



An Independent Review of New Mexico's ESSA Plan

Bellwether Education Partners, in partnership with the Collaborative for Student Success, convened an objective, independent panel of accountability experts to review ESSA state plans. We sought out a diverse group of peer reviewers with a range of political viewpoints and backgrounds, and we asked them to review each state's accountability plan with an eye toward capturing strengths and weaknesses.

We aimed to provide constructive feedback to the states, and to serve as a source of straightforward information to the public so that they are better able to engage policymakers if and how they see fit. Inherently, this independent process could not take into account the numerous political and situational challenges that occur in every state. We are in no way attempting to diminish those challenges, but the scope of this review was to compare the rigor and comprehensive nature of state accountability plans.

Peers worked in small teams to review the plans that states formally submitted to the U.S. Department of Education. After writing their own reviews independently, the peers met for two days to discuss their individual reviews and work together on the collaborative draft you'll see below. The teams were asked to use their discretion and expertise to respond to and score each rubric item, and those scores were normed across states and peers.

Each state was given the opportunity to review the draft peer analysis and to provide substantive additions and corrections. Still, the reviews should be considered a snapshot of state plans as of April–June 2017, and we anticipate that states will continue to update their plans going forward.

To read more about the project, as well as a list of the expert peer reviewers, visit the Bellwether website [here](#).

Overall Strengths and Weaknesses

Strengths: What are the most promising aspects of the state's plan? What parts are worth emulating by other states?

New Mexico has proposed a clear rationale for its K-12 goals, with a strong alignment to its "Route to 66" postsecondary attainment goal. Specifically, the state has included a goal to reduce the percentage of postsecondary enrollees who require remediation, and the state's accountability system includes a college-readiness indicator. Holding schools accountable for this measure will help the state move closer toward its long-term education and economic needs. This type of alignment between K-12 and higher education goals should be a model for other states.

The plan has other strong components as well. New Mexico produces overall school ratings that are clear to parents and other stakeholders, building upon the state's commitment to high standards and aligned assessments. Additionally, New Mexico also has a strong and clear plan for how it will build on its current school accountability system and adapt it over time. That includes consideration to how schools that are already identified as low-performing will continue to progress along school-intervention timelines. Moreover, the state presents an aggressive, concrete list of interventions in



low-performing schools, which suggests that New Mexico is taking seriously the challenges faced by those schools.

Finally, New Mexico’s plan outlines a number of ways it has and will continue to engage stakeholders on key aspects of its implementation efforts, including a “Return Tour” after the plan was submitted as a way to share updates and explain how the plan will affect schools and communities.

Weaknesses: What are the most pressing areas for the state to improve in its plan? What aspects should other states avoid?

New Mexico’s approach to incorporating subgroups into its school-rating system could be promising, but, as presented, leaves a lot of uncertainty. New Mexico does not directly incorporate subgroup performance into a school’s rating. Instead, it proposes different thresholds for different groups to define consistent underperformance. The state has clearly run the data to define its categories and settle on different thresholds for different groups, but it does not present that data in the plan. Without additional data, setting different gap thresholds may signal that low performance is sufficient for some groups but unacceptable for others.

New Mexico could also work to improve its exit criteria for schools that are identified as comprehensive and targeted support schools. The state should consider setting exit criteria for schools identified for comprehensive improvement that will facilitate sustained improvement, as it does for schools identified for targeted improvement.

Finally, the state has been implementing its existing school-rating system for several years, and it could be clearer about how it plans to transition to its new system so that educators, parents, and other stakeholders know what is coming and can engage and respond effectively.

Plan Components

Goals: Are the state’s vision, goals, and interim targets aligned, ambitious, and attainable? Why or why not?

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New Mexico has a strong vision: 66 percent of its working-age adults will have a college degree or postsecondary credential by the year 2030. Accordingly, the state has set strong goals for academic proficiency, high school graduation rates, and postsecondary remediation. The plan sets ambitious goals for subgroups of students, including English-language learners, and students with disabilities. In particular, New Mexico should be commended for setting a postsecondary remediation goal. This is a strong indicator for ensuring cross-system alignment, and one of vast importance to both students and the state.



Although New Mexico is in the midst of adopting a new assessment of English-language proficiency, it aims to achieve increases of 2 percentage points a year. It provides data showing this would be an ambitious but reasonable target based on its past performance. Similarly, New Mexico's expected graduation rate improvement appears ambitious and achievable based on recent state gains. The state also plans to use an extended-year graduation rate, and importantly it sets higher goals for that rate than the four-year rate. The state may experience a plateau or even a decline, however, as the new graduation requirements are implemented in 2020. It may need to revisit its long-term goal after those data are available.

