

Utah Accountability Technical Manual 2017-2018

UTAH STATE BOARD OF EDUCATION



UTAH STATE BOARD OF EDUCATION | NOVEMBER 2018

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Introduction

The Utah State Board of Education (USB E) makes annual accountability determinations for schools based on measures of student academic achievement, student growth, and equitable educational opportunity. While accountability systems are intended to reliably measure the impact of schools on student learning, they must also:

- Establish transparency in school performance for parents and policy makers;
- Make determinations for additional reward, support or consequence;
- Enable the continuous improvement of teaching and learning in the school.

[Utah Code 53E-5-2](#) establishes the school accountability system and requires the board to assign overall ratings based on school performance several indicators. Changes to this code made in 2018 add additional indicators to the accountability system. This document, The Accountability Technical Manual, lists technical details regarding the accountability indicators, methodologies, calculations, and business rules used for the calculation of school accountability indicators and assignment of overall ratings, and details Utah's accountability systems for educators, parents, and other stakeholders.

Utah is committed to using fair and transparent accountability models that meaningfully differentiate the performance of schools. This technical manual will review the following information relevant for 2017-2018:

1. System purpose
2. Accountability and assessment changes for 2017-2018
3. Utah's school accountability system
4. School accountability reporting
5. Meaningful identification of schools in need of support

Chapter 1: System Purpose

The passage of the Every Student Succeeds Act (ESSA) in 2015 marked the beginning of a new development cycle for accountability systems. States have been presented with an opportunity to revise and redesign accountability systems that have been part of the Elementary and Secondary Education Act (ESEA) since No Child Left Behind (NCLB). This opportunity gives states the chance to reinforce the connection between accountability systems and school improvement systems, as well as strengthen the coherence of these systems with a state's larger priorities and theories of action, and drive systems for ongoing continuous improvement.

Theory of Action. State accountability systems establish a set of principles to drive school and district performance towards college- and career-readiness, distinguish performance to meaningfully target supports to the students most in need, provide timely, transparent data to spur action, and foster innovation and continuous improvement throughout the system (D'Brot, Keng, & Landl, 2018). These principles focus on the entire cycle of the system, including accountability as a driver for school improvement and ongoing continuous improvement. Overall summative scores and/or ratings are meant to represent performance across the full spectrum of measures, capturing school performance holistically.

Beyond school ratings, state accountability systems are somewhat abstract at the school and classroom levels. States utilize a theory of action for accountability systems to leverage and incentivize behaviors that improve outcomes for students and facilitate equitable access to high-quality educational opportunities. However, there often exists a gap between the intended system impact and how behaviors change (D'Brot & Keng, 2018).

It is critical to understand the complementary roles that accountability and school improvement play. The supports and progress monitoring associated with a state's support system should be used to understand whether the identification system is sending the right signals, prompting effective questioning, and eliciting the intended behaviors among Local Educational Agencies (LEAs) and schools. The information gleaned from the support and monitoring that states deliver through its' accountability system can then be used to confirm identification decisions for school improvement or refine school practices (D'Brot & Keng, 2018).

Utah's Accountability System. Utah's Accountability system is designed to incentivize schools to engage in processes that support student performance, emphasize student growth, and improve opportunities for students to access instruction through supportive learning environments. The intended outcomes are to simultaneously communicate performance to schools in order to inform school-level decisions, such as program, policy, or instructional decisions, as well as accurately identify those schools in the state that require comprehensive or targeted school improvement under Title I.

School year 2017-2018 marked a transitional year for accountability. In the Utah legislative session of fall 2016, the Utah legislature passed significant changes to Utah's school grading system via Senate Bill

220. In addition, the 2015 reauthorization of the Elementary and Secondary Education Act (ESEA), known as ESSA, enacted significant changes to school accountability and reporting requirements.

One objective of accountability systems is to support educators as they make critical programmatic and instructional decisions effecting student learning in Utah, and to improve student growth and learning outcomes. Both pieces of legislation, State S.B. 220 and ESSA, go into effect for the 2017-2018 school year. With these changes in statute, Utah has a valuable opportunity to redefine the system for school accountability and align state accountability with federal accountability requirements to establish a single accountability system that meets both state and federal requirements.

Among these changes, Utah has added additional indicators for school performance. These additional indicators are intended to expand the definition of successful schools and capture more of the work schools do to help students. New indicators, such as English learner progress, growth of the lowest performing 25% of students, indicators of postsecondary readiness through successful participation advanced placement, concurrent enrollment, international baccalaureate, and CTE pathways, and inclusion of five-year graduation rate emphasize and incentivize schools to increase high quality equitable educational opportunities. In addition, there is an increased emphasis on growth measures as well as measures that are not tied to student assessments. These changes have been made in an effort to align with Utah's theory of action: that the indicators provide fair and accurate information to schools, parents, and communities; that the accountability system accurately captures the breadth of school performance to drive instructional decision-making; and that the accountability system accurately identifies the schools in the state who are in need of additional support (D'Brot & Keng, 2018).



Figure 1: Accountability Improvement Cycle (D'Brot & Keng, 2018)

Accountability & Assessment Changes in Utah

This section provides an overview of changes to the Accountability system from school year 2016-2017, to school year 2017-2018, and assessment changes that will take place in 2018-2019 to help schools and LEAs anticipate and plan for the shifts that are taking place over these years.

2016-2017 Accountability (Last year)

- Accountability requirements remained largely the same as 2015-2016; the most significant changes to accountability go into effect for 2017-2018.
- Participation in SAGE remained as required for grades 3 through 10.
- Participation in SAGE was optional for 11th grade in 2017; this determination was made by each individual LEA.
- The ACT was administered statewide to all students in 11th grade.
- 11th grade SAGE assessments were excluded from accountability for 2017.

Changes for 2017-2018 Accountability (This year)

- Accountability determinations for 2017-2018 will be made based on the 2017-2018 statewide administration of SAGE in ELA, math, and science for grades 3 through 10, ACT for grade 11, and several other measures of student progress.
- One SAGE writing prompt was given instead of two as in previous years.
- Accountability Reports will be made available to LEAs in late November, and are scheduled for public release on December 10, 2018.
- The ACT was administered statewide to all students in 11th grade to measure math, English, reading, science, and writing.
 - Schools had the option to administer SAGE to 11th grade students. These 11th grade assessments are excluded from accountability calculations.
- Overall school grades (A, B, C, D, or F) will not be assigned for school year 2017-2018. This was determined by the Utah State Board of Education in April, 2018. Schools will still be held accountable on all indicators and schools and LEAs will receive Accountability Report Cards, but no letter grade will be assigned to schools for 2017-2018.

Assessment Changes for 2018-2019

- **RISE:** Utah's new statewide assessment for grades 3-8, RISE, will replace SAGE in 2018-2019. Achievement and Growth for grades 3-8 will be used in accountability for 2018-2019.
- **Utah Aspire +:** A Utah Core Standards aligned college readiness assessment, Utah Aspire + (UA+), will be used as the annual academic assessment for math, English, reading, and science for grades 9 and 10 statewide beginning in 2018-2019.
- **ACT:** ACT will again be administered to all 11th graders statewide.
- RISE, Utah Aspire +, and ACT will be used in accountability calculations for 2018-2019, next year's school accountability release.

Please refer to the Utah State Board of Education website for a summary of [2019 Utah Assessment Updates](#) and [RISE Testing FAQs](#).

Chapter 2: Utah's School Accountability System

Aligned with Utah's Theory of Action, Utah has defined indicators of school accountability that support student learning and school improvement. To emphasize and encourage schools to prioritize equitable educational opportunities and provide learning environments that support each student and their unique needs, several indicators have been added to the accountability system from previous years. These include English Learner Proficiency (ELP), Growth of the lowest performing 25% of students, and participation in advanced coursework and CTE pathways. Elementary and middle school performance is measured by indicators of academic proficiency, academic growth, English learner progress, and growth of the lowest performing 25% of students (see Figure 2, p 16). High school performance is measured by the same set of indicators and, in addition, indicators of postsecondary readiness (see exhibit 2). Each of these indicators has an assigned policy weight, reflective of system values, a number of points possible, and meaningfully differentiates school performance (Reyna, 2016; Utah's ESSA Consolidated State Plan, 2018).

Overall ratings. Historically, Utah has used normative standards for assigning overall school ratings. In other words, a school's overall rating was dependent on the performance of all schools in the state. Normative comparisons among schools for the purpose of assigning letter grades created the perception among schools that letter grades were unpredictable and made them difficult to compare from year to year. Beginning in 2017-2018, Utah's accountability system will change this practice, moving from a normative system to a criterion-based system for setting cut scores for school grades.

[Utah Code 53E-5-204](#) defines school overall ratings, based on the indicators included in the Utah accountability system, on an A-F letter grade scale:

- An A grade represents an EXEMPLARY school;
- A B grade represents a COMMENDABLE school;
- A C grade represents a TYPICAL school;
- A D grade represents a DEVELOPING school;
- An F grade represents a CRITICAL NEEDS school.

For the 2017-2018 school year, Utah code requires the board to evaluate a school based on the school's performance level on the indicators described in this chapter, but does not require the assignment of an overall rating or school letter grade. Therefore, each indicator of school accountability will be calculated and reported; however, no overall letter grade will be assigned to schools for 2017-2018.

This section of Utah Code also states that for any future school year in which there is a transition to a new assessment and the board determines it is necessary to establish a new baseline for determining student growth, the board is not required to assign an overall rating to a school to any school which the new baseline applies.

For elementary and middle schools, the total points possible for school accountability is 150 points. For high schools, 225 total points are possible. If a school has fewer than 10 English learners (ELs), points for the English learner progress indicator are removed from the total points possible for the school. The

percentage of total points possible earned by a school is used to 1) determine the school's overall rating, 2) designation of the lowest performing Title I schools for support and improvement, and 3) targeted school improvement based on the consistently underperforming student groups within a school.

Table 1: Points and weighting of indicators for elementary/middle schools

| Indicator | Points | Percentage of Total | Percentage with <10 ELs |
|---------------------------------|--------|---------------------|-------------------------|
| Achievement | 56 | 37% | 41% |
| Growth | 56 | 37% | 41% |
| EL Progress | 13 | 9% | -- |
| Growth of Lowest Performing 25% | 25 | 17% | 18% |
| Total | 150 | 100% | 100% |

Table 2: Points and weighting of indicators for high schools

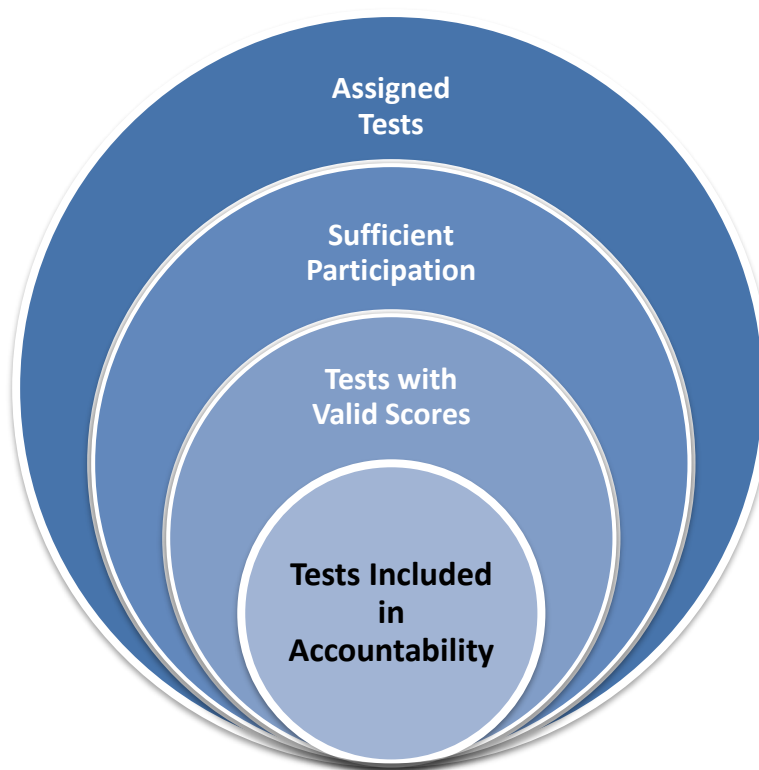
| Indicator | Points | Percentage of Total | Percentage with <10 ELs |
|---------------------------------|--------|---------------------|-------------------------|
| Achievement | 56 | 25% | 41% |
| Growth | 56 | 25% | 41% |
| EL Progress | 13 | 6% | -- |
| Growth of Lowest Performing 25% | 25 | 11% | 18% |
| Postsecondary Readiness | 75 | 33% | 35% |
| Total | 225 | 100% | 100% |

The following sections will discuss 1) how statewide tests are included in accountability, and 2) each of the indicators used in school accountability calculations and the method for each.

