

# **State of Utah Consolidated State Application Accountability Workbook**

**Plan Submitted  
to U.S. Department of Education  
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**UTAH STATE OFFICE  
OF EDUCATION**

## **PART I: Summary of Required Elements for State Accountability Systems**

### Summary of Implementation Status for Required Elements of State Accountability Systems

#### Principle 1: All Schools

F	1.1	Accountability system includes <i>all schools and districts in the state</i> .
F	1.2	Accountability system holds <i>all schools to the same criteria</i> .
F	1.3	Accountability system incorporates the <i>academic achievement standards</i> .
F	1.4	Accountability system provides <i>information in a timely manner</i> .
F	1.5	Accountability system includes <i>report cards</i> .
F	1.6	Accountability system includes <i>rewards and sanctions</i> .

#### Principle 2: All Students

F	2.1	The accountability system includes all students
F	2.2	The accountability system has a consistent definition of full academic year.
F	2.3	The accountability system properly includes mobile students.

#### Principle 3: Method of AYP Determinations

F	3.1	Accountability system expects all student subgroups, public schools, and LEAs to reach proficiency by 2013-14.
F	3.2	Accountability system has a method for determining whether student subgroups, public schools, and LEAs made adequate yearly progress.
F	3.2a	Accountability system establishes a starting point.
F	3.2b	Accountability system establishes statewide annual measurable objectives.
F	3.2c	Accountability system establishes intermediate goals.

#### Principle 4: Annual Decisions

F	4.1	The accountability system determines annually the progress of schools and districts.
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#### **STATUS Legend:**

**F** – Final state policy

**P** – Proposed policy, awaiting State approval

**W** – Working to formulate policy

Principle 5: Subgroup Accountability

F	5.1	The accountability system includes all the required student subgroups.
F	5.2	The accountability system holds schools and LEAs accountable for the progress of student subgroups.
F	5.3	The accountability system includes students with disabilities.
F	5.4	The accountability system includes limited English proficient students.
F	5.5	The State has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.
F	5.6	The State has strategies to protect the privacy of individual students in reporting achievement results and in determining whether schools and LEAs are making adequate yearly progress on the basis of disaggregated subgroups.

Principle 6: Based on Academic Assessments

F	6.1	Accountability system is based <i>primarily on academic assessments</i> .
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Principle 7: Additional Indicators

F	7.1	Accountability system includes graduation rate for high schools.
F	7.2	Accountability system includes an additional academic indicator for elementary and middle schools.
F	7.3	Additional indicators are valid and reliable.

Principle 8: Separate Decisions for Reading/language arts and Mathematics

F	8.1	Accountability system holds students, schools and districts separately accountable for reading/language arts and mathematics.
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Principle 9: System Validity and Reliability

F	9.1	Accountability system produces reliable decisions.
F	9.2	Accountability system produces valid decisions.
F	9.3	State has a plan for addressing changes in assessment and student population.

Principle 10: Participation Rate

F	10.1	Accountability system has a means for calculating the rate of participation in the statewide assessment.
F	10.2	Accountability system has a means for applying the 95% assessment criteria to student subgroups and small schools.

**STATUS Legend:**

F – Final policy

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## **PART II: State Response and Activities for Meeting State Accountability System Requirements**

### Principle 1: All Schools

#### 1.1 Accountability system includes all schools and district in the state.

Utah requires all public schools and LEAs, including those serving special populations and charter schools, to participate in the Utah Performance Assessment System for Students (U-PASS). Special population schools include the Utah Schools for the Deaf and the Blind, and Youth in Custody (YIC). Several key steps in the accountability process assure inclusion of all students, schools, and LEAs.

- For many years, the Utah State Office of Education (USOE) has pre-printed assessment answer sheets for all Utah schools. This pre-printing is based on official state IDs and school names. At the time of USOE test scoring, the USOE is able to assure that all schools are participating in testing.
- **Utah is now using computer based testing in addition to paper based testing. The pre-print submission process is the same for both the paper and computer based formats.**
- USOE has now implemented a State-wide Student Identifier that has increased the verification process.
- With the implementation of the Utah Alternate Assessment program (UAA) those schools that serve students who have severe disabilities are able to fully participate in testing and accountability.
- Finally, USOE, in collaboration with LEAs, can ensure that YIC students also participate in testing and accountability.

U-PASS includes course/grade specific criterion-referenced tests (Core CRTs) as well as norm-referenced tests, performance tasks and diagnostic testing. For compliance with federal No Child Left Behind (NCLB) legislation, the Core CRTs from U-PASS are used to report academic achievement. Using a subset of tests from U-PASS allows Utah to utilize all rules, auditing procedures, and practices already in place to meet NCLB requirements.

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## 1.2 Accountability system holds all schools to the same criteria.

U-PASS holds all schools accountable to the same criteria as mandated by the Utah Legislature. Central components of state and federal accountability are the state's high quality standards-based criterion-referenced assessments (Core CRTs). Utah has a long history of standards-based assessments aligned to the Utah Core Curriculum, which is a comprehensive curriculum for each subject at each grade-level/course as mandated by state law. The first use of Utah's Core CRTs was in the 1989-1990 school year.

Performance standards have been established for all Core CRTs. Across all tested grades and subject areas, the Bookmark Technique was utilized. To assure appropriate use of the method, USOE staff consulted with original authors of the technique. The same performance standards are approved for the Utah Alternate Assessment (UAA). Establishing the same performance standards allows the state to include special population students that do not take the Core CRTs in standard or **modified accommodated** conditions, but do participate in the UAA.

Other non-testing indicators (graduation rate and attendance) are uniformly defined and implemented in schools and LEAs across the state. This uniformity of measures assures that the same criteria are applied in determining LEA and school AYP status.

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- 1.3 Accountability system incorporates, at a minimum, a definition of *basic*, *proficient*, and *advanced* student achievement levels in reading/language arts and mathematics.

Utah has defined proficiency levels for all Core CRTs. The cut scores for each Core CRT were established using the Bookmark Technique. Four levels are defined: Level 1: Minimal, Level 2: Partial, Level 3: Sufficient, Level 4: Substantial. The Utah State Board of Education adopted the new titles and descriptors on April 4, 2003. The descriptors for each level as well as the match to federal proficiency levels are outlined in Table 1.

Table 1: Utah Student Achievement Level Matched to Federal Levels

Level	Descriptor	Federal Levels
Level 4: Substantial	A student scoring at this level is proficient on measured standards and objectives of the Core Curriculum in this subject. The student's performance indicates substantial understanding and application of key curriculum concepts.	Advanced
Level 3: Sufficient	A student scoring at this level is proficient on the measured standards and objectives of the Core Curriculum in this subject. The student's performance indicates sufficient understanding and application of key curriculum concepts.	Proficient
Level 2: Partial	A student scoring at this level is not yet proficient on measured standards and objectives of the Core Curriculum in this subject. The student's performance indicates partial understanding and application of key curriculum concepts.	Basic
Level 1: Minimal	A student scoring at this level is not yet proficient on measured standards and objectives of the Core Curriculum in this subject. The student's performance indicates minimal understanding and application of key curriculum concepts.	

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1.4 Accountability system provides information in a timely manner.

AYP information will be available to the districts for a 30 day review on August 15. After the 30 day review, the information will be released to the public. See section 1.7 for a description of the application of sanctions based on this timeline.

Table 2 outlines the data elements/events, purposes, and date due for the 2004-2005 school year and all years thereafter. All dates refer to the time by which the required data are to be “clean and final,” but not the date of final submission.

