include representatives from the business, labor, higher education, and K-12 education communities, as well as other community leaders. Although the group can make recommendations regarding any educational matter, their first and primary role, as codified in the legislation itself, is to review and make recommendations on academic standards and assessments (IND CODE § 20-19-4, 2005).

PL 146 called for the IDOE to develop, and the SBOE to adopt, academic standards for every grade level from kindergarten through Grade 12 for English, mathematics, social studies, and science that should be based, in part, on the results of ISTEP+ testing, as well as standards for other subject areas not tested under ISTEP+. To further increase the accessibility of the process, the standards developed by the IDOE were reviewed by the Education Roundtable in order to comply with the section of the legislation that states the standards are to be “clear, concise, and jargon free” (IND CODE § 20-31-3-1, 2005), allowing them to be easily understood not only by administrators and teachers, but also by parents and community members. To ensure that the standards would remain current through the years, the standards for each subject area are to be reviewed/revised every six years, in conjunction with the textbook adoption for each subject (IND CODE § 20-31-3-3, 2005).

Indiana received praise early on for its work to improve its academic standards. A 2000 report by Achieve, Inc. noted the strengths of the state’s efforts. In particular, the report’s authors noted that “Indiana’s restated standards show significant strengths, including grade-by-grade specificity and use of jargon-free language” (Achieve, Inc., 2000). They praised grade-by-grade standards, as opposed to standards for grade clusters, for the additional support and guidance they gave to educators. The use of jargon-free language was cited by the report as making the standards more accessible to parents and students. Although the Achieve, Inc. report was released too early in Indiana’s academic standards revision process to evaluate the rigor of all academic standards required by PL 146, more recent reports have ranked Indiana among the best in the nation for the quality of its academic standards.

In 2006, a joint report from Achieve, Inc. and Jobs for the Future noted that “Indiana leads the pack when it comes to setting high standards for all students that reflect the real-world demands of careers and college” (Achieve, Inc. & Jobs for the Future, 2006). In 2008, Education Week’s Quality Counts report evaluated all 50 states in the category of “Standards, Assessment, and Accountability.” The 2008 report ranked Indiana, for the second consecutive year, as the best state in the nation for the high quality of its academic standards and accountability (Education Week, 2008). Indiana achieved this distinction again with the 2012 Quality Counts report (Highetower, 2012).

The more consequential Public Law 221 was passed in concert with Public Law 146 and represented the successor to Governor Orr’s “A+ Program,” in some cases building on ideas previously established as part of that program. Like its predecessor, PL 221 created a performance-based system of accreditation and accountability, financial incentives for high-performing schools called Student Educational Achievement Grants, funding for professional development, and annual performance reporting. PL 221 also adapted three-year school improvement plans, to be revised annually, as a core component of the new accountability system. These elements and their framework form the bulk of this legislation.

The process of writing the rules pursuant to PL 221 was a two-year long process marked by close collaboration with the Indiana Department of Education (IDOE), the Education Roundtable, and the State Board of Education (SBOE); however, there were some disagreements concerning how to actually implement the system laid out by the legislature. Much of the disagreement centered on the labeling system for the categories of school improvement. Although many labeling conventions were discussed and the Indiana Chamber of Commerce favored more stringent category labels, Indiana’s education establishment and community leaders believed that negative labels for schools would stigmatize the schools and discourage their overall improvement. Eventually a compromise was reached with all interested parties agreeing on the following category labeling convention: “Exemplary Progress,” “Commendable Progress,” “Academic Progress,” “Academic Watch,” and “Academic Probation.” In 2010, the SBOE passed a rule to change the category labels to an A-F letter-grade system; this change will be discussed in greater detail later, as it served as a precursor to the more substantial rule changes initiated in 2011.

Although PL 221 was created before NCLB, the 2001 federal law required all states to incorporate the federal system into their own accountability systems. To make this accommodation, any Indiana school that failed to meet Adequate Yearly Progress (AYP) for two consecutive years was precluded from placing any higher than the “Academic Progress” category. Other differences between NCLB and PL 221 will be discussed in a later section of this brief.

Student performance and student improvement for PL 221 are determined by the results of the ISTEP+ English/language arts and mathematics tests. Conceptually, the law also called for the inclusion of science and social studies exams; however, neither of these tests was factored into PL 221 computations since they are not tested at every grade level. A school’s student performance was the average percentage of students passing all ISTEP+ tests in Grades 3 through 10 (as opposed to AYP which sets benchmarks that student subgroups must all meet). Student improvement was calculated based on the percentage improvement on all ISTEP+ tests of student cohorts over the course of a

**PUBLIC LAW 221**

As passed, PL 221 was a complex piece of legislation, outlining not only the new performance-based system of accountability and consequences, but numerous revisions and updates to old provisions, such as School Improvement Plans. As previously mentioned, the three primary components of the legislation that are summarized below are: a performance-based system of accreditation, accountability, and consequences; three-year School Improvement Plans; and financial awards and incentives.

**Accountability Categories**

Perhaps the most important and visible feature of the legislation is the accountability system, which consists of five categories into which all Indiana schools are placed based on student performance and improvement. Table IA shows how these two factors combined prior to the 2009-10 school year to determine a school’s placement into one of five categories: “Exemplary Progress,” “Commendable Progress,” “Academic Progress,” “Academic Watch,” and “Academic Probation.” In 2010, the SBOE passed a rule to change the category labels to an A-F letter-grade system; this change will be discussed in greater detail later, as it served as a precursor to the more substantial rule changes initiated in 2011.

Although PL 221 was created before NCLB, the 2001 federal law required all states to incorporate the federal system into their own accountability systems. To make this accommodation, any Indiana school that failed to meet Adequate Yearly Progress (AYP) for two consecutive years was precluded from placing any higher than the “Academic Progress” category. Other differences between NCLB and PL 221 will be discussed in a later section of this brief.
Table 1. Student Performance and Improvement in PL 221 Placements

<table>
<thead>
<tr>
<th>Performance (Percent passing ISTEP+)</th>
<th>Improvement (average passing percentage improvement over a three-year period)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Exemplary Progress</td>
</tr>
<tr>
<td>≥90%</td>
<td>≥1%</td>
</tr>
<tr>
<td>≥80%</td>
<td>≥3%</td>
</tr>
<tr>
<td>≥70%</td>
<td>≥4%</td>
</tr>
<tr>
<td>≥60%</td>
<td>≥5%</td>
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<td>≥50%</td>
<td>≥6%</td>
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<tr>
<td>≥40%</td>
<td>≥6%</td>
</tr>
<tr>
<td>&lt;40%</td>
<td>≥6%</td>
</tr>
<tr>
<td>&lt;30%</td>
<td>≥6%</td>
</tr>
</tbody>
</table>

Gray cells indicate placements that schools cannot receive given their performance and improvement (the exception being if a school fails to make AYP). Source: IND CODE ANN. § 511-6.2-6-5, 2001.

For example, if 76% of a school’s students passed ISTEP+ tests, and the school showed 2.4% improvement over a three-year period and met AYP, the school would be placed in the “Commandable Progress” category. However, if this same school failed to meet AYP for two consecutive years, the school would be placed in the “Academic Progress” category. This particular example holds true for both the category definitions prior to the 2009-10 school year and the definitions effective in the 2009-10 school year.