Part I. Statewide Tests Included in Accountability

This section describes which statewide tests are included in participation and accountability calculations. Not all tests taken by students are included in accountability calculations. There are four requirements that must be met for a test to be included in accountability calculations: a) Assigned Tests, b) Participation, c) Valid Score, and d) scores used in Accountability calculations (see Figure 2). Information collected by USBE from Local Educational Agencies (LEAs) via Utah eTranscript and Record Exchange (UTREx; see Appendix B) and through Participation Codes is used to determine whether a test is included in calculating accountability.

Figure 2: Test Inclusion in accountability



A. Assigned Tests.

Students in grades 3-10 who took SAGE in 2017-2018 were assigned tests based on course enrollment. In order for students to be assigned the appropriate test, they must:

- Be enrolled in a Utah public school;
- Be enrolled for a Full Academic Year (FAY; Enrolled in the same school for ≥ 160 days);
- Be enrolled in courses which have core codes with associated tests (e.g. ELA, math, or science), as sent by the LEA through UTREx; and,
- Complete the course instruction.

B. Participation.

In order for a student to be considered a participant, the student's test score must meet the minimum requirements for a *sufficient response*. Requirements for a sufficient response are:

- Answering six or more items for the adaptive portion of the test (i.e. math, science, and non-writing portions of ELA);
- One non-blank character in a writing prompt.

Not all students will complete assigned tests. Participation codes are used to provide an explanation as to why a student did not participate in an assigned test, or why a student participated in a test in a non-standard way. Situations where students may not have taken assigned tests include the following, and should be indicated by the appropriate participation code (see appendix A):

- Student's parent or guardian requested parental opt-out (204);
- Student refused to test (106);
- Student had an unanticipated health emergency (107);
- Student is an English Learner (EL) and enrolled in the school after April 15th of the current school year (103);
- Student did not complete course instruction (108);
- Course instruction was not provided (109);
- Student already took the test in a previous year (110);
- USBE Excused (111; Requires USBE authorization; this is rare);
- Student is a Foreign Exchange Student (no participation code required).

In most cases, if a student's test meets the criteria for a sufficient response, but a participation code indicates that the student did not participate, the student's test is recoded as Standard Participation (participation code 200, see Appendix A) and counts towards the participation rate for the school. Cases where this practice is not used, and which exclude students from being counted in participation are:

- The student has a valid test score but the student's participation code indicates the student's parent or guardian requested parental opt-out;
- If a student's participation code indicates the student did not test AND the student's test does not meet the criteria for a sufficient response;
- If a student does not meet the requirements for a sufficient response and their participation code indicates standard or accommodated participation, the student's test is re-coded as 'did not test' (101);
- The student transfers to another school before or during the testing window before the school had a reasonable opportunity to administer the assessment (112).

The following formula is used to calculate the participation rate for schools and LEAs:

$$\text{Participation Rate} = \frac{\text{Number of test participants}}{\text{Participants} + \text{required nonparticipants}}$$

Beginning with the 2017-18 school year, in accordance with state law, Utah will factor into the statewide accountability system the requirement for 95 percent student participation in statewide assessments by publishing the school or LEAs participation rate on the school accountability report. This participation rate calculated for reporting purposes will not include students who do not participate in an assessment due to parent opt-out provisions described in state law or who have another participation code that excludes them for participation.

C. Valid Scores.

In order for a test to have a valid score, the student must 1) meet participation criteria, 2) have answered at least 85% of the items on the assessment, and 3) the test must not be invalidated through the testing platform or through participation code. If students do not answer at least 85% of the items but meet the minimum criteria for participation, they are still included in participation rate calculations as described above but will not be included in the calculations for accountability indicators. In addition, the test must be also considered on- or above-grade level for the student.

Integrity of assessment data is done by matching student tests to schools using state student IDs (SSID) and school enrollment information obtained from UTREx. Integrity checks take into consideration student enrollment, accurate student identification on the test date, student grade level, and subject tested. During this process, students who took tests below their grade level are assigned a proficiency level of 1 for accountability purposes.

D. Test Scores Used in Accountability Calculation.

Test scores that are included in school accountability calculations must meet the assigned tests, participation, and valid score requirements described above. These test scores are used to calculate each applicable indicator, the total points possible for the school, and in the assignment of overall school ratings.

E. Special Considerations for Tests Included in Accountability.

There are a number of considerations, including number of tests (N size), test status, invalidated tests, and alternate assessments, that determine if and how a score is included in accountability calculations.

1. Year of Operation. Elementary and Middle schools in their first year of operation may request to be exempt from school grading to establish a baseline for performance. High schools may request an exemption for their first two years of operation. [The School Grading Exemption Request Form](https://schools.utah.gov/file/c2d26682-0161-4879-82c0-885aeabbad45) is available on the Assessment and Accountability Web page at: <https://schools.utah.gov/file/c2d26682-0161-4879-82c0-885aeabbad45>.

2. N-Size. Utah defines the minimum number of students, or n-size, of 10 in accountability to ensure maximum student group visibility while protecting student privacy and maintaining reliability. The National Center for Educational Statistics indicates that a minimum n-size of 10 is acceptable when applying a population perspective to statistical soundness ([NCES, 2010](#)). Utah recognizes that protecting the privacy of students and their personally-identifiable information is of the utmost importance. Utah ensures the minimum number is sufficient to not reveal any personally-identifiable information by using a system of primary and complementary controls to protect the information. A minimum n-size of 10 to maximize the number of schools and student groups included in accountability determinations and reporting while maintaining statistical soundness and protecting student privacy (Utah Consolidated State Plan, 2018). In most cases, a test must meet the minimum n-size criteria to be included in accountability calculations.

3. Test Status. USBE receives test status information from the test vendor which describes what occurred during each testing occasion. A testing occasion occurs each time a student logs in to take the test regardless of whether they complete, attempt, or do nothing other than log into the system. These data are important in identifying which tests are viable, especially in cases where the same student has more than one test occasion on the same test.

Only one score per subject can be included for a student in a single year. In some cases, there are duplicate test scores for the same student and subject in the same year. When multiple test events are found, USBE treats only one test event as official for reporting and accountability. The tie-breakers for which test is included in USBE calculations are as follows:

1. Preference for tests with an overall score
2. Preference for tests with a status of complete, then partially complete, then expired, then invalidated.
3. Number of responses
4. Preference for tests where the adaptive portion is started prior to the writing portion

4. Invalidated Tests. When a test is considered *invalid* by the LEA or USBE, the test status is flagged with the appropriate participation code (203 or 303; see Appendix A). Invalid tests are not included in participation, achievement, or growth calculations.

Tests should be considered invalid under very rare circumstances, such as when an incorrect test is given, a test is spoiled due to inappropriate administration/ethical violation, or a student is caught cheating. For more information, see the [Standard Test Administration and Testing Ethics Policy](#) (2018).

5. English Learners. With the approval of [Utah's ESSA Consolidated State Plan](#), (2018) Utah will assess *all* English learners in English language arts, mathematics, and science beginning in their first year of enrollment, with the exception of recently arrived students who first enroll in the U.S. on or after April 15th of the current school year. These students are given the opportunity to take the assessment but are not required to do so. The exception Utah has selected under ESEA section 1111(b)(3)(A)(ii) allows a state, for the purposes of accountability, to:

- a. In first year of enrollment, test all English learners in all tested subjects, but exempt these students' scores from proficiency and growth calculations in the accountability system (assessment in this year establishes the student's performance baseline);
- b. In second year of enrollment, test all English learners in all subjects and are included in growth calculations; and,
- c. In the third year of enrollment and thereafter, test all English learners in all subjects and include in growth and proficiency calculations.

6. Alternate Assessments. Utah uses two alternate assessments: Dynamic Learning Maps (DLM) for English language arts and mathematics and the Utah Alternate Assessment (UAA) for science. The UAA and DLM are administered to students with the most significant cognitive disabilities, who have an IEP, and whose IEP team has determined that the student is not able to participate in the SAGE Summative or other state assessments, even with test accommodations. If the IEP team determines that participation in the UAA is necessary, the decision must be documented in the student's IEP.

In prior years, DLM and UAA data were excluded from accountability due to the unavailability of DLM test scores. USBE included scores from DLM in accountability for 2017 and will be including DLM scores in accountability in 2018. Including this data follows these processes and guidelines:

1. LEA marks students with the most significant cognitive disabilities using the 1% flag within UTREx: These students will be rostered to take UAA/DLM.
2. LEA administers the UAA and DLM.
3. LEA scores the UAA locally, DLM is scored externally.
4. USBE asks LEAs to submit the UAA scores by the end of the school year; DLM scores are delivered directly to USBE.
5. USBE merges UAA and DLM scores with student enrollment information from UTREx.

In order for a UAA/DLM test to be considered countable, the following rules apply:

1. Students must have been enrolled for the full academic year (FAY);
2. If a student was not flagged as 1% at any point during the school year, as indicated by data submitted to USBE through UTREx, the student is therefore not eligible to take the UAA/DLM;
 - a. In these cases, they are considered eligible for SAGE and count in participation rates and accountability calculations.
3. If a student took both UAA/DLM and SAGE, the SAGE score is used in accountability;
4. If a student was expected to test but has no SAGE or UAA/DLM test record, nor a participation code, USBE applies the participation code 101, did not test, (see Appendix A), and the test counts in participation but not in accountability calculations;
5. In very few cases, if a student has a UAA/DLM test record and the 1% flag cannot be verified through a SCRAM record or UTREx submission, the test is removed.

Part II. Accountability Indicators

Each indicator of school performance is assigned points and weight according to state policy ([Utah Code 53E-5-2](#)). These points are summed to determine an overall score and overall rating¹. This rating is intended to represent performance across the spectrum of accountability measures, summarizing school performance holistically. Each indicator used in Utah's accountability system and method for calculating each indicator described in this section.

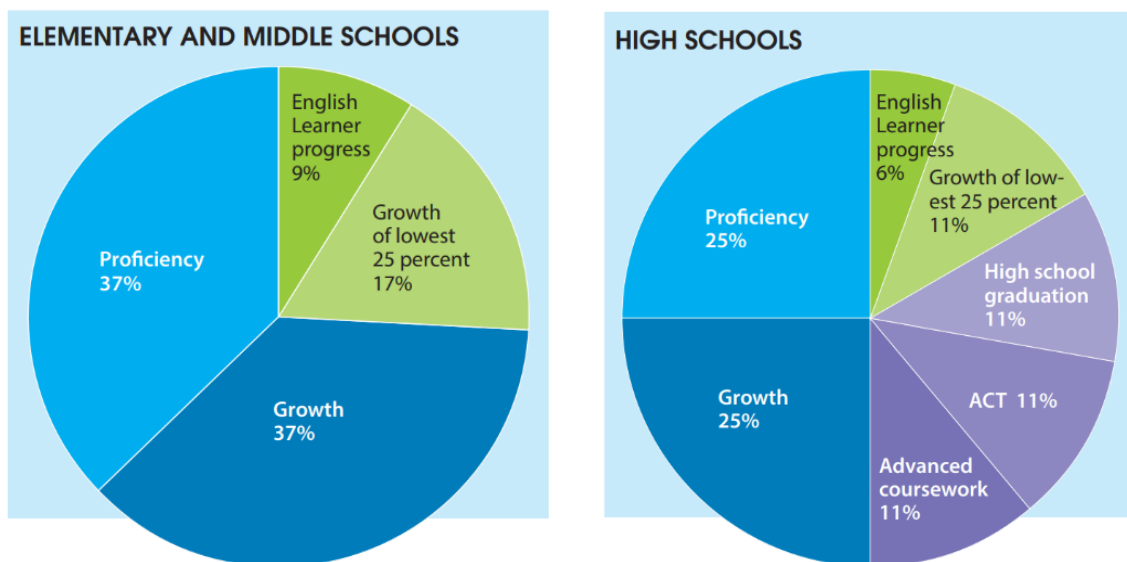


Figure 3: Summary of points and weighting of indicators for elementary, middle, and high schools in Utah

A. Achievement

The academic achievement indicator for all schools is based on annual statewide administration of a standards-based assessment for each respective grade span. Utah administers standards-based assessments to all students statewide in grades 3 through 10 to measure academic achievement in the

¹ Overall ratings, or school grades (A, B, C, D, or F), will not be assigned for school year 2017-2018. This was determined by the Utah State Board of Education in April, 2018. Schools will still be held accountable on all indicators and schools and LEAs will receive an Accountability Report Cards, but no letter grade will be assigned to schools for 2017-2018.

areas of English language arts (ELA), mathematics, and science. For students with the most significant cognitive disabilities, Dynamic Learning Maps (DLM) is used as the annual assessment for reading/language arts and mathematics, and the Utah Alternative Assessment (UAA) for science.