New Mexico could, however, further strengthen its plan by providing additional context and data explaining how it developed its goals. For example, it's not clear what the connection is between the state's long-term "Route to 66" vision and the annual performance targets in the interim.

Standards and Assessments: Is the state's accountability system built on high-quality standards and assessments aligned to college and career readiness? Why or why not?

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New Mexico's plan continues the state's commitment to the Common Core State Standards and the Next Generation Science Standards. The state uses Partnership for Assessment of Readiness for College and Careers (PARCC) assessments. The state also continues to include assessments in grades in earlier grades (K-2), and in Spanish. New Mexico also has a social studies assessment. New Mexico should also be commended for specifically including a plan for how it will use its federal funds to cover Advanced Placement exam fees for low-income students.

Additionally, the state recognizes the alternate assessment for students with the most significant cognitive disabilities as a part of its assessment system. However, it could improve its plan by describing how it will meet the 1 percent participation cap for these assessments.

Indicators: Are the state's chosen accountability indicators aligned to ensure targets and goals are met and likely to lead to improved educational outcomes for students? Why or why not?

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New Mexico's plan provides a simple, high-quality list of meaningful indicators of student success, including the growth of the lowest-performing students, college and career readiness, extended-year graduation rates, and chronic absenteeism. The state does well to include a broader measure of high school graduation while still placing a strong emphasis on the four-year cohort graduation rate.



New Mexico indicates that a school that does not meet the 95 percent participation rate will have its letter grade dropped one letter. This is laudable, and the state could further strengthen its plan by applying the same rule if any individual subgroup does not have a 95 percent test participation rate. Similarly, New Mexico mentions it plans to further align its accountability system and its long-term “Route to 66” goal by including college enrollment and remediation rates within its college- and career-readiness indicator.

The state may want to consider setting more nuanced timelines for students to gain English-language proficiency. Currently, New Mexico’s plan proposes a common five-year timeline regardless of level of proficiency upon entry, but students who start at higher levels may be capable of progressing faster than five years.

Academic Progress: Has the state created sufficient incentives for schools to care about both student proficiency and student growth over time? Why or why not?

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New Mexico’s accountability system places a strong weight on student growth, and it does so in unique ways. For elementary and middle schools, 25 percent of their overall grade is based on student proficiency rates, a simple measure of student achievement that clearly indicates how many students are meeting grade-level expectations. Another 15 percent is students’ scale scores, adjusted for student demographics. This measure provides an indication of the average performance in the school, but it can mask high and low performance. Another 10 percent is allocated to a school’s overall year-to-year student growth. Finally, New Mexico adds another 20 percent allocation for growth among each school’s bottom quartile of students, and another 20 percent for the school’s top three quartiles. High schools are rated on the same measures, but they are generally given lower weights.

New Mexico makes the case that growth models are “well suited to monitor school performance over time” and “provide a robust picture of schools’ ability to facilitate student achievement” better than simple static comparisons, such as proficiency rates. The state has been using these measures in its accountability system for a number of years, and it provides a robust technical description of its proposed measures. Although this combination of measures could confuse parents, educators, or other stakeholders, New Mexico has committed to using feedback from stakeholder meetings with parents and families to ensure its system is usable and easy to understand.

All Students: Does the state system mask the performance of some subgroups of students, or does it have adequate checks in place to ensure all students (including all subgroups of students) receive a high-quality education? Why or why not?

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New Mexico does not explicitly incorporate subgroup performance in its accountability ratings calculations. The state's inclusion of student growth for the bottom quartile of students in each school may help capture these students, but without additional data, it's impossible to know if a school could have a low-performing subgroup and still receive a high letter grade.

Similarly, the state's plan for defining chronic underperformance of student subgroups could be promising, but it lacks sufficient details to determine for sure. For example, New Mexico plans to identify the students-with-disabilities group in a particular school as consistently underperforming if it trails students *without* disabilities by 40 percent in reading and math proficiency. The plan does not say whether the comparison group is all students statewide or other students within the same school. Comparing with the statewide average would be the stronger approach. The plan also does not give a rationale for the 40 percent threshold or an estimate of how many schools this approach might capture. The plan has similar definitions for English learners, economically disadvantaged students, Native American students, black students, and Hispanic students, but sets different thresholds for different subgroups, which could send the wrong signal that low performance is sufficient for some groups but unacceptable for others. On the other hand, the state's proposed minimum subgroup size of 10 students is strong and will ensure that schools adequately capture low-performing groups.