In terms of performance and improvement, the present category placement definitions made adjustments to increase the improvement thresholds schools must meet according to their performance level (see Table 1B). For instance, for schools with 50% or more (but less than 60%) of their students passing ISTEP+, the improvement thresholds have changed, effective in the 2009-10 school year. Under the old thresholds, schools in this performance level with a decrease in performance (<0% improvement) were placed on Academic Probation; however, under the new thresholds, schools that demonstrate less than 1% improvement receive an Academic Probation placement. Aside from small adjustments such as this, the “<40%” and “≥40%” performance levels have been eliminated, having been substituted with a single “<50%” performance level. These changes can be observed in Tables 1A and 1B.

# Accountability Consequences

In addition to categorizing schools, PL 221 specifies a system of consequences in order to provide some incentive for schools to seek improvement. The law and the administrative rules focused primarily on the consequences of schools falling into the “Academic Probation” category. Consequences include a local response (consisting of a public hearing), state assistance, and changes to the school’s accreditation status; Figure 1 summarizes these consequences. For each year that a school remains on “Academic Probation,” the consequences become progressively more substantial, ultimately resulting in state intervention. The 2011 school accountability placements marked the first year in which schools found themselves in the sixth year of academic probation, with sixth-year consequences taking effect in the 2011-12 school year. While as many as 17 schools were in the fifth year of academic probation and faced these consequences should they not improve, only seven fell into the sixth year of consequences. The 1999 legislation and the 2001 administrative rules did not provide specific consequences, leaving it open to discussion and ultimately to the SBOE to make the final decision. On August 29, 2011, the SBOE approved a plan that would place five schools under the management of private firms. In Gary, Forreston High School will be managed by Edison Learning, Inc. In Indianapolis, Arlington High School will be operated by EdPower and Charter Schools USA will operate Howe High School, Manual High School, and Donnan Middle School. The private firms spent the 2011-12 school year assessing the schools and developing turnaround plans, with formal takeovers starting in the 2012-13 school year. The two other schools in the sixth year of consequences, Broad Ripple Magnet High School and George Washington Community School (both in Indianapolis Public Schools) were assigned Lead Partners to assist the schools in their turnaround efforts. Scholastic Achievement Partners and The New Teacher Project were assigned to work with Broad Ripple; Wireless Generation and The New Teacher Project were assigned to work with George Washington.

The Evolution of Indiana’s School Accountability System — 3
## School Improvement Plans

Another integral piece of Indiana’s accountability system is the school improvement plan. Although school improvement plans were required by law under the “A+ Program” in 1987, PL 221 incorporated them and further specified the means by which they should be developed and the content they should contain (Indiana House Enrolled Act 1750 §13, 1999). Under this provision of the law, every principal must, with the help of a committee consisting of administrators, teachers, parents, and community leaders, develop a three-year improvement plan for his or her school. This plan must be reviewed and revised every year to ensure that progress is being made toward the established goals. A school’s plan is reviewed by the school corporation’s superintendent and ultimately approved by the local school board before being sent to the IDOE (IND CODE § 511-31-5-4, 2005). School improvement plans are a critical part of overall school accreditation. Schools that are already accredited by an approved accrediting agency or that follow an approved school improvement planning model receive no further review of their School Improvement Plan by the IDOE; however, schools that choose an optional format approved by the SBOE or another format are reviewed by the IDOE to ensure that all minimum requirements are met (J. Zaring, personal communication, September 3, 2009). The school improvement plans address nearly every aspect of the school, from safety to curriculum to student achievement. By law, the plans must address attendance rates and the percentage of students meeting academic standards; high schools must also address graduation rates in their improvement plans (IND CODE §20-31-5-4, 2005).

Apart from these three requirements, schools also have the option of describing the extent to which they will make improvements in other areas of education. The only requirement in establishing these objectives is that results must be measured by setting clear benchmarks.

School improvement plans are a critical aspect of Indiana’s accountability system, since the first five years of consequences involve the revision of the plans. School improvement plans approved by local school boards must be submitted to the IDOE’s Office of School Accreditation, which serves as a clearinghouse for the plans. Prior to 2009, the IDOE also asked schools to submit plans because annual professional development grants were based on professional development programs contained in the school improvement plans (G. Frampton, personal communication, January 26, 2012). The Indiana General Assembly allocated $21 million of these grants in the biennial budget passed in 2001; $27.6 million in budgets passed in 2003, 2005, and 2007; and $11 million in the budget passed in 2009.

The current state budget, passed in 2011, eliminated this funding. To further increase the effectiveness of school improvement plans, schools are barred from receiving full accreditation unless they have a current plan on file with the Office of School Accreditation.

Each school’s professional development program must be created in conjunction with the school improvement plan and must be written by the same team that writes the school’s improvement plan (IND CODE ANN. § 511-6.2-4-2(b), 2009). Professional development programs, as developed by each school and approved by the local school board, must emphasize improvements in student performance and student learning. After the local school board approves the professional development program, it is submitted to the SBOE, which reviews the programs to ensure that they meet all requirements. The SBOE provides extensive codified rules for developing these programs in comparison to other aspects of PL 221.

### Figure 1

**PL 221 Consequences for Schools Receiving an “Academic Probation” Placement**

| Year 1 | • Local education agency (LEA) conducts public hearing and revises its school improvement plan.  
• School can request state-appointed outside team to manage school or help revise the improvement plan (School considered in Year 4).  
• Accreditation: Provisional |
| Years 2 and 3 | • School implements revised improvement plan.  
• LEA can request for a state-appointed outside team to assist in developing a new plan (School considered in Year 4).  
• Accreditation: Provisional |
| Years 4 and 5 | • School considers recommendations of outside team.  
• State will appoint an outside team to help revise improvement plan and recommend changes to promote improvement. LEA can request technical assistance.  
• Accreditation: Probationary |
| Year 6 | • State Board of Education conducts a hearing on options for the school. State may intervene.  
• School implements action determined by State Board of Education.  
• Accreditation: Probationary |

Source: IND CODE §20-31-9
School Performance Awards

Although the negative consequences to schools appear complex, involving multiple stages and various processes designed to put schools on the path to improvement, the rewards for schools that perform well are fairly simple. Public Law 221 established the Student Educational Achievement Grant, which was designed to “stimulate and recognize improved student performance in meeting academic standards under the ISTEP+ program” (IND CODE § 20-31-7-4(a), 2005). The law itself does not enumerate the details of the program and instead defers to the IDEO and the Education Roundtable to negotiate details such as the amount of grants and the system of distribution. Since its inception, the Indiana General Assembly has chosen not to fund this grant system, thus making action by the IDEO and the Indiana Education Roundtable unnecessary. Efforts to repeal this program, along with other obsolete statutes by the Indiana General Assembly, have so far been unsuccessful.

In addition to this grant fund, PL 221 also continued (from the 1987 “A+ Program”) a more general program of performance-based rewards for schools, which may or may not be high-performing, but which demonstrate improvement in performance (IND CODE § 20-31-11, 2005). Performance and improvement are dependent on benchmarks that are considered appropriate for the school by the SBOE and state superintendent. To be eligible for these performance-based rewards, schools must demonstrate improvement for two years (IND CODE § 20-31-11-2, 2005). Once this improvement is identified, the award must progress through a series of approval measures including a formal written report from the SBOE submitted to the State Budget Committee and subject to the approval of the governor. This award program has also not been funded for the last several years.

