

Feedback on the October 26, 2022 Academic Performance Framework Draft

Topic	Author	Comment	PEC Response
<p>1.A State Accountability Option 1</p>	<p>Glenna's notes</p>	<ul style="list-style-type: none"> ○ What about the other 5%? ○ Provide a participation rate ○ Do we even need to have this, since it's in ESSR 	<p>If the "other 5%" refers to the difference between 95 and 100, state regs define the participation rate at 95%.</p> <p>The participation rate is 95% and is included in the business rules. However, if a school fails to test 95%, the PEC may use Option 1 to make a determination.</p> <p>Unclear what "this is" that is in ESSR</p>
<p>1.A State Accountability Option 2</p>	<p>Julia</p> <p>Glenna's Notes</p> <p>CDC</p> <p>Julia</p>	<p>P4. Identify how these two types of data result in a score. (i.e. you get a red from the state data and a green from your other data, then what is your rating? Scoring here is only on the supplemental assessment.</p> <p>Two things, but only one measurement.</p> <p>How are the points from the state score and the other test going to be scored and combined?</p> <p>P.7. Why would a school limit themselves to this option over Option 2? In option 2, a child can "ring the bell" in one of two ways. In this option, the school is limited to the special assessment.</p>	<p>Provide better language for scoring using Option 2.</p> <p>The school's annual performance on the state report card AND their performance on proficiency and growth data using supplemental assessments.</p> <p>Green (Meets/Exceeds) = The school is above the 50th percentile on the state accountability framework OR The school is between the 26-50th percentile of all schools on the state performance framework AND is at or above national norms for proficiency and/or growth in both reading and math</p> <p>Yellow (Working to Meet) = The school is between the 26-50th percentile on the state report card OR The school is below the 26th percentile on the state report card and above the national norms for proficiency and/or growth in both reading and math.</p> <p>Red (Does Not Meet) = Bottom 25th Percentile of all schools (Intervention category) AND The school is below the national norms in reading and/or math.</p>

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			Provide language to show that for Option 2, the school's primary accountability metric is the state accountability system and for Option 3, the primary accountability metric is their negotiated accountability system.
1.A State Accountability Option 2	Julia	Do all supplemental assessments have standard deviations for the school as a whole? <div style="font-size: small;"> <p>Option 2 – as drafted in the state accountability system using the charter contract.</p> <p>AND</p> <p>Supplemental proficiency and growth data using PEO-approved nationally normed assessment(s) under special circumstances, with PEC-approved rubrics, nationally normed assessments agreed to in the school's charter contract.</p> <p>The school's overall performance on the state assessment.</p> <p>The school's annual performance on the state report card AND their performance on proficiency and growth data using supplemental assessments:</p> <ul style="list-style-type: none"> • Green (Meets/Exceeds) = At or above the national norms for proficiency and/or growth in both reading and math. • Yellow (Working to Meet) = Within 1 standard deviation below the 50th percentile. • Red (Does Not Meet) = Below 1 standard deviation below the 50th percentile. </div>	Remove language referring to “standard deviation” and replace with “national norms”.
1.A State Accountability Option 3	CSD	95% participation rate is included in the state score. Will that be included in Option #?	Yes. As already stated: If less than 95% of students identified to be tested are tested on the school-specific assessments, the results are considered invalid and the school defaults to Option1
1.A State Accountability Option 3	Glenna's notes	Can this really be scored? (since it's the school's unique data). Why 70% ?	Yes. The school will provide CSD with their testing company's reports. They will be combined into a weighted school-level report with a percent of students who met their target.
1.A State Accountability Option 3	Julia	P. 4 The school's overall performance on the state accountability system using the state assessment <u>rating as compared to other schools and the state-generated grade, if applicable.</u>	Language accepted
1.A State Accountability Option 3	Patti's notes	P. 6. The school must negotiate a performance scale that is comparable to Option 1 and based out of 100 points and approved by PEC.	Leave at a scale of 1 to 100 to make it very easy to calculate and to compare across schools.