New Mexico also deserves credit for including a timeline for eliminating opportunity gaps for students with disabilities being served by ineffective teachers.

Identifying Schools: Is the state's plan to identify schools for comprehensive and targeted support likely to identify the schools and student groups most in need? Why or why not?

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New Mexico's accountability system produces a single, clear summative rating overall and for each indicator, which can help educators, parents, and the public understand school performance in context. These A-F grades are tied to a school's identification for comprehensive support and improvement. The state also drops a school's grade by a letter if 95 percent of students do not take the state assessments.

New Mexico has had this system in place for five years, and it plans to continue it through the 2016-17 and 2017-18 school years, but the state also presents a plan to add new measures over time, including a new science indicator and the inclusion of college enrollment and remediation rates. In addition, partially in response to stakeholder feedback, it will boost the weighting given to student proficiency rates. While the new system is mostly developed already, the state could provide greater clarity around how it will weight some of its sub-indicators, which appear to combine absenteeism and



survey results into one “opportunity to learn” indicator and to combine participation and success in its college- and career-readiness indicator.

While the state should be applauded for defining “consistently underperforming” subgroups in terms of math and English-language arts performance, the state’s plan to identify schools with these subgroups still lacks context around how many schools the rules would actually identify in need of support (see above). In addition, the state should consider including graduation rates as a part of the definition of a “consistently underperforming” subgroup and a “low-performing subgroup.”

New Mexico will identify additional schools as in need of targeted support and improvement if “the vast majority” of any subgroup of students performs “well below” on academic proficiency and if it’s not demonstrating “sufficient growth” compared with the bottom 5 percent of schools. However, the state does not explicitly define these terms.

Supporting Schools: Are the state’s planned interventions in comprehensive and targeted support schools evidence-based and sufficiently rigorous to match the challenges those schools face? Why or why not?

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Although New Mexico’s plan provides little detail about the interventions that will be initially implemented in low-performing schools, the state clearly identifies actions that must be taken in a school that fails to improve three years after being initially identified for comprehensive support and improvement. At that point, schools must choose between closure, restart, champion and choice, or significant restructure and redesign. If the school does not choose one of these options, the state department will choose one for it. This represents a clear, concrete list of interventions in low-performing schools, and suggests that New Mexico is taking seriously the challenges faced by those schools.

The state does not fully articulate how it will distribute its 7 percent set-aside for school-improvement activities, but it does plan to leverage it through a competition. It has also committed to funding plans that use the strongest base of evidence. The state is also planning to use a 3 percent set-aside dedicated to Direct Student Services to support expanded learning time, AP course access, K-3 literacy and mathematics, pre-k services, personalized learning, and student transportation (for students enrolled in schools of their own choosing).

Exiting Improvement Status: Are the state’s criteria for schools to exit comprehensive and targeted support status sufficient to demonstrate sustained improvements? Why or why not?

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For New Mexico schools identified for comprehensive support and improvement, the state offers both a relative and criteria-based way to exit: performing above the 5 percent threshold, or receiving a letter grade of C. These options may represent significant differences in performance levels, but it is likely that schools will exit via the lower bar of improving above the 5 percent threshold, rather than meeting the requirements of a C grade. The state should provide additional details, for example, over what period of time a school must demonstrate improvement in order to exit identification status.

The state's plan to exit schools identified for targeted support and intervention is also vague. New Mexico's plan says that schools would need to successfully implement their improvement plan and show "sufficient growth" for two consecutive years, but the state does not define what "sufficient growth" might mean.

Continuous Improvement: Has the state outlined a clear plan to learn from its implementation efforts and modify its actions accordingly, including through continued consultation and engagement of key stakeholders? If not, what steps could the state take to do so?

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New Mexico's plan outlines a number of ways it has and will continue to engage stakeholders on key aspects of its implementation efforts. For example, it will be adding science as an indicator in its accountability system in response to stakeholder feedback, and it will continue to gather input as it considers adding an "Opportunity-to-Learn" survey to its accountability system in future years. Additionally, New Mexico's plan includes an innovative idea for a "Return Tour" across seven communities in the state where the state's leadership will present an overview of the submitted plan, how it changed in response to initial stakeholder feedback, and how the state will implement the plan going forward.