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Frequently Asked Questions regarding Idaho's ESEA Waiver Application:

1. **Will the waiver application take the place of Idaho's Accountability Workbook?**
    a. Yes. However, at this point it is unknown whether the U.S. Department of Education will require revisions to the Accountability Workbook to make the waiver parallel to the waiver document.

2. **When will Idaho know if the waiver is approved by the U.S. Department of Education?**
    a. The review of Idaho's waiver will take place at the end of March. The U.S. Department of Education has informed us that they will strive to approve as quickly as possible after that. The final approval will be driven by how many issues need to be addressed in response to the review team and how quickly states can move to make changes. The U.S. Department of Education hopes to get as many states through the process as possible before summer.

3. **When will the star ratings be released to the public?**
    a. At the end of this school year, the SDE will be assigning new star ratings with this year's data, including this year's testing results. It is the SDE's plan to offer an appeal process for both the AYP and Star Rating data during June-July 2012, provided the negotiations with U.S. Department of Education will allow for that. The waiver requires the SDE send the ratings to the U.S. Department of Education with the waiver application. The SDE has not done so at this time because we wanted districts to see their data and have time to understand it and appeal it before doing so. Our plan is to send the updated star ratings to the U.S. Department of Education once we have all of the data corrected and the new data from this spring.

4. **Why is Idaho choosing to adopt one accountability system for all schools rather than just schools that receive Title I funding as is required under Federal law?**
    a. The Idaho State Board of Education and Superintendent of Public Instruction Tom Luna have long supported one, streamlined accountability system for all Idaho's public schools to ensure all students receive a uniform education that best meets their needs. This accountability system is different in its requirements for expenditures in that only the lowest-performing schools are required to set aside funds. The plan details flexibility for the use of federal funds in order to meet the obligations in non-Title I schools that are identified as One- or Two-Star Schools. Right now, the state does not have the funding to maintain two systems of accountability. Through Idaho's education reform known as Students Come First, the state has finally been able to implement a growth model, which educators have demanded for years. Now, Idaho is applying for a waiver aligned to this growth model and the Students Come First laws. With this waiver, we will have one system of accountability that more accurately measures school performance and ensures we spend our scarce resources on the schools and students who need it most.

5. **When does the star rating system go into effect and take over for AYP?**
    a. Idaho has proposed to hold AYP targets at the same level they were during the 2010-2011 school year while introducing the new performance framework. The existing NCLB improvement timeline will continue to be in place until spring 2013. However, an initial star rating will be available to schools and districts by fall 2012. Therefore, there will be a transition period during the 2012-2013 school year in which schools will have ratings under two systems. In order to provide clarity of the requirements for 2012-2013, we have included a table in the waiver application that details how the requirements of the two systems will integrate for a one-year period. That table can be found on page 81 of Idaho's ESEA Waiver.

6. **I am having trouble accessing my schools star ratings on the SDE website. How do I go about accessing them?**
    a. The State Department of Education has put together a guide that outlines how to access and interpret the star rating system accountability information found on the AYP site. That document was sent to Superintendents and Charter School Administrators on February 10, 2012. If you need additional information or assistance, please contact Dr. Angela Rishell at arishell@sde.idaho.gov.

7. **In reviewing the ESEA waiver, we are unable to locate the public comments that were received. Where in the waiver are the public comments located?**
    a. An entire listing of public comments received by the State Department of Education can be found as Attachment 2 in the waiver as is identified in the Table of Contents. Please see the following pages in the waiver for specific public comments:
        i. Attachment 2, pg. 5 – 25, Public Comments for Suggested Change and ISDE Response
        ii. Attachment 2, pg. 26, Idaho Indian Education Advisory Committee
        iii. Attachment 2, pg. 27, Idaho Commission on Hispanic Affairs
        iv. Attachment 2, pg. 28, Email from Senator John Goedde
        v. Attachment 2, pg. 29, Committee of Practitioners
        vi. Attachment 2, pg. 30, Email from Greg Lowe
        vii. Attachment 2, pg. 31 – 36, ISSA, ESEA Waiver Committee
        viii. Attachment 2, pg. 37 – 40, Boise School District
        ix. Attachment 2, pg. 41 – 49, Meridian School District
        x. Attachment 2, pg. 50 – 53 Lewiston School District
        xi. NCLB ESEA Request Public Comment pg. 54 – 128.