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		Do we need to change language to eliminate : <u>based out of 100%</u>	
1.A State Accountability Option 3	PED	<ul style="list-style-type: none"> • Green (Meets/Exceeds) = 70% or more of the possible points <i>Too low? Maybe 80%?</i> • Yellow (Working to Meet) = Between 69.9-50% of the possible points <i>50%-79%</i> • Red (Does Not Meet) = Below 50% of the possible points 	Ultimately, the percentages may need to change once PEC runs the data with a few schools.
1.A State Accountability Option 3	CSD	This will be negotiated by the schools and PEC. Based on mission goal negotiations in the past, there is concern regarding the level of rigor. A Commissioner commented that the assessments are PEC-approved and, therefore, this is not a concern. I respectfully disagree as the points at which a score is earned for this assessment is based on the PEC/school negotiation of what is Meets/Working/Does Not Meet. The assessment choice is not a concern; the scoring is.	This comment is directed at PEC not the framework.
1.A State Accountability Participation Rate	Julia	P4. If less than 95% of students <u>identified to be tested</u> are tested on the school-specific assessments, the results are considered invalid and the school defaults to Option1	Accepted
1.B.--Student Group Performance	CSD	Many charter schools have fewer than 20 students in some subgroups. As written below, those schools will not be held liable for subgroup performance. Schools should be held accountable for all	Holding a school accountable for high-stakes decisions such as renewal and closure when there are so few students (<20) may result in unreliable scores over time. Groups fluctuate and when there are small n-sizes, one or two students can make a huge difference. Even 20 is a small number.

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		<p>students. The issue is that individual data must be masked but a method for scoring without sharing that data needs to be considered.</p> <p>Subgroup performance is available from PED Accountability for all subgroups regardless of size. However, in public reports those scores are masked with an * for any groups with 10 or fewer to avoid FERPA violations. The important note is that the data is available and included in the state score. It could be the same with the subgroup reporting for PEC. The subgroup data would be reviewed by CSD and compiled (due to several subgroups) to arrive at a score. That overall score would prevent any possibility of identifying the results for specific students.</p> <p>For options #2 and #3, it might be a good idea to identify specific subgroups of interest to the PEC (for example: <i>include</i> low-income, Native American, Hispanic, Black, ELL, and students with disabilities; <i>exclude</i> gender, race,</p>	<p>Because the data is available on PED, there is no need to duplicate it on PEC report cards, AND it may confuse things to add.</p> <p>Student groups will be identified.</p>

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		other ethnicities)	
1.B.--Student Group Performance	Julia	<p>P5. I see many variables here and don't see clearly how it would work. It would really help to take a sample school and score them. Does PED set targets for each special student group?</p> <p>What happens if they don't?</p> <p>Then at least three of these categories result in all students being looked at again (gender, race, ethnicity).</p> <p>Further, do students that fall into multiple categories count multiple times? In a small school, this could have a large impact.</p> <p><small>1.B. Outcome for Special Student Groups The school ensures every student group (low-income students, Native American students, English language learners, students with disabilities, gender, race, ethnicity, and any other populations identified by PED as a special population) demonstrate academic excellence on the school's chosen option in 1A.</small></p>	<p>The groups will have the same target—there is no reason why any one student group should, based on their demographics, be worse than any other.</p> <p>The outcome is outlined in the criteria—if not all student groups meet the target, the school will be “yellow”</p> <p>True. Students will count multiple times.</p>
1.B.--Student Group Performance	Julia	These groups will change annually based on the type of students enrolled. This is hard to implement.	True. This is done already by PED in their framework.
1.B.--Student Group Performance	Julia	<p>I'm not sure what Yazzie Martinez is called out here. This seems to be much broader than Yazzie Martinez.</p> <p>It seems like this could be limited to Yazzie Martinez groups, which might prove to be more simple to score..</p> <p>I would like to see what Matt thinks is an easy, reliable growth indicator.</p>	<p>The student groups defined through Yazzie Martinez were determined by PEC to be the most important group of students to ensure academic growth and proficiency.</p> <p>Comment is directed at PED to engage with Matt.</p>
1.B.--Student Group Performance	Patti's notes	P. 6. Under Option 2: individual growth target on their supplemental assessment for every student group for math	100% of students do not need to reach the goal. Each student is given an individualized growth target. Based on the percent who reach that target, the school will earn green, yellow, or red.