Table 2: Data Submission Timeline

<b>Data Element/Event</b>	<b>Purpose</b>	<b>Date</b>
Test Pre-print file	Pre-print of test answer documents or preparation of computer based test documents	April 1
Test Window	Language Arts test completion	Five <del>five</del> six weeks, beginning five <del>five</del> six weeks prior to last Monday of school year
	Mathematics test completion	Five <del>five</del> six weeks, beginning five <del>five</del> six weeks prior to last Monday of school year
	Science test completion	Five <del>five</del> six weeks, beginning five <del>five</del> six weeks prior to last Monday of school year
Test Answer Documents – <del>paper</del>	Scoring of student answer documents by USOE	Last day of district school calendar (1 week after close of test window)
Test Results – <del>computer</del>	Scoring of student computer responses by vendor	Within 48 hours of each test completion
Raw Data Return	Preliminary Data Review by LEA	4 days after submission of answer document or 48 hours after computer test submission
End of Year Clearinghouse Data	Student level demographic data including cumulative add/drop codes	July 15
Begin of Year Clearinghouse Data	Drop-out data	October 15

For many years, the USOE has scanned and scored Core CRTs. This has been a great benefit for quality control and scoring turnaround. The testing window for the Core CRTs maximizes the days of instruction but still facilitates timely scoring and reporting of results.

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Raw scores ~~will be~~ **for both paper and computer based tests are** distributed to LEAs for review and preliminary analysis. This preliminary analysis allows LEAs to project AYP results and anticipate budget and notification actions. See section 1.7 for details.

The USOE developed and implemented a state Data Warehouse. The Data Warehouse serves as the foundation for the analysis and generation of school and district performance reports and determination of LEA and school AYP prior to the start of a new school year. Appeals will be allowed at the school and LEA level. The timeline currently in place allows schools enough time to notify parents about public school choice or supplemental educational service options.

**Student Pre-Print Data (March/April)** - Preprint student data is submitted to USOE. This data includes student demographic data. At the district and school level, this data is summarized and sent to districts to approve or make corrections in their operational student data and then resubmit it. This individual information is used to pre-print Core CRT answer sheets **or prepare computer tests**. This process both reduces work for the students and improves student data. Districts provide written approval of their pre-print data before answer sheets are printed **or computer tests prepared**.

**Core CRT Scanning & Scoring (May/June)** - ~~Math and~~ Language arts, **math and science** Core CRTs are scanned and scored by USOE **or the computer based contractor**. Utah is one of only a few states that do in-house scanning and scoring. This approach leads to faster scoring turnaround, stronger quality assurance procedures and more accurate test data transfer to our USOE Data Warehouse. Throughout the scanning process, inconsistencies and problems with student answer sheets are identified and corrected. Depending on the issue, either the district or school is directly involved. USOE scoring staff is assigned certain districts. This has enabled a relationship to develop with the districts and increases the cooperation as scanning or scoring issues arise. Scoring turnaround and testing procedures are well documented in Utah Board rule, R277-473-3. Time Periods for Administering and Returning Test Materials.

**Clearinghouse “End of Year” data submission (July)** - From an accountability perspective, this student level data submission provides background characteristics, grade level data, enrollment date, exit date, graduation status, and attendance. This serves as the foundation of student level identification to which test data is matched. These data are passed on to the USOE Data Warehouse for integration with the other data systems.

**Teacher and Course Data (i.e., CACTUS) submission (July)** - Teacher and course level data is maintained in the CACTUS database. This database is centralized by USOE. CACTUS serves as the operational teacher system and is updated throughout the school year. Districts are required to have all changes into the system finalized by July 1<sup>st</sup>.

**Behavior and Assessment Data Merge (July)** - USOE data warehouse merges various data systems needed for AYP calculations. Utah has a State-wide Student Identifier used to merge student data.

**Appeals and Consequences to missing data deadlines** - Board Rule R277-484. Data Standards, Deadlines and Procedures gives clear and specific detail regarding data



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deadlines. Districts must meet data deadlines or funds will be withheld. This rule also specifies procedures to get an extension for a deadline.

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1.5 Accountability system includes report cards for public schools and LEAs.

AYP reports for schools and LEAs serves as the report card, include aggregated and disaggregated academic achievement data by race/ethnicity, poverty, and students with limited English proficiency, students receiving special education services, gender, and migrant status. For determining AYP, only total school, race/ethnicity, poverty, and students with limited English proficiency, students receiving special education services are used.

Districts are required by law to make these reports available to the public either in print or electronic copy. In addition to the district level distribution, reports are available through USOE.

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1.6 Accountability system includes rewards and sanctions for public schools and LEAs.

Utah complies with NCLB requirements to identify for improvement, take corrective action, and restructure schools based on AYP for schools receiving Title I funds. In addition, LEAs and schools are identified for exemplary performance. All public schools' status with regard to AYP is made available to the public through performance reports and media sources.

The LEA which is identified for improvement, will exit improvement when it does not miss AYP in the same subject and in all grade spans for two consecutive years, or it does not miss AYP for the other academic indicator in all grade spans for two consecutive years.

<b>Utah LEA and State Sanctions</b>	
For Title I schools failing to make AYP, the LEA must, in the subsequent school year, do the following:	
School Year 1 – No AYP	Warning issued. <del>Superintendents</del> Local education agencies are encouraged to take immediate action to assist toward improvement.

<p>Year 2 – No AYP SPI Title I Improvement Year 1</p>	<ul style="list-style-type: none"> <li>• LEA designates school as needing improvement before the beginning of the school year following failure to make AYP.</li> <li>• LEA must notify all parents of school’s designation.</li> <li>• School identifies a school support team (SST) that will work with the school to conduct an appraisal and make school improvement recommendations to the school leadership team.</li> <li>• School identifies a school leadership team that develops or revises a two-year achievement improvement plan to be approved by LEA within three months of improvement designation. Plan must include required elements: scientifically-based research, successful actions, professional development including 10% of its Title I Part A funds, specific annual, measurable goals and targets, fundamental teaching and learning needs, parental involvement, additional time for learning, and shared responsibility for improvement.</li> <li>• LEA and/or qualified others provide technical assistance* with scientifically based quality support.</li> <li>• LEA convenes peer review process within 45 days of receiving the plan or sooner, as possible. shares school improvement plan with local school board and sends plan with Title I school improvement funding request to USOE for approval.</li> <li>• School implements plan expeditiously but not later than next full school year.</li> <li>• State ensures that LEA has assisted well provides quality technical assistance to school.</li> <li>• State provides assessment data.</li> <li>• LEA provides choice option and transportation to all students to another public/charter school not under improvement, as desired by parent/student.</li> </ul>
<p>*Technical assistance must include at least six elements: Scientifically based research; analysis of data; parental involvement; sustained, aligned, and focused professional development; instructional strategies; and focused budget and resources.</p>	

