

Background

In December 2015, President Barack Obama signed into law the bipartisan Every Student Succeeds Act (ESSA), reauthorizing the Elementary and Secondary Education Act of 1965 (ESEA), the nation's education law and longstanding commitment to educational equity for all students, and replacing the No Child Left Behind Act. Under ESSA, authority has now been devolved to the states, allowing each state the flexibility to set policies, create timelines for progress, and develop school improvement plans. In addition to developing a plan for spending federal funds and meeting federal requirements, each state is responsible for charting its own plan that best meets the needs of its own students.

Last month, the Nevada Department of Education (NDE) completed a draft of the State Education Plan and the current state of student achievement. Stakeholders have been invited to provide feedback on the draft of the Consolidated State Plan, which will be submitted to the U.S. Department of Education in early April 2017.

Review

The Kenny Guinn Center for Policy Priorities **commends the Nevada Department of Education** for the inclusive process and emerging product of the ESSA plan.ⁱ

We applaud the connection to the **transforming Nevada economy**, the **measurable benchmarks and goals**, the structure of the **organizing principles**, the demonstration of **aligned assessments** through the K-12 education system, the **focus on equity** within our system and aligned accountability and structural reforms, and the clarity offered by **articulating tiers of support** for persistently struggling schools.

In the pages below, we evaluate the ESSA draft against the Guinn Center's education policy principles (See Appendix A for summary of Principles of Education Reform, *paper forthcoming March 2017*) and observe tremendous alignment.ⁱⁱ

In addition, the Guinn Center offers several recommendations that promote the intentions of the ESSA plan and should be taken under advisement by NDE and the ESSA Advisory Group.

- 1.) We see an opportunity to unify and align many elements of the strategies named in the "Educational Equity and Supporting All Students" focus area through a change management plan, the core of which is the weighted funding formula along with clear, defined accountability mechanisms. We suggest two conceptual frameworks to add structure and clarity to this process:

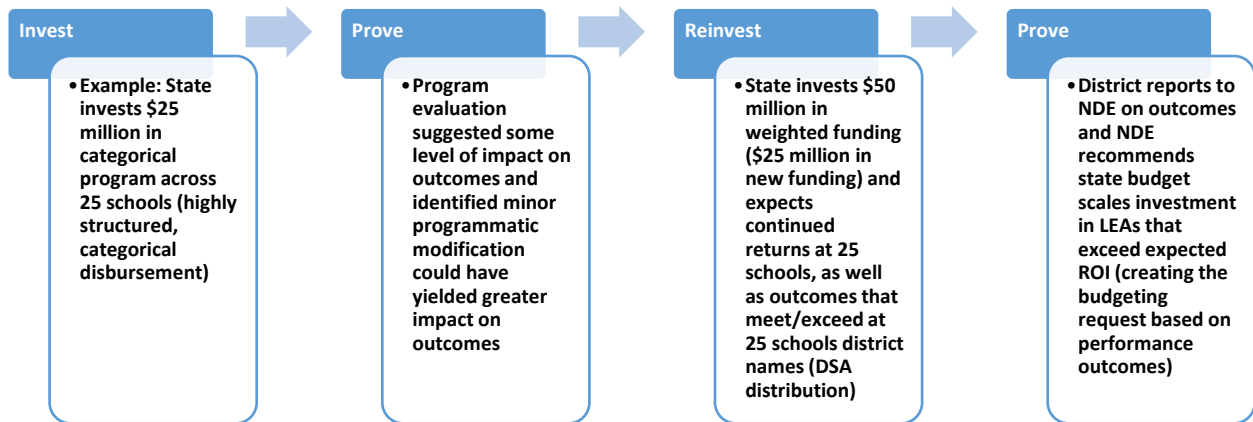
First, we suggest NDE creates a readiness rubric to assess readiness to move categorical investments ('pilot' spending programs) – such as Zoom Schools – to the Distributive School Account in the weighted funding model. NDE can draw from best practices in piloting and scaling strategic initiatives. (See Table 1 for an example of how NDE might use a readiness rubric.)