Academic achievement has a total of 56 points possible in school accountability, accounting for 37% of the total points possible for elementary and middle schools, and 25% of the total points possible for high schools. One third of the points (18.6667) will be awarded for each subject area: ELA, Math, and Science. These points will then be summed for a total of 56 points possible for achievement².

Points are allocated to schools for achievement in proportion to the percentage of the school's students who score proficient or above (i.e. SAGE proficiency level of 3 or 4) on the regular or alternate statewide assessment in each subject.

$$\text{Achievement Points} = \left(\frac{\text{Number of proficient scores}}{\text{Total number of scores}} \right) \times 56$$

To be included in the Achievement indicator, students must:

- Have taken the test in the current school year;
- Have a proficiency level score;
- Be enrolled at the school for the full academic year (160 days minimum).

If there are fewer than 10 students tested in any given subject area, that subject will not be included in the calculation. The points for that subject will be redistributed to the remaining subject(s) which have 10 or more tests. If there are fewer than 10 tests in all three subject areas, the school will not receive points for Achievement. In these cases, the points for Achievement will be removed from the total points possible for the school, and the school will not receive an overall rating.

² For the purposes of reporting the achievement indicator, beginning with the 2017-18 school year and in accordance with state law, Utah will not include students who do not participate in an assessment due to parental opt-out provided in state law or who have participation codes which exclude them from participation in calculation of the achievement indicator for the state accountability report card. Separately, for federal reporting purposes only, the achievement indicator will be calculated to include students as participants up to 95 percent in statewide assessments. This will be published in a separate, federal report that will be made publicly available.

B. Growth

Independent from student achievement, which captures student performance in a single year, the student growth indicator measures a school's performance as the amount of students' academic progress, regardless of their present level of proficiency, over time. Recognizing a school's success in producing sizable student performance gains encourages schools to focus their efforts on making academic progress and distribute their effort broadly across the entire student body, or to focus on consistently underperforming student groups. Academic Growth has a total of 56 points possible in school accountability, accounting for 37% of the total points possible for elementary and middle schools, and 25% of the total points possible for high schools.

To be included in the Growth indicator, students must:

- Have a valid statewide assessment score and Student Growth Percentile (SGP) from the current school year;
- Have an SGP from the prior year, regardless of where they were enrolled;
- Be enrolled in the school for the full academic year (≥ 160 days) in the current school year.

One third of the points (18.6667) will be awarded for each subject area: ELA, Math, and Science. These points will then be summed for a total of 56 points possible. If any subject (ELA, math, or science) has fewer than 10 students tested, that subject will not be calculated. In these cases, points will be redistributed equally to the subject(s) with a sufficient number of tests. If all three subject areas have fewer than 10 tested, then the school will not receive points for Growth. In these cases, the points for Growth will be removed from the total points possible for the school, and the school will not receive an overall rating.

Indexing of Points for Growth. In 2016, S.B. 220 defined student growth in the Utah accountability system. This legislation states:

A student demonstrates sufficient growth if a student's scale score on a statewide assessment is equal to or exceeds the student's growth target. The board shall establish a formula for determining a growth target for each student based on the statewide cohort of students with the same scale score on a particular statewide assessment.

Operationalizing this definition requires calculating two student variables; Student Growth Targets (SGT) and Student Growth Percentiles (SGP). The calculation of the Growth is based on these two student elements.

- **Student Growth Target (SGT):** The methodology for determining whether a student's performance on a statewide assessment is equal to or exceeds the student's SGT requires setting individual growth targets toward proficiency for each student, based on a three-year trajectory, to either reach academic proficiency or maintain academic proficiency. A student is considered to have met their SGT if they meet or exceed the growth target for the current year based on this three-year trajectory.

- **Student Growth Percentile (SGP).** SGP is used to determine the *amount* of growth students make on a statewide assessment compared to their academic peers – those students who had similar performance on statewide assessments in previous years (Betebenner, 2011). The SGP describes how typical or atypical a student’s growth is by examining the student’s current achievement relative to the students’ academic peers. This score is reported as a percentile on a scale from 1-99.

Growth is calculated by a) whether a student did or did not meet their SGT as determined by quartiles, and b) the amount of growth the student made as determined by their SGP. Each student will receive a relative point weight using the following index:

Table 5: Point weight index for Growth based on SGP and SGT

| Student SGP | Student Met SGT | Student Did Not Meet SGT |
|-------------|-----------------|--------------------------|
| >65 | 1.00 | .75 |
| 50-65 | .75 | .50 |
| 40-49 | .50 | .25 |
| <40 | .25 | 0 |

The summed weights for all students will then be divided by the total number of tests to establish a percent. This percent will be multiplied by the total possible points for each subject area to determine the number of points awarded to a school:

$$\text{Growth Points} = \left(\frac{\text{Summed weights for all students and subjects}}{\text{Total number of scores}} \right) \times 56$$

C. Growth of the Lowest 25%

Including growth of the lowest performing 25% of students in a school (lowest quartile group, or LQ) is intended to be an indicator of equitable educational opportunity ([Utah Code 53E-5-2-5\(3\)\(a\)](#)) and increase focus on students in the lowest quartile with the highest need for support within a school. This group of students is identified annually based on performance on statewide assessments, as defined by scores from the prior year, regardless of where the students were enrolled. A school must have at least ten student tests in the lowest quartile group to calculate this indicator. Students included in this group must:

- Have a valid statewide assessment score and an SGP for the current school year;
- Have an SGP from the prior year, regardless of where they were enrolled;

- Fall in the lowest performing 25%, or lowest quartile (LQ) of students within current year school based on prior year scores;
- Be enrolled in the school for the full academic year (≥ 160 days) in the current school year.

There are 25 points possible for the Growth of the Lowest 25% indicator. All tests in all subject areas (ELA, math, and science) are combined in the calculation for this indicator. If there are fewer than ten student tests in the lowest quartile group, the school will not receive points for this indicator and the 25 points possible for Growth of the Lowest 25% will be removed from the total points possible for a school.

The method for calculating points for Growth of the Lowest 25% uses SGP only. The percentage of students who achieve an SGP of 40 or greater, the threshold considered to have made sufficient growth, is divided by the total number of students in the LQ group. This percentage is multiplied by 25 to determine the points awarded for this indicator:

$$\text{Growth of of LQ Points} = \left(\frac{\text{LQ students with SGP of } \geq 40}{\text{All students in the LQ group}} \right) \times 25$$

D. English Learner Progress

A key change in the Every Student Succeeds Act (ESSA) is that assessment and accountability for English Learner Progress was moved from Title III to Title I, and must be included in the state's overall accountability system (Goldschmidt, 2018). Utah's accountability system includes an indicator of English learner progress (ELP). This indicator is a measure of EL students' academic language development and proficiency in English. Utah defines English proficiency as earning a proficiency level score of 5.0 or greater as measured by the WIDA ACCESS assessment, which is administered annually to all English learners in the state. This assessment measures academic language development in the domains of reading, writing, listening, and speaking, and uses a 1 to 6 scale to indicate academic language ability overall and within each language domain.

For the ELP indicator to be included in a school's calculation, the school must have at least 10 English learners who took the WIDA ACCESS assessment in the current and prior year. If a school has fewer than 10 EL students with scores in both years, the school does not receive points for the ELP indicator and the 13 points possible for the indicator are removed from the overall total points possible for the school.

The method for determining the percentage of students who make adequate progress toward ELP takes into consideration three student variables which impact language acquisition: 1) initial grade level; 2) initial English language proficiency level; and 3) time enrolled in Utah schools. Each of these factors plays a role in determining the amount of growth which can be expected each year and the timeline to reaching proficiency.

1. Initial Grade level. Academic language becomes more rigorous as students increase in grade level. For example, the academic language demands in 1st grade science differ significantly from the academic language demands of 8th grade science. EL students who enter school in kindergarten or early grades

tend to progress toward becoming English fluent quickly due to the language rich nature of early grades and less complex use of English for academic topics. Students with limited English who enter school later face a much greater challenge due to the increased complexity in academic content as well as academic discourse. This observed phenomenon provides the rational for dividing progress targets for ELP into three grade spans: k-3, 4-7, and 8-12.

2. Initial English language proficiency level. EL students enter school with varying levels of English proficiency depending on their exposure to English prior to attending school. For example, approximately 75% of EL students in Utah were born in the United states and have exposure to English before entering school. Students who enter school with greater levels of proficiency in English have a much different timeline for reaching English fluency than those students who enter with very limited English. This variable is accounted for in the progress targets for each grade span in the y-axis (see tables 6, 7, and 8).

3. Time enrolled in school. A student’s ability to acquire language should increase with each year an EL student receives supportive instruction in English. The amount of time an EL student has been in school is an important variable in determining the amount of growth they should be expected to make each year as well as their timeline to reach proficiency. This variable is also accounted for in the progress targets for each grade span in the x-axis (see tables 6, 7, and 8).

Points are awarded to schools for this indicator in proportion to the percentage of students who make adequate progress toward English language proficiency or who reach English proficiency (earn an overall proficiency level of 5.0 or greater) as measured by WIDA ACCESS assessment. Adequate progress targets are set for each student annually dependent on the three variables described above: grade level, initial proficiency level, and number of years enrolled in school. These progress targets are set according to the tables below (see tables 6, 7, and 8). If at any point the student scores as proficient (a 5.0 or greater on the WIDA ACCESS assessment) they are included in the calculation as having made adequate progress. If a student’s proficiency level score is equal to or greater than their progress target, they are considered to have made adequate progress.

The percentage of points for a school is determined by the number of current EL students who meet or exceed their adequate progress target OR reach proficiency divided by the total number of EL students in the school. This percentage is multiplied by the 13 points possible for this indicator to determine the number of points allocated to a school (note: EL students in their first year are excluded from the calculation because they do not have a prior year score; their ACCESS score in their first year is needed to establish baseline):

$$\text{Points} = \left(\frac{\text{Number of ELs making adequate progress} + \text{ELs reaching proficiency}}{\text{Total number of current EL students} - \text{first year ELs}} \right) \times 13$$

Table 6: Initial Grade 1-3 EL Adequate Progress Targets

| Initial ELP Level | Time in EL Program | | | | | | |
|-------------------|--------------------|------|------|------|------|------|------|
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | 1.0-1.9 | +1.4 | +1.0 | +0.7 | +0.6 | +0.3 | +0.1 |
| | 2.0-2.9 | +1.2 | +0.7 | +0.6 | +0.3 | +0.2 | +0.1 |
| | 3.0-3.9 | +0.8 | +0.6 | +0.5 | +0.3 | +0.1 | +0.1 |
| | 4.0-4.9 | +0.6 | +0.5 | +0.3 | +0.2 | +0.1 | +0.1 |

Table 7: Initial Grade 4-7 EL Adequate Progress Targets

| Initial ELP Level | Time in EL Program | | | | | | |
|-------------------|--------------------|------|------|------|------|------|------|
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | 1.0-1.9 | +1.0 | +1.2 | +0.8 | +0.6 | +0.4 | +0.2 |
| | 2.0-2.9 | +1.0 | +0.8 | +0.6 | +0.4 | +0.3 | +0.1 |
| | 3.0-3.9 | +0.8 | +0.6 | +0.3 | +0.2 | +0.1 | +0.1 |
| | 4.0-4.9 | +0.6 | +0.3 | +0.2 | +0.1 | +0.1 | +0.1 |

Table 8: Initial Grade 8-12 EL Adequate Progress Targets

| Initial ELP Level | Time in EL Program | | | | | | |
|-------------------|--------------------|------|------|------|------|------|------|
| | | 1 | 2 | 3 | 4 | 5 | 6 |
| | 1.0-1.9 | +0.7 | +1.0 | +0.6 | +0.4 | +0.3 | +0.2 |
| | 2.0-2.9 | +0.6 | +0.8 | +0.6 | +0.5 | +0.3 | +0.1 |
| | 3.0-3.9 | +0.6 | +0.7 | +0.5 | +0.3 | +0.1 | +0.1 |
| | 4.0-4.9 | +0.4 | +0.5 | +0.1 | +0.1 | +0.1 | +0.1 |

*Gray cells indicate years after student should have met exit criteria.