<p>Year 3 – No AYP SPI-2 Title I Improvement Year 2</p>	<ul style="list-style-type: none"> <li>• Designation</li> <li>• Parent notification</li> <li>• Technical assistance</li> <li>• <del>Choice, where feasible</del></li> <li>• LEA arranges provision for supplemental service to all eligible students. LEA provides annual notice of eligibility for supplemental services.</li> <li>• LEA provides public school choice option and transportation to students to another public school not under improvement, in accordance with Title I requirements.</li> <li>• <del>State assigns monitor</del></li> </ul>
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<p>Year 4 – No          AYP          SPI 3          Title I          Improvement          Year 3          (Corrective          Action)</p>	<ul style="list-style-type: none"> <li>• Designation.</li> <li>• Parent notification</li> <li>• Technical assistance</li> <li>• Supplemental educational services</li> <li>• Public school choice</li> <li>• Required corrective action and notice of corrective action.</li> <li>• State works closely with the school and LEA to determine membership of the school support team.</li> <li>• The school support team (SST) will conduct an appraisal and/or instructional audits, as appropriate.</li> <li>• The school leadership team will revise the school improvement plan based on input from the appraisal process and incorporates at least one corrective action, in accordance with Title I requirements.</li> <li>• LEA shares corrective action plan with local school board and sends plan with Title I school improvement funding request to USOE for approval.</li> <li>• Schools in corrective action may apply for SEA support for instructional coaching and leadership training, when eligible (eligibility based on need and commitment).</li> </ul>
<p>Year 5 – No          AYP          SPI 4          Title I          Improvement          Year 4          (Planning for          Restructuring)</p>	<ul style="list-style-type: none"> <li>• Designation.</li> <li>• Parent notification of plan to restructure</li> <li>• Technical assistance</li> <li>• Supplemental educational services</li> <li>• Public school choice</li> <li>• State <del>intervention at LEA level possible</del> provides technical assistance to LEA in planning for restructuring.</li> <li>• Schools may continue to receive SEA support for instructional coaching and leadership training, when eligible.</li> <li>• LEA works with the school community to develops a plan for alternative governance provisions, in accordance with Title I requirements, and submits its plan for restructuring to the local school board.</li> <li>• LEA sends restructuring plan to USOE for approval.</li> <li>• State approves the LEA plan for restructuring or <del>revises corrective action</del> requests revisions and advises Utah State Board of Education of designation.</li> </ul>

<p>Year 6 – No  <b>AYP</b>  <b>SPI-5</b>  <b>Title I</b>  <b>Improvement</b>  <b>Year 5</b>  <b>(Restructuring)</b></p>	<ul style="list-style-type: none"> <li>• Designation</li> <li>• <b>Parent</b> Notification</li> <li>• <del>Technical assistance</del></li> <li>• <del>Choice</del></li> <li>• <del>Supplemental services</del></li> <li>• <del>Corrective action</del></li> <li>• LEA must implement plan for alternative governance provisions</li> <li>• State <del>intervention at LEA level possible</del> <b>provides technical assistance to LEA in implementation of restructuring plan.</b></li> </ul>
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There are no sanctions or designations for non-Title I schools beyond those specified in U-PASS for all Utah schools. U-PASS specifies school improvement plans for all Utah schools, regardless of Title I status.

Rewards

Schools making AYP and those making significant improvement are recognized by the USOE. All schools and LEAs are acknowledged, regardless of Title I status. Recognition may include: media/press release; visits from dignitaries; certificates, banners, or plaques.

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## **PRINCIPLE 2. All Students**

### 2.1 Accountability system includes all students.

By law, all Utah students participate in the Core CRT program. Over the past three years, because of state and federal accountability, several steps have been refined to ensure inclusion of all students. Many of these modifications were implemented to meet state accountability and federal special education legislation (i.e., IDEA 1997).

USOE has pre-printed answer sheets **or computer tests** for Utah students. This pre-printing has increased the quality and quantity of student test data. Pre-print files are submitted to the USOE by LEAs and are compared with other student level data submitted by LEAs, including the S3 and clearinghouse data (see section 1.4 for details).

Utah has defined appropriate accommodations for students with disabilities. The use of Core CRTs has allowed for a variety of accommodations to be selected by the IEP team and still yield valid results that do not affect the test score interpretation.

Utah has implemented alternate assessments for students with the most significant cognitive disabilities. The purpose of the alternate assessment is to measure the achievement of students with disabilities against alternate academic achievement standards as defined by the State.

Utah's Alternate Assessment (UAA) is designed for assessing students with severe disabilities, especially those with the most significant cognitive disabilities. ~~Objectives for the UAA are based on the student's IEP goals.~~

Youth in Custody (YIC) students, as well as students in special purpose schools, also participate in testing and accountability. YIC facilities work with LEAs to obtain testing materials. The LEAs must either declare the YIC program as a school or include them with an existing school.

Students in the United States for less than one year will not be required to take the English Language Arts CRT or the Science CRT, but will be required to take the math CRT. CRT scores for ELL students in their first year in the United States will not be used for AYP calculations. All other ELL students will participate in accordance with NCLB with appropriate accommodations. These accommodations may include, but are not limited to, linguistic accommodations and small group settings

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## 2.2 Accountability system has a consistent definition of full academic year.

The USOE defines a full academic year as one in which students are in membership, in the same school, for not less than 160 days. This definition represents a proxy for continuous enrollment, which may be literally determined by the LEA during review of AYP results.

Data necessary for implementing Utah's definition of full academic year have been collected for many years through the clearinghouse file. Temporary non-attendance due to suspensions does not constitute a break in enrollment. A student transferred to another school or LEA is considered no longer continuously in membership at the original school.

Students in membership in more than one school within a single LEA for not less than 160 days will be included in determining the AYP of the LEA. Finally, all Utah students who are in membership in a Utah school for a full academic year are part of the statewide AYP calculation, including students who have not been in membership in any single LEA for the full academic year.



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### 2.3 Accountability system properly includes mobile students.

The development of the Data Warehouse and State-wide Student Identifier allows the USOE to include and track students who move frequently. The Warehouse gathers data from a variety of collection sources, including test data, S3 data, and clearinghouse data (see section 1.4 for details).

From a testing perspective, all students, regardless of the amount of time they have been at a school, participate in the Core CRTs at the end of the school year. The reporting of school and LEA Core CRT performance results includes ~~all students including mobile students and other special populations, such as students receiving special education services and students with limited English proficiency.~~

**Whole school, gender, migrant status, English Language Learners, Students with Disabilities, Non-disabled students, Economically Disadvantaged, Non Economically Disadvantaged and ethnicity.**

Supporting evidence and background:

- USOE Data Warehouse (information & background)  
<http://www.schools.utah.gov/warehouse/>
- Warehouse Data Dictionary  
[http://www.schools.utah.gov/warehouse/upass\\_data\\_dict\\_new\\_format.pdf](http://www.schools.utah.gov/warehouse/upass_data_dict_new_format.pdf)
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### **PRINCIPLE 3: Method of AYP Determinations**

3.1 Accountability system expects all student subgroups, public schools, and LEAs to reach proficiency by 2013-14.

Utah's accountability system uses three criteria for AYP determination: participation rate, academic achievement, and an additional indicator. These three criteria are applied to both mathematics and in ~~reading/language arts~~ **English language arts** separately.

Utah has incorporated the NCLB expectation that by 2013-14 all student subgroups, schools, and LEAs will demonstrate proficiency in the areas of in ~~reading/language arts~~ **English language arts** and mathematics. Utah's plan includes all public, charter, and special population schools.

To determine if yearly progress is made, starting points have been set for mathematics and in ~~reading/language arts~~ **English language arts** at each of two levels: elementary/middle school and high school. The starting point was set according to federal guidelines (see section 3.2a for details). Based on the starting point using 2001-2002 school year data and the ultimate goal of 100% of students proficient by 2013-2014 school year, intermediate goals are set based on the statewide annual measurable objectives (see sections 3.2b and 3.2c for details). Schools must meet the annual measurable objectives or make acceptable improvement (*safe harbor* provision) for academic achievement as part of the requirements for making AYP.

The other two criteria – participation rate and additional indicators are also used to make AYP determinations for student subgroups, schools, and LEAs. Details of these two criteria are in sections 7 and 10 respectively.

3.2 Accountability system has a method for determining whether student subgroups, public schools, and LEAs made adequate yearly progress.