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		and reading/ELA – Does 100% of students have to reach growth goal	
1.B.--Student Group Performance	Glenna's notes	<p>Option 1 & 3 Concern about meeting 20+ students. Perhaps add count verbiage to include beginning through end of SY.</p> <ul style="list-style-type: none"> • Link to the PED-approved assessments instead of a footnote. • What is growth target for Native American? • A student may fall into several groups. 	<p>The 20+ students will be limited to full academic year students. Language to be added.</p> <p>For purposes of clarity and version-control, including the PED-approved assessments at the time of publication in the document provides the most clarity.</p> <p>Each student is given an individual growth target that is based on multiple factors, not just race and ethnicity.</p> <p>Students will have multiple identities, as do all people.</p>


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1.B.--Student Group Performance	PED	<ul style="list-style-type: none"> Yellow (Working to Meet) = One or more student group has fewer than 70% of students meet their individual state growth target but more than the majority have 50% attain their individual state growth targets in every student group in math and reading/ELA. This is confusing...and complicated Red (Does Not Meet) = The majority of student groups have fewer than 50% of "majority" needs to be defined: 51% or more? more than 50%? 	<p>Revised.</p> <p>Majority of student groups will depend on the number of student groups at the school. This brings up the point of what to do if only two student groups. The "majority" would be both. Since a percentage is used in this same sentence to identify the percent of students to meet their individualized growth target, majority will stay as a word, not a percentage. Can add a footnote.</p>
1.B.--Student Group Performance	<p>Julia</p> <p>CSD</p>	<p>What happens to a school that does not have 20+ students?</p> <p>The subgroup scores are included in the state accountability scores, regardless of size but the data is masked in public reports. However, the larger issue is that data is comparing the performance of the prior year's students to the performance of the current year's students which often is not the same students.</p> <p>Therefore, the data for schools with low n sizes (most charters and microdistricts) is not statistically reliable.</p>	<p>For schools without a small student body, the students will count in "all students", likely in "gender", and in any other student group with an n-size greater than 20.</p> <p>Correct.</p>

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		<p>Nevertheless, it is included.</p> <p>In response to the comment about ALL subgroups being considered which ultimately means all students AND that students may be counted multiple times because they are in multiple subgroups, both of those are true for the current state accountability system</p> <p>The data for individual students could be provided to CSD for each subgroup in order to calculate results, provide an overall score that combines or averages each subgroup, and mask the ones with 10 or fewer on the public report. This is similar to how the accountability scores are calculated.</p>	<p>Correct</p> <p>The PEC has concerns about basing a high-stakes decision, such as renewal or closure, on data with fewer than 20 students.</p>
1.B.--Student Group Performance	CSD	Subgroup data is included in the state score (first half of this option) regardless of size. Does this option mean that the school will additionally provide subgroup data based on other tests?	Yes, student group data will be provided by the school through the testing company's reports.

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1.B.--Student Group Performance Option 2	CSD	How are the points from the state score and the other test going to be scored and combined?	No. The internal test will be used as a “second look” if the school does not meet the state-determined standard on the state assessment.
1.B.--Student Group Performance Option 3	Glenna’s notes CSD	Look at pre & post to show growth. I think this option should be based on interim assessments (pre and post) within the same school year. This would more accurately demonstrate actual measurable growth of students.	Pre-and post-tests is one way to show growth. Another is year-over-year, which is closely aligned to state growth metric. Business rules will still need to be created. The data reports from the testing company are the most reliable and capture whether students met their expected growth target. The business rules have not been developed.
2.A – Mission Aligned Goal	Julia CSD Glenna’s notes	P.8 Often the PEC wants to ensure that the goal covers a lot of the students in the school. Could they do one just for a small group of students? What about schools with multiple grade levels where one goal might not cover the entire student population? In that case, the PEC may want to allow two goals (such as one for K-5 and one for 6-12). In the past, PEC did not approve goals that included a subset of students as they wanted schools to demonstrate that they are serving all students. Provide an example of a mission-specific goal	The point of a mission-aligned goal is that all (or close to all) students are able to benefit from the school’s mission. Therefore all (or close to all) students shall be included in a mission-aligned goal. With that said, a school may choose to measure the impact of its mission on ALL seniors, or all 9th graders, versus every student in every grade. Considering goals for two distinct “campuses” or grade bans is a reasonable consideration. Schools will need to negotiate goals with PEC.