8. **Will districts receive star ratings or just schools?**
    a. The ESEA waiver required the SDE to supply the ratings of schools as part of the application. As a result, that is where we have focused our attention at this time. We will produce ratings for districts but will wait until the end of this school year when districts have had a chance to appeal their data and we have had a chance to include this year's assessment data to update the star ratings for all schools as well. The State Department of Education will not be reporting district star ratings as part of the waiver process.

9. **Will the star rating system be released to the public or will they only be available to districts this year while still under review by the U.S. Department of Education?**
    a. While the waiver does require that we send the ratings to the U.S. Department of Education as part of the application, the SDE will not be releasing the list of star ratings to the public or submitting the list of the schools and their star ratings as required in the waiver to the U.S. Department of Education at this time. We have placed the star ratings behind the secure site where only school administrators can access their respective schools' data. We wanted districts to be able to see their data and have time to understand and appeal it before we submit it and make it public. We will be building an application similar to the AYP appeals site and will provide districts the opportunity to view and appeal any data related to the star rating prior to making it public or sending it to the U.S. Department of Education.

10. **Grade 9 is actually taking the Grade 10 ISAT and our data seems to indicate that this influences the % proficient because they are not taking a "true" Grade 9 end-of-year test. How does the new system account for this difference in testing Grade 9 students versus all other grade levels?**
    a. The Achievement ratings are calculated using only 10th grade data. Ninth grade data is not included in the achievement percentages. The Growth to Achievement and Growth to Achievement Gaps are calculated using 9th and 10th grade data because the scores use a vertical scale and can illustrate growth from grade to grade.

11. **It appears that all four (4) subgroups are merged in the new system. The score is multiplied by four (4) to calculate the points. How does this work in schools that might have only 1, 2, or 3 subgroups that reach the "N" of 25?**
    a. In schools that do not have 25 students in each subgroup, the subgroups are combined into one subgroup to avoid not identifying high-risk students. When subgroups are combined, each student is only counted one time. For example, if you have a student that is Minority, LEP and Free and Reduced Lunch, his scores would only be counted one time. In schools where there are 25 students in all subgroups, the students are kept separate but are counted multiple times if the student was identified in multiple subgroups. We will be proposing a change to the U.S. Department of Education to address this.

12. **In looking at the metrics used to determine star ratings, we are concerned that a disproportionate number of alternative schools will be classified as One- and Two-star schools?**
    a. The State Department of Education has received feedback related to alternative schools and how they are identified in the new star rating system. While we do believe that students in an alternative setting have high potential for growth, and we do recognize that an accountability system designed to evaluate alternative schools may need to focus on or place more of an emphasis on other indicators of success. Based on the feedback we are getting, the SDE has committed to pulling together a working group of superintendents and principals to analyze the star rating system as it pertains to alternative schools and make recommendations for possible revision once we have begun negotiations with the U.S. Department of Education about the waiver approval.

13. **In reviewing the star rating for our high school, we do not believe that we have received credit for all of our students who have been taking dual credit courses.**
    a. The star rating reports that were previously published took into account AP, IB and Tech Prep courses which were collected through ISEE but not Dual Credit courses because the system was not collecting that information at the time. If a school had AP, IB or Tech Prep programs, they would have been rewarded in that category as long as the ISEE upload included a grade for the course being taken. For schools that utilize Dual Credit, they would not have received the credit which is why we made a point of needing to allow for an appeals opportunity so that districts can get that data in. The coding for dual credit is a new field that is required with the March upload but available under the V2 Templates during the February upload. You can find a list of required fields at http://www.sde.idaho.gov/site/isee/ under "Required Data Collection Elements 2011-2012." As mentioned above, districts will have an opportunity to update and correct their data for the first semester and or trimester, and we will be in contact with districts once we establish a process for doing so.

