Section 4: Accountability, Support, and Improvement for Schools

Instructions: Each SEA must describe its accountability, support, and improvement system consistent with 34 C.F.R. §§ 200.12-200.24 and section 1111(c) and (d) of the ESEA. Each SEA may include documentation (e.g., technical reports or supporting evidence) that demonstrates compliance with applicable statutory and regulatory requirements.

4.1 Accountability System

Guiding Principles of New Mexico's Accountability System

- Replacing the existing summative determination of A–F school grades with the *New Mexico Spotlight School* designation and *Levels of Support*, provided by the Public Education Department (PED), represents a paradigm shift in philosophy from failing schools to celebrating success and providing support for schools in need. In schools with low academic performance, we believe the system is failing the school–not the other way around.
- Designations of excellence also provide a spotlight on schools with excellent performance on individual indicators to further celebrate success and help families in their decisions around school choice, as aligned with the individual family's set of values.
- Leveraging the spirit of the Every Student Succeeds Act to identify schools with the greatest need for support and schools that demonstrate excellence
- Recognizing the importance of mathematics and English language arts (ELA) for all performance measures, measuring them equally and reporting each separately
- Using multiple years of student and/or school data where possible (typically three years of academic growth/achievement data)
- Assessing performance for all elementary and middle schools with the same rubric (EL Model) and all high schools with an expanded rubric (HS Model)
- Including student academic growth and achievement as the majority of a summative determination, with additional indicators, such as graduation rates
- Augmenting those measures with other critical college and career readiness measures and opportunity-to-learn measures, such as student attendance and surveys
- Awarding a summative score of up to 100 points
- Awarding scores for each individual component of a school's report, in addition to the overall summative determination
- Provide information on LEAs as well as individual schools for each indicator
- Disaggregating and reporting each measure by the subgroups of gender, race/ethnicity, students with disabilities, English learners, and economically disadvantaged students
- Including all students with disabilities, including those with the most significant cognitive disabilities who require the state's alternate assessment
- Relying heavily upon student growth and progress on each indicator, in addition to student proficiency and utilizing these measures to determine school improvement interventions and supports

Schools Rated

Over the past five years, school ratings in New Mexico have been calculated for all public schools, including locally authorized and state-authorized charter schools. Certain schools do not generate school ratings because their funding and governance is either shared or wholly sponsored under a non-PED authority. Examples include the School for the Deaf, School for the Blind and Visually Impaired, and the Juvenile Justice institutions, all of which receive their funding and oversight from non-PED state agencies. This exemption was formalized and approved in 2008 via negotiations between the PED and the US Department of Education. Similarly, the PED has not extended accountability to the Bureau of Indian Education (BIE), private, or home schools to date. Based on stakeholder engagement, the SEA is engaging in additional tribal consultation on accountability systems and how the PED and BIE can best work together. While these schools are not rated, their student achievement, graduation rates, and other accountability information, where available, is aggregated and reported alongside that of New Mexico's public schools.

The PED recognizes that the Navajo Nation has an approved accountability plan titled the *Diné School Improvement Plan* (DSAP) that was signed and approved by the US Department of Education and the U.S. Department of Interior for the BIE. We look forward to working and collaborating with the Navajo Nation on Indian education support.

State statute (22-2E-4(B) NMSA) provides for a minimum combination of factors to be included in the system of school support and accountability.

(1) for elementary and middle schools:

(a) student proficiency, including achievement on the New Mexico standards-based assessments;

(b) student growth in reading and mathematics; and

(c) growth of the lowest twenty-fifth percentile of students in the public school in reading and mathematics; and

(2) for high schools:

(a) student proficiency, including achievement on the New Mexico standards-based assessments;

(b) student growth in reading and mathematics;

(c) growth of the lowest twenty-fifth percentile of students in the high school in reading and mathematics; and

(d) additional academic indicators such as high school graduation rates, growth in high school graduation rates, advanced placement and international baccalaureate courses, dual enrollment courses and SAT and ACT scores.

Student Learning At All Levels

New Mexico's philosophy regarding school accountability is undergirded by the belief that all students can achieve at the highest levels. For New Mexico's children, that starts with a deep commitment to early literacy—both in terms of policy and State supported, targeted investments—such as K–3 Plus. Reading is the gateway to learning, and—historically—New Mexico has ensured that students in kindergarten (K) through third grade are incorporated into school performance measurement using a statewide ELA assessment. This allows for meaningful feedback to elementary schools with nontraditional grade configurations, as well as expanded feedback to most traditional elementary schools.

Building upon that foundation, all students in kindergarten through grade 11 are assessed in ELA, and students in grades 3 through 8 are assessed in grade-level mathematics. In high school grades 9–11, all students enrolled in a relevant math course must take the aligned summative assessment. This inclusion of high school grades 9–11 similarly ensures more robust and informative feedback to schools. New Mexico's integrated approach around assessment, accountability, and targeted investments creates comparability both over time and in-between different types of schools, as every grade level K–11 generates robust data on student performance.

School-level accountability has excluded students who are housed in temporary off-site locations, typically treatment centers, homebound, hospitalized, or in temporary correctional facilities. Students in these settings, who have a parent school affiliation (i.e., a student in a temporary behavioral setting but who will be returning to the sending school), are still tested, and their scores are included with the parent school where possible. All off-site students are included in LEA and state accountability regardless of school affiliation**.**

A. Indicators. Describe the measure(s) included in each of the Academic Achievement, Academic Progress, Graduation Rate, Progress in Achieving English Language Proficiency, and School Quality or Student Success indicators and how those measures meet the requirements described in 34 C.F.R. § 200.14(a)–(b) and section 1111(c)(4)(B) of the ESEA.

- The description for each indicator should include how it is valid, reliable, and comparable across all LEAs in the state, as described in 34 C.F.R. § 200.14(c).

- To meet the requirements described in 34 C.F.R.§ 200.14(d), for the measures included within the indicators of Academic Progress and School Quality or Student Success measures, the description must also address how each measure within the indicators is supported by research that high performance or improvement on such measure is likely to increase student learning (e.g., grade point average, credit accumulation, performance in advanced coursework).

- For measures within indicators of School Quality or Student Success that are unique to high school, the description must address how research shows that high performance or improvement on the indicator is likely to increase graduation rates, postsecondary enrollment, persistence, completion, or career readiness.

- To meet the requirement in 34 C.F.R. § 200.14(e), the descriptions for the Academic Progress and School Quality or Student Success indicators must include a demonstration of how each measure aids in the meaningful differentiation of schools under 34 C.F.R. § 200.18 by demonstrating varied results across schools in the state.

The framework for the New Mexico's system of school support and accountability recognizes that school performance should be assessed within three overarching categories: 1) student academic performance, including graduation rates, 2) student achievement growth, 3) English language proficiency, and 4) other indicators of school quality that contribute to college and career readiness.

SUMMATIVE POINTS			
ESSA Indicator	**EL/MS**	**HS**	**ESSA Indicator Classification**
Math and Reading Proficiency	30	25	Academic Achievement (AA)
Student Academic Growth Q4	5	5	Academic Progress (ES) AA (HS)
Student Academic Growth Q2–3	10	10	Academic Progress (ES) AA (HS)
Student Academic Growth Q1	25	15	Academic Progress (ES) AA (HS)
English Language Proficiency	10	5	English Language Proficiency (ELP)
Science Proficiency	5	5	School Quality/Student Success
Chronic Absenteeism	5	5	School Quality/Student Success
College and Career Readiness	n/a	10	School Quality/Student Success
Educational Climate Survey	10	5	School Quality/Student Success
Growth in 4-Year Rate	n/a	5	School Quality/Student Success
4-Year Graduation Rate	n/a	5	Graduation Rate
5-Year Graduation Rate	n/a	3	Graduation Rate
6-Year Graduation Rate	n/a	2	Graduation Rate

4.1.A.i Measures for the Academic Achievement Indicator

Math and Reading Proficiency

The first indicator, math and reading proficiency, is computed identically for both ES and HS models. The measure consists of the number of students who are on grade level in ELA and mathematics, with equal weight provided to both subject areas, divided by either the total number of tested students or 95 percent of enrolled students in the school (whichever is larger). Overall proficiency is measured and reported for the following subgroups:

- All Students
- Race/Ethnicity (Caucasian, African American, Hispanic, Asian/Pacific Islander, American Indian)
- Students with Disabilities
- Economically Disadvantaged (eligible for Free/Reduced Priced Lunch Program)
- English Learners (current only)

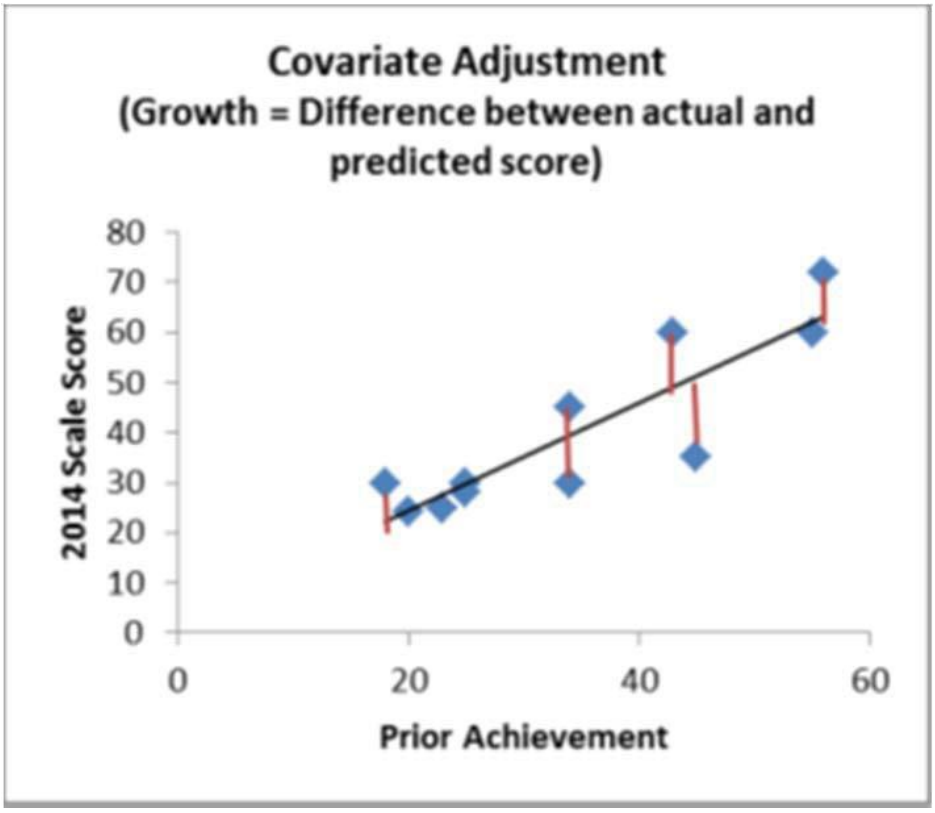
4.1.A.i Measures for the Academic Progress Indicator

THE CENTRAL ROLE OF STUDENT GROWTH IN NEW MEXICO'S SYSTEM

Theoretical Justification

The research base for the validity and reliability of incorporating student growth, using New Mexico's methodological approach, is strong. Student growth is based on an individual student growth model (Raudenbush and Bryk, 2002; Willet and Singer, 2003; Goldschmidt, et. al., 2005). The threat of potential confounding factors in non-randomized, cross-sectional designs (Campbell & Stanley, 1963), and the limitations of pre-post designs (Bryk & Wesiburg, 1977; Raudenbush & Bryk, 1987; Raudenbush, 2001) in making inferences about school, program, or teacher effects (i.e., change in student outcomes due to a hypothesized cause) are increasingly understood. These and other related methodological challenges lead many to consider the advantages of examining growth trajectories to make inferences about change (Rogosa, Brandt, & Zimowski, 1982; Willet, Singer, & Martin, 1998; Raudenbush & Bryk, 2002).