In January of 2011, the IDEO presented a tentative plan for revising Indiana’s accountability framework. The plan was similar to past frameworks in that it was to be driven by school performance and would be significantly influenced by growth and improvement in student achievement. Additionally, the new framework made a concerted effort to relate performance criteria for high school students to their level of college and career readiness. Finally, it was the intent of the IDEO that the new framework be separated from AYP, eventually replacing it completely. The IDEO plan had three parts: first, it aimed to separate AYP from state accountability; second, it revised the criteria used to place schools in accountability categories; and third, it adopted letter grades for accountability determinations to clarify the murky “performance and improvement” categories.

Separation from AYP

The No Child Left Behind Act of 2001 (NCLB) was a bipartisan effort under President George W. Bush to increase schools’ accountability for student learning. Arriving two years after the passage of PL 221, NCLB added a second layer of school accountability for states. As previously cited, by federal law this second layer of accountability was incorporated into Indiana’s system by linking AYP results to the PL 221 accountability category placements. Using student performance on standardized test scores as a proxy for measuring learning, the AYP component of NCLB requires schools to show measurable yearly increases in student achievement on standardized tests.

The incorporation of AYP into PL 221 was especially difficult in Indiana due to key differences in how the U.S. Department of Education (USDOE) under NCLB’s AYP requirement and the SBOE under PL 221 measured indicators of learning. First, AYP only considers the percentage of students passing ISTEP+ and End-of-Course Assessments; PL 221 incorporates improvement as well as performance. Second, PL 221 tracks cohorts of students from year to year, while AYP uses year-to-year comparisons of the same grade level. Moreover, consequences of failing to make AYP are only applied to Title I schools; both Title I and non-Title I schools missing growth targets under PL 221 receive consequences, though public charter schools and nonpublic schools are exempt. Third, AYP is based on the total number of students enrolled in the school for 162 days in the year of testing; PL 221 uses students enrolled for 126 days as its base. Fourth, performance measurements in PL 221 include all students tested, whereas AYP incorporates data analyzed by student demographic subgroups. Finally, AYP determinations are not affected by PL 221, but as AYP is a federal regulation, PL 221 incorporates AYP determinations into category placements. A source of major tension, category placements for Indiana schools were capped at “Academic Progress,” a C under the new letter grade system, for schools in which the same student subgroup fails to make AYP for two consecutive years.

These differences are not trivial; significant friction has resulted over the reconciliation of the two sometimes competing systems of accountability. Schools truly wishing to improve needed to navigate two sets of criteria that often produced disparate recommendations for improvement and penalties for failure. As the frustration with the competing systems neared the boiling point, the Obama administration announced that it would offer waivers to states who believed they already possessed a strong accountability system. After significant debate by the SBOE, Indiana became one of the first states to apply for this waiver. State Superintendent of Public Instruction Tony Bennett, in an SBOE meeting in December, voiced confidence in the waiver, saying the document was “about as solid as anyone [sic] in the country” (Tony Bennett, SBOE meeting video 12/7/11). Indeed, on February 9, 2012, Indiana became one of ten states to be granted the waiver for exemption from AYP, meaning that the state would no longer have to include AYP in calculating category placements (Elliott, 2012). In a statement released following news of acceptance of Indiana’s waiver application, Bennett remarked that “Indiana will take advantage of the flexibility we have been granted with this waiver by continuing to pursue policies that produce better academic outcomes for our children” (Elliott, 2012). Fulfilling a critical component of PL 221 reform, this exemption will assist in streamlining the category determination process and will present a more coherent, concise accountability framework overall. Subsequently, an eleventh state has had its waiver application approved and 26 states and the District of Columbia have applied for a waiver in round two of waiver consideration.

RECENT OVERHAUL OF PL 221

The IDEO made the decision in early 2011 to change Indiana’s school accountability framework because state education leaders and policymakers deemed it incomprehensible to parents, administrators, and the community at large. The desire for school accountability to be “clear, concise, and jargon free” was not facilitated by the ambiguity of the initial performance criteria or category placements, and the public was calling out for change (IND CODE § 20-31-3-1, 2005).

Revision of Placement Criteria

After significant debate by the SBOE, the plan for revising placement criteria was published for public comment in the Indiana Register on December 14, 2011. After a subsequent
review of comments and further debate at the February Board meeting, the SBOE voted 6 to 2 to accept the rule change with minor modifications (Elliot, 2012). The new rule included major changes in criteria for the following school types: elementary and middle schools open for four years or more; elementary and middle schools open for three years or less; high schools; elementary feeder schools; high school feeder schools; small elementary and middle schools; small high schools; school corporations; and schools opening, reopening, reconfiguring, or redistributing students. The following discussion will focus primarily on elementary and middle schools open for four or more years and high schools. A brief discussion will follow on the rule variations for the remaining school types.

**ELEMENTARY AND MIDDLE SCHOOL EVALUATIONS**

The revision of placement criteria is based on a new method of calculating the performance and improvement category grade. According to LSA #11-51 511 IAC 6.2-6.4 (f), a category grade is assigned by the Board according to the metric presented in Tables 2-5 (Elementary and Middle Schools) and 5-12 (High Schools). The first step in determining the evaluation is to calculate the English/language arts and mathematics points bases.

**Elementary and Middle School: English/Language Arts**

For English/language arts, a preliminary score is set by determining the percent of students passing ISTEP+, IMAST, and ISTAR English/language arts tests. The resulting percentage is converted to points, as seen in Table 2.

Working from this preliminary score, a final point score is determined by adding or subtracting points based on ability to meet or failure to meet test score growth criteria, respectively. Section 511 IAC 6.2-6-5.1 lists two possible ways to gain one point to the preliminary score (heretofore assuming students included obtained valid results): (a) if at least 42.5% of the lowest 25% of students taking the ISTEP+ English/language arts test demonstrate “high growth,” defined as scoring ≥ to the 66th percentile; and/or (b) if at least 36.2% of the top 75% of students taking the same test demonstrate high growth (see Table 3).

There are four ways to lose points from the preliminary score: (a) if at least 39.8% of students taking the English/language arts ISTEP+ test demonstrate “low growth,” defined as ≤ the 34th percentile; (b) if fewer than 95% of students performing in the lowest 25% on the prior year’s test were tested on the English/language arts component; (c) if there are at least 40 students performing in the lowest 25% on the prior year’s ISTEP+ English/language arts assessment and fewer than 95% of the students not included in that lowest 25% subgroup were tested on that component in the year being assessed; or (d) if no points were deducted under the first two options, and fewer than 95% of students enrolled in the school were tested on the English/language arts component (see Table 3). Finally, the rule makes provisions to neither add (see a and b in the above paragraph) nor deduct (see only a above) points if a school has fewer than ten students who were enrolled for at least 162 days in the year being assessed, were not tested in English/language arts ISTEP+, were not included in the subsection in (c) (above), or were not assessed for growth. With these points added or subtracted from the preliminary score, the base point score is converted into A-F letter grades (see Table 3). This base point score and corresponding letter grade is the school’s accountability result for English/language arts.

**Elementary and Middle School: Mathematics**

Mathematics point scores and letter grades are calculated in a similar manner. A preliminary score is established based on the percentage of students passing the mathematics test from the ISTEP+, IMAST, and ISTAR (Table 2). Next, points are added to or deducted from this preliminary score (see Table 4). Schools may earn points or avoid losing points on the mathematics preliminary score if they meet the same set of requirements set forth for English/language arts exemption.