14. **The star rating system uses Student Growth Percentiles (SGP) and Adequate Student Growth Percentiles (AGP) to determine growth. Does the Students Come First Pay-for-Performance plan use AGP or SGP in its calculations? If not, what calculation is being used?**
    a. Yes. Pay-for-Performance under Students Come First is calculated using SGP. The star rating system is based on both SGP and AGP, while the Pay-for-Performance metric is based entirely on SGP and achievement. Therefore, they are not directly connected. A school does not have to have a specific star rating to be eligible for a Pay-for-Performance bonus in either growth or achievement.

15. **How is the star rating system from the ESEA Waiver tied to Pay-for-Performance from Students Come First?**
    a. While the Pay-for-Performance model and the star rating system are both based partially on Student Growth Percentiles, they are not directly connected. You do not have to have a specific star rating to be eligible for Pay-for-Performance. The state Pay-for-Performance shares are based on where a school is in the Growth and Excellence quartiles, not on how many stars they have earned. If the school is in either (or both) the top 75% of schools on the Growth measure, or the top 50% of the Excellence measure, all certificated employees in the building will earn state Pay-for-Performance shares, unless they do not meet local measures set by the local school district. The Pay-for-Performance structure was built prior to the ESEA Waiver opportunity and the creation of the star rating system. We are currently analyzing the relationship between the two and how and if they should be aligned.

16. **Why is our AYP data (% proficient) higher than what is showing in the star rating system?**
    a. As you may recall, Idaho has been using an "indexing" system for AYP for the past few years. In those calculations, basic students are counted as half proficient (0.5) and added to your totals, thus increasing your percent proficient under the AYP system. In the star rating system, the SDE has still accounted for students who were not continuously enrolled using the same business rules we have now. The SDE has also exempted LEP1 and LEP2 students from those calculations, with the goal of exempting LEP3 next year when we have the coding in the ISEE system. However, the percent proficient and advanced is just a straight calculation of those students with the exemptions listed above. As a result, the number will be less unless you did not have any students who were basic or if your basic students were in the LEP2 category.

17. **My school has always made AYP, and now I am a Two-Star School. How can this be?**
    a. AYP was based solely on proficiency. While proficiency is part of the overall equation in the star rating system, the Idaho's new Accountability Plan now utilizes multiple measures when looking at a school's performance, including a significant portion of points being assigned to growth and growth to a standard.

18. **Why is Idaho requiring SES and Choice for One- and Two-Star Schools when it is not required?**
    a. The decision to use STS (tutoring) and Choice is a matter of principle. In the lowest-performing schools, many students need additional help. STS and Choice are the only options available to empower families and students with an alternative method of support. It gives them the opportunity for additional assistance or an alternative instructional setting. Without it, they are left to the sole discretion of the school while it is undergoing change. Substantial improvement of a school takes time, and the students and their families cannot afford to wait for the changes to take full effect. The STS and Choice requirements have been limited to the lowest-performing schools. This is a substantial reduction from the Idaho's previous accountability system. The plan also creates significant flexibility for how to meet the STS and Choice obligations that were previously unavailable to districts. While the old SES model had significant flaws, research does support the need for additional learning time (an element required in the waiver).

19. **Under the ESEA Waiver, are Choice and STS available to all students?**
    a. While we believe in School Choice and STS as options for students, we also recognize the issues inherent to both under the current No Child Left Behind law. In the plan, Choice and STS are limited to the lowest-performing schools in the state (One- and Two-Star Schools), as opposed to all schools in improvement, and are only available for students who are not proficient in core subject areas based on state tests. Idaho has also written significant flexibility into the plan for both the funding and design aspects of both to address capacity and cost issues. A significant change from the NCLB SES model is that it was required in all schools in improvement status, regardless of the severity of a school's data. Under the new plan, only the lowest-performing schools and districts that have lacked progress for two years are required to offer it. The plan limits the eligibility of students and provides flexibility for when, where, and how the district can deliver STS.