Additional Note on EL students in Accountability. ESSA allows for students to be monitored for up to four years after reaching proficiency, and also allows for these former EL student to be included in accountability calculations. Historically, EL students have been removed from the EL student group as they reach proficiency, effectively removing those students who are successful in attaining English from any student group analysis. This practice disproportionately skews the performance of the EL student group. By including both EL students and former EL students (up to four years after they reach English fluency) in the EL student group for accountability calculations and reporting of performance, the EL

group is more fairly represented, providing more stable and equitable calculations of the English learner performance.

E. Postsecondary Readiness

Postsecondary readiness accounts for 75 points, or 33%, of the total points possible for high schools. Postsecondary readiness is comprised of three sub-indicators: graduation rate, ACT performance, and successful participation in advanced college and career coursework. Each sub-indicator is worth 25 points, or 11%, of the total points possible for high schools.

1. Graduation rate (25 points). Graduation rate for all high schools in the state is an indicator of student post-secondary readiness. Graduation rate for each school is calculated using the standard federal four- and five-year adjusted cohort guidelines. High school graduation accounts for 25 points, or 11%, of the overall accountability calculations for high schools. If there are fewer than 10 graduates in any given cohort, points for graduation will be removed from the total points possible for a school, adjusting the total points possible for Postsecondary readiness.

The graduation rate for any given year is determined by graduation rate from the year prior in accountability calculations. Students are placed in a graduation cohort when they enter ninth grade and are expected to graduate within four years. For example, the cohort that entered 9th grade for the first time in the fall of the 2014-2015 school year was expected to graduate by the end of the summer, 2018. LEAs report final graduation rates for a given year in October of the following year. For this reason, the graduation indicator acts as a delayed indicator, and the graduation rate for any given year is determined by graduation rate from the year prior in accountability calculations. For school year 2017-18, the graduation rate for 2016-2017 will be applied. 5-year graduation rates are delayed by two years.

Points for graduation are awarded in proportion to the percentage of students who graduate within four years, and up to 10 percent of the points possible for graduation may be awarded for students who graduate in five years³ (2.5 out of 25 points) to recognize schools who continue to work with student who do not meet graduation requirements in four years.

$$\text{Points} = ((4 \text{ year graduation rate } \% \times 22.5) + (5 \text{ year graduation rate } \% \times 2.5)) \times 25$$

Many schools will not have a 5-year graduation rate; in such cases all points for graduation are allocated to the 4-year graduation rate. The method for calculating 4- and 5-year graduation ensures that points

³ State law authorizes USBE to award up to 10 percent of the points allocated for high school graduation to a school for the five-year cohort graduation rate (UCA Section 53A-1-1108, as in effect November 1, 2017).

are allocated accurately for four- and five- year graduation, and a school will not earn more than the 25 total points possible for the graduation rate indicator.

Students are included in graduation rate calculations according to the following guidelines:

- If a student graduates earlier than their cohort, they are considered a graduate.
- If a student never graduates, graduates after the fifth year, or is considered an ‘other completer’, they are counted as a non-graduate.
- The last school that a student enrolls in is considered the school of graduation for accountability.
 - If a student attends two schools in their final year, and one school graduates the student while the other does not, then the school the student graduated from is considered the school of graduation for accountability.
 - If neither school graduates the student, then the school with the latest exit date is accountable for the student’s graduation.
- Students who continue in high school for the purpose of receiving Special Education services in order to obtain an Alternate Diploma based instruction in the alternate academic achievement standards and who take alternate assessments will have their cohort adjusted:
 - If a student graduates with an Alternate Diploma, these students are counted in the 4-year graduation rate in the year they receive the Alternate Diploma;
 - If a student does not return to school to complete the Alternate Diploma, they are counted as a non-graduate in the year they do not re-enroll.

2. ACT (25 points). Points are awarded proportional to the percent of students earning a composite score of 18 or higher on the 11th grade administration of the ACT. There 25 points possible for the ACT indicator, and points will be awarded in the year the test was administered.

$$ACT\ Points = \frac{Number\ of\ students\ with\ composite\ score\ \geq\ 18}{Total\ number\ of\ ACT\ scores} \times 25$$

There must be at least 10 ACT scores for a school to calculate the ACT indicator. If there are not at least 10 ACT scores for a given year, the 25 points possible for ACT will be removed from the total points possible for a school.

3. Readiness Coursework: Readiness coursework is intended to be an indicator of equitable opportunity for students to access advanced college and career courses in high school. Schools can make significant impact in this area by analyzing student course-taking patterns and working with student to encourage them to enroll in more rigorous coursework.

Points for this indicator are allocated in proportion to the percentage of students who complete at least one of the following:

- A “C” grade or better in an Advanced Placement course;
- A “C” grade or better in an International Baccalaureate course;
- A “C” grade or better in a concurrent enrollment course; or
- Complete a career and technical education (CTE) pathway.

Like graduation, the readiness coursework indicator acts as a delayed indicator to allow students to complete one or more of the above at any point during high school. Students are included in their graduating cohort year, whether they graduate or not, if they met any one of the above criteria. Students are only counted once, and the credit can be earned at any school. The school receiving points for this indicator is the same as the school where the student counts for graduation.

To calculate points for the readiness indicator, the percentage of students who met at least one of the four criteria during high school out of all students in the graduation cohort is multiplied by the 25 points possible for readiness coursework.

$$\text{Coursework Points} = \left(\frac{\text{Number of students who met coursework criteria}}{\text{Total number of students in graduation cohort}} \right) \times 25$$

If there are fewer than 10 students who meet readiness coursework criteria, points for this indicator will be removed from the total points possible for a school and the school does not receive points for the readiness coursework portion of Postsecondary readiness.

F. Self-Reported Indicators

[Utah Code 53E-5-211\(2\)](#), which describes reporting requirements for the state accountability system, allows schools to include up to two self-reported indicators on their school report card:

A school may include in the school's report card described in Subsection (1) up to two self-reported school quality indicators that: (a) are approved by the board for inclusion; and (b) may include process or input indicators.

These self-reported indicators, chosen from the board approved list below, provide an opportunity for schools to share the work they are doing to support students in their school. Self-reported indicators are not scored and do not receive points in the accountability system toward the overall school rating, but rather are an opportunity for schools to self-report their own progress, evaluate their own program implementation, and highlight process or input measures on their school’s public accountability report card.

The Board approved a list of six domains of implementation that schools can report up to two indicators of their choice in April, 2018. The domains approved by the Board are based on the work of John Hattie,

as described in his book, Visible Learning (2009), and may include implementation efforts in the areas of:

- School-level factors;
- Student factors;
- Teacher factors;
- Instructional factors;
- Parent and family engagement;
- And equitable educational opportunities.

Beginning in 2019, schools will be notified of the window to upload their self-reported indicators annually by July 1st. More information and examples of self-reported indicators within each of these domains is described in Appendix C.

Part III: Calculation of Overall Scores and Overall School Ratings

To determine the overall school rating (or school letter grade), all points for indicators which can be calculated for each school are summed to calculate an overall total and percentage. The overall score and percentage of points earned are used to determine the school's overall school rating.

Standards for Overall School Ratings: No more moving targets. In the spring of 2017, the Utah State Board of Education (USBE) with support from the Center for Assessment convened a series of meetings to implement a standard setting process for the Utah school accountability system. Utah engaged in an innovative process to establish performance standards for school accountability (Domaleski, D'Brot, Keng, Keglovits, & Neal, 2018). This process convened a panel of leaders and stakeholders, broadly representative of the state's interests and able to articulate a vision for education in the state, evaluate information and make recommendations regarding performance *criteria* for schools and the assignment of overall ratings (see Appendix E). Cut scores, policy level descriptors, and school performance level descriptors were established to clarify interpretation of school grades. The results of this standard setting established the cut scores for each overall school rating⁴:

For years in which letter grades are assigned, the cut scores, or percentage of total points earned, for each letter grade are as follows:

Elementary and Middle Schools (150 possible points)

- A – Exemplary School; 63.25% of total points earned
- B – Commendable School; 55% of total points earned
- C – Typical School; 43.5% of total points earned
- D – Developing School; 35.5% of total points earned
- F – Critical Needs School; less than 35.5% of total points earned

High Schools (225 possible points)

- A – Exemplary School; 64% of total points earned
- B – Commendable School; 57% of total points earned
- C – Typical School; 46% of total points earned
- D – Developing School; 38% of total points earned
- F – Critical Needs School; less than 8% of total points earned

⁴ Overall ratings, or school grades (A, B, C, D, or F), will not be assigned for school year 2017-2018. This was determined by the Utah State Board of Education in April, 2018. Schools will still be held accountable on all indicators and schools and LEAs will receive an Accountability Report Cards, but no letter grade will be assigned to schools for 2017-2018.

The effort to establish performance thresholds for overall ratings through a well-defined, defensible procedure was done to strengthen the validity of Utah’s accountability system and reflect the state’s vision and theory of action for accountability. Shifting to a criterion-based approach sets fixed targets for school performance, supporting the theory of action and intended interpretations and uses for school accountability (Domaleski et al, 2018). The Policy Descriptors and SPLDs for each letter grade in Elementary/Middle and High Schools are given in Appendix E, Exhibits E-1 and E-2. In years where school letter grades are assigned, the recommended threshold percentages listed above for overall school ratings will be used to assign letter grades to schools based on the percentage of points earned in Utah’s accountability system. A complete memorandum of the standard setting process for setting threshold scores for is included in Appendix E.

Chapter 3: School Accountability Reporting

In accordance with state and federal law, USBE is required to publicly publish accountability reports in the form of state, LEA, and school accountability data in the form of school report cards annually. The accountability reports published each year are reflective of school performance from the previous year. The [Utah School Report Cards](http://www.utahschoolgrades.schools.utah.gov) can be found at www.utahschoolgrades.schools.utah.gov and, for 2018, are expected to be released to the public in early December, 2018⁵. The ESSA-required reporting elements which fall outside the scope of a report card intended for families and parents are available to the public on the USBE's website.

Utah's accountability system is designed to numerically aggregate the indicators of school accountability into an overall rating⁶, and determine an A-F letter grade in years where school letter grades are assigned. Each of the indicators described in Chapter 2 is assigned a policy weight and point value (see figure 2), and the points for each indicator are summed to determine the percentage of total points possible and overall rating of a school's performance. Reports are published for each school, LEA, and for the state.

Utah's School Report Card is just one piece of information that communicates how well a school is performing across a range of indicators of student performance, growth, and postsecondary readiness for college and career. It is designed to be an interactive tool for families, communities, educators, and policymakers to see the performance of schools, LEAs and the state. This information is used to accurately identify schools in need of support and improvement, and ultimately influence school and LEA practices (Reyna, 2016). In order to transparently report how schools are providing students in Utah with a high-quality education, the school accountability report provides a great deal of information for each indicator, including comparisons to LEA and state averages, performance of student groups, and the school self-reported indicators. This is intended to provide high-quality education data and information transparently to the public in an accessible format. Beyond basic transparency, the aim of the school accountability report is to deepen understanding about student performance and inform actions that serve to improve the education of each student. These reports are intended to help all stakeholders, especially families, understand what the data mean and why these data are valuable (Peltzman & Curl, 2017).

⁵ School accountability reports are anticipated to have a delayed release due to new science assessments implemented in 2017-2018, the results of which will not be available until October, 2018, delaying the ability to calculate the achievement and growth indicators.

⁶ The Utah State Board of Education elected in April, 2018 to not assign overall ratings or letter grades for 2017-2018; therefore, no overall ratings or letter grades will be reported for schools on the accountability report card. This decision, however, does not preclude the state from utilizing the accountability system to identify schools in need of support and improvement.

School Accountability Report Card Elements

Utah's School Report Card is just one piece of information that communicates how well a school is performing across a range of indicators of student performance, growth, and postsecondary readiness for college and career. When combined with students' individual performance, the Accountability Report Card is intended to give parents and families a more accurate picture of their child's academic experience. Each of the indicators included in school accountability are reported on the report card for each school, LEA and the state. For any indicator or student group with an n-size less than 10, the data will not be displayed to protect student privacy. For most indicators, trends over time, comparisons to state and district, and performance by student group is reported in the 'view details' for each indicator. In addition, school enrollment and demographics are reported for all schools, as well as the percentage of participation in statewide assessments. For LEA and the State report, each student group is re-established to include all students within the LEA or all students within the state.