Research indicates that student growth models are well-suited to monitor school performance over time and provide a more robust picture of schools' ability to facilitate student achievement than does a simple, static comparisons (Choi et. al., 2005). Growth models are a subset of the more general longitudinal models that examine how outcomes change as a function of time (Singer and Willet, 2003); these models are more flexible than traditional repeated measures designs, because data need not be balanced nor complete (Singer and Willett, 2003; Raudenbush and Bryk, 2002). This latter point is important, as the student growth model is sensitive to student mobility and can include students in a school's estimate of growth, whether or not the student has a complete set of data. New Mexico historically used three years to estimate growth for a student, which logically falls within the tested spans of elementary and middle schools.

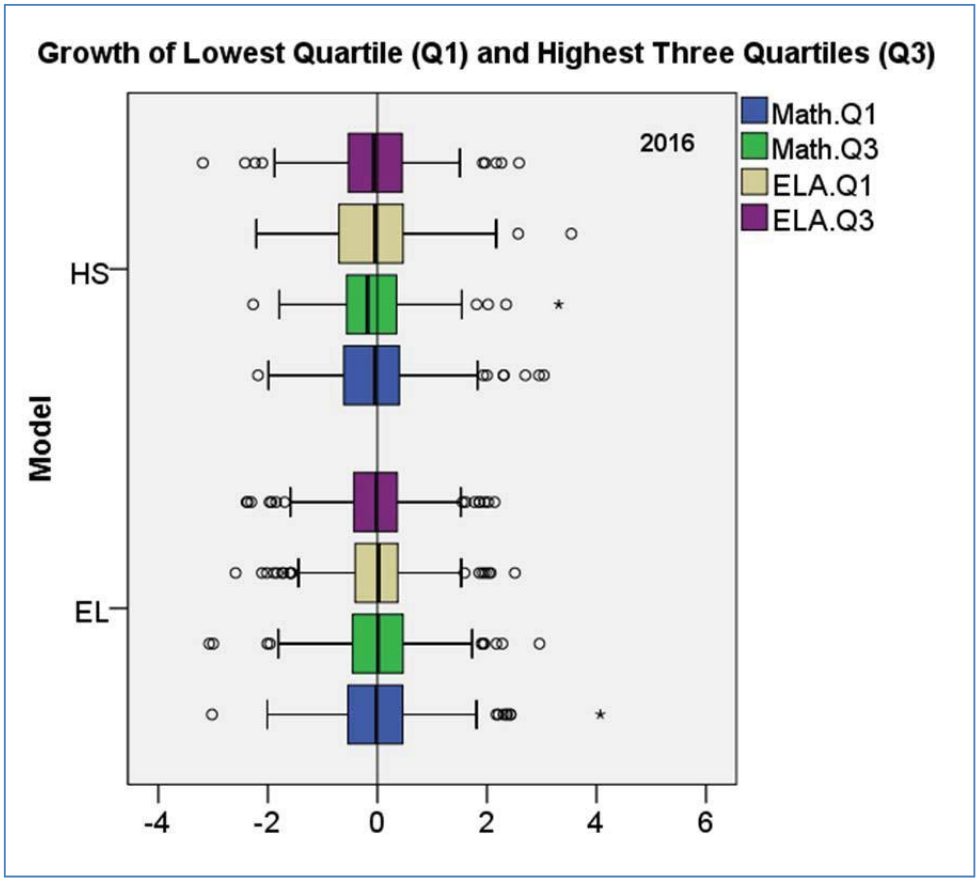


Growth Measures 1–3: Student Growth (Q1, Q2–Q3, and Q4)
Growth at the student level is measured in a comparable, valid, and reliable way statewide, in relation to how a particular student scored in the current year compared to their academic peers. The state's paradigm relies on a year's worth of growth, which is operationalized as a growth value of zero.

Academic peers are students who scored about the same in the two prior years in ELA and mathematics. A student who scored the same as the average of his or her academic peer group has made one year's worth of growth. The model is illustrated in the graph on the previous page where 12 students are depicted with their academic peers on a growth continuum. The slope of the line in the model depicted above indicates the extent that academic growth is equitably distributed amongst students.

All students belong to one of the subgroups (Q1–Q4), no duplication of membership exists, nor is any student excluded. By definition, every school has a bottom quartile and by explicitly placing additional weight on these students' growth, the system provides incentive for continuous improvement in all schools, not just those with legacy subgroups meeting a certain size limitation. In this way, the inclusion of student growth provides for meaningful differentiation of schools across New Mexico.

Students who are not members of the Q1 subgroup become, by default, members of a remaining subgroups Q2–4 (upper three quartiles). Because these groups contain three times more students, and because both subgroups contribute the same number of points in the weighting scheme, each Q1 student influences the overall score three times more than does the Q3 student. This equity-based approach to school accountability allows for more targeted interventions at the state and local levels.



4.1.A.i Measures for the Graduation Rate Indicator

New Mexico's graduation rate method monitors schools for student dropouts, consistent with the federal definition for the adjusted cohort graduation rate. The cohort takes form with all first-time 9th graders in the first of the four years of the cohort span. They are joined by new incoming 10th graders in the second year, 11th graders in the third year, and 12th graders in the fourth year. Every high school student is assigned to a graduation cohort the moment they enter a public high school for the first time, and their expected fourth year of graduation does not change. This ensures that no child is unaccounted for by our schools and educators, or within the state's ambitious goals for student success.

The graduation component consists of four measures that integrate—not only current graduation rates—but also extended rates along with growth in rates over a three-year span. The 4-year rate is weighted the most heavily and forms the basis for graduation growth. The extended year rates, 5-year and 6-year, are weighted relatively less but are nonetheless important to high schools that focus on programs such as credit-recovery and returning adult students. The growth in 4-year rates similarly incentivizes these schools that work with underserved populations to work toward timely graduation goals, aligned with New Mexico's long-term goals for graduation rates. See below for visualization.

The multiple components within the graduation indicator liberate the element from a need for a minimum group size, since three successive cohorts of students (4-year, 5-year, and 6-year) accumulate sufficient numbers to establish reliability for very small schools. Moreover, cohort membership is made up of every student ever enrolled for any length of time during a four-year period, including dropouts, and therefore is higher than any single-year census of seniors. The composite score therefore absolves the need for a minimum group size for accountability and provides a stable and complete picture of school success.

College and Career Readiness Indicator—Within the State's High School Model (CCR)

High schools are awarded credit when students participate in college and career readiness (CCR) activities. The CCR indicator is calculated in a valid, reliable, and consistent manner for all high schools statewide, with the number of students participating in CCR activities divided by the number of students in the high school cohort (note: CCR utilizes the same cohort that leads to the 4-year graduation indicator, which includes every student ever enrolled during the four years of the cohort span). Moreover, the weighting system embodied in *Shared Accountability* and cohort approach incentivizes high schools to maximize opportunities (*Participation*) in all grades 9–12, not just later grades. *Participation* is awarded 3 of the total 10 points in this indicator. We have proposed changing this indicator to also include remediation rates. The following are the current eligible CCR indicators. All students enrolled in grades 9–12 are eligible for participation in one or more of these programs.

Graduation

Are students graduating in four years? What percent of students are graduating in 4, 5, or 6 years? And is the school improving its graduation rate over time?

12.32 **17**

	All Students	Gender F	Gender M	Race / Ethnicity White	Afr Amer	Hisp	Asian	Am Indian	Economically Disadvantaged	Students with Disabilities	English Language Learners
Cohort of 2015 - 4-Year Rate											
Cohort Graduation (%)	81.36	84.3	78.5	81.1	74.2	81.0	88.4	64.3	72.9	77.9	63.5
Non-Cohort Graduation (%)	-										
SAM Adjustment (Weighted %)				This school did not qualify to be a SAM school.							
Points Earned	6.51										
Cohort of 2014 - 5-Year Rate											
Graduation (%)	84.55	86.0	82.7	83.2	76.0	84.7	95.7	-	70.9	76.5	70.4
Points Earned	2.54										
Cohort of 2013 - 6-Year Rate											
Graduation (%)	87.28	91.8	83.1	88.7	86.6	84.4	92.2	-	72.3	83.9	82.2
Points Earned	1.75										

Growth in 4-Year Rates

Growth takes into account three years of graduation rates.

Growth Index	-.31
Points Earned	1.52

College and Career Readiness Indicator—Within the State's High School Model (CCR)

-**PSAT/NMSQT**, Preliminary SAT/National Merit Scholarship Qualifying Test, is co-sponsored by the College Board and National Merit Scholarship Corporation. The assessment yields scores in English composition (verbal), mathematics, and writing and offers benchmark scores that indicate college readiness in two age groups: 1) sophomores and younger and 2) juniors and older.

-**SAT** is a widely used college admissions examination that measures the skills in three subjects: mathematics, reading and writing.

-**ACT** is a national college admissions examination that is recognized internationally. The ACT yields scores in four areas, English, mathematics, reading, and science, and offers benchmark scores that indicate college readiness in each.

-**Concurrent Enrollment/Dual Credit** in an accredited New Mexico post-secondary institution, offering college credit are counted as evidence of post-secondary preparation. All courses that are non-remedial are counted.

-**AP**, Advanced Placement, is a national qualifying examination, aligned to 34 college-level courses. Most four-year colleges grant students credit, advanced placement, or both on the basis of the score on the AP exam for that subject. Students do not get college credit for enrolling in a high school AP class. They must demonstrate participation and/or success in the national exam.

-**Career Program of Studies** is a sequence of high school courses that are recognized to lead to industry-recognized certification. Foundations for career readiness are built from the Carl Perkins Vocational and Applied Technology grant definitions. To be considered successful, the student must complete all coursework with a "C" or better and graduate from high school with a regular diploma.

-**AccuPlacer** is a computer-adaptive, college placement test offered by College Board that helps institutions of higher education place students in appropriate courses. Questions are chosen for each student on the basis of the answers to previous questions. The Accuplacer consists of reading, mathematics, language use skills, and writing.

-**COMPASS** is a computer-adaptive college placement test offered by ACT that helps institutions of higher education place students in appropriate courses. Questions are chosen for each student on the basis of the answers to previous questions. COMPASS provides scores in reading, writing skills, writing essays, mathematics, and English as a second language.

-**IB**, or the International Baccalaureate program of studies, is a standardized and enhanced high school curriculum where students must demonstrate competency in six study areas. The program originated in Sweden and grants credentials that are recognized outside the US.

-**SAT** Subject Tests are standardized subtests that complement the SAT, are usually taken to improve a student's credentials for admission to colleges in the United States. Each test is timed at one hour, and tests are available in multiple subjects related to a student's interests or a college's requirements.

-**TABE**, the Test of Adult Basic Education, is an assessment that measures a person's grade level in reading, mathematics, and language. This test is allowable only for designated Supplemental Accountability Model (SAM) schools.

-**WorkKeys**, a job skill assessment created by ACT, is used by businesses to measure workplace skills of job applicants and by schools and colleges to help prepare students for the workplace. This test is allowable only for designated SAM schools.

-**ASVAB**, the Armed Service Vocational Aptitude Battery, provides three composites: verbal, mathematics, and science/technical, as well as a composite score called the Armed Forces Qualification Test (AFQT) score. The ASVAB scores identify occupations that best suit a candidate's abilities and can be used to qualify for enlistment. This test is allowable only for designated SAM schools.

High schools further receive credit (7 points) for students' achieving a benchmark known to demonstrate readiness (*Success*) on each of the CCR activities included in the *Participation* metric. These benchmark scores were drawn from evidence-based reports that verified post-secondary success, and in the case of placement exams, the score that allows placement in local colleges and universities without need for remedial coursework. Students can be successful on any one of many college and career readiness activities.