There are two ways to gain points on the mathematics preliminary score: (a) one point is awarded if at least 44.9% of the lowest 25% of students taking the ISTEP+ mathematics test demonstrate high growth; and/or (b) if at least 39.2% of the top 75% of students taking the ISTEP+ mathematics test demonstrate high growth. There are four ways to lose points from the preliminary score: (a) if 42.4% of all students taking the ISTEP+ mathematics test demonstrate low growth; (b) if fewer than 95% of students in the lowest 25% on the prior year’s test are not tested in the current year; (c) if there are at least 40 students performing in the lowest 25% on the prior year’s ISTEP+ mathematics assessment and fewer than 95% of the students not

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**ELEMENTARY AND MIDDLE SCHOOL GPA CALCULATIONS (TABLES 2-5)**

<table>
<thead>
<tr>
<th>Table 2. Assessment Preliminary Point Score Determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Percentage of Students Passing Assessment</strong></td>
</tr>
<tr>
<td>90.0-100.0</td>
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<tr>
<td>85.0-89.9</td>
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<tr>
<td>65.0-69.9</td>
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<tr>
<td>60.0-64.9</td>
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<tr>
<td>0.00-59.9</td>
</tr>
</tbody>
</table>

*According to Federal standards, only students enrolled in the US 12 months or less are exempted from proficiency calculations.

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The growth period for elementary and middle schools is one year.
included in that lowest 25% subgroup were tested on that component in the year being assessed; or (d) if no points were deducted under the first two options, and fewer than 95% of students enrolled in the school were tested on the mathematics component (see Table 3). Finally, the rule makes provisions to neither add (see a and b in the above paragraph) nor deduct (see only a above) points if a school has fewer than ten students who were enrolled for at least 162 days in the year being assessed, were not tested in English/language arts ISTEP+, were not included in the subsection in (c) (above), or were not assessed for growth. With these points added or subtracted from the preliminary score, the base point score is converted into A-F letter grades (presented in Table 5). This base point score and corresponding letter grade is the school’s accountability result for mathematics.

To obtain the final performance and improvement category grade, the SBOE averages the base English/language arts and mathematics point scores (that is, they sum the two scores and divide by two). The result is a final point score. That figure corresponds with an overall letter grade (see Table 5).

*** A school must have a minimum of 10 students to be eligible for points in this area. ** A school must have a minimum of 10 students in the top 75% to be eligible for points in this area. *** A school must have a minimum of 10 students to be eligible for possible loss of points in this area. **** A school must have a minimum of 40 students in the subgroups to be eligible for loss of points in this area.

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### ELEMENTARY AND MIDDLE SCHOOL GPA CALCULATIONS (continued from page 6)

#### Table 3. Elementary and Middle School English/Language Arts Point Score Adjustments

<table>
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<tr>
<th>If...</th>
<th>Then...</th>
</tr>
</thead>
<tbody>
<tr>
<td>$\geq 42.5%$ of bottom 25% show “High Growth”**</td>
<td>Add 1 point</td>
</tr>
<tr>
<td>$\geq 36.2%$ of top 75% show “High Growth”***</td>
<td>Add 1 point</td>
</tr>
<tr>
<td>$\geq 39.8%$ of all students show “Low Growth”****</td>
<td>Subtract 1 point</td>
</tr>
<tr>
<td>$&lt;95%$ of all students take the ISTEP+, IMAST, or ISTAR****</td>
<td>Subtract 1 point</td>
</tr>
</tbody>
</table>

* A school must have a minimum of 10 students in the bottom 25% of growth period to be eligible for points in this area.
** A school must have a minimum of 10 students in the top 75% to be eligible for points in this area.
*** A school must have a minimum of 10 students to be eligible for possible loss of points in this area.
**** A school must have a minimum of 40 students in the subgroups to be eligible for loss of points in this area.

#### Table 4. Elementary and Middle School Mathematics Point Score Adjustments

<table>
<thead>
<tr>
<th>If...</th>
<th>Then...</th>
</tr>
</thead>
<tbody>
<tr>
<td>$\geq 44.9%$ of bottom 25% show “High Growth”**</td>
<td>Add 1 point</td>
</tr>
<tr>
<td>$\geq 39.2%$ of top 75% show “High Growth”***</td>
<td>Add 1 point</td>
</tr>
<tr>
<td>$\geq 42.4%$ of all students show “Low Growth”****</td>
<td>Subtract 1 point</td>
</tr>
<tr>
<td>$&lt;95%$ of all students take the ISTEP+, IMAST, or ISTAR****</td>
<td>Subtract 1 point</td>
</tr>
</tbody>
</table>

* A school must have a minimum of 10 students in the bottom 25% to be eligible for points in this area.
** A school must have a minimum of 10 students in the top 75% to be eligible for points in this area.
*** A school must have a minimum of 10 students to be eligible for possible loss of points in this area.
**** A school must have a minimum of 40 students in the subgroups to be eligible for loss of points in this area.

* A feeder school is defined as a school that directs a significant number of students to a particular middle or high school.

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### HIGH SCHOOL EVALUATIONS

Criteria for high school placement categories differ from that of elementary and middle schools in that they are not based on growth of achievement on test scores, but on End-of-Course Assessments (ECAs), graduation rate, and college and career readiness scores. Specifically, the components used to calculate the overall score for high schools are English Grade 10 ECA, Algebra 1 ECA, a graduation rate score, and a college and career readiness score. The calculation method is similar to that used in elementary and middle schools, with the establishing of a preliminary score that is modified into a
base score with points added or subtracted for meeting or failing to meet benchmarks. At the high school level, scores are capped at a maximum of 4 points and a minimum of 0 points. The three resulting base scores are then weighted and added together to produce a figure that is converted into an overall letter grade (the English Grade 10 ECA, Algebra I ECA, and graduation rate are weighted by multiplying the corresponding base point score by 3; the college and career readiness score is weighted by multiplying the corresponding base point score by .1 [see Table 13]). The process is modeled in Tables 6-14.

**High School: English**

The preliminary point score for English Grade 10 ECA is based on the percent of students passing the ECA or ISTAR by the end of Grade 10 (see Table 6).

Schools can gain one-half point in one of two ways: (a) if the percentage of students passing the ECA or ISTAR is at least 10.3 percentage points higher than the percent of those same students passing the Grade 8 English/language arts test, or (b) if at least 10 students in the graduation cohort do not pass the English Grade 10 ECA and at least 59.3% of the students in the graduation cohort who do not pass the ECA or ISTAR by the end of Grade 10 do pass the assessment by the time the cohort graduates (see Table 7). A total of one-half point can be deducted if the percent of students passing the ECA or ISTAR is at least .1 percentage point lower than the same students’ scores on the Grade 8 English/language arts test. After the necessary additions or reductions, the resulting point score is the final score.

**High School: Mathematics**

The preliminary score for a school’s Algebra 1 ECA is obtained by taking the percentage of students passing that ECA or ISTAR by the end of Grade 10 (Table 6).