Table 1. Example of Readiness Rubric

Program	Clarity of Purpose and Monitoring Plan	LEA Capacity and Ability to Sustain Program	Readiness Level
Nevada K.I.D.S. Read	<p>The 3rd grade proficiency benchmark is very clear and measurable and the effort to add literacy specialists to schools is easy to track and monitor.</p> <p>315 schools were awarded funds in the 2016-17 school year, which means that this program reaches most Nevada elementary schools.</p>	<p>Literacy specialist roles have been funded so program appears sustainable.</p> <p>Minor risk in losing targeted literacy plans and aligned professional development, but school-based decision-making (i.e., AB 394) and possible alignment/integration with other professional development initiatives offsets lack of restricted funding through opportunity for integration.</p>	Yes – ready for transition to DSA
Zoom Schools and Victory Schools	<p>NDE reports that it lacks sufficient data to provide an authentic analysis of Zoom Schools, which suggests more time is required to analyze the impact of categorical investment.ⁱⁱⁱ</p> <p>Given that these funds concentrate in a relatively small number of the highest need schools, a school grant funding mechanism ensures that dollars are not diverted (to other programs).</p>	<p>Current spending at the level of local education agencies (LEA) is misaligned to Zoom and Victory funding. For example, Clark County School District (CCSD) reports that it does not fund schools in alignment with Free and Reduced Lunch price student population.</p> <p>Moreover, CCSD reports that it does not yet have a system in place to track the flow of funds to the student and then measure the impact of any related service provided to that student. In other words, there is no way to evaluate whether the funds are helping specific groups, as intended.</p> <p>This suggests that a significant change in LEA expenditures strategy would be required by districts to sustain the intent of programs, and that there is significant risk that funds would be diverted for other purposes if moved into the DSA at this point.</p>	No – not ready for transition to DSA

In addition, NDE has articulated an “Invest – prove – reinvest – prove” strategy that can be applied to articulate meaningful performance indicators and increase outcomes for student sub-groups. NDE should accelerate the reinvest cycle for local education agencies (LEAs) that demonstrate the best return on investments (the defined student outcome targets) to maximize impact and learning throughout the education system. We see this as an organizing principle to apply to the multiple interventions articulated at various levels of the system in this sub-section. See example process (Figure 1):

Figure 1. Invest-Prove-Reinvest-Prove Strategy



2.) The Guinn Center suggests additional strategies that ‘raise the ceiling’ in addition to closing gaps. We applaud the laser focus on closing opportunity/outcomes gaps and on educational equity. However, considering Nevada’s continued aggregate position as a low achieving state, we also want to ensure that the equity strategy is complemented by a significant expansion of Advanced Placement (AP) courses, dual-credit bearing opportunities, decreased need for college remediation, stronger career/college pathways, and diplomas that have value, etc.^{iv} Below, we outline several strategies that would reinforce this focus.

- a. Related to Nevada School Performance Framework (NSPF): We suggest anchoring the 5-Star rating at a higher level – one that ensures every measure of a 5-Star school exceeds national averages.^v Further the star rating should be aligned to meaningful targets and advancement at all levels. For example, it has been reported that in some cases 3-Star performing middle schools were low performers on several indicators. Conversely, 2-Star high schools appear to achieve tremendous progress in performance and yet remain at 2-Star ranking.
- b. NDE should identify and facilitate expansion of course and enrichment offerings that serve as predictors of sustained student success beyond the K-12 journey (e.g., second language offerings, Algebra 1 in middle school, music education, dual-enrollment, and college access offerings). There is an advisory group recommendation in the accountability, school improvement, and support section of the ESSA Plan to use ACT, Advanced Placement, International Baccalaureate, and Dual-Enrollment in the high school Nevada State Performance Framework, which is promising. In pursuing this priority, NDE should monitor access to current and expanded offerings through an equity lens (within and across districts) and ensure that access to such programs mirrors or exceeds the diversity of the district.