The timeline and the contours of the items below were developed in direct response to stakeholder input throughout several years. The following revisions will take effect:

- A student growth target-based indicator will be included for the acquisition of English language proficiency, with a weight of 10 percent in elementary and middle school and 5 percent of a high school's rating. Baseline data will be solidified, collected, and shared with the field.
- A new indicator for science will be included—drawing primarily upon student performance on statewide science assessments, but also considering overall student engagement in STEM fields. The state will continue to engage educators, as well as business and industry, in the development of this new indicator.
- A measure examining and reporting the academic growth of students in the highest quartile of performance will be included—encouraging our highest-performing students to aim even higher and incentivizing educators and schools to identify and serve high-ability students.
- A refined definition of college and career readiness, drawing upon new data collection apparatuses and new policy constructs. To ensure high standards for all students, lagging indicators, such as college enrollment and remediation rates, will be considered for inclusion, as well as continued use of leading indicators, such as advanced placement success and industry credential attainment.
- For 2019–2020, a new instrument/measure as part of the Opportunity To Learn indicator, with stakeholders from inside and outside the PED coming together to select student and family survey instruments that account for school safety, climate, culture, and responsiveness to community needs, including looking into having a version for K–3
- An elimination of bonus points, given the opportunities provided in the new indicators above

"It's time we pay equal attention to the sciences all the way through the pre-college pipeline or our students are going to continue to be woefully underprepared for post-secondary education especially in STEM fields."

4.1.A.i Academic Achievement

As in previous years, the grade levels and subject areas assessed remain stable for 2018–2019 and beyond, with the exception of the inclusion of student performance on the statewide science assessments (see School Quality or Student Success indicators below). These standards-based assessments are administered to students, once in the elementary, middle, and high school levels—grades 4, 7, and 11—in English and Spanish. Equal weight will be awarded to ELA and math within the Academic Achievement indicator, with the number of proficient students in the relevant subject area divided by the total number of assessed students or 95 percent of enrolled students in the school, whichever is greater.

4.1.A.ii Academic Progress

International comparisons show that the top US students are scoring at or below average when compared to their peers in 27 countries in mathematics, 19 countries in reading, and 22 countries in science (US Department of Education—USDOE, National Center for Education Statistics. *The Condition of Education 2016* (NCES 2016-144), International Assessments). While progress is being made in raising the achievement of students scoring in the lowest levels, the achievement of students at the highest levels nationwide is not on pace with other leading nations.

To ensure that our historically high-performing students are making significant learning gains, weights on accountability measures will broaden the focus of student growth to include a new sub-measure that represents the highest performing quartile (25 percent) of students. Student growth will result from a composite of lowest quartile (25 percent), middle two quartiles (50 percent), and highest quartile (25 percent) of students, with the three complementary groups weighted progressively less in value. While the major emphasis remains on the lowest quartile, the recognition of these higher-performing students in accountability will not only provide a more discriminating picture of school effects, but it will reward those schools that are serving this important group of students well—providing additional differentiation between schools. Attention to this group in each school has pedagogical value that transfers beyond the boundaries of the group, such as the acceleration of curriculum and instruction, informing professional development of educational staff, and incentivizing the raising of expectations for all students. The measures for this Q4 group and the breakout of Q2–Q3 will take effect starting in the 2018–2019 school year. Methodology for calculating Q1, Q2–3, and Q4 will follow the statewide, valid, reliable, and comparable student growth procedures described previously.

Consistent with ESSA, student growth measures for high schools will be incorporated into the Academic Achievement indicator, while student growth measures in elementary and middle schools are part of the Academic Progress (Other Academic) indicator.

4.1.A.iii Graduation Rate

The calculation methodology of combining the 4-year, 5-year, and 6-year adjusted cohort graduation rates, with additional emphasis on improvement of the 4-year adjusted cohort rate will continue from the methodology established for past years. This approach to rating multiple cohorts and providing additional weight for high schools that improve their four-year graduation rates has been approved by USED in the past, and it is consistent with New Mexico's approach of including multiple measures of student success within a single indicator. The Growth 4-year Rate is a mechanism to help judge a school's ability to increase the overall 4-year rate from year-to-year; it is called Growth 4-year Rate to further incentivize schools to continue to increase their graduation rate above targets. It is incentivizing the right behavior, and it keeps the indicator from seeming meaningless for schools. Additionally, this extra emphasis on the 4-year graduation growth rate helps smooth out the volatility that occurs with so many of New Mexico's schools because of a very small student body.

For the purposes of Federal accountability Growth 4-year Rate will count as a School Quality Indicator (4-year growth).

Graduation rates are one-year lagged. That is, the rates that are published in January are for the cohort that graduated by August 1 of the prior year. Calculation of 4-year, 5-year, and 6-year cohort graduation rates uses the Shared Accountability method that is described fully in the Graduation Technical Manual on the PED website, http://ped.state.nm.us/Graduation/index.html. The method is not repeated here but in general:

1. A rate is generated for every school that has any grade 9, 10, 11, or 12.

2. For new high schools that do not yet have a graduating cohort class, a hybrid school support and accountability model is used. These schools earn points based on the remaining non-cohort indicators, and they are excused from College/Career Readiness and Graduation. The resulting total points scale is adjusted to reflect the reduced number of indicators, however the scale and maximum possible total points are the same.

3. The graduation goal is 100 percent. The model includes 4-year, 5-year, and 6-year rates, which currently produce a maximum of 5, 3, and 2 points respectively. Growth of the 4-year rate is worth an additional 5 points, yielding a total of 15 possible points for graduation. The extended-year rates include only members of the prior 4-year cohort and do not allow new entrants in subsequent years.

4. Points are awarded through method 1, where the rate is multiplied by the possible points for that category. For example, a 5-year rate of 80 percent is equal to .80 X 3 = 2.4 points.

Graduation Growth refers to annual increase in the 4-year graduation rate and is based on three years of data. Growth in the 4-year rate reflects the school's overall ability to help students complete their high school careers in a timely way. The goal is 90 percent of students graduating in four years, so any school that has a graduation rate of 90 percemt is awarded all four points. The slope is calculated (see below) and changed into points.

TECHNICAL DETAIL

Graduation Growth is based on the slope of the 4-year graduation rates for the past three years. The table below shows how these slopes are calculated for schools that have graduation rates for each year (Schools A and B), and for schools that have missing graduation rates (for example, new schools with only two years' worth of data).

Table 1: Calculating Slopes from Four-Year Rates

	2013	2014	2015	Slope	Method
School A	50%	55%	60%	+5% per year	(2015 - 2013)/2
School B	60%	70%	50%	-5% per year	(2015 - 2013)/2
School C	-	55%	60%	+5% per year	2015 - 2014
School D	60%	-	50%	-5% per year	(2015 - 2013)/2
School E	-	-	40%	no slope	

\- no graduation rate for that year

Schools with only one rate (School E) have no slope. For these schools, the points for their other graduation components are adjusted to account for the absence of growth.
Slopes can be conceptualized as a regression:

$$GradRate_{ij} = B0^{(j)} + B1^{(j)}\, Year_{ij} + e_{ij}$$

Where:

$B0^{(j)}$ = the intercept for the individual school.

$B1^{(j)}$ = the slope for the individual school.

$Year_{ij}$ = the year.

The slopes depicted in Table 1 can be used as a simplification of this method.

The slope is divided by the standard deviation of all slopes, resulting in some positive and some negative values. These values are then transformed using a cumulative distribution function (CDF) into a variable that can range from 0 to 1. The CDF value is multiplied by the four possible points for graduation growth, with the qualification that any school, where the rate is higher than the goal of 90 percent, receives all four points regardless of their slope.

4.1.A.iv Measures for the Progress in Achieving ELP Indicator

"The "growth to proficiency measure" will be helpful for districts with ELs and allow districts to focus on those students' learning needs."

Accountability toward English language proficiency (ELP) will occur through a single measure of growth for students who are English learners (EL). The ELP growth targets are a measure of the extent to which students are gaining ELP over a reasonable period of time. The longer students are identified as EL students, the less likely they are to graduate on time and to acquire coursework required for post-secondary advancement. Research indicates that ELs generally require from four to seven years in developing the academic language proficiency in English necessary to be successful academically (Cook, Boals & Lundberg, 2011; Goldenberg, 2008; Greenberg, Motamedi, Singh, & Thompson, 2008; Hakuta, Butler, & Witt, 2000; Saunders, Goldenberg, & Marcelletti, 2013). Based on analysis of the state's ELP data (based on WIDA ACCESS for ELLs©), the mean number of years a student is classified as an EL is four to five years. Title III, Section 3121(a)(6) of ESSA requires that LEAs report the number and percentage of ELs who have not attained ELP within five years of initial classification as an EL and first enrollment in the LEA. Thus, New Mexico proposes a statewide vision for all students achieving ELP within five years.

Given trends in national research and the state's data, the PED has crafted ELP goals that are both ambitious and achievable. The result is an index table that is responsive to stakeholder input and that values two important student characteristics known to impact the ability for an EL to become proficient in English: the student's grade level at entry and their English proficiency at entry (demonstrated by their ELP achievement). Every student who enters EL status will be considered within the appropriate cohort, based on these two student characteristics. The student will remain in that tracking cohort for the remainder of their time in PED schools, regardless of their migration to different schools or districts.

Each year, the student's ELP progress will be measured against their customized growth target for that year. These ELP growth targets were derived from the ELP results (based on WIDA ACCESS for ELLs©) from 2010 to 2016 and do not account for the recent standards-setting adjustment that will apply to the 2017 WIDA ACCESS for ELLs 2.0 administration. For that reason the student ELP growth targets will be re-evaluated and re-published prior to implementation to ensure that the student growth figures remain ambitious yet feasible and grounded in research and data. Establishing yearly ELP growth targets allows schools to have a ready tool for identifying students who are on track to meet their timeline for reclassified fluent English proficient (RFEP) status and those who may need additional language supports or targeted intervention to meet those goals. Moreover, the concept of meeting yearly growth targets simplifies and integrates the accountability spectrum for these students. Any student who is meeting their annual goal is on target to being RFEP in a judicious amount of time, exited from EL status appropriately, able to advance academically with their peers, and, in many cases, outperform them. The use of annual ELP growth targets also ensures that schools are not motivated to prematurely exit students. Premature exiting of EL students can lead to negative future academic consequences if those students are not provided appropriate supports through reclassification to RFEP status and monitoring for a minimum of two years afterward. Further, Title III, Section 3121(a)(5) requires local education agencies to report to the SEA the number and percentage of RFEP students meeting the state's challenging academic standards for each of the four years after such students are no longer receiving services supplemented with Title III funding.

In order to hold schools accountable, all EL students' ELP assessment scores are compared to their personalized annual ELP growth target. When the student's score falls short of their target, the value is negative, and when it exceeds expectations, it is positive. These residual values are accumulated for all students within the school for an overall student ELP achievement summary, where a positive figure indicates students are progressing at a rate higher than expected and by how much they are exceeding that expectation. The summary values for schools will be used to establish cut points for this indicator of school support and accountability.

The metric used for the ELP indicator is whether or not EL students meet their individualized annual growth targets, based on performance on the state's annual ELP assessment, the WIDA ACCESS for ELLs 2.0. The individual growth targets take into account 2010–2016 WIDA ACCESS data before the new standards-setting. Thus, new baselines and growth targets based on 2017 and 2018 ELP data will be necessary to re-establish appropriate annual growth targets for students, based on initial ELP level and grade level at initial EL classification.

The NM PED will calculate the ELP indicator in a uniform and consistent manner across all districts across the state. The ELP indicator creates annual growth-to-proficiency targets, ensuring that ELs achieve ELP (and exit EL status, reclassifying to fluent English proficient, RFEP) within five years from initial classification. Thus, if EL students meet their annual growth targets, they are on-track to achieve ELP within five years of initial classification, which is the state's long-term ELP goal for each EL student.

The indicator is valid, because it is based on the WIDA ACCESS for ELLs 2.0 assessment, and it will be reliable because the method for calculating ELP growth will be consistently applied, using a precise protocol that can be independently applied and replicated. As the final metrics are produced, the NM PED will provide evidence of the ELP measure's validity and reliability prior to inclusion in the final school accountability model.

Schools will not be selected for low performance on the EL indicator alone. The school support and accountability model provides a rich array of school success parameters which are combined to express an overall rating. Where schools are consistently underperforming, the PED interventions will address those parameters where the school seems to be struggling the most. As an example, that may include any or all of the indicators in EL progress, graduation, college and career readiness, or achievement in reading, mathematics, or science. This paradigm recognizes that each component of school support and accountability is part of an integrated whole that requires systemic intercession, rather than symptomatic remedies.

The table below indicates preliminary ELP growth targets for EL students, based on currently available data. Note that these targets may be realigned in 2019, once sufficient history is available that reflects the new ACCESS scoring paradigm. As new data is obtained in the future, realignment could take place yearly.