Points are added or deducted in a fashion nearly identical to that used for the English/language arts ECA; the only differences are in the assessments referenced (Algebra I ECA vs. English/language arts ECA), and the percentage point thresholds for adding a point (17.1% and 62.8% for adding a one-half point) (mathematics criteria are identical) (see Table 7). As in the English/language arts ECA final point score calculation, the resulting figure after additions and subtractions is the final point score.
Table 10. High School Graduation Rate Point Score Adjustments

<table>
<thead>
<tr>
<th>If...</th>
<th>Then...</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of students from the Grade 10 cohort that passed the ECA ≥ 17.1 percentage points higher than the percentage of the same students who passed the Math portion of ISTEP+, IMAST, or ISTAR in Grade 8*</td>
<td>Add .5 points</td>
</tr>
<tr>
<td>≥ 62.8% of students in the graduation cohort that did not pass the Algebra I ECA or ISTAR at the end of Grade 10 pass those assessments by the time the cohort graduates from high school</td>
<td>Add .5 points</td>
</tr>
<tr>
<td>Percentage of students from the Grade 10 cohort that passed the ECA &lt; 0.0 percentage points lower than the percentage of the same students who passed the math portion of the ISTEP+, IMAST or ISTAR in Grade 8*</td>
<td>Subtract .5 points</td>
</tr>
</tbody>
</table>

** A school must have a minimum of 10 students to be eligible for addition or loss of points in this area.

Table 11: High School College and Career Readiness Rate Calculation Method*

<table>
<thead>
<tr>
<th># Cohort</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grads Who Passed an AP Exam</td>
</tr>
<tr>
<td>Grads Who Passed an IB Exam</td>
</tr>
<tr>
<td>Grads Who Received 3 College Credits</td>
</tr>
<tr>
<td>Grads Who Received Industry Certification</td>
</tr>
</tbody>
</table>

Total # Cohort Graduates

* Each student may only count once in the numerator.

Table 12. High School College and Career Readiness Point Score Determination

<table>
<thead>
<tr>
<th>Percentage of Graduates Who are “College or Career Ready”*</th>
<th>Preliminary Point Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>25.0 - 100</td>
<td>4</td>
</tr>
<tr>
<td>18.4 - 24.9</td>
<td>3</td>
</tr>
<tr>
<td>11.7 - 18.3</td>
<td>2</td>
</tr>
<tr>
<td>5.0 - 11.6</td>
<td>1</td>
</tr>
<tr>
<td>0.0 - 4.9</td>
<td>0</td>
</tr>
</tbody>
</table>

** This will not be applied until AY 2014-15. The target number is subject to change. An Industry Certification target number will also be applied to this subgroup in AY 2014-15 as a mechanism for a school to not incur the 1.00 penalty. A school must have a minimum of 10 students to be eligible for points in this area.

Table 13. High School Point Score Weighting Method

<table>
<thead>
<tr>
<th>Preliminary Point Score Category</th>
<th>Weight By</th>
</tr>
</thead>
<tbody>
<tr>
<td>English Grade 10 ECA</td>
<td>0.3</td>
</tr>
<tr>
<td>Algebra I ECA</td>
<td>0.3</td>
</tr>
<tr>
<td>Graduation Rate</td>
<td>0.3</td>
</tr>
<tr>
<td>College and Career Readiness</td>
<td>0.1</td>
</tr>
</tbody>
</table>

Note: Sum resulting figures to get final point score

Table 14. Final Point Score Conversion to Letter Grade

<table>
<thead>
<tr>
<th>Final Point Score</th>
<th>Letter Grade</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.51 - 4.0</td>
<td>A</td>
</tr>
<tr>
<td>3.0 - 3.50</td>
<td>B</td>
</tr>
<tr>
<td>2.0 - 2.99</td>
<td>C</td>
</tr>
<tr>
<td>1.0 - 1.99</td>
<td>D</td>
</tr>
<tr>
<td>0.0 - .99</td>
<td>F</td>
</tr>
</tbody>
</table>

* A school must have a minimum of 10 students to be eligible for addition or loss of points in this area.

Table 8. High School Algebra I End-of-Course Assessment Point Score Adjustments

<table>
<thead>
<tr>
<th>If...</th>
<th>Then...</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of students from the Grade 10 cohort that passed the ECA ≥ 17.1 percentage points higher than the percentage of the same students who passed the Math portion of ISTEP+, IMAST, or ISTAR in Grade 8*</td>
<td>Add .5 points</td>
</tr>
<tr>
<td>≥ 62.8% of students in the graduation cohort that did not pass the Algebra I ECA or ISTAR at the end of Grade 10 pass those assessments by the time the cohort graduates from high school</td>
<td>Add .5 points</td>
</tr>
<tr>
<td>Percentage of students from the Grade 10 cohort that passed the ECA &lt; 0.0 percentage points lower than the percentage of the same students who passed the math portion of the ISTEP+, IMAST or ISTAR in Grade 8*</td>
<td>Subtract .5 points</td>
</tr>
</tbody>
</table>

** A school must have a minimum of 10 students to be eligible for addition or loss of points in this area.

Table 9. High School Graduation Rate Preliminary Point Score Determination

<table>
<thead>
<tr>
<th>Percentage of Graduates from Graduation Cohort*</th>
<th>Preliminary Point Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>90.0-100.0</td>
<td>4</td>
</tr>
<tr>
<td>85.0-89.9</td>
<td>3.5</td>
</tr>
<tr>
<td>80.0-84.9</td>
<td>3</td>
</tr>
<tr>
<td>75.0-79.9</td>
<td>2.5</td>
</tr>
<tr>
<td>70.0-74.9</td>
<td>2</td>
</tr>
<tr>
<td>65.0-69.9</td>
<td>1.5</td>
</tr>
<tr>
<td>60.0-64.9</td>
<td>1</td>
</tr>
<tr>
<td>0.00-59.9</td>
<td>0</td>
</tr>
</tbody>
</table>

* Exemptions:
  * The total number of excluded students may not exceed 3% of the school's total graduation cohort

Table 10. High School Graduation Rate Point Score Adjustments

<table>
<thead>
<tr>
<th>If...</th>
<th>Then...</th>
</tr>
</thead>
<tbody>
<tr>
<td>≥ 34.4% of four-year graduates received a non-waiver Honors diploma*</td>
<td>Add 1 point</td>
</tr>
<tr>
<td>At least 13.2% of students for the cohort that did not graduate within four years*</td>
<td>Add 1 point</td>
</tr>
<tr>
<td>≥ 32.8% of four-year graduates receive General and waiver diplomas*</td>
<td>Subtract 1 point</td>
</tr>
</tbody>
</table>

* This will not be applied until AY 2014-15. The target number is subject to change. A school must have a minimum of 10 students to be eligible for points in this area.

** This will not be applied until AY 2014-15. The target number is subject to change. An Industry Certification target number will also be applied to this subgroup in AY 2014-15 as a mechanism for a school to not incur the 1.00 penalty. A school must have a minimum of 10 students to be eligible for points in this area.

Table 14. Final Point Score Conversion to Letter Grade

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<td>D</td>
</tr>
<tr>
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</tbody>
</table>

* A school must have a minimum of 10 students to be eligible for addition or loss of points in this area.

Table 8. High School Algebra I End-of-Course Assessment Point Score Adjustments

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<tr>
<th>If...</th>
<th>Then...</th>
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<tr>
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<td>Add .5 points</td>
</tr>
<tr>
<td>≥ 62.8% of students in the graduation cohort that did not pass the Algebra I ECA or ISTAR at the end of Grade 10 pass those assessments by the time the cohort graduates from high school</td>
<td>Add .5 points</td>
</tr>
<tr>
<td>Percentage of students from the Grade 10 cohort that passed the ECA &lt; 0.0 percentage points lower than the percentage of the same students who passed the math portion of the ISTEP+, IMAST or ISTAR in Grade 8*</td>
<td>Subtract .5 points</td>
</tr>
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** A school must have a minimum of 10 students to be eligible for addition or loss of points in this area.

Table 11: High School College and Career Readiness Rate Calculation Method*

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</tr>
<tr>
<td>Grads Who Passed an IB Exam</td>
</tr>
<tr>
<td>Grads Who Received 3 College Credits</td>
</tr>
<tr>
<td>Grads Who Received Industry Certification</td>
</tr>
</tbody>
</table>

Total # Cohort Graduates

* Each student may only count once in the numerator.