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2.A Mission aligned goal SEL	Julia	P.8. These feel much more subjective than the others. (referring to SEL)	SEL surveys are considered valid and reliable.
2.B. Fidelity of Educational Program Implementation	CSD	This appears to be very subjective. Also, schools determine the educational program components in the charter contract so this should be easily demonstrated and could inappropriately inflate the academic score. This item was included in Organizational Performance (indicator 1a) in the past and may be more appropriate there.	At this point, no weights have been assigned. This area may be a minor overall area of the score. However, at the same time, measuring the way that the school implements its program is not a minor aspect of school. Raising it to academic shows the importance of this work.
2.B. Fidelity of Educational Program Implementation	Julia	P. 8 Fidelity would need to be defined here.	Open to suggestions.
2.B. Fidelity of Educational Program Implementation	Glenna's notes	School could be doing a terrible job, yet never receive Red	Need to provide more context to resolve comment.
2.C – Conducive Learning Culture	Julia Glenna's notes	P. 8. This [re-enrollment] elevates one of the 7 academic indicators to a very high level. Is that as you intend it? (Right now it isn't scored at all). Then, how do you ensure that the reason that students are not re-enrolling is related to the school? Never rated concurrent enrollment before; now its elevated. Do we want	Re-enrollment (or choosing the same school year over year) is an important part of school choice. Families always re-enroll due to school-related issues except if they move out of state or catchment area, which could be a reason to discount the student in this metric.

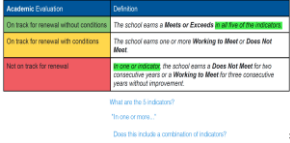
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	<p>PEC</p> <p>CSD</p>	<p>to do this? May get a lot of arguments.</p> <p>Unless this is in statute, I don't think recurrent enrollment should be included - it's not something the school can control. Often, families leave school districts and leave NM for many reasons other than the school, and it's hard to track why the student didn't return (unless exit surveys are collected and requests for record transfers are kept/reviewed).</p> <p>This is concerning in part due to the fact that students "charter shop", along with the fact that there are points at which students chose to leave a charter school for reasons other than the learning culture. One very specific example is the students who are promoted to grades 6 and 9 who chose another school for reasons such as athletics, band, etc.</p>	<p>Re-enrollment is in statute. And, it is an important factor of school choice. Students who attend multiple schools are more worse off than those who attend a "low quality" school year over year.</p> <p>It is BECAUSE families "charter shop" that this metric is important.</p> <p>Grades 5 to 6 and 8 to 9 are excluded.</p>
2.C – Conducive Learning Culture	Julia	<p>P. 8 This is numerous groups. Which are they?</p> <p>How are they scored? What is a school makes re-enrollment overall, but misses re-enrollment of one ethnicity, what is the score?</p>	<p>Yellow (Working to Meet) = Not all student groups have a re-enrollment rate of at least 85% but all students and the majority of student groups have a re-enrollment rate of at least 65% and no student group is below 65% for two or more consecutive years.</p>
2.C – Conducive Learning Culture	Julia	<p>P. 8 Rewrite</p> <p>Re-enrollment for every student [group] with 20+ students in the following grade-bands K, (baseline year), reenroll in grades 1-5, 6 (baseline year), reenroll in grades 7-8, 9 (baseline year), reenroll in grades 10-12.</p>	Accepted
2.C – Conducive Learning Culture	Glenna's notes	Grade level bands may not reflect enrollment drop offs between 5-6, 8-9, etc. Consider: grades 1-5, 7-8, 10-12.	Revised to clearly reflect that this is exactly what we are anticipating—not capturing natural breaks between grades 5 and 6 and 8 and 9.