- **Achievement:** Achievement is an indicator of student proficiency on statewide academic assessments in a single school year. The report card shows the percentages of students who demonstrate proficiency in English language arts, math, and science for this school year. These percentages are disaggregated by subject and for each student group which meets the required minimum n-size of 10.
- **Growth:** Growth is an indicator of how students grew academically compared to their academic peers in the state. The Growth indicator is reported as the percentage of student who met their annual growth target (SGT). These percentages are disaggregated by subject and for each student group which meets the required minimum n-size of 10.
- **Growth of the Lowest 25%:** Growth of the Lowest 25% shows growth specifically for the lowest performing 25% of students. The growth of the lowest performing 25% of students within a school is reported as the percentage of students with an SGP of 40 or greater for students included in this group.
- **English Learner Progress:** English learner (EL) progress is an indicator of EL students' progress toward becoming fluent in English. This indicator is measured by the WIDA ACCESS assessment of English proficiency and measures the language domains of listening, reading, speaking, and writing. The English Learner Progress Indicator is reported as the percentage of students who met their ELP progress target OR who reached English proficiency as measured by the WIDA ACCESS assessment.
- **Postsecondary Readiness:** Postsecondary Readiness is an indicator that communicates how well-prepared students are for college and career. This indicator includes information regarding students ACT performance, graduation rate, and the percentage of students successfully participating in advanced courses that prepare students for college and career (i.e. completing

coursework with a C or better in an Advanced Placement (AP), concurrent enrollment, or International Baccalaureate (IB) course; or who completed a career/technical education (CTE) pathway at any time during their high school enrollment). The Postsecondary readiness indicator is reported as the percentage of students who: 1) earned an ACT score of 18 or higher in the 11th grade administration of ACT; 2) Earned a C or better in qualifying courses; and, 3) graduated with a regular diploma.

- **School Self-Reported Indicators:** Schools may choose to describe up to two additional measures of school quality; evaluation of implementation, practices, and/or school effectiveness. These self-reported indicators are not awarded points in the overall rating for the school, but provide the opportunity for schools to highlight ways the school is supporting students to be successful in addition to the indicators included in school accountability.
- **Other Measures:** These other measures of school performance are not awarded points in the overall rating for a school, but are predictors of academic outcomes and student success.
 - Consistent attendance is the percentage of students who miss fewer than ten school days during the school year, which is correlated with multiple positive student outcome.
 - For high schools, Postsecondary enrollment is the percentage of students who enroll in a college in the state of Utah after graduation. Select 'View Details' to see comparisons to the district and/or state, and how student groups performed in each area.
 - For elementary schools, Early Reading Progress is the percentage of students reading on grade-level by the end of third grade.

Chapter 4. Meaningful Identification of Schools in Need of Support

This section is intended to be a brief overview of how accountability and improvement systems are intended to work together and the types of school support and improvement systems available under ESSA. In school accountability, school's overall performance and performance within each indicator should meaningfully differentiate among schools. The overall percentage of points earned for a school is tied directly to identification of schools in need of support and improvement. Comprehensive information on the identification and requirements for schools in school improvement can be obtained from USBE Title I staff.

Comprehensive and Targeted School Improvement

The lowest performing 5% of schools are identified annually based on the percentage of points possible each school earns. There are three categories of support under ESSA:

- Comprehensive support and improvement;
- Targeted Support and Improvement; and
- Additional Targeted Support and Improvement.

Comprehensive Support and Improvement. Comprehensive Support and Improvement (CSI) schools are generally identified on the basis of overall performance of students within a school. Schools may be identified for CSI if 1) they are in the lowest performing 5% of Title I schools, or 2) any high school with a graduation rate of 67% or lower. These determinations are made once every three years, beginning in 2018-2019.

Targeted Support and Improvement. Targeted Support and Improvement (TSI) Schools are identified based on consistently low performing student groups within a school. Each student group within a school is compared to the performance of the lowest performing 5% of schools in the state. If any student group is consistently performing at or below the lowest performing 5% of schools in the state for two consecutive years, they are eligible for TSI identification. High schools who have a student group with less than 67% graduation rate for two consecutive years are also eligible for TSI identification. These determinations are made annually.

Additional Targeted Support and Improvement Schools. Additional Targeted Support and Improvement (ATSI) Schools are those schools who are identified as TSI (having consistently underperforming student groups) who are not Title I and do not make substantial improvement within a four years, including the year they were identified. These schools are subject to increased intervention and consequences. Any Title I TSI school that does not improve within four years automatically elevates to CSI status.

Each type of support and improvement has clear entrance and exit criteria. After 2018-2019, schools will receive an alert prior to a year they might be identified to allow them one year to course-correct or improve student outcomes. One distinct difference between CSI and TSI schools is that TSI schools are accountable to the LEA, and CSI are accountable to the State under Title I. CSI schools are eligible for additional funding from the state. TSI schools are intended to alert LEAs of disproportionate rates of performance of student groups, and LEAs are responsible for monitoring the school improvement plans

and student group performance of TSI schools. This may include evaluation or changes to school policy, funding, and instruction decisions.

Special Cases in Accountability Determinations

In all cases, identification must be informed by all of the state's ESSA accountability indicators and the system of annual identification (Lyons, D'Brot, & Landl, 2017), ensuring that all schools are held accountable to the same high expectations and that no school or student group is invisible. However, typically due to n-size for the indicator, not all indicators can be calculated for all schools.

Schools for which an overall accountability determination cannot be made. All schools will be included in the accountability system; however, for schools for which an accountability determination cannot be made (i.e. schools designated as serving special populations, schools serving youth in state custody, and schools that do not meet the minimum n-size on all required indicators), each school if identified for CSI or TSI improvement will be reviewed on an individual basis to determine if a comprehensive or targeted improvement designation is appropriate. In these cases, USBE will use a second review process to look at the unique circumstances for each of these schools and examine additional points of data (e.g. local data student performance, credit earned, increased attendance, school engagement, and additional types of successful completion such as earning a GED) to make final accountability determinations and recommend supports and interventions.

Schools for which an overall accountability determination cannot be made (i.e. are missing indicators) are often necessarily small schools, alternative schools, or schools who exclusively serve special populations. With the exception of the English Learner Progress Indicator, in these cases where schools are unable to calculate an indicator, these schools will be flagged as having missing indicators and may receive a "second-tier" review if they fall in the lowest performing 5% of all schools (Utah ESSA consolidated State Plan, 2018). For schools in the lowest performing 5% of schools in the state who do not have at least Growth and Achievement, the school may be asked to provide a root-cause analysis to the state to determine if they are in need of additional support (see exhibit 11).

Schools in their first year of operation: In accordance with state law, newly opened schools may request exemption from the state's accountability system until they have completed their first year of operation for elementary schools and second year of operation for high schools. Basing accountability determinations on two years of data for all schools will ensure each school is appropriately designated. In addition, including high schools after their second year of operation ensures that all available data on college readiness assessments and graduation outcomes can be included in accountability determinations. [The School Grading Exemption Request Form](https://schools.utah.gov/file/c2d26682-0161-4879-82c0-885aeabbad45) is available on the Assessment and Accountability Web page at: <https://schools.utah.gov/file/c2d26682-0161-4879-82c0-885aeabbad45>.

Split schools: Schools serving high school grades, together with grade 7 or lower (e.g., 7-12 or K-12 schools) will receive two accountability ratings, one for high schools which includes all high school indicators and one for non-high schools. CSI and TSI identification(s) may be made for one or both portions of a split school.

Schools serving special populations. Utah Legislation allows for alternative schools that exclusively serve a special population of students to be included in the State’s alternative school accountability system. The Definitions and process for alternative schools and schools that serve special populations can be found in Appendix F. The alternative indicators for schools and process for application are currently being reviewed by the Utah State Board of Education for implementation in 2019-2020.

All schools with an alternate flag who exclusively serve special populations will be reviewed on an individual basis according to alternative indicators. Decision rules will be used to determine if an alternative school meets criteria for additional support and improvement. In these cases, USBE will use a second review process to look at the unique circumstances for each of these schools and examine additional points of data (e.g. local data student performance, credit earned, increased attendance, school engagement, and additional types of successful completion such as earning a GED) to make final accountability determinations and recommend supports and interventions. See Appendix G: Alternative Schools and Use Case Examples, for more information.

Summary of Processes for Schools Serving Special Populations:

- A. If a school does not meet the minimum “n” size in at least the proficiency and growth indicators, and other than the English Learner indicator, so that an overall accountability rating cannot be determined;

OR

- B. If a school receives an accountability rating that places the school in the bottom five percent of schools but the school has a “special purpose” and needs to have an accountability review that takes that special purpose into account;

THEN

- C. The USBE will perform a second-tier review of the school to determine if the USBE is confident that the school is “low performing” and should receive School Improvement or School Turnaround services and supports through:
 - a. Comparing school performance to an alternative set of indicators;
 - b. Request that the school provide additional data through a root-cause analysis process.

Conclusion

The Utah State Board of Education (USBE) makes annual accountability determinations for schools based on measures of student academic achievement, student growth, and equitable educational opportunity. While accountability systems are intended to reliably measure the impact of schools on student learning, they must also:

- Establish transparency in school performance for parents and policy makers;
- Make determinations for additional reward, support or consequence;
- Enable the continuous improvement of teaching and learning in the school.

[Utah Code 53E-5-2](#) establishes the school accountability system and requires the board to assign overall ratings based on school performance several indicators. Changes to this code made in 2018 add additional indicators to the accountability system. This manual presents the indicators, methodology, calculations, and reporting elements included in Utah's accountability system and business rules used for the calculation of school accountability indicators and assignment of overall ratings, detailing Utah's accountability systems for educators, parents, and other stakeholders. Additionally, school accountability captures key considerations for how schools can leverage accountability data as one source to inform school and LEA policy, funding, and instructional decisions to impact student learning and improve student outcomes.

References

- Bettebenner, D. (2011). *A technical overview of the student growth percentile methodology: student growth percentiles and percentile growth projections/trajectories*. The National Center for the Improvement of Educational Assessment. Dover, New Hampshire.
- D'Brot, J., & Keng, L. (2018) *An introduction to accountability implementation; a preface to the operations, performance standards, and evaluation resources*. Washington D.C.
- D'Brot, J., Keng, L., & Landl, E. (2018). *Accountability identification is only the beginning; monitoring and evaluation accountability results and implementation*. Council of Chief State School Officers. Washington D.C.
- Domaleski, C., D'Brot, J., Keng, L., Keglovits, R., & Neal, A. (2018). *Establishing performance standards for school accountability systems*. Council of Chief State School Officers. Washington D.C.
- Goldschmidt, P. (2018). *Handbook for developing and monitoring the English language proficiency indicator and English learner progress*. Council of Chief State School Officers. Washington D.C.
- Hattie, J. (2009). *Visible learning*. Milton Park, Abingdon, Oxon; Routledge Press.
- Lyons, S., D'Brot, J., & Landl, E. (2017). *State systems of identification under ESSA: a focus on designing and revising systems of school identification*. Council of Chief State School Officers. Washington D.C.
- Peltzman, A., & Curl, C. (2017). *Communicating performance: a best practices resource for developing state report cards*. Council of Chief State School Officers. Washington D.C.
- Reyna, R. (2016). *Key issues in aggregating indicators for accountability determinations under ESSA*. Council of Chief State School Officers. Washington D.C.
- Utah State Board of Education (2018). *Standard test administration and testing ethics policy*. Retrieved from <https://www.schools.utah.gov/File/23262a5f-48b1-4658-b79e-343ea6e578b7>
- Utah State Board of Education (2018). *Utah's ESSA consolidated state plan*. Approved July 11, 2018. Retrieved from <https://www2.ed.gov/admins/lead/account/stateplan17/utconsolidatedstateplanfinal.pdf>

Appendix A. Assessment Participation Codes

Participation codes are provided by the LEA to USBE and are used to provide USBE with information about student test participation and, in non-standard circumstances, what occurred during testing or why a test was not administered. For these special instances, participation codes control and document how the test record is handled for reporting aggregates and accountability calculations. Participation codes are not intended to explain data errors present in UTREx (see Appendix B). As per R277-404, LEAs are responsible for updating local student information system (SIS) so that UTREx data are accurate. Participation codes are entered in the [Data Gateway SAGE Special Codes Tool](#). The following table provides the definition and appropriate use of participation codes that may be assigned by the LEA.