Utah's accountability plan uses three criteria – participation rate, academic achievement, and additional indicator – for determining in student subgroups, schools, and LEAs have made adequate yearly progress. The Data Warehouse serves as the data source for making the determination of AYP for student subgroups, schools, and LEAs. As described in section 1.4, the Data Warehouse stores data from test files, clearinghouse data (including student demographic information), and S3 year-end data containing additional student information for determining membership in relevant subgroups.

Academic Achievement

In determining AYP for student subgroups, schools, LEAs and the state as a whole, Utah compares the percent of students proficient to the annual measurable objective, examines participation rates, and examines the additional academic indicator.

A student subgroup, school, or LEA of 10 or more students must meet or exceed the annual measurable objective for ~~in reading/language arts~~ **English language arts** and mathematics, must meet the participation rate for subgroups of 40 students or more, and meet the state's requirement for another academic indicator (attendance for elementary and middle schools and graduation for high schools). If a student subgroup, school, or LEA fails to meet or exceed the annual measurable objective, it must have reduced the percent of students not proficient by the appropriate percentage (*safe harbor*). If the *safe harbor* provision is employed, the additional indicator must be disaggregated and used for determining AYP for the subgroup.

Table 3 displays the impact data for various N sizes on student subgroups. These data indicate that the minimum N selected by Utah, N=10, will allow the maximum number of schools to be held accountable for student subgroup performance.

**Table 3: Impact Data for Various Minimum N Sizes – Grades 3-8**

Number of Schools with Subgroups Included in AYP Analysis for Various Minimum N Sizes (School with >10 students = 522)					
	Minimum N				
	10	25	30	50	75
School	522				
White	511	486	483	471	440
Low Income	491	444	427	355	265
Students with Disabilities	450	280	227	63	11
Limited English Proficient	308	173	149	81	41
Hispanic	294	161	144	87	48
Black	29	2	1	0	0

In calculating AYP for LEAs, schools, and ~~sub~~ **student** groups, Utah employs a test of statistical significance with a one-tailed *alpha* of 0.01 for academic achievement of the annual measurable objective. This allows schools with small ~~sub~~ **student** group populations to be held accountable without falsely identifying a school. This creates a

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balance between validity (holding schools accountable for all students) and reliability (assuring that those ~~sub~~ **student** groups identified have not been so identified simply on the basis of random fluctuation of scores). For AYP determination based on the annual measurable objective, a test of statistical significance will be applied for subgroups  $\geq 10$ . The null hypothesis is that the observed percent of students proficient in any subgroup is equal to the required percent proficient defined by the annual measurable objective. The test of statistical significance is a z-score with the distribution of school mean scores (in terms of percent correct) around the null hypothesis. A school or LEA makes AYP if the null hypothesis is *not rejected*.

In calculating AYP, any LEA, school, or student ~~sub~~group that does not meet the annual measurable AYP goal, must decrease the percentage of students not proficient by at least 10 percent in accordance with the *safe harbor* provision. Utah employs a test of statistical significance using a one-tailed *alpha* of 0.25 for determining school-wise *safe harbor* (improvement).

#### Participation Rate

Participation in Core CRTs will be determined for each student ~~sub~~group, school, and LEA by comparing the testing pre-print file, test answer documents, all student file and clearinghouse data using the Data Warehouse. This process is used for all student ~~sub~~groups, schools, and LEAs. For details about participation rate, see section 10.

#### Additional Indicators

The additional indicators for Utah's accountability plan are attendance (elementary/middle schools) and graduation (high schools). These indicators can be calculated using data in the Data Warehouse. Schools and LEAs must meet the state goals for each indicator to make AYP. In addition, a student ~~sub~~group must meet the additional indicator goals if the *safe harbor* provision is employed for the student subgroup. The state goals for the additional indicators are 93% attendance and 85.7% graduation rate. For details about these indicators, see section 7.

~~Because Utah cannot currently determine graduation rate for all subgroups, a proxy additional indicator will be used to determine AYP for 2003-2007. This proxy will be attendance. The attendance rate will be obtained by dividing the sum of days in attendance by the sum of days in membership across all students in the school and LEA. The goal for attendance will be set at 93%, consistent with the additional indicator goal for elementary and middle schools (see section 7.2). Schools must meet this goal or improve from the previous year.~~

~~For a school that meets the annual measurable objective for all sub-student groups and thus uses only school level data for the additional indicator, graduation will be used. However, if a school employs safe harbor for a subgroup, AYP will be determined using graduation for the total school and attendance for the student subgroup(s). This temporary situation will apply equal criteria to all student subgroups while still holding the school accountable for graduation. Beginning in 2008, graduation will be the only additional indicator used at the high school level.~~

## 3.2a Accountability system establishes a starting point.

A baseline is separately established for in ~~reading/language arts~~ **English language arts** and mathematics based on NCLB requirements using the 20th percentile school by enrollment ordered by percent proficient for each subject. A separate starting point is established for grade spans 3-8 and grade 10. The same starting point and the same annual measurable objectives apply to all student subgroups within the grade spans, culminating in 100 percent proficiency of all students by 2013-2014.

Table 4 displays student performance by proficiency. Table 5 displays performance based on grade level for the Grade 3-8 grade span. Finally, Table 6 displays the 20<sup>th</sup> percentile score for Utah schools by enrollment, when ranked by performance.

**Table 4: Number and Percent of Students by Proficiency – Grades 3-8**

Overall	Proficient (Level 3 and 4)	Not Proficient (Levels 1 and 2)	Mastery Missing	Total Included
Language Arts	153,335 (73.74%)	54,599 (26.26%)	7,888	207,934
Mathematics	140,303 (67.29%)	68,202 (32.71%)	7,317	208,505

**Table 5: Performance by Grade – Grades 3-8**

Grade	Mathematics			Language Arts		
	% Proficient	% Not Proficient	Total Included	% Proficient	% Not Proficient	Total Included
3	71	29	35,498	76	24	35,544
4	71	29	36,292	77	23	36,169
5	71	29	35,319	77	23	35,211
6	61	39	34,967	71	29	35,396
7	65	35	33,249	79	21	32,941
8	65	35	33,180	62	38	32,673

**Table 6: Starting Point – Grades 3-8 and High School**

Content Area	Percent Proficient
Language Arts 3-8	65%
Mathematics 3-8	57%
Language Arts HS	64%
Mathematics HS	35%

To verify that the 20<sup>th</sup> percentile score by enrollment, once ranked by performance, was higher than the lowest student subgroup performance, the student subgroup data were analyzed. Table 7 displays student subgroup performance results for the 3-8 grade span. These results verify the use of the 20<sup>th</sup> percentile scores for Utah's baseline value.

**Table 7: Student Subgroup Performance – Grades 3-8**

Subgroup (Ordered by number of students)	Language Arts		Mathematics	
	% Proficient	Total Included	Percent Proficient	Total Included
Caucasian	78%	176,164	71%	175,985
Low Income	59%	66,081	53%	66,707
Students with Disabilities	31%	23,029	28%	23,770
Limited English Proficient	48%	19,148	43%	19,754
Hispanic	46%	18,881	40%	19,467
American Indian	42%	3,481	37%	3,529
Asian/Pacific Islander	75%	3,342	74%	3,392
Black	53%	2,175	42%	2,189

Table 8 displays the student subgroup performance on Language Arts for 10<sup>th</sup> grade in Utah. These data are included to verify the 20<sup>th</sup> percentile starting point, which is 64 percent proficient.