Individual Student English Language Proficiency (ELP) Growth Targets

Grade(s)	ELP Level at Entry	ELP Level Growth Over Five Years				
		1 Year Later	2 Years Later	3 Years Later	4 Years Later	5 Years Later
K–3	1.00	2.6	3.4	4.0	4.6	5.0
	2.00	3.3	3.8	4.5	4.8	5.0
	3.00	3.8	4.3	4.7	4.9	5.0
	4.00	4.4	4.6	4.8	4.9	5.0
4–6	1.00	2.6	3.3	3.8	4.5	5.0
	2.00	2.9	3.4	3.9	4.5	5.0
	3.00	3.6	3.9	4.3	4.7	5.0
	4.00	4.2	4.4	4.5	4.7	5.0
7	1.00	2.4	3.2	3.7	4.4	5.0
	2.00	3.1	3.7	4.1	4.5	5.0
	3.00	3.7	4.1	4.4	4.7	5.0
	4.00	4.2	4.4	4.6	4.8	5.0
8	1.00	2.4	3.2	3.7	4.4	5.0
	2.00	3.1	3.7	4.1	4.5	5.0
	3.00	3.7	4.1	4.3	4.5	5.0
	4.00	4.2	4.4	4.6	4.8	5.0
9	1.00	2.4	3.2	3.7	4.4	5.0
	2.00	3.1	3.5	3.7	4.3	5.0
	3.00	3.7	4.0	4.2	4.6	5.0
	4.00	4.2	4.4	4.6	4.8	5.0
10	1.00	2.4	3.2	3.7	4.4	5.0
	2.00	3.1	3.3	3.7	4.3	5.0
	3.00	3.7	4.0	4.3	4.7	5.0
	4.00	4.2	4.4	4.6	4.8	5.0
11	1.00	2.4	3.2	3.7	4.4	5.0
	2.00	2.9	3.3	3.7	4.3	5.0
	3.00	3.6	4.0	4.3	4.7	5.0
	4.00	4.2	4.4	4.6	4.8	5.0
Data in red indicate years where the student is typically exited from high school						

Consideration of Including Former EL Students

A diverse cross-section of educators serving EL students statewide felt it important to acknowledge the academic progress made by RFEPs. In New Mexico's system of school support and accountability, RFEP students will be reported annually alongside their current EL counterparts so that schools and LEAs can verify longitudinal progress. While exited students' academic success is important for long-term monitoring, these students will not be included in the ELP indicator, where only currently designated EL students will be appraised. The state has elected to focus the school accountability indicator on progress towards ELP growth, which is pertinent only to students striving toward English language acquisition. Moreover, the progress of RFEP students in the areas of ELA and math are disaggregated and recounted in other parts of school ratings; to include their academic achievement within the ELP indicator would be redundant.

4.1.A.v Measures for School Quality or Student Success Indicators

Science

The NM PED will add science to the collection of achievement measures in all grade spans in 2018–2019 in order to maximize the variety of areas that inform school progress and create a new *STEM Readiness* indicator to help students succeed in 21st century careers, notably those roles that are in high demand in New Mexico.

Nationally, science competencies appear to be suffering, with the *Center for Accountability in Science* survey showing that most Americans couldn't pass a high school health class (https://www.accountablescience.com/). As the home for several major federal laboratories and high-technology industries, New Mexico posits that the integration of science into school ratings will help schools build capacity for our workforce, while ensuring that all students are receiving a well-rounded foundation for adult life. Stakeholders throughout New Mexico echoed this sentiment during stakeholder engagement. This indicator will include, at minimum, the rate of students at the proficient level on the statewide science assessment (which undergoes federal peer review to demonstrate validity and reliability) and will be reported for all students and disaggregated for each subgroup.

Opportunity-to-Learn Survey (OTL)

While New Mexico's OTL survey, detailed earlier, is a valid and reliable measure of effectiveness (to learn more about the Opportunity to Learn indicator, visit the website at: http://aae.ped.state.nm.us/), the state plans to explore other instruments that might have broader application to learning climate, academic achievement, engagement, and self-efficacy for use in school ratings across all grade spans in the 2019–20 school year. Any new measures must be valid, reliable, and comparable statewide in order to support effective differentiation of schools, and the PED will submit an updated plan to the USDOE once the specific OTL measures have been selected, based on input the state has received. Through PED's process of stakeholder engagement throughout communities across New Mexico, extensive feedback was collected regarding what stakeholders would like to see represented as a part of the Other School Quality or Student Success indicators.

In this process of refining a new OTL measure, along with the input gathered from stakeholders—which valued student and family survey instruments that account for school safety, climate, culture, and responsiveness to community needs, including a version for the early grades—the PED will consider content and predictive validity, relevance for all grades, and evidence that the survey is related to student achievement gains. Moreover, the method of administration will need to ensure private and candid response, complete coverage of all students, and the ability to disaggregate the results by all student characteristics. The state remains fully committed to engaging students about their educational experiences in a manner that fosters meaningful feedback to schools and teachers. Capturing student and family engagement, educator collaboration and engagement, school climate, and other critical components for quality schools will allow for more meaningful differentiation between schools.

Chronic Absenteeism

Beginning in the 2018–2019 school year, the State proposes to expand the statewide methodology to account for all absences, both unexcused and excused (chronic absenteeism). Absenteeism represents lost instructional time, whether excused or not, and has a strong relationship with achievement and graduation. As early as pre-kindergarten, students who are chronically absent are less likely to read proficiently by the end of third grade and more likely to be retained in later grades (Connolly, Faith, & Olson). For this reason, the PED will begin to track PreK attendance in the 2017–2018 school year. Absenteeism further serves as an indicator in the early warning system that is relevant to all grades and is considered an important metric in accountability, demonstrating greater variance across schools than

attendance alone, enhancing meaningful differentiation of schools. The PED will have multiple years to work with stakeholders to establish the full methodological and operational implications.

The State will work with stakeholders to detail the chronic absenteeism measure so that adequate protections and audits are in place prior to implementation, and the PED will update the ESSA plan once a statewide, comparable definition of chronic absence has been defined for use in the 2018–19 school ratings.

College and Career Readiness

College and career readiness propels students from a solid foundation of early and secondary learning into rigorous career and technical education programs and college completion goals. Inclusion of college-and-career readiness measures, as an additional School Quality or Student Success component for high schools, will continue to be an important component of New Mexico's system of school support and accountability. For the 2018–2019 system, the PED will refine the definition of this component to ensure the highest standards for all students and submit an amended plan to the USDOE to ensure that the CCR indicator continues to be calculated in a way that is valid, reliable, comparable, and adds to meaningful differentiation of high schools. Indicators, such as college remediation and college persistence, will be considered, as will newly developing indicators in CTE fields; Seals of Biliteracy; college, career and civic experiences; and on-track indicators for graduation.

Approach to Subgroups

The State uses accountability information gleaned from traditional subgroups across all schools to ensure that achievement does not appear to be atypically suppressed in a disadvantaged student group. This information is paramount in informing interventions for Comprehensive Support and Improvement (CSI) and Targeted Support and Improvement (TSI) schools. All indicators and measures continue to be disaggregated, examined, and reported to serve the needs of stakeholders, and—in addition—an index analysis will drive further action for schools that appear to be consistently failing to serve disadvantaged subgroups.

The evaluation will take place by way of a post hoc evaluation of indicators by subgroups, and schools that demonstrate systematic failure to serve certain student groups will be identified as CSI or TSI.

i. List the subgroups of students from each major and racial ethnic group in the State, consistent with 34 C.F.R. § 200.16(a)(2), and, as applicable, describe any additional subgroups of students used in the accountability system.

New Mexico considers and disaggregates these following subgroups throughout all indicators:

- All Students
- Race/Ethnicity (Caucasian, African American, Hispanic, Asian/Pacific Islander, American Indian)
- Students with Disabilities
- Economically Disadvantaged (eligible for Free/Reduced Priced Lunch Program)
- English Learners (current only)

While not all of these students are in protected classes, data are disaggregated nonetheless to inform curriculum, policy, and equity.

ii. If applicable, describe the statewide uniform procedure for including former children with disabilities in the children with disabilities subgroup for purposes of calculating any indicator that uses data based on State assessment results under section 1111(b)(2)(B)(v)(I) of the ESEA and as described in 34 C.F.R. § 200.16(b), including the number of years the State includes the results of former children with disabilities.

For the state's accountability system, the State has chosen to continue the practice of identifying students only with an Individualized Education Program (IEP) in the Students with Disability subgroup and to not include students who may have exited that status. This practice is in keeping with prior accountability models and preserves historical continuity and comparability with previous years.

iii. If applicable, describe the statewide uniform procedure for including former English learners in the English learner subgroup for purposes of calculating any indicator that uses data based on State assessment results under section 1111(b)(2)(B)(v)(I) of the ESEA and as described in 34 C.F.R. § 200.16(c)(1), including the number of years the State includes the results of former English learners.

The State will also continue the practice of identifying students only qualifying for current EL status in the English learner subgroup and to not include students who have exited. This practice is in keeping with prior accountability models and preserves historical continuity and comparability with previous years.

iv. If applicable, choose one of the following options for recently arrived English learners in the State:

O *Applying the exception under ESEA section 1111(b)(3)(A)(i); or*

☐ *Applying the exception under ESEA section 1111(b)(3)(A)(ii); or*

☐ *Applying the exception under ESEA section 1111(b)(3)(A)(i) or under ESEA section 1111(b)(3)(A)(ii). If this option is selected, describe how the State will choose which exception applies to a recently arrived English learner.*

The State proposes to continue its policies for recently arrived English learners. New Mexico employs the practice of exempting students, who qualify as recently arrived English learners, from participating in the ELA assessment, provided that students take the language proficiency assessment. These students take the math assessment within their first year and following the completion of their first year, take both the ELA and math assessments annually. New Mexico has a waiver application system in place for students requiring language accommodations if needed for subsequent years.

These practices are in keeping with prior accountability models and preserve historical continuity and comparability with previous years.

Minimum Number of Students.

v. If the State's minimum number of students for purposes of reporting is lower than the minimum number of students for purposes of accountability, provide that number consistent with 34 C.F.R. § 200.17(a)(2)(iv).

For 2018–19 and following years, the PED will employ the following group sizes:

- A minimum group size of 20 for protected subgroup evaluation for TSI identification
- A minimum group size of 10 for public reporting
- No minimum for the calculation of growth or proficiency in the system of school support and accountability
- A school-wide participation minimum of 30

vi. Describe how the State's minimum number of students meets the requirements in 34 C.F.R. § 200.17(a)(1)-(2);

Regarding a minimum group size for accountability decisions, the State appreciates that larger group sizes are needed for statistical power and stability, which is why an n-size of 20 is used for high- stakes decisions regarding identification for TSI status. However, as a state with many smaller districts and schools, setting a minimum size that is too robust has the unintended consequence of excluding many of our students and schools from school ratings altogether. Moreover, the State holds the view that annual performance measures are not a sample but rather are a census of all students. In that paradigm, there is no concept of sampling error, benchmarks are valuable, and most importantly, detailed information about small subgroups is considered valid. If the State holds that a complete assessment of all students is not representative of the whole population, particularly where the sample size (subgroup within school) is small, then too many of our schools would be dismissed on an almost permanent basis.

The USDOE has mandated that states monitor all schools regardless of size and that no operational schools can be excused from accountability. In the early years of AYP—annual yearly progress—this directive necessitated substitutions (e.g., LEA summaries or feeder patterns), where student populations were small, and school officials complained that these practices compromised any meaningful feedback regarding their school. While New Mexico has elected to apply accountability down to a single student, this has been the case only once in the past 10 years. As explained earlier, with expanded assessments to both lower and upper grades, and the inclusion of three years of data, it is quite improbable that this situation would ever reoccur. If it should, the state would petition to use uniform averaging to provide a more stable estimate of school success.

The impact of using minimum group sizes was fully described in our approved ESEA Flexibility Request (December 8, 2015, page 69), where under the prior AYP rules almost half of the schools were not held accountable for the EL subgroup, and approximately 20,000 students were excused from school accountability.