LEA Assigned Participation Codes:

| Code | Title | School Grades | Federal Reporting | Description |
|------|---|----------------------------------|----------------------------------|--|
| 101 | Did Not Test | Countable for Participation only | Countable for Participation only | Student was enrolled at the school and eligible to test with or without reasonable accommodations, but still did not test. |
| 103* | EL First Year in U.S. April 15 or Later | Not Countable | Not Countable | The student is an English learner (EL) and first enrolled in the U.S. on or after April 15 of current school year. Student is not required to test, but testing is made available. |
| 104* | EL First Year in U.S., Enrolled Before April 15 | Countable for Participation only | Countable for Participation only | The student is EL and first enrolled in the U.S. before April 15 of current school year. Student must take ELA, Math, and Science. |
| 106 | Student Refused to Test | Not Countable | Countable | Student refuses to start the assessment or refuses to complete at least six items of the assessment. |
| 107 | Excused for Health Emergency | Not Countable | Not Countable | Student is unable to test during the testing window due to an unanticipated health circumstance. |
| 108 | Course Instruction Not Complete | Not Countable | Not Countable | Student will not complete instruction during the current academic year. |

| | | | | |
|------|--|-------------------------------------|-------------------------------------|---|
| 109 | Course Instruction Not Provided | Not Countable | Not Countable | LEA has used a core code for a course that a student did not take. |
| 110 | Test Has Already Been Taken | Not Countable | Not Countable | Student has already taken the same test during a previous administration year. |
| 111 | USBE Excused – Approval Needed | Not Countable | Not Countable | Requires USBE authorization (E.g. student has mistakenly been assigned an assessment which should not have been generated). |
| 112 | Student Transferred Before Testing Window | Not Countable | Not Countable | Student transferred out of school before the LEA had a reasonable opportunity to administer the assessment. |
| 200 | Standard Participation | Countable | Countable | Student took the test under normal circumstances. |
| 201 | Accommodated | Countable | Countable | Student took the assessment with allowed accommodation(s). |
| 202 | Modified | Countable for Participation only | Countable for Participation only | Student took the assessment with non-allowed modifications which interfere with the validity/reliability of the test. |
| 203 | Invalidated | Not Countable | Not Countable | LEA determines that the test was spoiled or invalid (E.g. Student cheated; test administrator broke protocol). |
| 204 | Parental Exclusion | Not Countable | Countable | A parent or guardian has requested in writing that the student be exempt from testing. |
| 205* | EL in Second Year of Enrollment | Counted in Participation and Growth | Counted in Participation and Growth | Student is EL and first enrolled in the U.S. during the 2016-2017 school year. Student must take ELA, Math, and Science. |

*103, 104, 205 - This exclusion is only created by USBE if the student's first date enrolled in US and EL Status fields are correctly marked in UTREx. As such, these codes are **not** available to be set in TIDE and must be marked in the Data Gateway SAGE Special Codes tool. These codes are appropriate for students with interrupted formal education (SIFE) where the EL student has a gap of two or more years in their enrollment in the U.S and must be set in the Data Gateway Special Codes Tool. See p. 14 for clarification on EL student testing requirements.

USB E Assigned Participation Codes

300 codes are set only by USB E when validating participation codes at the end of the school year to distinguish them from codes set by LEAs. These participation codes may appear in reports, and are provided here for information.

| Code | Title | School Grades | Federal Reporting | Description |
|------|---|---------------|-------------------|--|
| 300 | Standard Participation | Countable | Countable | The test has a sufficient response, but was assigned one of the following codes: 101, 105 – 111. |
| 301 | USB E Assigned Did Not Test | Countable | Countable | A special code is set that indicates participation but there is not a sufficient response, or the LEA: <ul style="list-style-type: none">• Did not use special code,• Used a participation code,• Used 110 and there is no previous test |
| 303 | USB E Assigned Invalidated | Countable | Countable | USB E determined that the test was invalidated. |
| 305 | USB E Confirmed Additional Test Participation | Countable | Countable | The student has valid reason to take the same test again in another year. The test has sufficient response, and the same test can be found in a prior year with a valid scale score. |

Note: All 11th grade SAGE tests will be excluded from accountability calculations regardless of participation code. If LEA testing plan indicates 11th grade students will take SAGE, code 101 is recommended - student did not test. If LEA testing plan indicates 11th grade students will *not* take SAGE, code 200 is recommended – standard participation. Other participation codes may be used, however any 11th grade SAGE test will not be included in accountability calculations.

Validating participation codes.

USB E accepts the participation code the LEA has provided in most cases. In certain cases, USB E validates participation codes for accuracy and may change the participation code when necessary. The following validation checks are common (see the above participation code definitions).

Check non-participation codes for participation. In cases where the LEA submits a code that indicates non-participation (e.g., 101 – Absent), if the student actually met the sufficient response criteria, USB E will recode the non-participation code to 300 – USB E Approved Standard Participation.

Check participation codes for non-participation. In cases where the LEA submits a code that indicates participation and the student did *not* meet the sufficient response criteria, USBE will recode the participation code to 301 – USBE Approved Absent.

Check EL students for previous enrollment. Per the EL participation requirements, certain EL students are not required to take certain SAGE tests in their first year of enrollment in the US. The current policy also extends to students who have a gap of at least 2 years in their US enrollment (e.g., a student attended Kindergarten in Utah, moved back to their home country, then came back to Utah for school 5 years later). For every student excluded from testing as an EL, USBE verifies that they were not enrolled in Utah public schools in the previous 2 years. If they were enrolled, USBE will change the participation code to 301 – USBE Approved Absent.

Check for repeated courses. USBE only expects a student to take a specific SAGE test once during their school career. For example, a student took SAGE Chemistry in 2016, but was enrolled in a different course that triggered SAGE Chemistry in 2017. In this case, it is the LEA's decision whether or not the student should retest. If they choose not to retest, they can use code 110 – Student Previously Tested. In this case, a student cannot be counted as a parental exclusion for the second administration. The parents can still request that their child not test, but it is not counted as a parental exclusion for accountability purposes.

- For this check, USBE looks at all parental exclusions to see if the students previously tested. If they did, USBE will change the code to 110 – Student Previously Tested. **This is the only time that USBE will modify the parental exclusion participation code.**
- If the student tested previously and also tested in the current year, USBE changes the code to 305 – USBE verified previously tested. This test is both viable and countable.
- If the student tested previously but did *not* test this year, USBE keeps the code 110 – Student Previously Tested.
- If the student did not actually test previously, USBE checks to see if the student submitted a sufficient response for the test in the current year. If yes, the test will be recoded to 300 – USBE Approved Standard Participation. If no, then the test will be recoded to 301 – USBE Approved Absent.

Appendix B. Utah eTranscript and Record Exchange (UTREx)

LEAs are responsible for gathering, entering, and validating accurate student data into UTREx and for submitting the year-end data to USBE by the deadline of July 7 of each year. UTREx data related to accountability includes information on which school/LEA a student attends, their course enrollment and completion status, length of time enrolled at a particular school/LEA, ELL status, student gender, ethnicity, special education status, and other enrollment information.

The LEA and school for a student is determined from the most recent UTREx information available at the time the student first logs into a portion of a test event (e.g. ELA, math, or science). The LEA and school number are automatically recorded by the testing vendor. The following rules apply in determining the school of accountability for a student:

- If the initial test is reset, then the school of accountability will be determined when the student next logs into the test.
- If the testing vendor does not provide a school for the adaptive portion of the ELA test, then the school where the student started the writing portion will be used.
- Schools in their first year of operation can opt out of accountability.

Appendix C-1. School Self-Reported Indicators

Schools may report up to two self-reported indicators within any one of the six domains below. **This worksheet is designed to help schools prepare their self-reported indicators for upload to school accountability reports.** Examples of implementation activities and measures of effectiveness that can be reported are listed in the attached Example Self-Reported Indicators Guide. Complete one worksheet for each of the self-reported indicators you wish to upload.

1. SELECT A DOMAIN

- ☐ School-Level Factors ☐ Student Factors ☐ Teacher Factors
- ☐ Instructional Factors ☐ Parent & Family Engagement ☐ Equitable Educational Opportunities

2. SHORT TITLE

Give your implementation activity a short title (50 character limit):

3. DESCRIPTION

Describe your self-reported indicator in detail as you would like it to display on your school's report card. You may include measures of effectiveness, program evaluation, and hyperlinks (1500 character limit):

Appendix C-2. Example Self-Reported Indicators

Self-Reported Indicators must fall within one of 6 domains approved by the Utah State Board of Education: School-level Factors, Student Factors, Teacher Factors, Instructional Factors, Parent and Family Engagement, and Equitable Educational Opportunities. Schools are allowed flexibility in what they would like to report, but must select from one of these six domains.

School principals may choose to upload indicators of school quality, such as process, input, or program effectiveness data. The following examples of school implementation activities and example measures of effectiveness are provided as examples; schools are not limited to the activities in this list, as long as the activity reported by school falls within one of the six approved domains.

Example Self-Reported Indicators

| Domain | Example Implementation Activities | Example Outcome Measures |
|----------------------|---|--|
| School-Level Factors | School administers school climate survey | School climate survey results |
| | School offers arts, sports, or other special programs | Number of and participation in specialized programs |
| | School implements positive behavior interventions and supports | Office discipline referrals over time |
| | After school programs | Participation in after school programs |
| | School prioritizes STEM or 21 st century skills | Technology to student ration; participation in STEM programs |
| | School has received recognition from an outside source | School recognition or award |
| | School implemented an anti-bullying program | Incidences of bullying over time |
| Student Factors | School has emphasized and implemented efforts to improve attendance | Rates of Improved attendance |
| | Students perform well in AP classes | AP exam performance |
| | Student groups excelling in one area | Performance of student groups |
| | School measures students' experiences of school | School climate or school safety surveys |
| | Students make gains in credit recovery | Average credit accumulation per student |
| | School emphasizes career readiness and preparation | Percentage of students acquiring and industry-recognized license or certificate; CTE pathways programs; concurrent enrollment data |

| Domain | Example Implementation Activities | Example Outcome Measures |
|-----------------------------------|---|---|
| Teacher Factors | Teachers work in PLC teams, using data to improve instruction | PLC team fidelity measures |
| | Teachers use evidence-based instructional strategies (EBIS) | EBIS observation data |
| | School leaders increase classroom observations | Aggregate teacher evaluation data |
| | School focuses on instructional strategies for English Learners | % of teachers with ESL endorsements; WIDA ACCESS for ELLs growth analysis |
| | Teachers and staff are highly qualified | % of National Board certified teachers; teachers with Masters-level degrees or above |
| | Teachers implement tiered intervention strategies | Tier 2 & 3 Intervention outcomes |
| Instructional Factors | School implements social-emotional skills curriculum | School climate survey results; intervention fidelity measures; office discipline referral data |
| | Increased instruction targeting specific content areas | Student performance outcomes |
| | Teachers implement focused instructional strategies | Student performance outcomes |
| Parent & Family Engagement | School surveys parents about their engagement in their child's education | Parent engagement survey results |
| | School provides parent education, preschool, or nutrition programs | Evidence of impact; rates of participation |
| | School implements parent outreach activities or student-led conferences | Increased rates of parent attendance at school events; increased parent volunteer hours during school day |
| Equitable Educational Opportunity | School increases efforts to help EL students become fluent in English | Number of students reaching English language fluency; WIDA ACCESS for ELLs growth analysis |
| | School supports students to learn multiple languages | Number of students earning the seal of bi-literacy; impact of second language programs |
| | School provides Dual-Language Immersion (DLI) | DLI program evaluations; language proficiency assessment results |
| | School increases access to advanced courses for traditionally underserved populations (e.g. students with disabilities, English learners) | Rates of enrollment for student groups; course performance |
| | School increases access to college-level courses | Number of concurrent enrollment credits earned; |

Appendix D. Explanation of Student Growth Percentiles

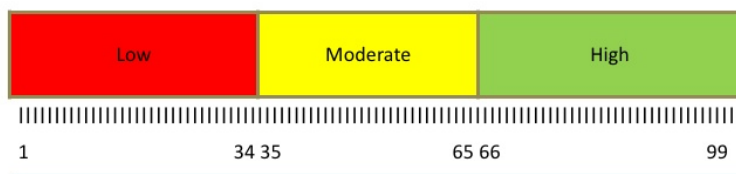
What are student growth percentiles?

A student growth percentile (SGP) describes a student's growth compared to other students with similar prior test scores (their academic peers). Although the calculations for SGPs are complex, percentiles are a familiar method of measuring students in comparison to their peers.

The student growth percentile allows fair comparison of students who enter school at different levels. It also demonstrates a student's growth and academic progress, even if he/she is not yet meeting proficient.

A student growth percentile is a number between 1 and 99. If a student has an SGP of 85, we can say that she showed more growth than 85 percent of her academic peers. A student with a low score on a state assessment can show high growth and a student with a high score can demonstrate low growth. Similarly, two students with very different scores can have the same SGP.

Student Growth Percentile Categories



Low Growth: Represents students with SGPs of 1-34

Moderate Growth: Represents students with SGPs of 35-65

High Growth: Represents students with SGPs of 66-99

How are student growth percentiles calculated?

Student growth percentiles are measured by using a statistical method called quantile regression that describes the relationship between students' previous scores and their current year's scores.

To whom are students being compared? What is an "academic peer"?