20. **Can school districts serve as their own SES provider?**
    a. The district has significant latitude to design something that meets the needs of students. However, since it is limited to persistently low-performing schools in which districts have already had two years to change the trajectory of performance, districts must put out a request for proposals (RFP) and use standard procurement policies to select at least one external provider that delivers STS services aligned with the district's and school's improvement plans. The state will no longer maintain a list of providers nor expect the district to offer more than one. Rather, the district is expected to exercise sound judgment in the selection process, and the SDE will monitor its plans. If the district does not receive any satisfactory proposals, the district may develop a plan (pending SDE approval) to provide its own STS services. We consider this to be a compromise between making districts offer multiple external provider choices, with the district being just one choice among many, and the fact that the school in question is persistently low-performing. We believe that this provision provides the flexibility districts have requested in the past while still serving the needs of Idaho's students and parents attending low-performing schools.

21. **The waiver says that parents will have the ability to select "any school in the state" as it pertains to school choice. Will my district have to provide transportation for students to travel to any school in the state of Idaho?**
    a. The plan states: "School Choice can be met through the use of the Idaho Education Network and virtual charter schools as well as any public school in the State" (p. 88). The intended audience is the U.S. Department of Education, not parents, per se. The wording is to demonstrate that districts may meet their obligations through multiple means. The sentence does not say, nor does it mean, that parents may choose "any school in the state." Just as with the current requirements regarding School Choice, the district (a) must do its due diligence to offer another school(s) within the district, and (b) if there are no choices within district, it must do its due diligence to find and offer other choices (e.g., virtual charter schools or in neighboring districts that are not in improvement status). Also, as is currently true, other districts are not required to take the student(s), but the district that is required to provide Choice is required to demonstrate that it sought options. The plan includes tremendous flexibility to assist districts in meeting these obligations. For example, it permits the use of the Title I set-aside for non-Title schools to cover the costs and allows courses in core subject areas that are delivered virtually (e.g., via Idaho Digital Learning Academy or other providers over the Idaho Education Network, internet, or other means) by other schools to count as Choice instead of transporting the student elsewhere. The district is required to offer Choice; parents do not get to select choices that are not provided by the district.

22. **How are graduation rates calculated for the star rating?**
    a. To calculate graduation rates, Idaho uses the formula from the National Center for Educational Statistics (NCES). Graduation rate is defined by NCES as the proportion of students who begin in ninth grade and go on to complete twelfth grade with a diploma. Idaho includes students who complete high school under the IEP exception. A General Education Development (GED) certificate does not meet requirements that are comparable for receipt of a regular high school diploma. We will continue to use this formula until 2013-2014 when Idaho will begin reporting graduation rates using a four-year adjusted cohort model that is required by the U.S. Department of Education. This is a current requirement, but Idaho received a waiver until 2013-2014. By 2013-2014, we will have the data needed to report using the four-year adjusted cohort model.

23. **How are Student Growth percentiles (SGP) calculated, and what are the formulas used in that calculation?**
    a. **Student Growth Percentile (SGP)** is a normative measure of academic growth. SGP is the percentile of a student's 2011 ISAT scale score within a conditional density:

$$\Pr(2011\ ISAT\ Scale\ Score \mid 2010\ ISAT\ Scale\ Score).$$

Quantile regression is used to estimate the conditional density associated with the student's 2011 ISAT scale score (Betebenner, 2008). A linear combination of B-spline seven cubic polynomial functions are used as the conditional quantile functions to accommodate non-linearity, heteroscedasticity, and skewness of the distribution (Betebenner, 2008). Given assessment scores for t occasions, ($t \geq 2$), the τ-th conditional quantile for Y_t based on $Y_{t-1}, Y_{t-2}, \dots, Y_1$ is given by

