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GEORGE W. BUSH  
INSTITUTE

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ACCOUNTABILITY SUMMARY FOR APPROVED WAIVERS

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The U.S. Department of Education (Department) has approved the first round of eleven state applications for ESEA waivers. The George W. Bush Institute (GWBI) has evaluated these approved applications – which reflect the tremendous effort that state and Department officials poured into them – based on [the ten principles](#) we believe to be fundamental to a strong state accountability system.

In February 2012, we issued [a brief](#) describing our impressions of the initial waiver applications submitted by the eleven states. Since then, the states have collaborated closely with the Department, based on input from the Department's peer reviewers, and made some important improvements to their accountability plans. Unfortunately, as detailed in the pages of this *Advancing Accountability* website, the approved applications do not address a number of our key concerns – and have raised some additional concerns – that could weaken state accountability systems and increase the risk that too many of our students will be left to languish in failing schools.

## IMPROVEMENTS

We're happy to have an opportunity to point out some key improvements to state accountability plans. With the Department's encouragement, several states clarified important parts of their applications, such as what their new indexes will look like and their plans for new school and district report cards aligned with new accountability systems. In addition, many states have committed to publicly reporting student achievement data disaggregated by the traditional ESEA subgroups, even in cases where the state plans to use a "super subgroup" approach (in which the state bases certain accountability decisions on the performance of a single group of low-performing or traditionally underserved students).

## OUR CONCERNS

Here's what we're worried about:

- *Limiting consequences to a certain small percentage of schools.* Over half of the eleven states will limit consequences for failing to meet state goals to a certain small percentage of schools (typically, the lowest performing 5% or 15%). The Department suggests this approach in its guidance, but we just don't believe it's good for kids. We're worried about what this seemingly random cutoff means for those students who are unlucky enough to be in a school at the 6% or 16% level that is most likely doing a very poor job of educating its students.
- *Backing away from annual accountability determinations.* Several states plan to evaluate whether schools have met the state's goals every three years instead of making such determinations annually. We're very concerned that without the pressure of potential consequences each year, schools will "take their feet off the gas." The pace of student improvement will slow. Plus, students could be stuck in a failing school for three years before that school receives state interventions.
- *Maintaining accountability during transitions.* To hold schools continually accountable for student performance throughout upcoming transitions – to new content standards, new assessments, new performance standards, new goals, and new interventions and consequences – will require thoughtful advanced planning. Unfortunately, most of these states appear to be distressingly ill-

prepared for the challenge. For example, many states have provided little to no detail on how they plan to help schools to continue to advance student learning while transitioning to the new consortia assessments (i.e., PARCC and SBACC).

- *Uncertainty and lack of clarity.* Despite some improvements, a number of state applications continue to suffer from uncertainty and lack of clarity in key areas, such as the ambitiousness of state goals, how the state plans to integrate a new or amended index into its accountability system, what choices will be available to students in low performing schools, and whether or not the state will make accountability determinations each school year (as opposed to doing so every two or three years).

## LOOKING FORWARD

As the waiver process moves forward, GWBI would like to emphasize two points.

First, as individuals and organizations committed to advancing education reform and improving student outcomes, we must work together. We know that state officials and other stakeholders have worked tirelessly to not only draft, revise, and improve these applications but also to make the necessary policy and legislative changes to their state accountability systems. Furthermore, we acknowledge that if a state has failed to satisfy one of our ten principles, it may be because the state has chosen a different approach that it believes will better meet the unique needs of the state and its students. Only time – and the data – will reveal which approaches are best.

Which leads to some good news and to our second point: we have an opportunity to learn a great deal from this process. Eleven states (plus the states approved in later application rounds) will experiment with new goals, new indexes, new growth models, new interventions, and other accountability tools. Some of these tools will work better than others; some may not work well at all.

Of course, the success of these tools – and their accountability systems – will depend largely on the skill and the energy with which states implement them. To that end, GWBI looks forward to being part of the ongoing efforts. We want to help states come up with solutions to the newest and toughest accountability challenges. Therefore, over the coming months, we plan to convene groups of education experts, and sponsor policy papers on several topics such as the transition to new assessments, and successful implementation of indexes.