For SGPs, a student is compared to his/her academic peers. A student's "academic peers" are all students in the state in the same grade and assessment subject that had statistically similar scores in previous years. In other words, they are students that have followed a similar assessment score path. Students are only compared to others based on their score history, not on any other characteristics, such as demographics or program participation. A student's growth percentile represents how much a student grew in comparison to these academic peers.

What is a median growth percentile?

The median growth percentile summarizes student growth percentiles by district, school, grade level, or other group of interest. The median is calculated by ordering individual student growth percentiles from lowest to highest, and identifying the middle score, which is the median. The median may not be as familiar to people as the average, but it is similar in interpretation – it summarizes the group in a single number that is fairly calculated to reflect the group as a whole. (Medians are more appropriate to use than averages when summarizing a collection of percentile scores.)

Can high scoring students still demonstrate growth?

Yes. Students that typically have high scores on state assessments will be compared to all other students

in the state that also have high scores. The data show that even students that score at the top of the scale will have varied performance the next year, so the model allows us to identify growth for students at the upper end of the scale.

Which students get growth percentiles?

The students included in the student growth percentile calculations are those that attend public school in the state of Utah and took a state assessment during the current school year. Certain test types and categories of students are excluded from this comparison group. Only students that have at least two years of consecutive scores are included. For example, if a student has a score in 5th grade, but not in 6th grade, she would not be included in the analysis.

All available scores are used in the model, as long as they are consecutive. All students in the state that have valid and consecutive test scores in the same subject and grade form the norming population for the calculation of the SGPs.

What can student growth percentiles tell us?

Student growth percentiles are primarily a descriptive model, telling us what amount of growth a student has made over the last year. This growth model is not a value-added model; it does not attempt to separate a teacher or school effect on student learning. SGPs can, however, help answer the following questions (Yen, 2007):

Parent Questions:

- Is my child growing adequately toward meeting state standards?
- Is my child growing more or less in Math, Science, or Language Arts, relative to other students in the state that scored similarly?

Teacher Questions:

- Did my students grow adequately toward meeting state standards?
- How much growth do my students need to become proficient?
- Are there students with unusually low growth who need special attention?

Administrator Questions:

- Are our students growing adequately toward meeting state standards?
- How does the growth of students in my school compare to students in other schools?
- Are students in different grade levels within my school growing similarly?

USBE Data Gateway – Student Growth:

<https://datagateway.schools.utah.gov/Assessment/StudentGrowth/2018>

Appendix E. Accountability Standard Setting Memorandum

Memorandum

To: Rich Nye and Jo Ellen Shaeffer (Utah State Board of Education)

CC: Tiffany Stanley, Cydnee Carter, Jared Wright (Utah State Board of Education)

From: Leslie Keng and Scott Marion (Center for Assessment)

Date: 5/30/2017

Re: Utah School Accountability System Standard Setting Process

On May 16-18, 2017, the Utah State Board of Education (USB E) with support from the Center for Assessment convened a series of meetings to implement a standard setting process for the Utah school accountability system. Over the course of three days, committees of school accountability system stakeholders from across the state of Utah reviewed and revised policy descriptors (PDs) and school performance level descriptors (SPLDs). They also recommended threshold scores for overall school ratings that will be used to assign letter grades to schools based on their performance on the indicators in the Utah school accountability system. This memorandum provides a high-level summary of the standard setting process and outcomes.

Overview

Part 11 of Utah’s Senate Bill 220 (SB220) provides detailed specifications of the requirements for Utah’s new school accountability system. The statute includes the performance indicators on which a school’s overall rating is based for elementary and middle schools (Section 53A-1-1106), and for high schools (Section 53A-1-1107). It specifies how points for the various indicators should be awarded in the calculation of a school’s overall rating (Section 53A-1-1108 through 53A-1-1110). It also provides the grade and labels for a school’s overall rating (Section 53A-1-1105). The letter grades and associated labels are as follows:

- “A” represents an exemplary school;
- “B” represents a commendable school;
- “C” represents a typical school;
- “D” represents a developing school; and,
- “F” grade represents a critical needs school.

SB220, however, does not specify what the threshold scores are for schools to be assigned each grade or performance label. Instead, it requires USB E to engage in a “criteria setting process” to establish performance level threshold scores. In establishing the threshold scores, USB E should solicit and consider input from stakeholders, including legislators, the governor, representatives from local school

boards, other representatives from school districts (including superintendents), other representatives from charter school governing boards, teachers, and parents (Section 53A-1-1113.5).

USBE, with support from the Center for Assessment, designed and implemented an accountability standard setting process to fulfill this statutory requirement. The process involved a well-defined, legally-defensible approach to obtain threshold score recommendations from the various stakeholders outlined in the SB220. The process included three main steps:

1. Establishment of Policy Descriptors (PDs)
2. Specification of School Performance Level Descriptors (SPLDs)
3. Recommendation of Performance Level Threshold Scores

The following sections provide descriptions of each of the three main steps. The overarching goal of the standard setting process was to establish performance levels that are meaningful and reflect the state's vision for the accountability system.

Policy Descriptor (PD) Meeting

On the evening of Tuesday, May 16, 2017, a committee of key legislators and state board members convened to review and revise the Policy Descriptors (PDs) for the Utah school accountability system. PDs are high-level statements about each performance level. They should be linked to Utah's goals and policy priorities and identify the most critical outcomes that are valued and considered non-negotiable. PDs should also be succinct and clear, so that anyone can read and understand them without technical jargon. They serve as the basis for the more detailed school performance level descriptors (SPLDs), which would be reviewed and revised on the following day.

Prior to the PD meeting, USBE and the Center for Assessment drafted preliminary PDs as starting points for the committee. During the meeting, committee members reviewed and discussed as a group the PD for each performance level in light of the legislative requirements and the state's goal and vision for its new accountability system. The committee made several important revisions to the draft PDs and approved them for use by the SPLD committee on the following day. The PDs approved by the committee were:

- An exemplary or "A" school exceeds expectations in academic achievement AND growth (AND postsecondary readiness, for high school). Equitable educational opportunities at the school should also be considered outstanding.
- A commendable or "B" school meets expectations on academic achievement AND growth (AND postsecondary readiness, for high school). Equitable educational opportunities at the school should also be satisfactory to strong.
- A typical or "C" school meets expectations on academic achievement OR growth (OR postsecondary readiness, for high school). Equitable educational opportunities at the school are also adequate.
- A developing or "D" school partially meets expectations for academic achievement OR growth (OR postsecondary readiness, for high school). Equitable educational opportunities at the school are not adequate.

- A critical needs or “F” school has not met expectations for academic achievement AND growth (AND postsecondary readiness, for high school). Equitable educational opportunities at the school are not adequate.

These policy descriptors were modified slightly during the school performance level descriptor meeting (described below) and the final policy descriptors are found in Appendix C.

School Performance Level Descriptor (SPLD) Meeting

On the afternoon of Wednesday, May 17, 2017, members of the Utah’s Assessment and Accountability Policy Advisory Committee (AAPAC) convened to work on the school performance level descriptors (SPLDs) for Utah’s school accountability system. SPLDs are more detailed descriptions of the characteristics of schools in each performance level. There is a range of performance expectations associated with schools in each performance level. The SPLDs are meant to describe a school in the middle of each performance level. The charge for this committee was to review and approve the SPLDs for use in the performance level setting meeting on the following day.

Prior to the SPLD meeting, USBE and the Center for Assessment drafted preliminary SPLDs as starting points for the SPLD committee. Separate SPLDs were written for elementary/middle schools and for high schools. During the meeting, the approved PDs from the previous day were shared with the committee. The committee then examined the SPLDs to ensure that they reflected Utah’s vision for the school accountability system in the PDs, described the expectations in the different performance levels, and were clearly articulated for the performance level setting committee. The specific question posed to the committee was:

- Are the key distinguishing features in each of the SPLDs clearly articulated? That is, if given information about schools’ performances, could you use these SPLDs to identify the differences between:
 - A schools vs. B schools;
 - B schools vs. C schools;
 - C schools vs. D schools; and,
 - D schools vs. F schools?

Each committee member reviewed the preliminary SPLDs independently. Committee members were then divided into table groups of 3-5 people to share their thoughts on the SPLDs and recommend revisions to each SPLD. Finally, the committee reconvened as a group to revise the SPLDs and approve them for use for the performance level setting meeting.

Appendix A provides the annotated agenda for the SPLD meeting. Appendix C shows the final SPLDs for elementary/middle schools and for high schools. Please note that the performance level setting committee made additional revisions to the SPLDs on the following day. The SPLDs shown in Appendix C reflected those revisions.

Performance Level Setting Meeting

On Thursday, May 18, 2017, a committee of AAPAC members, policymakers, parents, educators, association representatives, and technical experts convened to recommend performance level threshold scores for overall school ratings in the Utah school accountability system. The threshold scores will be used to assign letter grades to schools based on their performance on various indicators specified in statute. The committee followed an iterative value-based judgmental process that included multiple rounds of review, ratings and feedback to arrive at threshold score recommendations. The committee also made additional revisions to the SPLDs so that they reflected the recommended threshold scores. Such slight revisions to the descriptors are common in a standard setting process to ensure coherence between the data and the narrative descriptors.

Prior to the performance level setting meeting, USBE prepared two key sets of documents for the meeting: the ordered school profile lists (OSP) and detailed school profiles. An OSP is list of all schools in Utah, ordered by the percentage of total points earned on the legislatively-mandated accountability indicators. This list also included information about the number and percentage of points earned for each indicator by each school. A detailed school profile is a report that includes additional empirical data about a given school, including test participation rates, detailed breakdowns of each accountability indicator by subject area, and historical demographic and performance data, for all students and by subgroups.

During the performance level setting meeting, the committee members first reviewed and discussed the PDs and SPLDs approved by the committees on the previous days. They then participate in two rounds of judgments and discussions to arrive at recommended performance level threshold scores. In Round 1, the goal was to identify probable ranges for each threshold score (i.e., “range-finding”) using the OSP. This step was done independently by each committee member based on his or her interpretation of the SPLDs. In Round 2, the goal was to locate the threshold score for each performance level (i.e., “pinpointing”) within the respective probable ranges identified in Round 1. This step was done in table groups (of 3-5 people) by reviewing the detailed school profiles for every school within the probable ranges. Because of time constraints, each committee member (in Round 1) and table group (in Round 2) was assigned to review and provided recommendations for only one of the school levels: either for elementary/middle schools or for high schools. Appendix B provides the annotated agenda for the performance level setting meeting.

The final committee-recommended threshold scores, expressed as the percentage of total pointed earned on all of the accountability indicators, and associated impact data (i.e., the percentage of Utah schools in each performance level based on 2016 performance) are summarized in Tables 1 and 2.

Table E-1: Recommended Threshold Scores and Impact Data for Elementary/Middle Schools

| Performance Level | Recommended Threshold Score ⁶ (Expressed as % of total points earned) | Impact Data (% of schools in each category based on 2016 performance) |
|--------------------|---|---|
| A (Exemplary) | 63.25 | 7% |
| B (Commendable) | 55.0 | 24% |
| C (Typical) | 43.5 | 49% |
| D (Developing) | 35.5 | 15% |
| F (Critical Needs) | -- | 5% |

Table E-2: Recommended Threshold Scores and Impact Data for High Schools

| Performance Level | Recommended Threshold Score ⁷ (Expressed as % of total points earned) | Impact Data (Based on 2016 performance) |
|--------------------|---|--|
| A (Exemplary) | 64 | 13% |
| B (Commendable) | 57 | 34% |
| C (Typical) | 46 | 36% |
| D (Developing) | 38 | 13% |
| F (Critical Needs) | -- | 4% |

Next Steps

USBE will forward the recommendations by the committees, including the PDs, SPLDs, and performance level threshold scores, to the Board of Education for approval. The Board will report to the Utah State Legislature in the fall of 2017 on the implementation of the threshold scores.

