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Waiving Away High School Graduation Rate Accountability?

Introduction

The state waiver process currently underway presents an opportunity to strengthen college and career readiness among the nation's high school students. Unfortunately the waiver applications as submitted may also have the unintended consequence of weakening high school graduation rate accountability—a major indicator of how well high schools are preparing students for future education and work.

In November 2011, eleven states submitted applications to the U.S. Department of Education (ED) for waivers from up to ten provisions of the Elementary and Secondary Education Act (ESEA), now known as the No Child Left Behind (NCLB) Act. States proposed accountability systems including multiple measures of student achievement that would provide a more complete illustration of school performance than what is provided in current accountability systems. These measures also intend to provide an incentive for schools to offer all students a college- and career-ready education. While these aspects of the waiver applications move accountability in a direction more aligned with college and career readiness, the treatment of high school graduation rates in many state accountability indexes may reverse progress made in recent years to ensure accurate graduation rates are fully included in school accountability systems.

School Year (SY) 2011–12 marks the first year that federal regulations have required accurate high school graduation rate calculations and the use of those uniform calculations for accountability purposes. Specifically high schools that do not meet state-set goals or annual growth targets for the whole school or for any student subgroup are required to undergo improvement. New accountability systems proposed by states, however, will likely weaken graduation rate accountability by only counting graduation rates as a modest part of complex indexes used to judge the effectiveness of schools. As a result, this could create an incentive for schools to push out low-achieving students in order to increase overall scores on achievement tests and other measures of college and career readiness.[1]

When reviewing state waiver applications, ED should ensure the full implementation of its own 2008 high school graduation regulations. ED should also only approve applications that give equal weight to graduation rates and measures of student achievement, while also allowing states to use additional measures of college and career readiness in their accountability systems.

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Background

Over the past decade, education policymakers and practitioners have identified numerous problems with the nation's high school graduation rate, from the insufficient percentage of students graduating on time to the often inaccurate and inconsistent ways in which graduation rates are calculated.

In 2005, the nation's governors came together and committed to using a common, accurate high school graduation rate calculation.[2] The work of states and governors was incorporated into federal regulations governing graduation rate accountability in 2008.[3] Those regulations are being fully implemented for the first time in SY 2011–12. Overall and for each student subgroup, high schools either are required to meet a graduation rate goal set by the state, or meet a modest but meaningful annual growth target also set by the state. For the first time, all high schools are required to use a clear, transparent, and most importantly, accurate graduation rate calculation.

In addition, the implementation of the regulations will ensure that schools are held accountable for meeting "continuous and substantial" goals and targets for high school graduation rate accountability. This is a shift from the previously lenient graduation rate accountability under NCLB, where schools in some states could make Adequate Yearly Progress (AYP) for improving their graduation rate even one-tenth of 1 percent.[4]

Unfortunately, applications to receive waivers from core elements of ESEA submitted by eleven states at the invitation of ED could undo the significant progress that has been made on high school graduation rate accountability. Although ED has not invited states to request a waiver from graduation rate regulations, the waiver applications already submitted could weaken graduation rate accountability considerably.

High School Graduation Rates Within Accountability Indexes

Many states are proposing complex accountability indexes using multiple measures of student achievement. Rather than solely relying on assessments, the proposed accountability systems combine several indicators, including assessments, high school graduation rates, and other measures of college and career readiness.

Such indexes can be helpful in providing a more accurate picture of student achievement within schools and facilitating broad based improvement in the nation's schools. The inclusion of additional college- and career-ready measures, such as the percentage of students enrolling in postsecondary education, is a particularly important evolution in education accountability that will help to drive the nation's college- and career-ready goal. However, the proposed indexes could have negative consequences if the measures that make up the indexes are inappropriately weighted. And unfortunately, this is the trend found among the eleven states' waiver applications submitted to ED in November 2011. [5]

As detailed in Table 1, high school graduation rates account for less than 25 percent of the accountability index proposed by most states. For example, in Kentucky, graduation rates only

count for 14 percent of the total index.[6] In New Mexico, graduation rates count for 17 percent of the total index.[7] Making matters worse, it is unclear in both states as to whether the graduation rates of student subgroups are incorporated into the accountability system. It is inappropriate for graduation rates to count for such a small portion of state accountability systems, especially in light of the low graduation rates in many states. For example, the overall high school graduation rate in New Mexico is 57 percent, and in Kentucky, Hispanic students have a graduation rate of 62 percent.[8]

Accountability systems that give substantially more weight to indicators of proficiency, growth, and college- and career-ready measures (i.e., performance on SAT and ACT exams) than to high school graduation rates provide an unintentional incentive to push out low-achieving students in order to increase overall performance on these other measures. For example, in Colorado, it is mathematically advantageous for schools to focus on increasing test scores rather than graduation rates, because test scores—achievement, growth in achievement, gap closure, and ACT scores—constitute nearly 75 percent of Colorado's index.[9] One of the fastest ways to increase test scores is to prevent low-achieving students from taking the test by pushing them into alternative programs or pushing them out altogether.