**Table 8: 10<sup>th</sup> Grade Language Arts**

Student Subgroup (Ordered by number of students)	% Proficient	Total Included
Caucasian	76.6%	25,868
Low Income	58.3%	5,449
Hispanic	47.0%	1,617
Limited English	46.0%	1601
Special Education	22.4%	1,573
Asian	68.9%	437
American Indian	33.2%	335
Pacific Islander	53.9%	325
Black	51.9%	212
Total	73.9%	37,417

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3.2b Accountability system establishes statewide annual measurable objectives.

Utah has established separate annual measurable objectives for in ~~reading/language arts~~ **English language arts** and mathematics. Annual measurable objectives use the same percent proficient as the most recent intermediate goal. The ~~reading~~ **English language arts** and mathematics annual measurable objectives apply to all student subgroups, schools, LEAs, and the state as a whole. ~~For schools and/or districts who do not make AYP based solely on the students with disabilities subgroup, an adjusted percent proficient will be calculated by the use of a state-wide proxy. The state-wide proxy number is representative of 2% of the total number of students assessed within the students with disabilities subgroup. This adjusted percent proficient will be compared to the Utah's annual measurable objective (AMO). If the adjusted proficiency rate for the students with disabilities subgroup meets or exceeds Utah's AMO, the school may be considered to have made AYP for the 2006-07 school year.~~

A separate starting point will be established for grades spans 3-8 and grade 10. When calculating the percent proficient for a school with multiple grade levels, as well as the ~~sub~~ **student** groups within them, the annual measurable objective is an aggregate of the percent of proficient students ~~at all~~ **in the defined** grade levels in the school (a weighted average). **For schools with a combination of grades 3-8, all grade levels will be included for language arts and mathematics. For schools with a 12<sup>th</sup> grade, only the 10<sup>th</sup> grade will be included for language arts, and grades 10-12 for mathematics.**

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3.2c Accountability system establishes intermediate goals.

Utah incorporates intermediate goals for the minimum percentage of students achieving proficiency.

The intermediate goals assume equal increases expected each year based on the proficiency gap between the baseline percent proficient and 100 percent proficient divided by the 12 intervening years (annual increase). However, the required percent proficient is not increased each year, rather it increases every other year and in the final year of the program. Table 9 displays these values for in ~~reading/language arts~~ **English language arts** and Mathematics, based on the results of the 2002 administration of the Core CRTs.

Spring 2002	Starting Point
Spring 2005	Goal 1: Starting Point + (Annual increase * 2)
Spring 2007	Goal 2: Spring 2004 Goal + (Annual increase * 2)
Spring 2009	Goal 3: Spring 2006 Goal + (Annual increase * 2)
Spring 2011	Goal 4: Spring 2008 Goal + (Annual increase * 2)
Spring 2013	Goal 5: Spring 2010 Goal + (Annual increase * 2)
Spring 2014	Final Goal: 100 % proficient

**Table 9: Starting Point and Intermediate Goals – Grades 3-8 and HS**

	Starting Point	Goal 1	Goal 2	Goal 3	Goal 4	Goal 5	Final
Language Arts Grades 3-8	65 %	71 %	77 %	83 %	89 %	95 %	100 %
Mathematics Grades 3-8	57 %	64 %	71 %	78 %	85 %	92 %	100 %
Language HS Grade 10	64 %	70 %	76 %	82 %	88 %	94 %	100 %
Mathematics Grade 10-12	35%	47%	59%	72%	84%	96%	100%



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**PRINCIPLE 4: Annual Decisions**

**4.1** Accountability system determines annually the progress of schools and LEAs.

AYP decisions are made annually for each LEA and school. AYP determination is based on percent of students proficient or the reduction of students not proficient, participation rate, and achievement of the additional academic indicator. in ~~reading/language arts~~ **English language arts** and mathematics are examined separately for each of the aforementioned criteria for AYP. Annual measurable objectives for academic achievement are based on the most recent intermediate goal.

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## **PRINCIPLE 5: Subgroup Accountability**

5.1 The accountability system includes all the required student ~~sub~~groups.

Both state accountability and NCLB require the disaggregation and reporting of the following student ~~sub~~groups:

Race/Ethnicity

Economically Disadvantaged

**Non Economically Disadvantaged**

Students with Disabilities

**Non-disabled students**

Students with Limited English Proficiency

**Gender**

**Migrant status**

Data for required ~~sub~~ **student** groups have been collected by USOE for several years and is generated from the Data Warehouse. Utah school performance and LEA performance results are disaggregated by ~~sub~~ **student** groups.

## 5.2 Accountability system holds schools and LEAs accountable for the progress of student subgroups.

Utah's accountability plan uses three criteria – participation rate, academic achievement, and additional indicator – for determining in student subgroups, schools, and LEAs have made adequate yearly progress. The Data Warehouse serves as the data source for making the determination of AYP for student subgroups, schools, and LEAs. As described in section 1.4, the Data Warehouse stores data from test files, clearinghouse data (including student demographic information), and S3 year-end data containing additional student information for determining membership in relevant subgroups.

### Academic Achievement

In determining AYP for student subgroups, schools, LEAs and the state as a whole, Utah compares the percent of students proficient to the annual measurable objective, examines participation rates, and examines the additional academic indicator.

A student subgroup, school, or LEA of 10 or more students must meet or exceed the annual measurable objective for in ~~reading/language arts~~ **English language arts** and mathematics, must meet the participation rate for subgroups of 40 students or more, and meet the state's requirement for another academic indicator (attendance for elementary and middle schools and graduation for high schools). If a student subgroup, school, or LEA fails to meet or exceed the annual measurable objective, it must have reduced the percent of students not proficient by the appropriate percentage (*safe harbor*). If the *safe harbor* provision is employed, the additional indicator must be disaggregated and used for determining AYP for the subgroup.

Table 3 displays the impact data for various N sizes on student subgroups. These data indicate that the minimum N selected by Utah, N=10, will allow the maximum number of schools to be held accountable for student subgroup performance.

**Table 3: Impact Data for Various Minimum N Sizes – Grades 3-8**

Number of Schools with Subgroups Included in AYP Analysis for Various Minimum N Sizes (School with >10 students = 522)					
	Minimum N				
	10	25	30	50	75
School	522				
White	511	486	483	471	440
Low Income	491	444	427	355	265
Students with Disabilities	450	280	227	63	11
Limited English Proficient	308	173	149	81	41
Hispanic	294	161	144	87	48
Black	29	2	1	0	0

In calculating AYP for LEAs, schools, and subgroups, Utah employs a test of statistical significance with a one-tailed *alpha* of 0.01 for academic achievement of the annual measurable objective. This allows schools with small subgroup populations to be held accountable without falsely identifying a school. This creates a balance between validity

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(holding schools accountable for all students) and reliability (assuring that those subgroups identified have not been so identified simply on the basis of random fluctuation of scores). For AYP determination based on the annual measurable objective, a test of statistical significance will be applied for subgroups  $\geq 10$ . The null hypothesis is that the observed percent of students proficient in any subgroup is equal to the required percent proficient defined by the annual measurable objective. The test of statistical significance is a z-score with the distribution of school mean scores (in terms of percent correct) around the null hypothesis. A school or LEA makes AYP if the null hypothesis is *not rejected*.

In calculating AYP, any LEA, school, or student subgroup that does not meet the annual measurable AYP goal, must decrease the percentage of students not proficient by at least 10 percent in accordance with the *safe harbor* provision. Utah employs a test of statistical significance using a one-tailed *alpha* of 0.25 for determining school-wise *safe harbor* (improvement).