- 3.) We recommend taking a more systematic approach to accountability. Too many schools focus only on what happens at the school site, rather than considering and addressing the education experiences before and after child sets foot in that building. This siloed approach makes it more challenging to meet the needs of every child, and offers the risk of perverse incentives and shortcuts at school sites that lack strong leadership. While we applaud the addition of the “students in need of improvement” subgroup to add focus and appreciate greater clarity in the categories of school improvement (e.g., Comprehensive Support and Improvement Schools), we believe that the state can strengthen accountability measures. Therefore, we recommend taking a systematic lens to the approach to school accountability.
 - a. We recommend connecting existing measures of school success to pupil outcomes in the subsequent grade level – even when the next grade it is at another school.^{vi}
 - b. We suggest considering the rate of transiency or enrollment changes at choice schools. This will ensure that the magnets, charters, and other schools of choice are working to serve the needs of every child enrolled.
- 4.) Finally, we applaud the stated focus area of school leadership in the Superintendent’s cover letter^{vii} and would suggest a robust, focused effort to create new certification endorsements that link the “Accountability, School Improvement, and Support” to the lessons on school leadership. Based on national research and on observed patterns from the Shining Stars schools, CCSD Franchise School pilot, we recognize that school leadership can have an outsized impact on the quality teaching and learning in schools. We have also observed concerning patterns in our state in chronic instability of school leadership at our highest needs schools and perceive wide variation in the quality of the principals in our educational system. Further, educator and school leadership programs are being offered by a variety of University and non-profit partners without an integrated plan to attract our highest caliber leaders to schools with the greatest areas of need. Therefore, we recommend that NDE creates a set of aligned leadership endorsements that serve as attestations of the preparation of school leaders for Nevada’s focus schools.

We believe that at least three endorsements – school empowerment, school turnaround, and serving diverse linguistic learners – would catalyze the effort to build an aligned human capital strategy focused on the greatest needs facing Nevada’s education system. We view these endorsements as a way to match the state’s investment of resources and reforms with the LEA’s investment level of talent by creating incentives to place trained leaders with aligned preparation at target schools and increase salaries (and compensation) in accordance with those specialties. In addition, the state should require LEAs to staff focus schools with leaders holding the appropriate endorsement in order for the school to qualify for the greatest amount of state resources and interventions. Finally, the state can use grant funding to encourage higher education and nonprofit partners to build and grow quality programs that meet these needs. Accordingly, we recommend that NDE work with higher education and nonprofit partners to design a framework by which to assess the quality and rigor of educator and school leadership training programs in the state.



Policy Note **New Nevada Plan Under Every Student Succeeds Act (ESSA)**

ESSA Plan	Principle 1: Student Outcomes and Journey	Principle 2: Educators as Professionals	Principle 3: School as unit of impact	Principle 4: A systems and ecosystem view
Framing (p. 1-21)	<p>Aligned</p> <p>We appreciate the focus on multiple measures of student outcomes – especially college readiness and comparable data across states (to balance the less normative graduation rates). We also support the addition of State Education Goal 4 “All students learn in an environment that is physically, emotionally, and intellectually safe” which will put a focus on the experience of our children in school in our state’s focus and goals.</p>	<p>Opportunity</p> <p>Principal development is named in the framing letter as a critical lever that NDE can pull and mentioned throughout the plan, but the strategy is not clear. Additionally, the state of the educator workforce could be addressed in the framing.</p>	<p>Opportunity</p> <p>We would suggest framing a goal around the number of schools at certain star ratings (e.g., decreasing the number of 1/2 stars and increasing 4/5 stars) over time, considering the number of interventions and funding strategies that target schools as the organizing principle. Further, NSPF ratings are pointed to as evidence of the equity gap in the ‘Accountability/School Improvement’ section therefore it seems that a statewide goal would be appropriate.</p>	<p>Aligned</p> <p>We applaud including the rate of college remediation and 6-year graduation rates from Nevada institutions of higher education into the framing as a demonstration of a system view.</p>
1. Challenging Academic Standards and Assessments (p. 22-27)	<p>Aligned</p> <p>The alignment of rigorous assessments throughout the entire education journey of a child is a major point of progress and will enable schools, students, and parents to track college/career readiness progress along the school journey.</p> <p>We support evolving the End of Course Exams into true end of course assessments to better integrate the accountability system into the school journey of the student.</p>			<p>Opportunity</p> <p>We suggest adding a statement to the “Family Role” section that encourages parents to use the assessment information of their child to consider the school environment necessary for their child to thrive.</p>