Following this reasoning, no minimum group size is applied for accountability calculations that determine a school's summative score. For example, when publicly reporting data on students with disabilities, the State will meet the IDEA requirements at 34 CFR § 300.602(b)(3) and not disclose any information about students with disabilities that would be personally identifiable. When reporting any disaggregated data to the public (n-size of 10 students), those numbers will be masked, as described further below.

The proficiencies of all students contribute to the school's final points for Current Standing as well as for the Student Growth measures, and steps are taken to ensure that results from small-group sizes are not exposed in reporting. Growth is calculated using hierarchical linear modeling, where we are concerned about sample size (e.g., schools) rather than a cluster size (e.g., students). This approach has been widely accepted and used in related areas of research (children clustered within families). It may be further argued that the inclusion of three years' data, together with multiple measures and inclusion of more tested grades, K–11, all provide more data and better modeling of progress over time, which enhances statistical robustness and stability (e.g., confidence intervals and standard errors). In addition, the use of the quartile subgroups ensures extra protection for protected classes of students. This full inclusion guarantees accountability for our smallest schools and has been successfully in place since 2012.

TABLE: NM SCHOOLS WITH SPECIAL POPULATIONS*

	Math	ELA
All Students	822	849
Female	822	849
Male	822	849
Caucasian	782	816
African American	555	611
Hispanic	805	833
Asian/Pacific Islander	488	540
American Indian	618	666
Economically Disadvantaged	815	842
Students with Disabilities	814	841
English Learners	735	764
**Out of 849 schools rated in 2016*		

The use of a minimum group size in school ratings would eliminate even more schools from subgroup consideration. The use of the Q1 subgroup is more nondiscriminatory, because it ensures that all 849 schools are held accountable for the learning accomplishments of struggling students.

The discussion of minimum group size came up in meetings with teachers, principals, other school leaders, parents, and other stakeholders, but we did not get any official feedback through the survey, and only a few letters addressed the minimum group size, including the Acoma Pueblo Tribe, who wrote in support of the state plan proposal.

vii. Describe how other components of the statewide accountability system, such as the State's uniform procedure for averaging data under 34 C.F.R. § 200.20(a), interact with the minimum number of students to affect the statistical reliability and soundness of accountability data and to ensure the maximum inclusion of all students and each subgroup of students under 34 C.F.R. § 200.16(a)(2);

The State has rarely required the use of uniform averaging in the use of school ratings. On occasion, a three-year cumulative cohort is formed for schools that have fewer than four graduation cohort members over a four-year period. Otherwise, there is little need to enhance student counts, as was explained in 4.1.C.ii. It is expected that this rare instance of averaging will continue in the 2018-2019 school year and beyond, on an as-needed basis.

viii. Describe the strategies the State uses to protect the privacy of individual students for each purpose for which disaggregated data is required, including reporting under section 1111(h) of the ESEA and the statewide accountability system under section 1111(c) of the ESEA;

The size required for reporting continues to be 10 or more students in a group, and publications of sensitive data follow uniform guidelines for avoiding disclosure of individual students. School officers who require uncensored data for necessary school operations and curriculum decisions are provided reports that do not suppress or mask information. These reports are available through secure online resources and also through direct connection to assessment vendors. Otherwise, public versions of data utilize standard procedures of suppression, controlled rounding, and masking. These rules are applied to all aggregated data and reported subgroups, whether or not the group represents a protected class.

More specifically, to prevent unauthorized release of information about individual students the PED employs disclosure avoidance strategies advanced by the USDOE's Privacy Technical Assistance Center and by the National Center for Educational Statistics. The masking policies include three best practices recommended by the US DOE/USED, and they are 1) suppression, 2) controlled rounding, and 3) minimization.

1) Suppression involves removing data (e.g., from a row in a table) to prevent identification of students in small groups or with unique characteristics. The PED applies either a blank or a non-numeric character with a footnote in the banner or footer of the table. A minimum group size is required by the federal government for reporting, and the PED, like many states, uses a minimum of 10 students.

2) Controlled rounding reports values at the extremes of a set of numbers as less than or greater than that value. In addition, for groups with fewer than 100 students, the remaining categories are reported in ranges rather than a single figure. Therefore, the exact figure is not given but rather a broader range of figures that contain the exact value. The limits of the range are determined by the total number of students in the group, where each recoded category should represent a minimum of two to three students. The National Center for Educational Statistics[3] recommends these top and bottom coding limits based on group size (N):

A. N<10 completely suppressed
B. N=10 to 20 "≤20" and "≥80"
C. N=21 to 40 "≤10" and "≥90"
D. N=41 to 100 "≤5" and "≥95"
E. N=101 to 300 "≤2" and "≥98"
F. N=More than 300 "≤1" and "≥99"

Recoding is applied to any cell with percentages that fit the extremes of the distribution. For example, when the group contains a total of 20 students, and a cell shows 0 to 20 percent, it is noted in the report as "≤20" (condition b). When one or more cells are recoded, the remaining cells must be adjusted to account for the reduction in percentage.

G. N=10 to 20, collapse remaining cells into a single category that is the complement of the masked cell (i.e. "≤20" if the masked cell was "≥80")
H. N=21 to 40, report remaining cells in 10 percent ranges (e.g. "60-69")
I. N=41 to 200, report remaining cells in 5 percent ranges (e.g. "60-64")
J. N=201 or more, report remaining cells in actual whole numbers

The case of groups of 20 or fewer requires additional clarification. In the example that follows, the group of 20 students meets the minimum group size of 10 or more and is therefore reportable. Bottom coding is used to mask levels three and four, where the combined cells are reported as "≤20" using condition b. The remaining cells are combined and reported as "≥80" using the algorithm in condition G. Note that the first two rows (green) are provided only for context and would not be exposed in the final publication.

The resulting two categories will be consistently collapsed above and below the proficiency cut score, in this case the boundary between levels two and three. Where top and bottom recoding is not required for either of the two cells (e.g., 50 percent of students are on either side of the boundary), the reporting will follow the scheme depicted in item H., using bands that represent 10 percentage points. Whether top or bottom coding is required, the group will be collapsed into only two reporting categories as dictated by condition G.

TABLE 1: ILLUSTRATION OF SMALL GROUP SIZE (N=20)

	Level 1	Level 2	Level 3	Level 4
Count (N)	12	8	0	0
Actual (%)	60	40	0	0
Reported (%)	≥80		≤20	

3) Minimization refers to expressing the simplest amount of information required to meaningfully express data trends. These business rules apply in general to published aggregates and, again, are based on recommendations made by the National Center for Educational Statistics.[3]

a. Round percentages to the nearest integer.
   - Provide percentages without student counts.
b. Limit the number of output categories and collapse categories where possible.
   - Limit the number of repeated views of the same data under different segmentation parameters
c. Limit the number of variables used to segment students.

To illustrate, the SBA assessment, which has four performance levels, should be presented in the simplest method possible:

- Report only the percentage of the group that is proficient, rounded to the nearest integer. By merging performance levels three and four, the categories are reduced from four to two which lessens the need for top and bottom coding.
- Limit aggregates to state, LEA, and school. Three views of the data increase the risk that unsuppressed aggregates in a higher-level table will expose suppressed counts in a subordinate table. Just the same, these three views are necessary for most reporting. Note that adding subgroups (N=9) to the comparison multiplies the views dramatically (3 x 9=27 views) and exemplifies a higher risk of disclosure of individual students.

- Don’t combine attributes, such as ELL-Hispanic-Female, and ELL-Hispanic-Male. Provide the minimal set of student attributes required to understand the data.
- Top and bottom code all cells. The above steps should minimize the need for controlled rounding, because each cell will represent larger groups of students.

ix. Provide information regarding the number and percentage of all students and students in each subgroup described in 4.B.i above for whose results schools would not be held accountable under the State’s system for annual meaningful differentiation of schools required by 34 C.F.R. § 200.18;

All students are included in accountability.

x. If an SEA proposes a minimum number of students that exceeds 30, provide a justification that explains how a minimum number of students provided in 4.C above promotes sound, reliable accountability determinations, including data on the number and percentage of schools in the State that would not be held accountable in the system of annual meaningful differentiation under 34 C.F.R. § 200.18 for the results of students in each subgroup in 4.B.i above using the minimum number proposed by the State compared to the data on the number and percentage of schools in the State that would not be held accountable for the results of students in each subgroup if the minimum number of students is 30.

Not applicable.

Annual Meaningful Differentiation.
Describe the State's system for annual meaningful differentiation of all public schools in the State, including public charter schools, consistent with the requirements of section 1111(c)(4)(C) of the ESEA and 34 C.F.R. §§ 200.12 and 200.18.

- The Elementary and Secondary Education Act (ESEA) has had several tangible effects on education and the monitoring of schools. While ESEA monitoring requirements under NCLB set clear and concrete goals and firmly established that all students need to be considered, there is now opportunity to build upon these strengths and develop a school accountability system, effective beginning with the 2018–19 school year that further enhances policymakers' ability to fairly and accurately monitor schools. The literature (Linn, 1998; Baker, Linn, Herman, & Koretz, 2002; Choi, Goldschmidt, & Yamashiro, 2005; Baker, Goldschmidt, Martinez, & Swigert, 2003) is clear; in order to effectively monitor schools for interventions and recognition, several pieces must be in place, in order to create a coherent, comprehensive, unbiased, and fair system. Differentiating among schools for the purposes of providing support, where needed, and recognition, where warranted, should, to the extent possible, avoid confounding factors beyond school control with factors for which schools ought to be held accountable (Goldschmidt, 2006).

- Four elements (coherence, comprehensiveness, freedom from bias, and fairness) are the basis for the New Mexico school accountability system that enhances our ability to differentiate school performance in a more nuanced way than under the current ESEA system. A coherent system is one that seamlessly links together the elements of the system and incorporates stakeholders' beliefs regarding how schools ought to be held accountable. Hence, a coherent system collects elements that individually and jointly lead to the correct inferences about schools and the correct motivations for improvement. This is realized by considering validity evidence that supports inferences based on school performance—a notion similar to content and construct validity evidence (Messick, 1995; Mehren, 1997). That is, each element of the system should logically relate to better school performance (content validity evidence) and overall, the accumulation of elements should adequately represent the domain of interest (e.g., school performance).

- A coherent set of elements that forms the basis for making inferences about school performance should be comprehensive, which is consistent with basing school inferences on multiple measures (Baker, et. al. 2002). Monitoring schools based on unconditional mean school performance or on the percentage of students who are proficient does not hold schools accountable for processes under school control and tends to place large diverse schools at a disadvantage (Novak, & Fuller, 2003). Static average student performance measures tend to confound input characteristics (e.g., student enrollment characteristics) of schools with actual school performance (Goldschmidt, Roschewski, Choi, Autry, Hebbler, Blank, & Williams, 2005; Choi, Goldschmidt, & Yamashiro, 2005; Meyer, 1997; Goldstein & Spiegelhalter, 1996).

- A system that merely counts the percentage of proficient students is limited, because it reduces the amount of information available and ignores performance changes above and below the proficiency line that can be quite large (Thum, 2003; Goldschmidt & Choi, 2007). Moreover, basing inferences about schools on static measures ignores that learning is a cumulative process and that schools often face challenges related to the input characteristics of its students (Hanushek, 1979; Choi, et. al., 2005; Goldschmidt, 2006). For example, some schools consistently receive an extremely high proportion (>75 percent) of students who are EL. While there may be debate as to the length of time it takes an EL student to acquire academic language skills—and the expectation should be that each student does so and graduates college and career ready—the system should provide incentives for a school to educate those students by recognizing the achievement gains along the performance continuum.