Exhibit E-1: Policy Descriptors and SPLDs for Elementary and Middle Schools:

Exemplary School (“A” School):

1. Policy Descriptor: An exemplary or “A” school **exceeds expectations** in academic achievement **AND** growth. Equitable educational opportunities at the school should also be considered **outstanding**.
2. SPLDs: A school that is exemplary (i.e., receives a grade of A) obtains a **high** number of points on **all** of the following three indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science)
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science)
 - Equitable educational opportunities (as measured by academic growth for the lowest performing 25% of students and, if applicable, English learner progress)

Commendable School (“B” School):

1. Policy Descriptor: A commendable or “B” school **meets expectations** on academic achievement **AND** growth. Equitable educational opportunities at the school should also be **satisfactory to strong**.
2. SPLDs: A school that is commendable (i.e., receives a grade of B) obtains a **high** number of points on **at least one** of the following two indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science); OR
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science)**And** obtains an **adequate** number of points on **all** of the following three indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science); AND
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science); AND
 - Equitable educational opportunities (as measured by academic growth for the lowest performing 25% of students and, if applicable, English learner progress)

Typical School (“C” School):

1. Policy Descriptor: A typical or “C” school **meets expectations** on academic achievement **OR** growth. Equitable educational opportunities at the school are also **adequate**.
2. SPLDs: A school that is typical (i.e., receives a grade of C) obtains an **adequate** number of points on **two** of the following three indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science)
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science)

- Equitable educational opportunities (as measured by academic growth for the lowest performing 25% of students and, if applicable, English learner progress)

Developing School (“D” School)

1. Policy Descriptor: A developing or “D” school **partially meets expectations** for academic achievement **OR** growth. Equitable educational opportunities at the school are **not adequate**.
2. SPLDs: A school that is developing (i.e., receives a grade of D) obtains an **adequate** number of points on **one** of the following three indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science)
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science)
 - Equitable educational opportunities (as measured by academic growth for the lowest performing 25% of students and, if applicable, English learner progress)

Critical Needs School (“F” School)

1. Policy Descriptor: A critical needs or “F” school **has not met expectations** for academic achievement **AND** growth. Equitable educational opportunities at the school are **not adequate**.
2. SPLDs: A school that has critical needs (i.e., receives a grade of F) obtains an **adequate** number of points on **none** of the following three indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science)
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science)
 - Equitable educational opportunities (as measured by academic growth for the lowest performing 25% of students and, if applicable, English learner progress)

Exhibit E-2: Policy Descriptors and SPLDS for High Schools

Exemplary School (“A” School)

1. Policy Descriptor: An exemplary or “A” school **exceeds expectations** in academic achievement **AND** growth **AND** postsecondary readiness. Equitable educational opportunities at the school should also be considered **outstanding**.
2. SPLDs: A school that is exemplary (i.e., receives a grade of A) obtains a **high** number of points on **all** of the following four indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science)
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science)
 - Postsecondary readiness (as measured by graduation rates, college readiness assessments, and advance course work)
 - Equitable educational opportunities (as measured by academic growth for the lowest performing 25% of students and, if applicable, English learner progress)

Commendable School (“B” School)

1. Policy Descriptor: A commendable or “B” school **meets expectations** on academic achievement **AND** growth **AND** postsecondary readiness. Equitable educational opportunities at the school should also be **satisfactory to strong**.
2. SPLDs: A school that is commendable (i.e., receives a grade of B) obtains a **high** number of points performance on **at least one** of the following three indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science)
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science)
 - Postsecondary readiness (as measured by graduation rates, college readiness assessments, and advance course work)

Typical School (“C” School)

1. Policy Descriptor: A typical or “C” school **meets expectations** on academic achievement **OR** growth **OR** postsecondary readiness. Equitable educational opportunities at the school are also **adequate**.
2. SPLDs: A school that is typical (i.e., receives a grade of C) obtains an **adequate** number of points on **three** of the following four indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science)
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science)

- Postsecondary readiness (as measured by graduation rates, college readiness assessments, and advance course work)
- Equitable educational opportunities (as measured by academic growth for the lowest performing 25% of students and, if applicable, English learner progress)
-

Developing School (“D” School)

1. Policy Descriptor: A developing or “D” school **partially meets expectations** for academic achievement **OR** growth **OR** postsecondary readiness. Equitable educational opportunities at the school are **not adequate**.
2. SPLDs: A school that is developing (i.e., receives a grade of D) obtains an **adequate** number of points on **one** of the following four indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science)
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science)
 - Postsecondary readiness (as measured by graduation rates, college readiness assessments, and advance course work)
 - Equitable educational opportunities (as measured by academic growth for the lowest performing 25% of students and, if applicable, English learner progress)

Critical Needs School (“F” School)

1. Policy Descriptor: A critical needs or “F” school **has not met expectations** for academic achievement **AND** growth **AND** postsecondary readiness. Equitable educational opportunities at the school are **not adequate**.
2. SPLDs: A school that has critical needs (i.e., receives a grade of F) obtains an **adequate** number of points on **none** of the following four indicators:
 - Academic achievement (as measured by performance on the statewide assessment of ELA, math and science)
 - Academic growth (as measured by progress from year to year on the statewide assessment of ELA, math and science)
 - Postsecondary readiness (as measured by graduation rates, college readiness assessments, and advance course work)
 - Equitable educational opportunities (as measured by academic growth for the lowest performing 25% of students and, if applicable, English learner progress)

Appendix F. Alternative Schools Accountability

1. In order for schools to be considered alternative they must meet the definition of Alternative or of Exclusively Serving Special Populations. There are three definitions of Alternative or Special Purpose Schools, approved by the Board in October, 2018; defined below:

- A. “Special School for Students with Disabilities”
 - i. IDEA definition/Board Rule:
 - 1. A building in which all the students enrolled are eligible for special education and receiving special education services and supports.
- B. “Special School for Youth in Custody”
 - i. A youth in custody school is any individually accredited public school under the control of a local school board elected under Title 20A, Chapter 14, Nomination and Election of State and Local School Boards which exclusively serves youth in care as defined in 53E-3-503.
- C. “Alternative School” is 1) an LEA (charter school) whose key mission/purpose is to be a Comprehensive Dropout Intervention and Prevention Program or 2) a school who is a part of an LEA’s Comprehensive Dropout Intervention and Prevention Program:

A Utah Alternative Public School is a school operating as a Comprehensive Dropout Intervention and Prevention Program which 1) addresses needs of students who are not succeeding in a traditional school environment, 2) provides targeted instruction that increases student credit-earning rates toward graduation and 3) partners with community entities to provide a continuum of services with the focus of preparing students for life after high school. Characteristics of an alternative school learning environment may include flexible scheduling, small student-teacher ratios, college/career-oriented themes, adult advocates, trauma sensitivity and academic enrichment. Students who may benefit from Alternative Education include, (a) teen pregnant/parenting students, (b) re-engaged learners, (c) students with disciplinary infractions, (d) students needing additional mental health support and (e) individuals at risk of not successfully transitioning into adulthood.

2. All schools with an alternate flag who exclusively serve special populations will be reviewed on an individual basis according to alternative indicators. Decision rules will be used to determine if an alternative school meets criteria for additional support and improvement.

Appendix G: CSI and TSI School Ranking, Cut Score Setting, and Identification Business Rules

Step 1) ESSA School Ranking

1. All schools will have all accountability indicators calculated with the ESSA-required inclusion of non-participants as non-proficient up to 95% in the achievement indicator for ELA and math.
2. After calculations are completed, a ranked list of all schools will be produced, with ranking based on the percent of total points earned out of total points possible for all available indicators for a school.
3. To complete a total school list, the ranked list will include any school with an enrollment size greater than or equal to 10 and has at least one indicator of achievement. Any school that fails to meet these conditions will be included in the list of schools but will only be noted for inclusion at the end of the ranking as schools for which an overall rating cannot be made.
4. All schools (Elementary and high schools) will be ranked together into a single list using the following ranking guidelines: Overall Score, Achievement Score, Growth Score, Equity Score (growth of the lowest 25%), EL Progress Score, Graduation score, ACT Score, Advanced coursework score.
 - a. 2018 identification will use 4-year graduation rate only; 2019 and beyond will include 4- and 5-year.
 - b. The final ranking will be alphabetized by school name to control sort properties.
5. The bottom 5% of all schools for ESSA purposes will be established. This cut score will be rounded to the nearest tenth of a percentage point.
6. Any school falling below the 5% cut will be flagged as **'CSI - Bottom 5%'**.
7. Participations rates will be calculated for each school's subject area following the ESSA-required inclusion of non-participants as non-proficient up to 95% in the achievement indicator in ELA and math. Any school with less than 95% participation in any subject will be flagged for **'CSI - Participation'**.
8. Any school that has a graduation rate of 67% or below will be flagged as **'CSI - Graduation'**

Step 2) Statistically Viable School Ranking

1. Second ranking will include any school with both an Achievement Score AND a Growth Score. This follows the Utah Technical Advisory Committee's recommendation for minimum threshold for reliable school performance determinations.
2. This list will exclude all Alternate designated schools (*v_be_school.School_type not IN (2,4)*).
3. This list will use Utah's achievement score *without* the ESSA-required inclusion of non-participants as non-proficient up to 95% in the achievement indicator.
4. All schools (Elementary and High schools) will be ranked together into a single list using the following ranking guidelines: Overall Score, Achievement Score, Growth Score, Equity Score (growth of the lowest 25%), EL Progress Score, Graduation score, ACT Score, Advanced coursework score.
 - a. 2018 identification will use 4-year graduation rate only; 2019 and beyond will include 4- and 5-year.
 - b. The final ranking will be alphabetical by school name to control sort properties.

5. The bottom 5% and 3% of all schools in this list will be established in order to statistically and reliably determine if a school is truly performing in the bottom 5 or 3 percent of schools. This cut score will be rounded to the nearest tenth of a percentage point.
 - a. The Achievement and growth indicators from the bottom 5% cut will be used for all Student Group Targeted Support and Improvement (TSI) single year determinations.
 - b. The bottom 3% cut will be used for Utah's Turn-Around School Identification.

Step 3) Title I School Ranking

1. The statistically reliable list from step 2 will be filtered to include only Title I (whole school and targeted) schools.
2. The bottom 5% of all Title I schools will be used to establish a cut, set for determining the bottom 5% of Title I schools to be used in years when necessary.
3. Schools in this list will be compared to the All Schools cut from Step 1. Schools at or below this cut will be flagged as '**CSI Title I - bottom 5%**'.
 - a. In years where this does not capture at least the bottom 5% of Title I schools, the bottom 5% of Title I schools will be used for identification.

Step 4) CSI Determinations

1. **CSI – Bottom 5%:** The 3-year average overall score will be calculated for any Title I school with at least one CSI bottom 5% flag within a three-year period.
 - a. If a school's 3-year average score is at or below the 3-year average All Schools Cut from step 2 (Reliable ranking), the school will be identified as '**CSI – Bottom 5%**'
2. **CSI – Graduation:** Any school flagged as 'CSI Graduation Warning' who falls equal to or below 67% graduation for two consecutive years will be Identified as '**CSI – Graduation**'
4. **CSI – Participation:** Any school flagged in the ESSA ranking (step 1) for 'CSI - Participation' will be compared to their rank in step 2. If the school is *not* in the bottom 5% of schools in the step 2 ranking, they will be identified as '**CSI Warning - due to low Participation Rate**'

Step 5) TSI Determinations

1. EACH YEAR: student group(s) that have at least 10 students in the group will have their achievement score and growth score calculated and compared to the Statistically Viable (step 2) bottom 5% cut achievement and growth score. Any student group at or below this cut score will be identified as '**TSI – Low Performing Student Group(s)**'.
 - a. Specify and flag the student group for which the school was identified.
2. Student groups include: Race/ethnicity, students with disabilities, English learners, economically disadvantaged, and gender.

Step 6) ATSI Determinations

1. Schools who are identified as TSI that do not improve the performance of the student group(s) for which they were identified within four years of identification will be identified as '**ATSI – Consistently Underperforming Student Group(s)**'
2. Any Title I school identified as TSI that does not improve the performance of the student group(s) for which they were identified within four years of identification will be identified as '**CSI – Consistently Underperforming Student Group(s)**'

Step 7) Alternative Schools

1. All schools with an alternate flag will be reviewed on an individual basis according to alternative indicators. Decision rules will be used to determine if an alternative school meets criteria for additional support and improvement.

Use Case Examples

- **Case 1. School in Bottom 5% of ESSA School Rank without Alternate Flag and without Achievement and Growth Indicator:**
 - School will need to perform a “Root Cause Analysis” to determine if intervention is needed.
- **Case 2. School flagged in Bottom 5% of ESSA School Rank with Alternate Flag:**
 - School Identified in the ESSA School Rank that are flagged as both Alternate and in the bottom 5% will receive a Tier II review to determine if school is performing according to Student population and mission type.
- **Case 3. School flagged in Bottom 5% of ESSA in School Rank but not flagged in Statistically Viable School Rank:**
 - Schools will be noted as being in Bottom 5% because of participation rate below federal 95% participation requirements. No further action needed.
- **Case 4. School not flagged in Bottom 5% of ESSA but flagged in Statistically Viable and in Title I Rank list:**
 - Enough information is available to statistically determine that this school is in need of assistance and will be flagged as in Bottom 5% and will be flagged for CSI determination over three-year period.