For student groups that do not meet the status AMO and do not meet the standard safe harbor requirement, a Safe Harbor Same Student Calculation will be applied. This approach compares the performance of students in the student group enrolled for a full academic year that did not meet either the status or safe harbor targets with the performance of these same students in the prior year (as long as they were tested anywhere in Utah) to determine if there was a 10% reduction in the percentage of these matched students scoring below proficient. This calculation will not include a confidence interval, and will only be applied when there is a 95% match rate for the student group.

#### Participation Rate

Participation in Core CRTs will be determined for each student subgroup, school, and LEA by comparing the testing pre-print file, test answer documents, all student file and clearinghouse data using the Data Warehouse. This process is used for all student subgroups, schools, and LEAs. For details about participation rate, see section 10.

#### Additional Indicators

The additional indicators for Utah's accountability plan are attendance (elementary/middle schools) and graduation (high schools). These indicators can be calculated using data in the Data Warehouse. Schools and LEAs must meet the state goals for each indicator to make AYP. In addition, a student subgroup must meet the additional indicator goals if the *safe harbor* provision is employed for the student subgroup. The state goals for the additional indicators are 93% attendance and 85.7% graduation rate. For details about these indicators, see section 7.

~~Because Utah cannot currently determine graduation rate for all subgroups, a proxy additional indicator will be used to determine AYP for 2003-2007. This proxy will be attendance. The attendance rate will be obtained by dividing the sum of days in attendance by the sum of days in membership across all students in the school and LEA. The goal for attendance will be set at 93%, consistent with the additional indicator goal for elementary and middle schools (see section 7.2). Schools must meet this goal or improve from the previous year.~~

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For a school that meets the annual measurable objective for all subgroups and thus uses only school level data for the additional indicator, graduation will be used. However, if a school employs safe harbor for a subgroup, AYP will be determined using graduation for the total school and attendance for the student subgroup(s). This temporary situation will apply equal criteria to all student subgroups while still holding the school accountable for graduation. Beginning in 2007, graduation will be the only additional indicator used at the high school level.

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5.3 Accountability system includes students with disabilities.

Utah has developed **an** alternate assessment for students with the most significant cognitive disabilities. The purpose of the alternate assessment is to measure the achievement of students with disabilities against alternate academic achievement standards as defined by the State. ~~The Utah's~~ Alternate Assessment (UAA) is designed for assessing students with ~~severe disabilities, especially those with~~ the most significant cognitive disabilities. ~~Objectives for the UAA are based on the student's IEP goals.~~ Proficiency on the Utah Alternate Assessment will be limited to 1% of the total state enrollment.

The state's preprinting of student IDs on answer sheets, **preparation of computer files for computer based testing, and** the scanning and scoring of Core CRTs within the state, **and with the computer based testing contractor,** and the USOE Data Warehouse provide a series of checks to verify the inclusion of students with disabilities in testing and in accountability.

The students with disabilities subgroup will retain the scores of students who exit from special education services, for two years.

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#### 5.4 Accountability system includes limited English proficient students.

Limited English proficient students are currently included in statewide testing and the reporting of results, and comply with NCLB requirements to ensure LEP students participate in testing. Students with limited English proficiency receive accommodations for testing, as outlined in Utah's Requirements for Testing document. These accommodations may include, but are not limited to linguistic accommodations and test administration in small group settings.

Beginning in the 2003-04 school year, Utah allowed students who had reached proficiency and completed two years of monitoring, in accordance to Utah's LEP proficiency definition, to be included in the LEP subgroup for AYP reports.

Students in the United States for less than one year will not be required to take the English Language Arts CRT ~~or the Science CRT~~, but will be required to take the math **and science** CRT. CRT scores for ELL students in their first year in the United States will not be used for AYP calculations. All other ELL students will participate in accordance with NCLB with appropriate accommodations. These accommodations may include, but are not limited to, linguistic accommodations and small group settings

The state's preprinting of student IDs on answer sheets, **preparation of computer files for computer based testing, and** the scanning and scoring of Core CRTs within the state, **and with the computer based testing contractor**, and the USOE Data Warehouse provide a series of checks to verify the inclusion of students with limited English proficiency in testing and in accountability.

- 5.5 The state has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.

In calculating AYP for subgroups based on the annual measurable objective, and *safe harbor* provision, Utah employs a test of statistical significance to subgroups  $\geq 10$  for each year (Year Two  $N \geq 20$ , with no less than 10 in a single year, etc). This allows schools with small subgroup populations to be held accountable without falsely identifying a school. This also creates a balance between validity (holding schools accountable for all students) and reliability (assuring that those subgroups identified have not been so identified simply on the basis of random fluctuation of scores).

For reporting purposes Utah applies a minimum size of ten for all subgroups.

For the purpose of determining participation rates, as a component of AYP calculation, Utah uses a minimum size of 40 for each subgroup. The NCLB requirement for participation allows little room for extenuating circumstances when a small group of students are involved. This would allow only two students in a subgroup of 40 to not participate in testing due to circumstances beyond the control of schools. Utah will, however, implement the new flexibility allowed for multi-year averaging of participation. For any subgroup, school, or LEA that does not achieve 85% or greater participation in any one year, they will not meet the criteria as an average of 95% is not attainable.

Table 11 provides impact data for the number of schools that would have sufficient students to include in AYP calculations for various N sizes. This chart clearly indicates that many schools would not be accountable for subgroups if an N size greater than 10 were used.

**Table 11: Impact Data for Various Minimum N Sizes – Grades 3-8**

Number of Schools with Subgroups Included in AYP Analysis for Various Minimum N Sizes (Schools with >10 students = 522)					
	Minimum N				
	10	25	30	50	75
Schools	522				
White	511	486	483	471	440
Low Income	491	444	427	355	265
Students with Disabilities	450	280	227	63	11
Limited English Proficient	308	173	149	81	41
Hispanic	294	161	144	87	48
Black	29	2	1	0	0



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5.6 The State has strategies to protect the privacy of individual students in reporting achievement results and in determining whether schools and LEAs are making adequate yearly progress on the basis of disaggregated subgroups.

To assure privacy for students, Utah does not report overall and disaggregated results for groups of less than ten students. Requiring ten or more for reporting is acceptable for the Family Educational Rights and Privacy Act (FERPA) requirements.

Test results for student subgroups and schools with less than ten students are not displayed either in the hard copy or electronic formats of the school and LEA report card. Instead of values, "<10" is displayed. If all or none of students in a student subgroup are in the same proficiency level, reports are masked using "<5%" or ">95%" .

## PRINCIPLE 6: Academic Assessments

### 6.1 Accountability system is based primarily on academic assessments.

Determination of AYP is based on percent of students proficient on Core CRTs, a required additional academic indicator (attendance in elementary/middle schools, graduation rate in high schools), participation rates, and employment of the *safe harbor* provision. Each of these components is determined for both in ~~reading/language arts~~ **English language arts** and mathematics.

in ~~reading/language arts~~ **English language arts**:

Utah uses the Core CRT results from in ~~reading/language arts~~ **English language arts** in grades 3-8 and grade 10 to determine percent of students proficient for purposes of AYP. Proficient is defined as students reaching Level 3 or Level 4. Students in Utah enroll in grade specific language arts courses and therefore participate in the grade specific test. The Utah CRT Language Arts test has several subtests, all of which are included in determining proficiency. The subtests for Grades 3-6 are oral language, comprehension, vocabulary, writing, phonics and spelling, and viewing. The subtests for Grades 7, 8, and 10 are reading, writing, listening, and viewing.