<p>2. Accountability, School Improvement, and Support (p. 28 – 35)</p>	<p>Aligned</p> <p>We support the efforts to update the NSPF to capture a broader picture of school success and monitor equity. The district dashboard with additional considerations (i.e. student discipline and teacher distribution) is a promising strategy assuming the data included is reliable, normative and distinct from the NSPF (which should hold much greater weight as a measure of outcomes vs. inputs). Further, we support piloting efforts to monitor school climate towards the ends of accountability.</p> <p>Opportunity</p> <p>In addition to closing gaps, the accountability system should put more upward pressure on the system to concurrently raise the ceiling (i.e. AP access/outcomes).</p>	<p>Aligned</p> <p>Should the data exist, we agree with the recommendation to create and maintain a district level framework that includes a view into the equitable distribution of teachers in LEAs.</p>	<p>Aligned</p> <p>We applaud the shift to the continuous cycle for creating improvement plans vs. disjointed and compliance driven planning processes. We believe this recognizes the school as the primary driver of strategy.</p>	<p>Opportunity</p> <p>We would like to see a greater focus on accelerating interventions and efforts that are working (i.e. using Shining Stars list, resources to LEAs funds to scale success, etc.). Currently our system tends to cut back on resources and support once a school is improving. We would suggest doubling-down when a school is showing promise.</p> <p>In the “Family Role” section, in addition to suggesting families work with low performing schools to identify steps towards improvement, NDE should give parents data and resources to learn about other schools that are achieving stronger outcomes and help parents learn how to gain access for their child.</p>
<p>3. Supporting Excellent Educators (p. 36 – 39)</p>	<p>Opportunity</p> <p>NEPF does not yet appear to be a reliable indicator of the impact of an educator on the student journey/student outcomes for several reasons. This is an opportunity for our state’s approach.</p>	<p>Opportunity</p> <p>We are uncertain how the plan further ensures accurate evaluations and therefore accurate representation of the distribution of talent in our system (which we perceive as a major barrier).</p> <p>The plan lacks a mechanism for including advancement (in responsibility, compensation, otherwise) that is linked to the effectiveness (and impact) of the educator.</p> <p>NDE should promote greater curricular tools and resources that support educators in their pursuit of challenging academic standards (i.e. reviewing curricular resources, pacing guides, training of teachers on standards, etc.). The recommendation of the advisory group to leverage the complete Smarter Balanced product is a start.</p>	<p>Aligned</p> <p>We endorse the effort to report out distribution of talent by school type given that the quality of teachers/educators is one of the greatest predictors of school success.</p>	<p>Opportunity</p> <p>While traditional and alternative routes for educator preparation is listed, we believe there is an opportunity to better connect the pipeline and higher education system to the needs of K-12 (i.e., reporting that highlights the scale of hiring needs vs. supply from Nevada providers, an assessment of the quality of educator provider based on evaluations/student growth scores in the field, etc.).</p>



<p>4. Educational Equity and Supporting All Students (p. 40 – 49)</p>		<p>Opportunity</p> <p>The role of educators and leaders who are needed to execute the litany of program should be contemplated in the plan (i.e. we currently have a CTE teacher shortage).</p>	<p>Opportunity</p> <p>Several programs described are state level programs. We believe the state should move key decisions around strategy closer to the point of impact (i.e. state gives a set of options that schools can choose from based on their needs). There should be a shift towards funding and accountability at the state level and more latitude in terms of how to implement at the school level.</p>	<p>Opportunity</p> <p>This section reads like a list of programs and unique efforts rather than a coherent theory of action.</p> <p>We recommended considering the frame for this section a theory of action for implementing weighted funding and shifting categorical programs to weighted funding with concrete accountability mechanisms.</p>
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The Kenny C. Guinn Center for Policy Priorities is a 501(c)(3) nonprofit, bipartisan, independent research center focused on providing fact-based, relevant, and well-reasoned analysis of critical policy issues facing Nevada and the Intermountain West. The Guinn Center engages policy-makers, experts, and the public with innovative, data-driven research and analysis to advance policy solutions, inform the public debate, and expand public engagement.