As Indiana continues to seek new opportunities to drive student success, our state’s firm commitment to new levels of accountability for all schools accepting taxpayer dollars will bolster efforts to provide our students the top-notch education they deserve. The Indiana Department of Education, with significant input from educators around the state, has recently taken several effective steps to transform our state’s school accountability system.

Our state’s previous metrics drew justified criticism from parents and the public, as well as from our state’s teachers and school leaders. To begin, the old categories for school accountability placement (Exemplary Progress, Commendable Progress, Academic Progress, Academic Watch, and Academic Probation) were ambiguous and told the public little about their schools. Indiana needed clearer category labels that could be understood by people from all walks of life.

All Indiana schools received A through F letter grades for the first time last fall. This simple decision has had a profoundly positive effect on our school communities. Easy-to-understand category placements have driven new levels of community engagement across the board. Around the state, communities are participating in substantial discussions regarding school improvement, and many have formed new partnerships aiming to better serve the needs of students.

With these transparent labels in place, the need for more comprehensive accountability metrics was more apparent than ever. The old metrics were narrowly focused on how many students passing, and the federal Adequate Yearly Progress (AYP) measurement, which federal law required Indiana to include in our state metrics. The AYP determination often had a punitive effect on schools, creating a multitude of ways for them to fail to meet the requirement, with few opportunities to demonstrate student gains and progress toward closing achievement gaps.

In April, our State Board of Education approved new accountability metrics for school performance rankings. This decision was the result of a two-year process to create the new metrics, which were based on input from educators across the state and intense research on the academic indicators most directly related to student success. Indiana’s metrics for school performance had not changed since 1999, and the board felt a duty to Hoosier students, parents, and educators to update our accountability formula with more current and effective measures of academic achievement.

The final result is a fair and rigorous system that holds schools accountable for the success of all students, while leveling the playing field to ensure all schools have a chance to demonstrate effectiveness.

At the elementary and middle school levels, the new metrics balance performance, improvement, and growth to provide a comprehensive view of school achievement. Indiana’s Growth Model is used to increase letter grades of schools demonstrating high overall growth or measurable success in closing the achievement gaps within their buildings. Further, a school’s letter grade will fittingly drop if the school is not helping its students grow academically.

The Growth Model looks at the individual progress students make during the course of the school year rather than whether students simply “pass” or “fail” a test. Incorporating growth into our accountability metrics finally recognizes the accomplishments of so many educators who drive tremendous growth in students who start the school year performing well below grade-level. Our previous metrics were blind to growth for far too long. I’m tremendously proud Indiana is now using this new tool to measure the gains our teachers drive each year in their classrooms.

At the high school level, the metrics focus on completion and align with our goal to ensure students are ready to succeed in postsecondary courses and the workforce upon graduation. Once again, by implementing college and career readiness indicators, we are focusing on the things that matter most to the success of our students.

Students are expected to pass the end-of-course assessments, graduate, and complete at least one of four indicators representing college and career readiness: passing an AP or IB exam, earning college credit (dual credit), or earning an industry certification. There are multiple paths to success, but the formula is the same: an emphasis on the acquisition of the requisite skills that allow our students to compete for high-wage, highly-skilled jobs and careers.

Discussion around the metrics should focus on substantive policy differences and the many improvements to our previous, antiquated model. To be clear, Indiana’s new accountability system does not establish a quota system or unfairly punish high-poverty schools. By its very nature, incorporating the growth model as part of the new metrics breaks down barriers for schools with our most challenging student populations.

It is understandable that change of this magnitude will bring some level of discomfort to those who have become accustomed to operating under the old system. But when change helps us renew our focus on providing our students the skills they need to succeed, it’s a good thing. And so, many schools working hard to provide our students the top-notch educations they deserve have nothing to fear. Their efforts will be rewarded by the A through F school accountability system.

Those looking for evidence of bipartisan support for Indiana’s accountability metrics need look no further than the approval of our No Child Left Behind waiver application for the U.S. Department of Education. The new metrics were a key piece of the state’s application and received significant applause for the focus on closing the achievement gaps that have persisted in our nation’s schools for several generations.

We cannot waver in our commitment to provide all students access to a world class education. To achieve this goal, we must hold all stakeholders accountable for our students’ success and engage communities in collaborative partnerships to support school improvement efforts. Recent steps will go a long way toward helping Indiana accomplish this vision.

Dr. Tony Bennett

Dr. Tony Bennett is State Superintendent of Public Instruction for Indiana
Policy Perspective

The New A-F Model: The State Board of Education Failed to Listen to the Public

Dr. Vic Smith

On January 17, 2012, the only public hearing on new rules revising A-F categories attracted 35 speakers. All 35 spoke against the plan.

When the State Board of Education passed the rules at their next meeting on February 8th, changes proposed by the 35 speakers were ignored. The only changes made were those requested by federal officials to secure the federal waiver from No Child Left Behind announced on February 9th.

The State Board should have listened to stakeholders at the hearing. They have passed a flawed system. Issues raised at the hearing include the following:

1) The rules do not establish categories of improvement as the law requires.

“IC 20-31-8-3 Categories or designations of school improvement established

Sec. 3. The state board shall establish a number of categories or designations of school improvement based on the improvement that a school makes in performance of the measures determined by the board with the advice of the education roundtable. The categories or designations must reflect various levels of improvement.”

Instead of setting up categories based on improvement, the rules base letter grades on performance. The heaviest factor in the school grade is performance on ISTEP math and English tests. Predictably, 90% passing will bring an A and 60% will produce a D. Improvement is reduced to a bonus or reduction that can slightly lift or lower the performance grade.

2) The rules use improvement statistics based on peer performance in elementary and middle schools.

If a school has a high percentage of low-growth students, its grade will go down. If a school has a high percentage of high growth students, its grade will go up.

Here’s the problem: Low-growth and high-growth labels for students are determined relative to the performance of their peers. Whether a student’s growth is high enough to be labeled “high growth” is influenced by the growth of other students who start out at the same score. Given two students both passing the test and raising their scale scores by the same amount, one could be labeled “high growth” based on how peers performed, while the other student is not. High- and low-growth scores are norm-referenced statistics.

The use of norm-referenced measures in state accountability systems ended years ago. Policymakers in the 1990’s abandoned the use of norm-referenced measures for the purpose of accountability. Instead, state accountability policies were based on criterion-referenced measures, wherein a criterion is set and all students who achieve that level can pass. Basing high growth on the normal curve of peer scores is neither wise nor fair, yet this has been embedded in the new criteria for school letter grades.

3) The results unfairly punish the performance of Indiana’s elementary/middle schools.

IDOE projected before the February 8th vote that 405 Indiana schools (22.6%) would have D’s or F’s. In Florida, a state highlighted by Dr. Bennett as a role model for letter grades, only 6% of schools currently have D’s or F’s. The contrast between 22% and 6% is remarkable, especially given the fact that on the same national assessment test, Indiana has outsored Florida consistently in math, science, and 8th grade reading.

This comparison leads to the conclusion that Indiana now has a harsh standard that is roughly three times tougher than Florida in producing D or F schools, potentially feeding large numbers of schools into state takeover. Additionally, the same data produced only 20% D’s and F’s last August using the old system. Thus, the new rules assign D’s and F’s to 45 more schools than the old system.

Why should Hoosier schools be graded significantly lower than Florida schools?

Why should Hoosier schools be graded lower than 2010-11, using the same test data?