Describe the following information with respect to the State's system of annual meaningful differentiation:

xi. The distinct and discrete levels of school performance, and how they are calculated, under 34 C.F.R. § 200.18(a)(2) on each indicator in the statewide accountability system;

SUMMATIVE WEIGHTED POINTS			
ESSA Indicator	**EL/MS**	**HS**	**ESSA Indicator Classification**
Math and Reading Proficiency	30	25	Academic Achievement (AA)
Student Growth Q4	5	5	Academic Progress (ES) AA (HS)
Student Growth Q2-3	10	10	Academic Progress (ES) AA (HS)
Student Growth Q1	25	15	Academic Progress (ES) AA (HS)
English Language Proficiency	10	5	English Language Proficiency (ELP)
Science Proficiency	5	5	School Quality/Student Success
Chronic Absenteeism	5	5	School Quality/Student Success
College and Career Readiness	n/a	10	School Quality/Student Success
Educational Climate Survey	10	5	School Quality/Student Success
Growth in 4-Year Rate	n/a	5	School Quality/Student Success
4-Year Graduation Rate	n/a	5	Graduation Rate
5-Year Graduation Rate	n/a	3	Graduation Rate
6-year Graduation Rate	n/a	2	Graduation Rate
Total Points	100	100	

The state's adoption of a rating system, using levels of support, was designed to make clear to policymakers and the public what can otherwise be difficult to understand. At a minimum, the system recognizes the diversity of school achievement through a series of four designations, which vastly improves on the old AYP system, where schools either passed or failed. These distinct and discrete levels of school performance are Traditional Support and Improvement Schools, Targeted Support and Improvement Schools, Comprehensive Support and Improvement Schools, and More Rigorous Interventions Schools. The report card shows information for each measure by way of points that are then summed within each indicator. The PED is committed to enhancing school report cards so that consumers have a report that is simple and easy to understand.

xii. The weighting of each indicator, including how certain indicators receive substantial weight individually and much greater weight in the aggregate, consistent with 34 C.F.R. § 200.18(b) and (c)(1)-(2).

The weighting of each indicator, fully integrated into the system of school support and accountability released in 2019, is as follows:

In elementary and middle schools, the School Quality or Student Success indicators (in the aggregate) will receive a total of 20 points, and in high schools, they will receive 30 points—providing meaningful emphasis to these additional measures, while ensuring that the indicators are afforded substantial weight individually and much greater weight in the aggregate. Achievement and growth in math and ELA impact 70 percent of points in elementary and middle schools, while ELA and math achievement and growth, paired with graduation rates and growth in graduation rates, also receive 70 percent of the weight in high schools.

It should be noted that for the federal accountability framework, graduation rate counts for 10 points. But in New Mexico, we strongly believe that the indicator Growth in the 4-year Rate, which is worth 5 points and, under the federally mandated framework, is technically a component of School Quality. The indicator Growth in the 4-year Rate is a critical component of a high school's performance, because it reflects: 1) the school's overall ability to help students complete their high school careers in a timely way and 2) the progress the high school has made in improving its four-year, adjusted cohort graduation rate (the primary measure in the Federal graduation rate indicator).

In 2018 and beyond, for schools that do not have English learners or for which the subgroup size is too small for evaluation (20 students), an abbreviated model is substituted that removes the points allotted to the ELP indicator. For example in the EL model, the available overall points would be reduced to 90 rather than 100 possible points. Experience has shown that publishing different rating scales and cut points for certain schools may be confusing to users who are accustomed to the 100-point scale. For that reason, the individual indicators continue to be reported on their native scales so that they can be compared across schools. However, the total points for this abbreviated model are adjusted upward to the 100-point scale. This process does not disturb the original weights of each indicator; indicators can be directly compared across schools, and the final determination can continue to be evaluated on a standardized 100-point scale.

xiii. The summative determinations, including how they are calculated, that are provided to schools under 34 C.F.R. § 200.18(a)(4).

Summative determinations are designed to identify schools that need the most support and to provide families and other community stakeholders with information about their local schools. A school's final summative score is expressed as levels of support, ranging from more rigorous intervention (MRI), to targeted support and improvement (TSI), to comprehensive support and improvement (CSI), to traditional support, and to *New Mexico Spotlight School* designations. The summative determinations for MRI, CSI, and TSI are detailed in sections 4.2 and 4.3. Schools without these designations will have a summative designation of traditional support, unless they score above the 75th percentile with respect to their summative designation score, in which case, they will be designated a *New Mexico Spotlight School*. Replacing the existing summative determination of A–F school grades with the *New Mexico Spotlight School* designation and *Levels of Support* provided by the PED represents a paradigm shift in philosophy from failing schools to celebrating success and providing support for schools in need. Once again, in schools with low academic performance, we believe the system is failing the school—not the other way around.

SCHOOL SUPPORT DESIGNATION	DEFINITION OF SCHOOLS RECEIVING SUPPORT	PERCENTAGE OF SCHOOLS MEETING CRITERIA
New Mexico Spotlight School	Schools scoring above the 75th percentile on summative determination	25
Traditional Support School	Schools scoring above the threshold for support and improvement	~50
Targeted Support School	Schools in need of support with one or more groups of students	~25
Comprehensive Support School	Schools scoring in the bottom 5% of schools overall or <67% Grad rate	
More Rigorous Intervention School	Schools not exiting CSI Status after three years receiving support	

Designations of excellence also provide a spotlight on schools with excellent performance on individual indicators to further celebrate success and help families in their decisions around school choice aligned with the individual family's set of values. For example, some families may seek out schools with high academic performance, others may find more value in a thriving climate for Native children, some may be looking for both.

Designations of New Mexican Excellence	Schools scoring above the 90th percentile on any indicator
Designations of School Quality and Student Success	Schools scoring above a set standard on any indicator

Participation Rates

Describe how the State is factoring the requirement for 95 percent student participation in assessments into its system of annual meaningful differentiation of schools consistent with the requirements of 34 C.F.R. § 200.15.

Participation is gauged as the percentage of students who completed a valid scorable test when compared to enrollment figures averaged from several time points near the test window. Participation rates for high school mathematics require a denominator that is comprised of the enrollment counts in a relevant course. A student who is eligible for more than one assessment, such as an 8th grader taking Algebra I (i.e., who can take either the Math 8 or Algebra I assessment), must be assessed in the content that is considered more rigorous or of typically a higher grade level, and the student will not be expected to participate in more than one assessment. These students will be counted in the denominator of the participation rate that is applicable to the assessed content. The combined weighted percentages across courses, within content (math or ELA), will be used to derive the final rates within the school and within the LEA. In order to meet the required participation, both ELA and math must each have rates that, when rounded, account for 95percent or more of the eligible students. Failure to meet one of the two, i.e., either ELA or math, results in the school not having met participation targets.

Participation is computed for students in the conventional subgroups of ethnicity/race, students with disabilities, English learners, and economically disadvantaged, as well as for all students. The accountability, for which these rates apply, is subject to a minimum group size of 30, but rates are reported down to 10 or more students within a school across all grade levels.

Data Procedures.
Describe the State's uniform procedure for averaging data, including combining data across school years, combining data across grades, or both, in a school as defined in 34 C.F.R. § 200.20(a), if applicable.

For school accountability, all students in all grades are considered. Each student is weighted identically toward the final product, whether that is *Math and Reading Proficiency, Student STEM Readiness, Student Growth, Opportunity to Learn, EL Progress, Graduation*, or *College and Career Readiness*. For some growth measures, a student's prior two scores (years) enter into student growth calculations. And where prior scores are missing, the school or LEA mean is substituted to ensure that the student is not dropped from any analysis.

For statewide reporting, the same student population is used; however, because aggregates are larger and meet rules for data disclosure, the reporting can be provided in more detail. Included in state report cards are these extra categories, which are not to be used for accountability decisions:

- Recently arrived
- Exited EL status, Year 1
- Exited EL status, Year 2
- Exited El status, Year 3
- Military family (new)
- Foster family (new)
- Migrant

Combining Years. The State does not combine years for achievement measures, because the group sizes within a single year have been ample to support the current paradigm. The use of combined subgroups facilitates the adequacy of sample size and results in a complete census of students for accountability. Moreover, the use of two prior scores, in the computation of growth, assures that schools are not castigated based on a single poor year.

The State has employed three-year averaging of unweighted participation rates for the purposes of participation and will continue that practice. With the advent of requirements for individual legacy subgroups, the State has considered the option to develop a cumulative count of students over prior years. However, the method of comparing examinees to enrollment records does not lend itself to this kind of cross-year comparison, and the counts within legacy subgroups are small and the rates unstable. To combine these counts across years would compound the uncertainty. Therefore, the participation rate for legacy subgroups will utilize a minimum group size for the current single year.

Including All Public Schools in a State's Accountability System

If the States uses a different methodology for annual meaningful differentiation than the one described in D above for any of the following specific types of schools, describe how they are included, consistent with 34 C.F.R. § 200.18(d)(1)(iii):

xiv. Schools in which no grade level is assessed under the State's academic assessment system (e.g., P–2 schools), although the State is not required to administer a standardized assessment to meet this requirement.

Since all grades, K–11 are assessed, and since the State does not have 12th grade-only schools, every school will have achievement data by which to be evaluated. The concept of a feeder school (serving only grades prior to grade 3) is not relevant. Because the early grades of K through grade 2 are assessed only on ELA, their data are doubled to balance the lack of math in those schools' ratings.

xv. Schools with variant grade configurations (e.g., P–12 schools);

All schools are classified as either elementary or middle (EL model) or high school (HS model). Where ambiguity exists across models, such as for a school with grades 6 through 9, the rating model is assigned based on the maximum number of grades represented, in this case EL. A small number of schools (N=4) serve all grades kindergarten through 12, and a decision was made to default these schools to the HS model. Finally, nontraditional configurations, such as 6th grade and 9th grade academies, are assigned to the model where each typically resides. All of the grade levels within a school are combined for accountability.

xvi. Small schools in which the total number of students who can be included in any indicator under 34 C.F.R. § 200.14 is less than the minimum number of students established by the State under 34 C.F.R. § 200.17(a)(1), consistent with a State's uniform procedures for averaging data under 34 C.F.R. § 200.20(a), if applicable;

Not applicable.

xvii. Schools that are designed to serve special populations (e.g., students receiving alternative programming in alternative educational settings; students living in local institutions for neglected or delinquent children, including juvenile justice facilities; students enrolled in State public schools for the deaf or blind; and recently arrived English learners enrolled in public schools for newcomer students); and

Schools included for accountability are described at the beginning of this plan.

The charter school community and PED have agreed that the criteria to become a Supplemental Accountability Model (SAM) school and the modifications for such schools are incomplete. The PED will convene a group of stakeholders who will produce recommendations for a new State regulation. This will provide more clarity for all interested stakeholders and provide a sustainable path forward.

In New Mexico, schools for the blind/visually impaired and deaf, juvenile justice facilities and correctional education institutions meet the definition of an LEA under the IDEA and/or Title I and therefore receive federal funds. The state is responsible for the general supervision and monitoring of these programs.

Secondary Schools that are Not Degree-Granting

New Mexico has a long history of including secondary schools that do not award high school diplomas in its accountability system in a manner that is consistent with all other high schools. New Mexico's unique Shared Accountability graduation method is compliant with federal guidance and was approved by USED in 2010. The method assures not only that 9th graders are included but that they are apportioned a separate share of the 4-year, 5-year, and 6-year cohort graduation rates. Schools that serve only 9th graders (i.e., 9th grade academies) receive a graduation rate that is based on the time that students spent in that school. As a result of this method, high schools that do not have 12th grade graduating classes are still held accountable for their impact on graduation rates and student success. High schools with only grades 9, 10, or 11 are no longer exempt from graduation indicators, as they were under AYP. Details of Shared Accountability are in the Graduation Technical Manual in Appendix N.

It has been suggested that schools with high school grades other than the 12th grade be absolved from responsibility toward on-time graduation. The PED does not hold to this reasoning and, in fact, believes strongly that it is in the best interest of students that these schools be held accountable for their role in successful student preparation toward that goal. Primary research in successful graduation indicates that the 9th and 10th grades are critical periods for student success. To misdirect graduation accountability toward only degree-granting schools would dis-incentivize schools with lower-level grades and incentivize the creation of more schools in this category in order to escape recognition. This accountability paradigm inspires collaboration among all high schools to ensure that students are on the right graduation path. It bears repeating that the unique Shared Accountability rate described above holds these schools accountable for only their students and for only the amount of time those students spent in their school.

For the purposes of Federal Accountability, the calculated graduation rate for a school that does not have a graduating class will be counted as a School Quality indicator.