Mathematics:

~~Student in Utah, grades 3-5, enroll in grade specific math courses and therefore participate in the grade specific tests. Utah administers Core CRTs for math in grades 3-5. Students in Utah enroll in grade specific mathematics courses in grades 3-5 and participate in grade specific tests.~~ However, at grades 6, 7, 8, and high school Utah does not have a single grade-level assessment for use in determining AYP because students are allowed to select from a variety of mathematics courses at these levels to encourage advanced math achievement. Specifically, students in 6<sup>th</sup> grade may select to enroll in grade 6 math (grade-level course) or pre-algebra, students in the 7th grade may select to enroll in Math 7 (grade-level course), pre-algebra, or algebra. At the 8th grade, students may advance to the next course in the series, instead of all students being enrolled in pre-algebra (grade-level course). By high school (grades 10-12), the courses in which Utah students are enrolled are quite varied; consequently, Utah does not have a single, grade-level test at the high school level

Utah uses mathematics tests in grades 3-5 that are grade specific. For grades 6-8 the proficiency level for ~~any~~ **the** course **CRT** in which students are enrolled, at the grade level course or higher, is used and reported. This under-represents overall mathematics achievement since more advanced students' scores will not receive "additional" credit. In grades 6, 7, and 8 virtually all students are enrolled in a mathematics course **and take the associated CRT**. Mathematics achievement in grades 10-12 is determined through performance on algebra or geometry Core CRTs. **As with other CRTs, the results determine the percent of students proficient. Proficient is defined as students reaching Level 3 or Level 4.**

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In compliance with Utah's current agreement with the Department of Education, starting points based on 2002 data and AYP determination for 2003 is based on algebra and geometry scores for students, Grades 10-12, enrolled in these courses at the high school.

In addition to language arts and math CRTs,

**Science:**

Students in Utah, grades 4 - 8 enroll in grade specific science courses and therefore participate in the grade specific test. Utah administers Core CRTs for science in grades 4 – 8. However, at grades 9 – 12, students are allowed to select from a variety of science courses. Science CRTs for high school are earth systems, biology, physics and chemistry. As with other CRTs, the results determine the percent of students proficient. Proficient is defined as students reaching Level 3 or Level 4.

## PRINCIPLE 7: ADDITIONAL INDICATORS

### 7.1 Accountability system includes graduation rate for high schools.

NCLB regulation 200.19(a)(1) requires use of a graduation rate as the "other academic indicator" in determining the AYP of high schools and defines the graduation rate for this purpose as "the percentage of students, measured from the beginning of high school [presumably 9th grade], who graduate from high school with a regular diploma ... in the standard number of years."

This definition implies a cohort rate. Utah is exercising the option under 200.19(a)(1)(b) to adjust this definition slightly in order to ensure statewide comparability and reduce error in measurement by restricting the cohort to grades ten through twelve, since Utah high schools, which may implement any of three different grade spans, have only these three grades in common; in fact, nearly half have only these three grades—Grades 7-12 (21% of high schools), Grades 9-12 (33%), and Grades 10-12 (46%).

Specifically, the cohort graduation rate is operationalized by Utah, according to the recommendation of the NCES (U.S. Dept. of Ed., August 2002, p. 3), to simulate the movement of a class through high school:

The number of students who graduated from 12<sup>th</sup> grade in the current year divided by the sum of: (1) these same graduates, and (2) the number of students who dropped out of 12<sup>th</sup> grade in the current year, (3) 11<sup>th</sup> grade in the prior year, and (4) 10<sup>th</sup> grade in the year before that.

In order to continue applying official NCES definitions (U.S. Dept. of Education, January 2003, pp. 25, 79-81)—in distinguishing "graduates" from "other completers", and "dropouts" from "transfers" [see Note below]—which have already been incorporated into Utah State Board of Education rule (R277-419), Utah also lags the rate by one year; thus, the 2003 report includes the rate for the 2002 cohort.

Regular diploma graduates may include students with disabilities who can be retained as "seniors" until the age of 22. As long as such students are retained, their cohort year is adjusted, so that their completion status is included in the calculation of the graduation rate for the graduating class of the year in which it is finally determined.

Since graduation counts are derived from student level detail, they can be disaggregated by all of the programmatic and demographic categories identified in NCLB legislation. Dropout counts, however, are only available in disaggregated form by gender and ethnicity, as required by the NCES in its Common Core of Data (CCD) surveys, so graduation rates cannot be calculated for all subgroups.

To address the discrepancy between NCES/CCD and NCLB/AYP in disaggregation requirements, Utah will begin collecting dropout counts at the student level during the 2004-05 school year, when the Class of 2007 is in 10th grade.

In the meantime, for the reporting years 2003–2007, we will use the attendance rate (see Section 7.2) as a proxy additional indicator in determining AYP for high schools as follows:

- (a) For a school that meets the annual measurable objective for all subgroups and thus requires only school level data for the additional indicator, the graduation rate will be used; however, if
- (b) a school employs safe harbor for a subgroup, AYP will be determined using graduation for the total school and attendance for the student subgroup.

This temporary situation will apply equal criteria to all student subgroups while still holding the school accountable for its overall graduation rate. Beginning with the Class of 2007 (in reporting year 2008), a fully disaggregated graduation rate will be the only additional indicator used at the high school level.

NCLB regulation 200.16(a) specifies the 2001–02 school year as the base year for establishing the "starting point" for measuring AYP. Utah interprets this to mean that we should derive a "cut score" from the graduation rate of the Class of 2002. Using available data and method outlined above, we estimated the graduation rate for this cohort from the beginning of their 10th grade year through the end of their 12th grade year by ethnicity (with the count of regular diploma graduates in parentheses):

Asian	=	84%	(502)
Black	=	65%	(172)
Hispanic	=	65%	(1,574)
Indian	=	67%	(313)
Pacific Islander	=	76%	(315)
White	=	88%	(27,306)
Total	=	86%	(30,182)

The following decision rules will be applied to each unit of analysis (school or LEA):

- If the cohort contains less than 40 students, there are too few students to make a reliable decision about the graduation rate, the graduation rate indicator is "not applicable" to the unit.
- If the cohort is equal to or greater than 40 students and the graduation rate is greater than 85.7%, the unit "passes";
- If the graduation rate is less than 85.7% but greater than the graduation rate for the prior year cohort, the unit "passes";
- In all other cases the unit "fails".

The 85.7 percent cut score is just below the rate for the entire cohort in the base year (see the Total row, Table 12). As the table shows, this will be an ambitious goal for several of the ethnic groups and presumably for the students with disabilities and limited English proficiency populations.

The figure of 85.7 has a meaningful interpretation in terms of the event dropout rate. It is obtained by accepting a maximum event dropout rate of 5 percent per year over the life of the cohort. Thus, 95 percent of the cohort remains at the end of 10th grade, 90.025 percent (95% of 95%) remains at the end of 11th grade, and 85.738 percent or (rounded) 85.7 percent (95% of 95% of 95%) remains at the end of 12th grade, the normative time of graduation.

**Table12: Dropout Event Rate by Grade**

Grade	2001 Fall Enrollment	2001-2002 Dropout Event Count	Dropout Event Rate
7	35,538	367	1.03%
8	35,786	396	1.11%
9	35,029	519	1.48%
10	36,118	843	2.33%
11	35,923	1,387	3.86%
12	34,951	2,430	6.95%

Finally, note that this figure is not a starting point as such, but a constant applied every year, since under NCLB regulation 200.19(d)(1), "states are not required to increase the goals of its others academic indicators over the course of the timeline."