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Appendix A

Executive Summary of Principles of Education Reform (*forthcoming, March 2017*)

1. **Every child deserves the opportunity to love school and learn in school.** State leaders and policy makers should establish policies and direct resources in a way that elevates the educational journey (the experience and access of our children and families) to the level of educational outcomes (e.g., college and career readiness) in order to better align the system to a broadened definition of student success.
2. **Teachers and principals have the greatest impact on the learning and experience of students in school.** Policies should be established and resourced allocated in a way that elevates the teaching profession. Teachers, principals, and those who support students' success should be compensated as professionals, treated as professionals, and held to the high expectations that our students deserve.
3. **Decisions should be made closest to the point of impact.** Policies about resource allocation and key decision making rights should remain at the school site. By moving key decisions closer to our teachers, students, and families, we distribute leadership, set strategy responsive to the unique needs of each school community, and enable our system to adapt, respond, and scale up success in a more efficient way.
4. **Public education is a system of interconnected, interrelated components.** The overall education ecosystem should be integrated, vertically aligned, responsive, and able to adapt to meet the evolving needs of those within the educational ecosystem. Systems thinking allows decision makers to move beyond entrenched interests to collective progress. Policy makers must put a premium on outcomes and equity and be more open and adaptive in how to achieve those outcomes.

REFERENCES

ⁱ Comment refers to the March 1, 2017 Draft “The New Nevada Plan Under the Every Student Succeeds Act”

[http://www.doe.nv.gov/uploadedFiles/ndedoenvgov/content/Boards_Commissions_Councils/ESSA_Adv_Group/2017/TuesdayNightDraftF%20\(2\).pdf](http://www.doe.nv.gov/uploadedFiles/ndedoenvgov/content/Boards_Commissions_Councils/ESSA_Adv_Group/2017/TuesdayNightDraftF%20(2).pdf)

ⁱⁱ See Guinn Center “Principles for Education Reform.” (*forthcoming*)

ⁱⁱⁱ For further analysis, refer to Nevada External Outcomes Evaluation by ACS Ventures, LLC:

<http://www.acsventures.com/images/presentations/Nevada%20External%20Outcomes%20Evaluation%20Report%20-%20Dec%202016%20use%20this%20one.pdf>

^{iv} We support the recommendation in the March 1, 2017 Draft “The New Nevada Plan Under the Every Student Succeeds Act” to reserve 3% of Title I funds to AP, IB, Dual Credit and CTE. (p. 46,

[http://www.doe.nv.gov/uploadedFiles/ndedoenvgov/content/Boards_Commissions_Councils/ESSA_Adv_Group/2017/TuesdayNightDraftF%20\(2\).pdf](http://www.doe.nv.gov/uploadedFiles/ndedoenvgov/content/Boards_Commissions_Councils/ESSA_Adv_Group/2017/TuesdayNightDraftF%20(2).pdf))

^v Louisiana has articulated a similar strategy in redefining an “A” rated school (p. 4

<http://www.louisianabelieves.com/docs/default-source/louisiana-believes/essa-framework.pdf?sfvrsn=8>)

^{vi} For example, In Louisiana, the School Performance Framework gives points (credit) to the middle school if a) student enters high school and b) does not need remediation.

^{vii} We support the recommendation in the March 1, 2017 Draft “The New Nevada Plan Under the Every Student Succeeds Act” to set aside 3% of Title II-A funding for principal and school leader development in the ESSA plan (p. 58,

[http://www.doe.nv.gov/uploadedFiles/ndedoenvgov/content/Boards_Commissions_Councils/ESSA_Adv_Group/2017/TuesdayNightDraftF%20\(2\).pdf](http://www.doe.nv.gov/uploadedFiles/ndedoenvgov/content/Boards_Commissions_Councils/ESSA_Adv_Group/2017/TuesdayNightDraftF%20(2).pdf))