Not only can such indexes result in negative incentives, they can also result in insufficient rewards. For example, in Florida, growth in high school graduation rates accounts for up to 300 points within an index comprised of 1,600 points (18.75 percent of the total index)—200 points for the overall graduation rate and 100 points for the graduation rate of "at-risk" students.[10] If a school with a 60 percent graduation rate (120 points, or 60 percent of 200 points for overall graduation rate) were to increase its graduation rate to 80 percent, the school should be lauded as a success. However, depending on the graduation rate of its "at-risk" students, such a school could only gain between 40 and 140 points—an improvement between 2.5 percent and 8.75 percent on its overall index score.

Waiver Applications Compared to Current Policy

It is especially important to consider the proposed waiver applications in comparison to current high school graduation rate policy. Under the 2008 graduation rate regulations, high schools must reach the state's graduation rate goal or its annual improvement target for all students and for each student subgroup in order to make AYP. A school could meet its proficiency targets in math and reading, but it must also meet its graduation rate target to avoid the threat of being identified for improvement. Schools cannot simply push students out in order to increase achievement because graduation rates matter just as much as test scores. This will not be the case if the state waiver applications are accepted as submitted.

Federal Policy Recommendations

As ED moves forward with the waiver process, it must ensure that high school graduation rate accountability is not waived away. States should be encouraged to incorporate multiple measures of student achievement in their accountability systems, including statewide summative assessments, graduation rates, and other measures of college and career readiness, such as performance on Advanced Placement (AP)/International Baccalaureate (IB) exams, performance on SAT/ACT exams, or the percentage of students enrolling in postsecondary education. However, these measures must be weighted appropriately in order to provide suitable incentives to schools and school districts. Therefore, the Alliance for Excellent Education recommends the following:

(1) Regardless of whether states utilize an index for accountability purposes, high schools should be held accountable for graduation rates. Therefore, ED should require that all high schools with graduation rates less than 60 percent be classified as priority schools and undergo whole-school reform or replacement.

(2) State accountability systems should be comprised of achievement measures, high school graduation rates, and other measures of college and career readiness. Graduation rates should be given equal weight to achievement measures, and measures of college and career readiness—AP/IB performance, SAT/ACT performance, or the percentage of students enrolling in postsecondary education—should be incorporated as well in order to promote a deeper learning experience for the nation's students that will prepare them for the twenty-first-century world.

Conclusion

Graduation rate accountability is on the cusp of full implementation. In its attempt to provide flexibility to the nation's schools, the U.S. Department of Education must ensure that accountability gains for the nation's students are not waived.

This brief was written by members of the Alliance for Excellent Education's federal advocacy and policy staff.

Table 1: High School Accountability Indexes in State Waiver Applications

State	Portion of Accountability Index Attributed to High School Graduation Rates	Accountability Indicators and Weights
Colorado	26.25% The following are equally weighted: (1) High school graduation rates (2) High school disaggregated graduation rates (3) High school dropout rates	(1) Achievement Tests (15 points): Reading (25%), Math (25%), Writing (25%), and Science (25%) (2) Growth (35 points): reading (28.6%), math (28.6%), writing (28.6%), Colorado English language proficiency exam (14.3%) (3) Growth gaps (15 points): reading (33.3%), math (33.3%), and writing (33.3%) (4) Postsecondary and workforce readiness (35 points): graduation rate (25%), disaggregated graduation rate (25%), dropout rate (25%), Colorado ACT (25%)
Florida	18.75%	(1) Graduation rates: 18.75% (2) Statewide reading assessment: 18.75% (3) Statewide math assessment: 18.75% (4) Statewide writing assessment: 6.25% (5) Statewide science assessment: 6.25% (6) Acceleration work (AP, IB, dual enrollment, industry certification exams): 18.75% (7) College readiness (SAT, ACT, common placement tests): 12.5%
Georgia	Unclear	State would establish a college- and career-ready performance index (CCRPI) that includes high school graduation rates, but its application does not explicitly detail weights. Within the high school category, it appears that all four indicators are weighted equally. Other components of index include: (1) Achievement scores a. *High schools:* graduation rate, student attendance, postsecondary readiness, content mastery b. *Middle schools:* content mastery and preparation for high school, student attendance, supports and interventions, career exploration c. *Elementary schools:* content mastery and preparation for middle school, student attendance, supports and interventions, career awareness (2) Achievement gap closure (3) Progress toward 100% proficiency (4) Factors for success