See below for an example of Shared Accountability in our current system (fictitious school example).

Hill High School had seven members of the cohort, who were enrolled for either some or all of their four years at their school. The sum of all students (4.93) divided by the sum of the graduates (2.76) yields a graduation rate of 56 percent.

Features of New Mexico's Shared Accountability Model are illustrated in this example of Hill High School. The graduation rate is comprised of fractions of students that are reconstituted to make a whole student body. Hill High is being held accountable for every student that ever spent any amount of time in their school, but the longer the time at Hill HS, the more the impact on their rate. When another school contributes to the student's success or failure, both Hill HS and the other school share responsibility. This method allows high schools that do not have a senior class to receive feedback on their graduation success.

Cohort Members Ever Enrolled at Hill HS		Snapshots				Graduation Rate	
		Hill HS	Statewide	School Share[1]		Numerator (Grads Only)	Denominator (All Students)
Diego	Graduated	16	16	16/16	1.00	1.00	1.00
Allen	Still enrolled	10	12	10/12	0.83		0.83
Sue	Graduated	2	16	2/16	0.13	0.13	0.13
Tom	Graduated	5	8	5/8	0.63	0.63	0.63
Kerry	Failed exit exam	8	12	8/12	0.67		0.67
Don	Graduated early	14	14	14/14	1.00	1.00	1.00
Juan	Still enrolled	8	12	8/12	0.67		0.67
					Sum	2.76	4.93

[1] For every student whose school share is less than 1.0, the remainder of their outcome is attributed to other schools attended during the high school years.

xviii. Newly opened schools that do not have multiple years of data, consistent with a State's uniform procedure for averaging data under 34 C.F.R. § 200.20(a), if applicable, for at least one indicator (e.g., a newly opened high school that has not yet graduated its first cohort for students).

Schools included for accountability are described at the beginning of this plan.

4.2 Identification of Schools

Comprehensive Support and Improvement Schools (CSI)

i. The methodologies, including the timeline, by which the State identifies schools for comprehensive support and improvement under section 1111(c)(4)(D)(i) of the ESEA and 34 C.F.R. § 200.19(a) and (d), including: 1) lowest-performing schools; 2) schools with low high school graduation rates; and 3) schools with chronically low-performing subgroups.

New Mexico has demonstrated success in supporting many of its lowest-performing schools. Distinctive conditions for improvement are identified here that are evidence-based and central to the development of leaders.

New Mexico will identify schools for either Comprehensive Support and Improvement (CSI) or Targeted Support and Improvement (TSI) status, based a streamlined set of rules and criteria that focus intervention at the LEA level in addition to the school level.

A school is identified as being in need of CSI by

- being in the lowest-performing five percent of Title I schools in New Mexico, as identified by overall points earned; or
- having a 4-year graduation rate (high schools only) less than 67 percent for two of the past three years; or
- having been a Title I school that was previously identified for targeted support due to low performing student subgroups and that has not demonstrated sufficient improvement after three years in that status by meeting the exit criteria for additional targeted support (described below).

ii. The uniform statewide exit criteria for schools identified for comprehensive support and improvement established by the State, including the number of years over which schools are expected to meet such criteria, under section 1111(d)(3)(A)(i) of the ESEA and consistent with the requirements in 34 C.F.R. § 200.21(f)(1).

Comprehensive Support and Improvement status has a three-year implementation timeline. An identified school is expected to exit CSI status within three years of fully implementing their improvement plans and can do so by improving the metric that was responsible for identifying the school for comprehensive support.

- For schools identified as being among the bottom five percent of Title I schools:
    - improving the total score so that student performance is no longer in the bottom five percent of Title I schools in the state after three years and having improved the index score;
- For high schools identified due to low graduation rates:
    - increasing the school's four-year graduation rate to be at or above 67 percent;
- For Title I schools previously in Targeted Support and Intervention (TSI) with low performing subgroups:
    - improving the index score of the low-performing subgroup so that the subgroup is no longer in the bottom five percent in the state for that particular subgroup and having improved the index score for the subgroup.

Timeline

Identification and implementation of the first set of CSI schools (to be repeated every three years):

February–October 2017
- PED planning
- Field training (following release of school summative determination scores)

October–December 2017
- CSI schools identified
- Districts notified

January–April 2018
- District conducts school-level needs assessment and develops CSI plan for each identified school
- District submits CSI plans to the PED

April–May 2018
- Districts with CSI schools participate in program and budget reviews, including selecting and matching evidence-based interventions and vendors
- State reviews and considers approval of CSI plans

May–June 2018
- Districts plan and prepare for implementation

July 2018–July 2021
- Implementation

August 2021
- CSI schools not meeting exit criteria after three years implement more rigorous interventions

Targeted Support and Improvement Schools (TSI)

iii. The State's methodology for identifying any school with a "consistently underperforming" subgroup of students, including the definition and time period used by the State to determine consistent underperformance, under 34 C.F.R. § 200.19(b)(1) and (c).

iv. The State's methodology, including the timeline, for identifying schools with low-performing subgroups of students under 34 C.F.R. § 200.19(b)(2) and (d) that must receive additional targeted support in accordance with section 1111(d)(2)(C) of the ESEA.

TSI School Identification: ESSA calls for schools to be identified as in need of "targeted support and improvement" if they have at least one subgroup of students underperforming. ESSA suggests there could be two types of TSI schools:

- *Low-Performing Subgroup at Level of Lowest 5% of Schools* : Schools (Title I or non-Title I) with at least one low-performing subgroup of students, defined as a subgroup of students that is performing as poorly as all students in any of the lowest-performing five percent of Title I schools (CSI schools).

- *Consistently Underperforming Subgroups*: Schools (Title I or non-Title I) that have at least one "consistently underperforming" subgroup, based on the state's accountability system.

For simplicity, and to be responsive to our stakeholders who asked not to have an entirely different accountability system on top of our school summative determination scores, we have only one streamlined methodology that we will use to identify schools as TSI that meets all statutory requirements, described below. This will capture schools (Title I or non-Title I), with at least one consistently low-performing subgroup of students across all accountability indicators, that is not already identified as CSI.

For schools identified as in need of TSI, the LEA will help schools develop and monitor a plan.

Timeline

Identification and implementation of the first set of TSI schools:

February–October 2017

- PED planning
- Field training (following release of school summative determination scores)

October–December 2017

- TSI schools identified (see #2 below)
- Districts notified

January–April 2018

- District conducts school-level needs assessment and develops TSI plan for each identified school in partnership with stakeholders
- School submits TSI plans to the district

May–June 2018

- Districts plan and prepare for implementation

July 2018 July 2021

- Implementation of TSI plans in additional targeted support schools

February– October 2018

- PED planning

October–December 2018

- TSI schools with consistently underperforming subgroups identified (see #3, below)
- Districts notified

January–April 2019

- District conducts school-level needs assessment and develops, with schools, TSI plan for each identified school and submits TSI plan to the district in partnership with stakeholders

May–June 2019

- Districts and schools plan and prepare for implementation

July 2019–May 2020

- TSI schools implement LEA supported evidence-based interventions

All eligible subgroups in all schools (Title I and non-Title I) will undergo an analysis consisting of the following steps to determine if any subgroup of students is consistently underperforming:

1- Remove all CSI schools

2- Once every three years, in years in which CSI schools are identified, any school—with a subgroup whose performance over the past three years is similar, across all indicators, to CSI schools in the bottom five percent of Title I schools in the state—will be identified for TSI and required to

implement additional targeted supports. Implementing these targeted supports will involve creating a subgroup index score, similar to the methodology used to calculate school summative determination scores, and identifying schools with subgroups, whose subgroup index scores is among the bottom five percent in the state.

3- Annually, beginning with 2018–2019 school summative determination scores, any school—with a subgroup whose performance (for fewer than three years) has been similar, across all indicators, to CSI schools in the bottom five percent of Title I schools in the state—will be identified for TSI as a consistently underperforming subgroup.

As indicated above, CSI schools will not be identified for TSI status. Schools with a consistently under-performing subgroup that meets the identification criteria for three years will subsequently be identified for additional targeted supports and will implement additional actions in their TSI plans, as determined by the LEA. In the case of a charter school that is its own LEA, the school will either be required to submit additional actions in an amended school improvement plan to the SEA or to its authorizer.

v. The uniform exit criteria, established by the SEA, for schools participating under Title I, Part A with low-performing subgroups of students, including the number of years over which schools are expected to meet such criteria, consistent with the requirements in 34 C.F.R. § 200.22(f).

Schools with one or more low-performing subgroup can exit TSI status after three years, if all identified low-performing subgroups show sufficient growth so that the subgroup(s), for which it was identified, is no longer in the bottom five percent of schools in the state for that subgroup on the statewide subgroup ranked list and has improved its subgroup index score.

4.3 State Support and Improvement for Low-performing Schools.

School Improvement Resources.

Describe how the SEA will meet its responsibilities, consistent with 34 C.F.R. § 200.24(d) under section 1003 of the ESEA, including the process to award school improvement funds to LEAs and monitoring and evaluating the use of funds by LEAs.

New Mexico will withhold seven percent of State Title I funding to distribute to LEAs through a competitive grant application for school improvement. The PED will determine the formula, based on the amount available under ESSA Section 1003, ESSA Section 1111(d), and updated rules and non-regulatory guidance from ED.

Funding will depend upon the number of schools the PED designates as Comprehensive Support Schools and the number that apply for targeted funding. LEAs, with any CSI schools, are eligible to apply for funding to fund school improvement strategies. LEAs will also demonstrate the alignment of current resources to support school improvement strategies.

Technical Assistance Regarding Evidence-Based Interventions.

Describe the technical assistance the SEA will provide to each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement, including how it will provide technical assistance to LEAs to ensure the effective implementation of evidence-based interventions, consistent with 34 C.F.R. § 200.23(b), and, if applicable, the list of State-approved, evidence-based interventions for use in schools implementing comprehensive or targeted support and improvement plans consistent with § 200.23(c)(2)-(3).

All LEAs and schools in New Mexico will utilize the NM DASH (Data, Accountability, Sustainability, and High Achievement), a web-based action-planning tool identified for developing school improvement plans and identifying evidence-or research-based interventions it has put into place for the school year. NM DASH is available at no cost to every LEA or school in New Mexico and is required by statute.

The PED provides a differentiated approach of support to New Mexico LEAs and schools, designed to assist leaders in developing structures to support planning and implementation strategies; enhance their capacity to implement, monitor, and sustain effective practices; and support alignment of funding and resource allocation, aligned with organizational conditions necessary for turnaround success. These conditions have implications for both the LEA and school. To support its lowest-performing schools (CSI), the LEA must first address the following:

Leadership

Districts must commit to lead for success by identifying priorities, aligning resources, investing in change that is sustainable, and clearly and consistently communicating that change is not optional.

Differentiated Support and Accountability

To achieve ambitious results, districts, committed to turnaround, must prioritize low-performing schools and provide both additional, core support beyond what non-turnaround schools receive and individualized supports aligned with unique school needs, including the identification of resource inequities.

Talent Management

Public education is human capital intensive, and efforts to turn around low-performing schools must prioritize how talent policies and approaches will be bolstered to support turnaround.

Instructional Infrastructure
Districts often have invested heavily in resources in producing curriculum and data that teachers either do not have the capacity, understanding, or willingness to use. Districts must own this challenge and create an instructional infrastructure where data is well organized and the pathway on how to use data to adapt instruction are clear.

References
NM DASH (formerly known as the Web EPSS) is statutorily required in the state of New Mexico. All schools and LEAs complete this tool as identified by the New Mexico Administrative Code 6.29.1.8, available at http://164.64.110.239/nmac/parts/title06/06.029.0001.htm

Robinson, W., & Morando Rhim, L. (2016). Darden School of Business, University of Virginia. Available at: http://www.darden.virginia.edu/uploadedFiles/Darden_Web/Content/Faculty_Research/Research_Centers_and_Initiatives/Darden_Curry_PLE/School_Turnaround/CoCreating_Org_Conditions_for_Success_160720.pdf

Comprehensive Support and Improvement Schools

CSI schools will receive support designed to provide schools and LEAs, with the highest level of need, rigorous and explicit interventions. CSI schools must implement a school-specific comprehensive intervention plan that is developed by its LEA and is approved, monitored, and regularly reviewed by the PED. New Mexico's plan is the NM DASH.