A key problem is the anemic way the new rules award bonuses for improvement to elementary and middle schools. Relatively few bonuses are likely. Instead, performance scores will be the dominant factor in the school grade.

Including norm-referenced metrics in the model may also become the basis for lawsuits when IC 20-31-8-2(b) is considered: (b) The department shall assess improvement in the following manner: (1) Compare each school and each school corporation with its own prior performance and not to the performance of other schools or school corporations. The labeling of high- and low-growth students does indeed use comparisons involving the students of other schools and school corporations.

The state board did not listen well to the public during the hearing process, undermining public confidence in the validity of the grades and leaving the program vulnerable to lawsuits.

Dr. Vic Smith is a Retired Educator and Volunteer Board Member of the Indiana Coalition for Public Education
Do The New School Grade Models Make The Grade?

Todd Bess and Steve Baker

The Indiana Association of School Principals (IASP) served on the High School A-F committee from the beginning and this collaboration allowed for the correct input to be considered. Our goal was to help develop a fair, accurate, and transparent model that was a comprehensive picture of high schools in the state of Indiana. Borrowing from the elementary school model, we focused on performance and improvement, and the four categories that emerged represent the 18-month dialogue. The improvement factor also allowed for data that illustrated 8th grade to 10th grade, and 10th grade to 12th grade improvement in the areas of the Algebra 1 and English 10 End-of-Course Assessments (ECAs). The four categories are the Algebra 1 and English 10 End-of-Course Assessments, Graduation Rate, and College and Career Readiness (CCR). The ECAs were the two factors that were a part of the PL 221 grading model, while graduation rate and CCR were added to expand the model and present a more balanced scenario of what occurs during high school. Continued dialogue on the high school model is critical having students become college ready, but the general diploma can still be a significant accomplishment for many students who desire to enter directly into a career. The influences of poverty impact educational opportunities and the graduation rate grade should not solely represent the community’s demographics. Penalizing schools for having too many general diplomas without accounting for the factors that make graduation difficult in many communities was not the original intent of the committee.

The elementary/middle school model focuses MORE on performance and growth compared to prior year test scores. The idea of incorporating growth into school accountability is a positive step, as this gives credit for the work a teacher does with a student throughout the school year even though the student may not pass the ISTEP+ exam. Concern is noted, however, when growth is determined when comparing students against one another and without regard to poverty as a factor in learning opportunities. Examples of success with high-poverty schools do exist and these are to be celebrated and, hopefully, replicated. Right now these examples are limited and thus prove the difficulty of working with high-risk students. Dialogue must begin on how to provide credit to schools doing exceptional work with high-risk students. IASP also urges discussion on incorporating additional factors into the elementary/middle school model as exist in the high school model. Adding other student learning data into the elementary/middle school model will provide a better representation of what occurs during these critical formative years and can add to both the performance and growth factors for schools.

Another factor that deserves discussion is that each subject area GPA is capped at 4 points. This limits the final grade average of the two subject areas and does not provide the desired clarity of what is occurring in a school. Schools that are showing growth for the bottom quartile of students and for the whole school should be given credit for this outstanding work, and their final grade should represent the efforts of the teachers and students.

Grading schools is a difficult process, especially when striving to note a school’s performance on the basis of student test scores. Parents are personally connected to their school by virtue of their high involvement, and their understanding of the factors comprising the school grade is essential to insure their experiences are representative of the publicized grade. Indiana principals will continue to meet the needs of students and parents as they all desire ‘A’ great school.

Todd Bess is Associate Executive Director of the Indiana Association of School Principals.

Steve Baker is Principal at Bluffton High School and a member of the Indiana Education Roundtable.
**High School: Graduation Rate and College and Career Readiness**

To obtain a graduation rate score, a preliminary score is first established by the percent of students graduating from high school in four years (Table 9 presents the conversion into points).

One point may be added to this score if at least 34.4% of four-year graduates receive academic and/or technical honors or an international baccalaureate designation, and/or if at least 10 students in the graduation cohort fail to graduate in four years but at least 13.2% of students in the graduation cohort who failed to graduate in four years do so in five years (Table 10). One point will be deducted if at least 32.8% of four-year graduates receive a general diploma or waiver (Table 10). This resulting figure is the final point score for the graduation rate figure.

It is noteworthy that until the 2014-15 school year the final point score for the graduation rate will simply be the preliminary score without any addition or subtraction of points. The 2014-15 school year will see the first addition and subtraction of points to create the final graduation rate score.

Finally, the college and career readiness score starts with the graduation cohort (exclusive of students who did not graduate in four years or less) and establishes a cumulative percent based on the percentage of students who passed an AP exam with a 3 or higher, passed an IB exam with a 4 or higher, earned three college credits, obtained an industry certification, or met any other benchmarks approved by the SBOE (calculation method shown in Table 11).

That cumulative percent is matched with a point score (Table 12). After the four component point scores are collected, they are weighted appropriately and then summed (Table 13). The resulting letter grade is the final performance and improvement category grade (Table 14).

There are, as with elementary and middle school procedures, exceptions to the above calculation methods for feeder high schools and small high schools; the revised procedures are identical to those stipulated for feeder elementary and middle schools and small elementary and middle schools.

**Letter Grades for Accountability Determinations**

The change to letter grades as accountability categories in the 2010-11 school year paved the way for the substantially revised criteria previously discussed. The change to a letter grade system itself was born out of a similar desire for clarity in communication. A statement of need published by the IDOE in January 2010 spoke of the ambiguity of the current performance categories, explaining that the importance of each category is lost on many Indiana residents. The statement further elaborated that policymakers valued residents’ understanding of how their schools matched up with accountability requirements, but that the terms ‘Academic Watch’ or ‘Comendable Progress’ did not sufficiently communicate this. An initial rule change, adopted for the 2009-10 school year, made no substantive program changes but added a “relabeling feature” that synchronized the A-F system and the current progress category scheme.

The 2010-11 school year saw the A-F labels applied exclusively, and introduced a new rule change to revise category placement criteria. Though many in the academic community express relief at a simpler, more intuitive accountability system, public comments on the rule change question the efficiency and effectiveness of the letter grade system. In particular, educators are concerned with the accuracy of the system, and potential effects on motivation of students and schools given undesirable grades. Additionally, many question if the new system will actually increase school performance, or if it is simply a “reshuffling of the deck.”

**IDOE SCHOOL GRADE PROJECTIONS**

As part of the IDOE’s application for an NCLB waiver, they made general projections of how schools would be graded in 2012 as well as in 2015 and 2020. As can be seen in Table 15, in 2012 the IDOE projects that 28% of schools will receive a D or F with 47% of schools receiving an A or B. The IDOE projects that the number of schools receiving a D or F will decrease with no schools receiving these grades in 2020. It is notable that the IDOE projects over 50% of schools will receive an A in 2015 and nearly 75% of schools will in 2020 (Stokes, 2011). To facilitate understanding about the new accountability measures and category placements, the IDOE has developed an Excel tool and workbook aimed at giving schools and districts an idea of where they might place under the new rule.* The tool features sheets for both elementary/middle schools and high schools, and gives growth and participation target percentages for schools concerned with performance. A sample report card, also available on the website, shows a mock-up of category placements and overall grade determination. The tool, workbook, and other documents relating to accountability are available at http://www.doe.in.gov/Improvement/accountability/f-accountability.

* The online resources are meant to serve illustrative purposes only.

