

Inclusion of Student Subgroups in School Ratings

Section 1111(c)(4)(C)(i) of the Every Student Succeeds Act (ESSA) requires states annually to differentiate the performance of all schools based on five indicators, for all students and for each student subgroup. To do so, most states use school rating systems. From the fifty-two state ESSA plans,¹ the Alliance for Excellent Education (All4Ed) analyzed both the type of school rating system used by each state (if any) and the influence of student subgroup performance within that system.

States with school ratings provide an overall summative view of school performance across the five individual ESSA indicators. Types of ratings include A–F grades, 1–5 stars, descriptive ratings (e.g., unsatisfactory to excellent), and index scores (e.g., 85 out of 100 points). Most states with school ratings use an index to weight each indicator and sum the results to (1) produce the overall score and/or rating and (2) identify schools for comprehensive, additional targeted, or targeted support and improvement (CSI, ATS, or TSI respectively). All4Ed’s analysis focuses on the former.

To be clear, ESSA requires student subgroup performance to be included in states’ systems of annual meaningful differentiation of schools under section 1111(c)(4)(C)(i), but states are not required to use a rating system. However, if a state *chooses* to use a rating system to meet the requirements for annually differentiating schools in section 1111(c)(4)(C), then that rating system must comply with ESSA’s requirement to include the performance of subgroups of students within each indicator.²

States that receive a red or yellow rating in this analysis are not fully compliant with this provision.

For states choosing to use school ratings, All4Ed analyzed which indicators the states disaggregate and for which grade spans, whether the state includes all ESSA student subgroups and/or a “super-subgroup,” and the weight disaggregated indicators receive. ESSA student subgroups include major racial/ethnic groups, low-income students, English learners (EL), and students with disabilities. Commonly used super-subgroups are “high-needs” and “low-performing” students.

If the state does not disaggregate any indicators for the ESSA student subgroups when calculating index scores or school ratings, the chart notes this as “No subgroups” following the type of rating system the state uses (e.g., “A–F grades: No subgroups”), and the state receives a **red** rating. States that rate certain grade spans without considering ESSA student subgroup performance also receive a **red** (e.g., “Index: 20% Subgroups (K–8)”).

If the state includes disaggregated indicators in the index score or rating, the analysis then considers whether the state uses a super-subgroup, noting the percentage weight student subgroup performance receives. States that include all ESSA student subgroups in all school ratings receive a **green** rating (e.g., “1–5 stars: 15% subgroups”). States also ensure that student subgroups play a meaningful role in school ratings by creating a decision rule that lowers school ratings if a student subgroup is underperforming or prevents such schools from receiving top ratings. States with these rules also receive a **green** (e.g., “Descriptive ratings: Subgroup decision rule”).

States receive a **yellow** rating if they include some, but not all, ESSA student subgroups in all school ratings (e.g., “A–F grades: 18% super-subgroup”) or if they include all ESSA student subgroups in some, but not all, school ratings (e.g., “Descriptive ratings: 25% subgroups (K–8)”). This analysis considers a state as including all ESSA student subgroups when it uses a super-subgroup *so long as the super-subgroup captures all students in the school who otherwise would have been included if the individual subgroups were used*. In other words, a state using a “minority” students super-subgroup and three individual subgroups (low-income, EL, and students with disabilities) could receive a **green**, but a state exclusively using a “high-needs” super-subgroup (combining low-income, EL, and students with disabilities) could receive only a **yellow** because such a super-subgroup does not include racial/ethnic student subgroups. In addition, states receive a **yellow** if they have two overall school ratings, one reflecting the performance of all students and another reflecting all ESSA student subgroups.