The PED will host a series of blended learning opportunities (webinars, face-to-face training, and technical assistance tools) each year to support LEAs in understanding their roles and responsibilities, as identified in the NM ESSA Plan.

LEAs with identified CSI schools have three options for intensive improvement under New Mexico's ESSA plan:

1. NM DASH-Plus
- LEAs and schools must complete the NM DASH with an intensive focus on human capital development and additional student learning time and supports. Additionally, these schools will receive increased monitoring and accountability related to their plan.

2. State-Sponsored School-Based Interventions (such as Principals Pursuing Excellence)

3. Application for Competitive Grants for School Improvement
- LEAs with schools identified as CSI are eligible to apply for additional funding through a competitive grant process to support participation in an evidence-based school improvement program. This may be in addition to, or in support of, state-supported programs funded via targeted investments.

4. High school transformation in partnership with PED
- Schools will work directly with the Office of School Transformation, in partnership with John Hopkins University, to implement evidence-based, comprehensive reform addressing the structural issues that contribute to low graduation rates. Only 10 high schools will be selected for this opportunity each cycle.

NM DASH-PLUS: Implementation and Monitoring

CSI schools, in collaboration with their LEA, will complete the Six Step Needs Assessment (embedded in the NM DASH) to inform their school-improvement plan or NM DASH.

- Step 1: Identifying a Core Team
- Step 2: Analyzing Data and Setting Student Achievement Goals through deep data analysis and reflection of qualitative and quantitative factors
    - Student achievement data includes summative, formative and interim assessment data.
- Step 3: Attending to Four Focus Areas: Instructional Infrastructure, Data Driven Instruction, Talent Management, and Resource Allocation
- Step 4: Conducting a Self–Assessment to zero in on the deepest underlying cause or causes of school performance challenges that, if resolved, result in elimination or substantial reduction of the performance challenge for their struggling schools
- Step 5: Creating Desired Outcomes and Defining Critical Actions based on the results of the Self-Assessment
- Step 6: Creating a System for Monitoring Implementation by identifying metrics, feedback, and observation structures to determine progress; recording evidence to know that a positive impact is occurring in meeting Critical Actions; adjusting for accelerated progress and/or unanticipated barriers.

Steps 1–4 of the Six Step Needs Assessment are completed once by the LEA and school to create the Annual Plan. Steps 5–6 comprise the 90-Day Plan, which is completed twice in the school year. The LEA and school are responsible for monitoring and implementing their 90-day plan. For CSI schools, the PED will require additional monitoring of plans in conjunction with the LEA and school.

To arrive at implementation and monitoring of the NM DASH, LEAs with CSI schools will receive onsite visits to the schools by a PED team, where, in collaboration with the PED team, CSI schools and their LEA will review evidence of the implementation of the 90-Day Plan. LEAs, in collaboration with the assigned PED team member, will review progress indicators of Critical Actions toward desired outcomes and benchmark goals every 30, 60 and 90 days.

The CSI site visit serves as an examination of the systems that support and relate to instruction. It serves as the mechanism for examining these systems in place and challenges the LEA and school leadership to increase teacher effectiveness to enhance student learning through professional dialogue. It provides a means by which the PED team members can compile data for feedback to the LEA and school about the practices being implemented to support transformation.

PED team members will also perform desktop monitoring, including, but not limited to, reviewing and approving reimbursement requests to ensure the alignment of fiscal resources to programmatic needs, as identified in the 90-day plan. Additionally, PED team members will monitor the implementation of critical actions within the 90-day plan and review whether timelines and benchmark goals are met.

The results of these onsite visits and desktop monitoring activities may lead the PED to perform additional monitoring and to provide additional technical assistance and support to ensure that the LEA and CSI school is making progress towards its goals, as identified in the 90-day plan.

During these site-visits, the LEA will be required to provide information regarding the leading and lagging indicators (identified by the Priority Schools Bureau). The review of status reports and other evaluation data to report on the quality and effect of the implementation of the 90-day plan will also be considered.

At the end of site visit and desk top monitoring reviews, the PED team will summarize its findings from the review of implementation of the 90-day plan. The PED will complete a CSI Status Report and send it to the school principal and superintendent. All status reports, to include a review and analysis of interim data, will be posted on the PED website to inform stakeholders of the progress LEA and schools are making in improving academic outcomes for their students.

Due to the high number of schools likely to be identified as CSI, the PED will partner with Regional Education Cooperatives (RECs) and vetted strategic partners to accomplish onsite visits and desktop monitoring to provide targeted support with NM DASH planning, implementation, and monitoring.

Application for Competitive Grants for School Improvement

LEAs with schools identified as CSI are eligible to apply for additional funding through a competitive grant process to support participation in evidence-based school improvement program or innovative school interventions.

LEAs must demonstrate that they have the organizational conditions necessary for turnaround success (as identified in Section 4: Accountability, Support, and Improvement, 4.3 State Support and Improvement for Low-Performing Schools) when applying to participate in the evidence-based school turnaround programs that meet a minimum of a Tier II level of evidence. On average, participating schools experienced statistically significant improvements in student achievement after completing the program.

LEAs may submit multiple applications in response to this RFA. However, only separate and complete applications for each eligible CSI school will be accepted. LEAs will be required to submit a Letter of Intent (LOI) designating the specific identified schools for which applications will be submitted. Identifying the model being proposed for each school (i.e., NM DASH-Plus, Competitive Grants for School Improvement: school turnaround program, or innovative school improvement interventions) is required for the LEA's application to be considered.

For LEAs applying for competitive grants, they are required to attend an orientation meeting to review the RFA. As a part of the competitive grant application, LEAs are required to attend a 1-hour Will and Capacity Interview with the SEA regarding their application. The PED will host a series of blended learning opportunities to provide an overview and guidance of the requirements for CSI and TSI schools and to prepare LEAs for the application process.

Competitive Grants for School Improvement: Evidence-Based Interventions

While some ESSA programs allow the use of all four levels of evidence-based intervention, Section 1003 requires that CSI and TSI schools use these funds only for interventions reflecting one of the highest three levels of evidence (Strong, Moderate, and/or Promising).

- Strong: at least one well-designed and well-implemented experimental study (i.e., a randomized controlled trial)
- Moderate: at least one well-designed and well-implemented quasi-experimental study
- Promising: at least one well-designed and well-implemented correlation study with statistical controls for selection bias

The PED will not provide a list of potential evidence-based interventions for school turnaround programs for use in schools identified as CSI choosing to apply for the Competitive Grants for School Improvement; it is incumbent upon the LEA to demonstrate that the selected intervention falls into one of the three ESSA tiers of evidence. If an LEA and CSI school decide on an intervention outside of the posted PED listing, LEAs must prove that their selected intervention (including those led by vendors or partners) fall into one of the three ESSA tiers in Category 1 (see table below).

Tiers of Evidence in ESSA			
Category 1	**Tier 1**	**Tier 2**	**Tier 3**
demonstrates a statistically significant effect on improving student outcomes or other relevant outcomes based on	strong evidence from at least 1 well-designed and well-implemented experimental study	moderate evidence from at least 1 well-designed and well-implemented quasi-experimental study	promising evidence from at least 1 well-designed and well-implemented correlational study with statistical controls for selection bias

Targeted Support and Improvement Schools

Targeted Support and Improvement (TSI) schools receive additional targeted support and technical assistance from their respective LEA for three years (or until the school's exit from TSI or entrance into CSI).

Steps 1–4 of the Six Step Needs Assessment are completed once by the LEA and school to create the Annual Plan. Steps 5–6 comprise the 90-Day Plan, which is completed twice in the school year.

- Step 1: Identifying a Core Team
- Step 2: Analyzing Data and Setting Student Achievement Goals through deep data analysis and reflection of qualitative and quantitative factors
  - Student achievement data includes summative, formative and interim assessment data
- Step 3: Attending to four Focus Areas: Instructional Infrastructure, Data Driven Instruction, Talent Management, and Resource Allocation
- Step 4: Conducting a Self–Assessment to identify the deepest underlying cause or causes of school performance challenges that, if resolved, result in elimination or substantial reduction of the performance challenge for their struggling schools
- Step 5: Creating Desired Outcomes and Defining Critical Actions based on the results of the Self-Assessment
- Step 6: Creating a System for Monitoring Implementation by identifying metrics, feedback, and observation structures to determine progress; recording evidence to know that a positive impact is occurring in meeting Critical Actions; and adjusting for accelerated progress and/or unanticipated barriers

Steps 1–4 of the Six Step Needs Assessment are developed by the LEA and school in the Annual Plan and are completed once. Steps 5–6 comprise the 90-Day Plan, which is completed twice in the school year.

The LEA and TSI school are responsible for monitoring and implementing their 90-day plan. The PED will review alignment between LEA plan goals and TSI school plan annually via a desktop review of their NM DASH.

References

Rand Corporation (2016) School Leadership Interventions under the Every Student Succeeds Act: Evidence Review. Santa Monica, CA. http://www.rand.org/pubs/research_reports/RR1550-2.html

More Rigorous Interventions

Describe the more rigorous interventions required for schools identified for comprehensive support and improvement that fail to meet the State's exit criteria within a State-determined number of years consistent with section 1111(d)(3)(A)(i) of the ESEA and 34 C.F.R. § 200.21(f)(3)(iii).

Under ESSA, New Mexico is committed to supporting LEAs and their CSI schools to meet exit criteria in the form of providing additional accountability, progress monitoring tools, evidence-based interventions, additional federal funding, and targeted investment opportunities. For those schools identified for comprehensive support that fail to meet exit criteria, as outlined above, within three years, the SEA will require more rigorous interventions for LEAs and their CSI schools. New Mexico is thus taking the opportunity provided by ESSA to further define and explain what is intended under each of the two options for chronically underperforming schools. After three years of not meeting one of the exit criteria as described in section v. above, LEAs would be required to participate in a more rigorous intervention:

Two Options for Chronically Underperforming Schools:

Significantly Restructure and Redesign

1. The local education agency will create a plan to significantly restructure and redesign the vision and systems at a school including:
    a. Differentiated Support and Accountability
    b. Talent Management
    c. Instructional Infrastructure such as:
        i. Data-Driven Instruction
        ii. Observation and Feedback
        iii. Instructional Planning
        iv. Professional Development
    d. Culture
        i. Student Culture
        ii. Staff Culture
        iii. Leading the Leaders

The PED will provide guidance and technical assistance to the LEA and will approve all elements and sub-elements of the school's plan.

2. The LEA will create a plan to significantly restructure and redesign the vision and systems at a school within an evidence-based community schools model. Again, the PED will provide guidance and technical assistance to the LEA and will approve all elements and sub-elements of the school's plan, which include:
    a. Differentiated Support and Accountability
    b. Talent Management
    c. Instructional Infrastructure such as:
        i. Data-Driven Instruction
        ii. Observation and Feedback
        iii. Instructional Planning
        iv. Professional Development
    d. Culture
        i. Student Culture
        ii. Staff Culture
        iii. Leading the Leaders
    e. Community School Framework
        i. Academic Services for Students
        ii. Health and Wellness Services for Students and Families
        iii. Community Partnerships

The restructuring and redesigning from a traditional school to a community school must address the holistic needs of the student and the community at large. Full Service Community Schools (FSCS) provide comprehensive academic and health and wellness services for students, their family members, and community members, resulting in improved educational outcomes for students.

Periodic Resource Review

Describe how the SEA will periodically review, identify, and, to the extent practicable, address any identified inequities in resources to ensure sufficient support for school improvement in each LEA in the State serving a significant number or percentage of schools identified for comprehensive or targeted support and improvement consistent with the requirements in section 1111(d)(3)(A)(ii) of the ESEA and 34 C.F.R. § 200.23(a).

The SEA will address any identified inequities in resources by hosting annual program and budget reviews with any LEA that have CSI schools. Academic and non-academic expenditures will be discussed to identify areas where the LEA can leverage funds to address priorities established in school needs assessments and the alignment of existing resources to support improvement efforts.