$$Q_{Y_t}\left(\tau \middle| Y_{t-1}, \dots, Y_1\right) = \sum_{j=1}^{t-1} \sum_{i=1}^{3} \varphi_{ij}(Y_j)\beta_{ij}(\tau),$$

where φ_{ij}, $i = 1,2,3$ and $j = 1, \dots t-1$ denote the B-spline basis functions (Betebenner, 2008). SGP is not correlated with 2010 ISAT scale score; therefore, one cannot make an assumption that a low-achieving student with a SGP of 60 learned as much as a high-achieving student with the same SGP (Betebenner, 2008). Instead, a student with a SGP of 60 has grown as much as 60% of the student's academic peers, all Idaho students having a similar 2010 ISAT scale score at the same grade level.

Median Student Growth Percentile is a median of SGPs within a particular group of interest (i.e. school, minority students within a school, etc). By ordering the SGPs from smallest to largest within the group, denoted by $x_1, \dots, x_n$, the sample median is given by

$$\tilde{x} = \begin{cases} \left(\frac{n+1}{2}\right)^{th} ordered\ value & n\ is\ odd \\ average\ of\ \left(\frac{n}{2}\right)^{th}\ and\ \left(\frac{n}{2}+1\right)^{th}\ ordered\ value & n\ is\ even \end{cases},$$

where n is the number of students in the group.

24. **How is Adequate Student Growth Percentiles (AGP) calculated, and what is the formula used in that calculation?**
    a. Adequate Growth Percentile (AGP) is a criterion-referenced measure of academic growth. AGP is calculated based on the coefficient matrices derived from estimating the conditional density described above (Betebenner, 2008). Using the matrices as a look up table, multiple future growth/achievement scenarios are predicted upon 2010 ISAT scale score (Betebenner, 2008). AGP is translated as how much growth is necessary to achieve or keep proficiency within three years or 10th grade, whichever comes first.

       Median Adequate Growth Percentile is a median of AGPs for a particular group of interest (i.e. school, minority students within a school, etc). See above for how to obtain a sample median.

25. **What does a student have to score on the SAT for our school to earn five points in the College Entrance/Placement Exam category?**
    a. In addition to the SAT, the SDE will utilize the results from the ACT, ACCUPLACER and COMPASS exams. For each exam, Idaho will establish a benchmark score that has the highest probability that the student will not need remediation in a postsecondary education setting, and the metric will give points for the percentage of students who reach these set benchmarks. For example, the College Board has established that a composite score of 1550 on the SAT indicates an increased probability of success (defined as a freshman average grade of B- or higher) in college. This benchmark will be evaluated to determine the score where students are best prepared for college and professional-technical courses. During summer 2012, representatives of Idaho colleges and universities in partnership with teachers and representatives from Idaho's K-12 public schools will convene to agree upon a set cut score for the ACCUPLACER, ACT and COMPASS tests that will then be taken to the Idaho State Board of Education for approval. If a student takes multiple exams, the higher of the two exam scores will be calculated into the matrix.

26. **How are the advanced opportunities points calculated?**
    a. Advanced Opportunities are calculated based on both the percent of students who completed and the percent of students who earned a grade of C or better on an Advanced Placement (AP), International Baccalaureate (IB), or Dual Credit or Tech Prep course. Eligible students in this category are all public school juniors and seniors. The first measure considers the total number of students eligible for such courses (as defined in IDAPA 08.02.03. 106.02) to be all juniors and seniors and the percent of the eligible students who took one or more courses. The second measure is a cumulative percentage of the number of courses taken by any eligible students who completed a course. If a student takes multiple courses, the higher of the two course grades will be calculated into the matrix.

References

Betebenner, D.W. (2008). Norm- and Criterion-Referenced Student Growth. Retrieved from the National Center for the Improvement of Educational Assessment website: http://www.nciea.org/publications/normative_criterion_growth_DB08.pdf