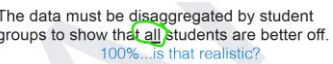


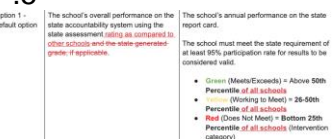
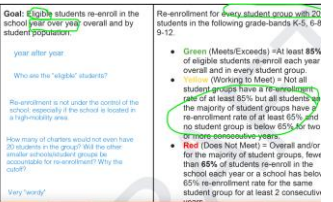
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2.C. Conducive Learning Culture	PED	P 3. 	Conducive Learning Environment will not be further defined. The objective is to identify if a school is not re-enrolling students from a specific population.
2.C. Conducive Learning Culture	CSD	If the intent was to not count the students moving from grade 5 to 6 or grades 8 to 9, that is not clear to me.	This is the intent and will clarify.
2.C. Conducive Learning Culture	CSD	<p>Recurrent enrollment, despite what was said today, is indeed included in the current organizational performance framework as indicator #3b which reads:</p> <p>The school meets the 95% average daily attendance goal, or demonstrates successful implementation of a whole-school student attendance improvement plan;</p> <p>The school maintains at least 80% retention of enrolled students from date of enrollment until the end of the school year, or students who leave prior to the end of the year are classified as graduates, completers, or have earned their GEDs; and</p> <p>The school has a 70% reenroll rate from one school year to the next.</p>	The CSD explains that re-enrollment is captured in the state accountability system.

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2.C. Conducive Learning Culture	CSD	It seems that recurrent enrollment is being elevated too high in the academic score. Would it be better to leave it in the Organizational Performance Framework? Or leave it here and change it to match the above indicator that has multiplied factors?	The PEC would like to keep re-enrollment as a high-stakes measure.										
Community Input	PED	<small>Should we include the request to PED Bureaus regarding their concerns/areas? I don't think we can guarantee their input but that we are attempting to collect input would be helpful for GB school leaders to know.</small>	Unclear on how to respond to this comment.										
Evaluation	Julia	<p>P3. I want to move the accountability more to the school and not always on PEC to enforce. I also think that this sentence moves past the PF to what the PEC will do with the scored document.</p> <p>The school review process must provide the CSD and PEC with the information they need to act if a school is flagged for support or intervention for their academic program. To that end, each<u>Each</u> school will receive an academic evaluation as follows:</p>	Accepted										
Evaluation	Julia	<p>P3. Revision to the evaluation language.</p> <table border="1"> <thead> <tr> <th>Academic Evaluation</th> <th>Definition</th> </tr> </thead> <tbody> <tr> <td>On track for renewal without conditions</td> <td>The school earns a Meets or Exceeds in all five of the indicators for the school year. assessment <small>assessed</small></td> </tr> <tr> <td>On track for renewal with conditions</td> <td>The school earns one or more Working to Meet or Does Not Meet for the school year. assessment <small>assessed</small> but does not meet the criteria for "not on track for renewal."</td> </tr> <tr> <td>Not on track for renewal</td> <td>In For one or more indicators, the school earns a Does Not Meet for two consecutive years or a Working to Meet for three consecutive years without improvement about <small>in status that allows improvement</small> (i.e. moving from Does Not Meet to Working to Meet)</td> </tr> <tr> <td></td> <td>CR The school's overall academic performance indicates that the school is failing to meet or make substantial progress toward the department's standards of excellence or student performance.</td> </tr> </tbody> </table>	Academic Evaluation	Definition	On track for renewal without conditions	The school earns a Meets or Exceeds in all five of the indicators for the school year. assessment <small>assessed</small>	On track for renewal with conditions	The school earns one or more Working to Meet or Does Not Meet for the school year. assessment <small>assessed</small> but does not meet the criteria for "not on track for renewal."	Not on track for renewal	In For one or more indicators, the school earns a Does Not Meet for two consecutive years or a Working to Meet for three consecutive years without improvement about <small>in status that allows improvement</small> (i.e. moving from Does Not Meet to Working to Meet)		CR The school's overall academic performance indicates that the school is failing to meet or make substantial progress toward the department's standards of excellence or student performance.	Agreed—Remove the renewal language and stick to annual reviews.
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Evaluation	Glenna's notes	Academic Evaluation & Definition table – provide a crosswalk for what constitutes green, yellow, red. Provide more language for Yellow..."but is NOT on track for ..."	Agreed—another document must be created to delineate renewal decisions.
Evaluation	PED		Unclear on why we need four levels?
PEC	Julia	P3. Addition of PEC	Accepted
PEC	Patti's notes	I know we discussed the PEC's right to make decisions as independently elected officials. I think this needs to appear somewhere in the PF.	Accepted
Performance Framework v Renewal Decisions	Julia	P1. Keep the purpose of this document focused on the PF, not what might happen if the results are not what PEC wants	Accepted
Performance Framework v Renewal Decisions	Patti's notes	Do we need to add an option under section for renewal that a school that substantially changes ratings in last year could be on track for non-renewal or renewal with conditions	Accepted—a new document.
Performance Framework v Renewal Decisions	Glenna's notes	Remove the paragraph: Statutory Renewal Requirements. Keep document specific to Performance Framework (Statute: 22-8B-9)	Accepted
Performance Framework v	CSD	Finally, how will the PEC	Separate document will need to be drafted for renewal decisions.