On the other hand, some states use an index only for school identification and do not appear to publicize index scores. The chart notes this as “Index only for CSI and TSI.” Other states choose not to use ratings at all and instead use dashboards to report school performance on each indicator separately for all students and for each student subgroup. The chart identifies these states as “Dashboard: No overall ratings.” Because these states’ ESSA plans are unclear about how the state will present and emphasize overall student subgroup performance when reporting school results to the public, these states receive a **yellow** rating with **stripes**. Absent clear, well-designed, transparent school report cards, these states are at risk for obscuring or confusing subgroup performance in reporting school data—and for noncompliance with ESSA.

Definition of Consistently Underperforming Student Subgroup

Section 1111(d)(2)(C) of ESSA requires states to identify schools for ATS if a student subgroup performs, on its own, at a level similar to schools in the bottom 5 percent of Title I schools in the state that are identified for CSI. In addition, sections 1111(c)(4)(C)(iii) and 1111(d)(2)(A) of ESSA require states to identify schools for TSI if a student subgroup is “consistently underperforming,” as defined by the state. As All4Ed noted in a [memo to the U.S. Department of Education](#), these are two distinct requirements and both should be used to identify schools that are struggling to serve subgroups of students—in particular, schools where there are large achievement gaps or where student subgroups are falling behind their peers on key academic indicators.

States that receive a red rating in this analysis have proposed to use definitions of “consistently underperforming” student subgroups that are not clearly compliant with ESSA, as opposed to states with green or yellow ratings that are compliant.

All4Ed analyzed each state’s definition of a “consistently underperforming” student subgroup requiring TSI against two primary criteria: (1) whether the definition is meaningfully different from the statutory definition of ATS and (2) whether the definition explicitly calls for schools to be identified for TSI on the basis of low student subgroup performance on a single indicator or subset of indicators as opposed to performance across all indicators.

States receive a red rating when the methodology they use to identify TSI is the same or nearly the same as the statutory definition of ATS; the chart notes this as “Not meaningfully different from ATS.” This includes, for example, states where the only difference between how TSI and ATS schools are identified is the number of years a school has had a student subgroup performing at a level below the bottom 5 percent of Title I schools. This also includes states with a definition for “consistently underperforming” that is narrower than the statutory definition of ATS, making it plausible that all TSI schools in the state also are identified for ATS (e.g., a state where a consistently underperforming student subgroup performs below the bottom 1 percent of Title I schools in the state). States also receive a red if their definitions of “consistently underperforming” student subgroups appear not

to comply with ESSA because they arbitrarily cap the number of schools that can be identified for TSI or are too vague to be meaningful.

For states whose definition of “consistently underperforming” student subgroup differs meaningfully from the statutory definition used to identify schools for ATS, the determining factor between a green or a yellow rating is the number of indicators on which a student subgroup must underperform to trigger identification. States where a student subgroup can be identified for TSI based on its performance on one, or a subset, of indicators receive a green rating, while those defining a “consistently underperforming” student subgroup across all indicators receive a yellow.

Some states, regardless of their rating, also receive an asterisk (*). While the methodology used by these states to identify consistently underperforming student subgroups may be distinct, these states’ plans have the potential to narrow the statutory ATS definition. They do so by limiting the group of schools eligible for ATS identification to those schools that also have a consistently underperforming subgroup. By using their consistently underperforming definitions as a way to “filter out” some schools prior to naming those needing ATS, these states risk excluding schools and student subgroups that would be identified if the statutory ATS definition alone was considered. Moving forward, it will be especially important to watch whether the definitions of consistently underperforming used by these states present a barrier to identifying schools with low-performing student subgroups that otherwise would have been identified for ATS.

¹ This analysis is based on approved ESSA plans for the District of Columbia, Puerto Rico, and all fifty states. Final approved ESSA plans are available on the U.S. Department of Education’s website at <https://www2.ed.gov/admins/lead/account/stateplan17/statesubmission.html>.

² For All4Ed’s legal interpretation of this provision of ESSA, visit <https://all4ed.org/reports-factsheets/ed-memo-support-for-historically-underserved-students-in-essa/>.