Indiana	30%	(1) High School graduation rates: 30% (2) English: 30% (3) Math: 30% (4) College- and career-ready indicators: 10%
Kentucky	14%	(1) Next-generation learners: 70% • Indicators within this category include achievement test scores, gap scores, high school graduation rates, individual student growth, and college- and career-ready indicators (e.g., ACT benchmarks/career-ready benchmarks). (2) Next-generation instruction and support program review: 20% (3) Teacher/principal evaluation: 10%
Massachusetts	Unclear	State will establish an index that combines high school graduation rate with state assessments in reading, math, and science. Index will be weighted based on four years of data with the most recent year being weighted the heaviest. Index will also include progress on closing the gap as measured by state assessments in English language arts, math, and science; performance at the advanced and warning/failure levels; growth/improvement; and graduation and dropout rates.
Minnesota	25%	(1) Proficiency of all students by subgroup: 25% (2) Student growth: 25% (3) "Growth gap reduction" between subgroups: 25% (4) High school graduation rate: 25%
New Jersey	No index	No index
New Mexico	17%	(1) Proficiency in math and reading for all students: 40% (includes 25% for status and 15% for three-year "conditioned" value-added) (2) Growth in proficiency among the highest three quartiles: 10% (3) Growth in proficiency among the lowest quartile: 10% (4) High school graduation rate: 17% (includes 8% for four-year rate;4% for five-year rate; and 5% for growth) (5) College and career readiness, including AP, ACT, PSAT, dual credit, and career prep: 15% (includes 5% for participation and 10% for "success") (6) Attendance: 3% (7) "Opportunity to Learn" survey on teaching: 5% (8) Student/parent engagement: 5% bonus

Oklahoma	Less than 33%; specific percentage has not yet been determined (see description of "whole-school improvement" measures).	(1) Achievement on student test scores: 33% (2) Gains on reading and math scores: 17% (3) Gains on reading and math scores by the lowest quartile of students: 17% (4) Whole-school improvement measures: 33%, which include percentage of students completing a college- and career-ready curriculum, high school graduation rate, parent and community engagement, school culture indicators, performance and participation in AP/IB/AICE/industry certifications, any other factors selected by state superintendent (individual weights of these components not specified)
Tennessee	20%	(1) High school graduation rate: 20% (2) End-of-course Algebra I (percentage proficient and above): 20% (3) End-of-course English I (percentage proficient and above): 20% (4) End-of-course English II (percentage proficient and above): 20% (5) End-of-course Biology I (percentage proficient and above): 20%

Endnotes

[1] See, for example, G. Orfield, D. Losen, J. Wald, and C. B. Swanson, "Losing Our Future: How Minority Youth Are Being Left Behind by the Graduation Rate Crisis" (Cambridge, MA: The Civil Rights Project at Harvard University, 2004).

[2] National Governors Association, "Governors Sign Compact on High School Graduation Rate at Annual Meeting," press release, available at http://www.nga.org/cms/home/news-room/news-releases/page_2005/col2-content/main-content-list/title_governors-sign-compact-on-high-school-graduation-rate-at-annual-meeting.html (accessed January 4, 2012).

[3] For additional details on components of the 2008 graduation rate regulations, see 34 C.F.R. 200.19(b), available at http://www2.ed.gov/legislation/FedRegister/finrule/2008-4/102908a.html (accessed January 4, 2012).

[4] U.S. Government Accountability Office, *No Child Left Behind Act: Education Could Do More to Help States Better Define Graduation Rates and Improve Knowledge about Intervention Strategies*. GAO-05-879 (Washington, DC: September, 2005), http://www.gao.gov/new.items/d05879.pdf (accessed January 3, 2012).

[5] This brief was informed by an Alliance for Excellent Education analysis of eleven states' ESEA flexibility requests submitted to the U.S. Department of Education in November 2011 found at http://www.ed.gov/esea/flexibility (accessed January 3, 2012).

[6] See http://www2.ed.gov/policy/eseaflex/ky.pdf (accessed January 3, 2012).

[7] See http://www2.ed.gov/policy/eseaflex/nm.pdf (accessed January 3, 2012).

[8] Editorial Projects in Education Research Center, "Diplomas Count: Beyond High School, Before Baccalaureate," special issue, *Education Week* 30, no. 40 (2011).

[9] See http://www2.ed.gov/policy/eseaflex/co.pdf (accessed January 3, 2012).

[10] See http://www2.ed.gov/policy/eseaflex/fl.pdf (accessed January 3, 2012).