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Renewal Decisions		<p>handle the following two NMAC regulations at renewal time? The proposed options allow schools to exclude the state accountability system completely in the evaluation by PEC. Does the proposed academic performance framework remove the right to close the school for not meeting accountability requirements required in statute?</p> <p>6.80.4.13(C) NMAC: The [renewal] application shall contain:</p> <p>(1) a report on the progress of the charter school in achieving the goals, objectives, student performance standards, state minimum educational standards, and other terms of the initial approved charter application, including the accountability requirements set forth in the Assessment and Accountability Act (Sections 22-2C-1 et seq., NMSA, 1978);</p> <p>6.80.4.13(D) NMAC: A chartering authority may refuse to renew a charter if it determines that:</p> <p>(2) the charter school failed to meet or make substantial progress toward achievement of the department's minimum educational standards or student performance</p>	

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		standards. [which has been interpreted as the state accountability system results]	
Wording/Format /Style	Julia	P.3. Rewording	Accepted
Wording/Format /Style	Julia	P3. This chart is included twice on one page. I think you only need it once.	fixed
Wording/Format /Style	Glenna's notes	P1. Part 1: School Academic Review Process – 3 rd & 4 th sentences are instructions to the school. Do we need them here?	Accepted
Wording/Format /Style	Glenna's notes	P1. Remove “solely” from the 2 nd paragraph on same page.	Accepted
Wording/Format /Style	PED	P.3 <small>determining the assessments used. The first step will be to negotiate with PLC and create your goal which will be included in your charter contract. Once included, CSD will use these goals to report to school's performance annually. Every school will receive a rating in each of the five Performance categories of "State Accountability Indicators" and "School-Specific Educational Measures". Use "the school (or GB or HAF) instead of "your goal"</small>	This is stylistic and up to PEC
Wording/Format /Style	PED	P. 3. 	Replaced with “performance areas,” which are defined above.
Wording/Format /Style	PED	1.A. State Accountability System <small>The school encourages students to meet or exceed the</small>	Style will be determined by PEC
Wording/Format /Style	PED	The school must meet the state requirement on at least 95% participation rate for results to be "meet the current NM state requirement OR 95%..."	Style will be determined by PEC
Wording/Format /Style	PED	2.A. Mission Implementation through Education Program <small>Educational</small>	Not sure if it needs to be educational– this is the “education program” versus the “extra-curricular program”. Happy to

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			switch, if consensus.
Wording/Format /Style	PED	<p>P 7.</p> 	This is how a SMART goal is written. It's typically done in a single sentence. I recommend not changing.
Wording/Format /Style	PED	<p>P 7.</p> <p>The data must be disaggregated by student groups to show that all students are better off.</p> 	To ensure that ALL students (yes, 100%) are better off, is realistic.
Wording/Format /Style	PED	<p>P.8</p> 	Semantics.
Wording/Format /Style	PED	<p>P. 8</p> 	Fixed
Wording/Format /Style	Julia	<p>P.5</p> 	Fixed
Wording/Format /Style	PED	 <p>Who are eligible students?</p> <p>“Year after year” versus “Year over Year”</p> <p>“Re-enrollment is not under the control of the school; especially if the school is located in a high-mobility area.</p> <p>How many of the charters would not even have 20 students in the group? Will the other smaller schools/s student s groups be accountable for re-enrollment =? Why the</p>	Comments addressed previously.

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		cutoff? Very “wordy”	
Wording/Format /Style	PED	P1–incomplete sentence and repeat language	fixed
Wording/Format /Style	PED	<small>22-88-9.</small> <small>(11) the process and criteria that the chartering authority intends to use to annually monitor and evaluate the</small> <small>overall governance and student performance of the charter school, including the method that the</small> <small>chartering authority intends to use to conduct the evaluation as required by Section 22-88-12 NMSA 1978,</small> <small>“the fiscal...” what?”</small>	fixed
Wording/Format /Style	Julia	P1. Legal citation	