**Table 15. IDOE School Grade Distribution Projections**

<table>
<thead>
<tr>
<th></th>
<th>2012</th>
<th>2015</th>
<th>2020</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>28%</td>
<td>58%</td>
<td>73%</td>
</tr>
<tr>
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**CONCLUSIONS AND RECOMMENDATIONS**

Since the creation of the A+ Program in 1987, school accountability has often been at the forefront of education policy discussions and regulatory changes in Indiana. The latest discussions emerging after the SBOE approved the rule change in February 2012 suggest that further changes to the school accountability model will be forthcoming. Our examination of the evolution of Indiana’s school accountability efforts over the past few decades provides several conclusions and recommendations to guide future discussions.

**Conclusion**

Discussions of the new school accountability models continue to focus on grading schools fairly. Although the new models are an improvement over the former system originally established by PL 221, critics continue to question in particular the elementary/middle school model and the scale score point adjustments for student growth and whether student performance and growth will be accurately described by the model. This is a healthy discussion that should continue into the future and evolve as the results produced by the new system are examined.
Recommendation
Both advocates and critics of the new system will closely follow schools’ results under the new accountability models, but attention should also be paid to the scaled score points and how they are adjusted throughout the grade calculation to better examine how the different components of the new models affect schools’ final grades. The IDOE should continue to host periodic forums on the school accountability models to solicit feedback from the communities which will allow further insight into how the new models work in practice and how school corporations use or don’t use the results to improve student instruction.

Recommendation
The elementary and middle school model currently recognizes growth for the top 75% and the bottom 25% of students. To better reflect student growth at all levels, future discussions of changes to the elementary/middle school model should also examine growth among the top 25% of students to ensure that these students are not neglected in school improvement plans.

Conclusion
In order to grade schools fairly and effectively, the models must take into account a variety of factors that indicate student growth and achievement. It is important that all stakeholders (school administrators, faculty, staff, and community members) understand the reasoning behind their school’s grade in order to improve student achievement most effectively. As such, grade calculations should be disseminated and explained in a concise, user-friendly, and informative way. The IDOE has made available sample school report cards on its website. The report cards boldly present a school’s grade and explain how the grade was determined in a mixed visual and textual display, with the first page providing a summary and the following pages providing a more detailed explanation.

Recommendation
School corporations and the IDOE should work together to ensure that school grades are widely distributed within local communities. In addition to making the report cards available online, the accountability grades should be included in the school annual performance reports published in the local newspapers of school corporations. Local school boards should also be required to have discussions of their schools’ accountability reports and grades within 60 days of the IDOE’s release of the information. Extra effort will need to be made until the public understands how the grades are calculated and where to find them.

Recommendation
The presentation of school grades and their explanations needs to be clear, concise, user-friendly, and informative. The IDOE should follow up with school corporations on how they publicized their school grades locally, how the report card format was received, and whether it was easily understood by their communities. School administrators also need to communicate to the IDOE any problems their communities have in understanding the report cards. If the public does not understand the report cards, then it is a wasted effort and a missed opportunity to reach out to school communities about the performance of their schools.

Conclusion
Although the incentives tied to the state’s school accountability system have been discontinued, the system of consequences has more recently been at the forefront of discussion, particularly with the implementation of sixth-year consequences and the SBOE signing lead partners or educational management organizations (EMOs) to manage failing schools. Turnaround schools managed by EMOs and lead partners present another set of issues related to school accountability will prove to be important to the successful turnaround of the state’s failing schools, and will be addressed in a later Education Policy Brief. Perhaps the biggest concern, given their relative unfamiliarity to the public, is the public trust in EMOs to manage and turnaround local public schools. Other issues which will need to be addressed concern upkeep of facilities at turnaround schools and transportation of students, two areas which have already caused friction in Gary and Indianapolis.

Recommendation
The IDOE and EMOs need to work to build public trust in these organizations to manage and improve local public schools. Any potential distrust of EMOs by parents could lead to them being understandably concerned about leaving their child in an “F” school. The IDOE and SBOE will need to continue to carefully monitor the turnaround schools and work with the EMOs to solve problems that arise. EMOs should also make an effort to build relationships within their new communities for the success of the school and its students.

Recommendation
Since EMOs are for-profit organizations and are allowed to profit from their management of turnaround schools in Indiana, there will be the concern from many in the local communities that these organizations may seek to profit at the expense of the students and the school facilities. The IDOE should maintain close oversight of EMO school budgets to ensure students and school facilities receive adequate and equitable funding.

Recommendation
Turnaround schools are finding themselves in a similar situation as charter schools in terms of their access to capital funds to maintain facilities. The IDOE needs to advocate for solutions which will put turnaround schools on an equal footing with local school corporations in access to Capital Project Fund monies. One possible solution would be for the IDOE to advocate for turnaround schools to either have access to the state’s charter school facilities fund or to have a similar fund established and funded by the state to serve turnaround schools.

Recommendation
Recent issues in Indianapolis regarding student transportation to turnaround schools brings to light the need for EMOs to have flexibility in transporting their students. While the memorandums of understanding between school corporations and turnaround schools require school corporations to provide transportation, many school corporations will not provide bus transportation if students live within a certain distance and have safe walking routes. However, EMOs should have the flexibility to provide other transport options or be able to negotiate other arrangements with local school corporations. All parties involved need to ensure that every student has a safe, reliable way to get to and from school and that they arrive on time.

Conclusion
The end goal of any school accountability system is seeking overall school improvement and helping improve struggling schools. As such, the system of incentives and consequences is inherently important. However, as it currently stands, Indiana’s school accountability system only bears consequences since funding for performance-based awards was never allocated by the Indiana General Assembly or has been discontinued in recent years.

Recommendation
The IDOE should advocate for reinstating funding for the incentives included in the original PL 221 which would reward schools for significant gains in student improvement or advocate for replacing these unfunded incentives with another form of incentive. The state’s use of merit-based pay provides an opportunity to further reward teachers and staff that facilitate large gains in student improvement.
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ACKNOWLEDGEMENTS

The authors would like to thank Jon Gubera, Chief Accountability Officer at the IDOE; Jeff Zaring, former Indiana State Board of Education Administrator; and Gary Wallyn, former Director of the Office of Accreditation and Awards at the IDOE, for their guidance and review of sections regarding the old and new systems of accountability under PL 221. A special thank you also to Dr. Tony Bennett, Indiana Superintendent of Public Instruction; Vic Smith, former educator; Todd Bess, Associate Executive Director of the Indiana Association of School Principals; and Steve Baker, member of the Indiana Education Roundtable, for contributing their views in our Policy Perspective Letters.

The authors would also like to thank all of the CEEP staff and research assistants who have provided edit suggestions to this brief over the course of its development, and in particular Terry Spradlin, Director for Education Policy and the High School Survey of Student Engagement, for his guidance and assistance in researching and developing the contents of this brief.

REFERENCES


IND CODE § 20-19-4, 2005

IND CODE § 20-31, 2005

IND CODE ANN. § 511-6.2, 2009

Indiana House Enrolled Act 1750 §13, 1999


WEB RESOURCES

IDOE – Office of Accountability
http://www.doe.in.gov/improvement/accountability

IDOE – A-F Accountability
http://www.doe.in.gov/improvement/accountability/f-accountability

IDOE – PL 221

IDOE – Sample Elementary/Middle School Report Card

IDOE – Sample High School Report Card
http://www.doe.in.gov/sites/default/files/accountability/sample-high-school-report-card.pdf

Education Policy Briefs are executive edited by Jonathan A. Plucker, Ph.D. and published by the

Center for Evaluation & Education Policy
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