## **7.1 Accountability system includes graduation rate for high schools.**

NCLB regulation 200.19(a)(1) requires use of a graduation rate as the "other academic indicator" in determining the AYP of high schools and defines the graduation rate for this purpose as "the percentage of students, measured from the beginning of high school [presumably 9th grade], who graduate from high school with a regular diploma ... in the standard number of years." This definition implies a cohort rate. From the beginning, Utah has exercised the option under 200.19(a)(1)(b) to adjust this definition in order to ensure statewide comparability and reduce error in measurement by restricting the cohort to grades ten through twelve, since half of Utah high schools serve only those three grades.

Through reporting year 2007 (Class of 2006), the cohort graduation rate was operationalized according to the recommendation of the NCES (U.S. Dept. of Ed., August 2002, p. 3) to simulate the movement of a class through high school:

The number of students who graduated from 12<sup>th</sup> grade in the current year divided by the sum of: (1) these same graduates, and the number of students who dropped out of (2) 12<sup>th</sup> grade in the current year, (3) 11<sup>th</sup> grade in the prior year, and (4) 10<sup>th</sup> grade in the year before that.

In order to continue applying official NCES definitions (U.S. Dept. of Education, January 2003, pp. 25, 79-81), that is, to distinguish "graduates" from "other completers", and "dropouts" from "transfers" [see Note below], which had been incorporated into Utah State Board of Education rule (R277-419) in 1997, Utah also lagged the rate by one year; thus, the 2007 report includes the rate for the 2006 cohort, or, in other words, the Class of 2006.

Regular diploma graduates may include students with disabilities who can be retained as "seniors" until the age of 22. As long as such students are retained, their year of expected graduation is incremented by one, so that their completion status is included in the calculation of the graduation rate for the graduating class of the year in which it is finally determined.

As indicated in its original plan, Utah began collecting dropout counts at the student level during the 2004-05 school year, when the Class of 2007 was in 10th grade. High school completion status data is thus now available for each individual student in the Class of 2007 and will be the basis of AYP graduation rate reporting in 2008, according to a simplified formula:

Graduates in cohort divided by graduates plus dropouts in cohort, where entry into the cohort begins with 10<sup>th</sup> grade.

Since high school completion status counts are derived from student level detail, they can now be disaggregated by all of the programmatic and demographic categories identified in NCLB legislation.

NCLB regulation 200.16(a) specifies the 2001-02 school year as the base year for establishing the "starting point" for measuring AYP. Utah interpreted this to mean that we should derive a "cut score" from the graduation rate of the Class of 2002. Using then available data and the initial formula outlined above, we estimated the graduation rate for this cohort at 86% from the beginning of their 10th grade year through the end of their 12th grade year. We then developed the following decision rules for application to each unit of analysis (school or LEA):

- **If the cohort contains less than 40 students there are too few students to make a reliable decision about the graduation rate, the graduation rate indicator is not applicable and so the unit “passes”;**
- **If the cohort is equal to or greater than 40 students and the graduation rate is greater than 85.7%, the unit “passes”;**
- **If the graduation rate is less than 85.7% but greater than the graduation rate for the prior year, the unit “passes”;**
- **In all other cases the unit “fails.”**

The 85.7 percent cut score is just below the rate for the entire cohort in the base year. Synthetic cohort rates calculated for the Class of 2006 and submitted to ED via the CSPR in December 2007, suggest that this remains an ambitious goal for most demographic subgroups.

The figure of 85.7 also has a meaningful interpretation in terms of the event dropout rate. It can be obtained by accepting a maximum event dropout rate of 5 percent per year over the life of the cohort. Thus, 95 percent of the cohort remains at the end of 10th grade, 90.025 percent (95% of 95%) remains at the end of 11th grade, and 85.738 percent or (rounded) 85.7 percent (95% of 95% of 95%) remains at the end of 12th grade, the normative time of graduation.

Finally, we note that this figure is not a starting point as such, but a constant applied every year, since under NCLB regulation 200.19(d)(1), "states are not required to increase the goals of its other academic indicators over the course of the timeline."

For the 2008 AYP reports only - If a student group makes safe harbor (with or without confidence interval) and if the n size is greater than 40 for both years and if the graduation rate is below 85.7% for a student group other than whole school, attendance for 2007 & 2008 will be used to determine if there is an increase in the additional indicator. This will only be used for 2008 to allow a baseline to be set for each student group for graduation rate.



**7.2 Accountability system includes an additional academic indicator for elementary and middle schools.**

NCLB regulation 200.19(a)(2) requires "at least one academic indicator" for elementary and middle schools but does not identify a specific indicator. In subsection (b)(3) "attendance rates" are mentioned as a possibility, and Utah uses the attendance rate for this purpose.

Unfortunately, Utah cannot empirically derive a cut score from the 2001-02 school year for the attendance rate as done with the graduation rate, because attendance data were not collected at the state level in that year nor for several years -- funds are allocated to districts on the basis of membership rather than attendance, and the NCES/CCD has not required reporting attendance data since 1992. Utah, therefore, relies on a recommendation from the Center for Assessment (NCIEA, 2003), which has considerable experience in consulting on the construction of educational accountability systems in several states, as to what constitutes a reasonable value for this purpose.

Accordingly, units of analysis that achieve or exceed an attendance rate of 93 percent, as well as those that are below that standard but have improved their attendance rate when compared with the prior year, are considered as having met the additional indicator requirement of AYP.

The attendance rate is obtained by dividing the sum of days in attendance by the sum of days in membership across all students in the unit of analysis. Because attendance data is collected by the USOE at the student level, it can be disaggregated by all student subgroups when a school employs the safe harbor provision.

### 7.3 Additional indicators are valid and reliable.

Regarding the graduation rate, the definitions of "graduate" and "dropout" used by each LEA and the formula used by the USOE to calculate the rate explicitly comply with NCES standards. In addition, an independent accounting firm formally audits the dropout count in each LEA annually following these guidelines (State of Utah, APP-C5):

"2a. From the prior year attendance records, select a sample of students who did not complete the prior school year in grades 7-12 and were NOT identified by the district as dropouts. The sample size should be equal to or greater than 5% of the actual number of such students or, in other words, of the sampling frame; however, the sample size should not be fewer than 10 and need not exceed 30.

"2b. For the sample of students defined in 2a, determine whether the students have been properly excluded from the dropout totals as reported in the district's Annual Public School Fall Enrollment Report in accordance with SOE's rules for pupil accounting R277-419-5. In other words, determine whether adequate documentation exists to support the district's claim that the student was not a dropout."

Regarding the attendance rate, each LEA uses the same definition:

"Attendance" is the total number of days a student attended a specific school. A student is counted as "in attendance" on a school day if the student was counted on the class role by a teacher as being "present" -- in Grade 1-6, at any time during the day; and in Grades 7-12, in at least one period of the day.

The formula used for calculating the attendance rate reflects actual student behavior in the aggregate, on the one hand, and the school's differential responsibility for each student, on the other: a student enrolled for a shorter period with perfect attendance appropriately enhances the school's performance, but a student enrolled for a longer period with poor attendance is appropriately given more weight by virtue of having more days in membership, so the school has an incentive to improve that student's attendance.

#### NOTE

For the purposes of NCLB/AYP, the completion status of each secondary (Grade 7-12) student who leaves a Utah public school is (or, when dropout data collection is fully automated, will be) represented in the Data Warehouse by an "exit code" according to the following classification:

- Graduate (numerator and denominator) = "GR" or any of six "early graduation" codes.
- Dropout (denominator only) = "DO" or "CT" (the latter is a student who "completes" school without obtaining a "regular diploma").

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- Transfer (excluded from calculation) = any of seven codes identifying legitimate ways of leaving school, including death ("DE") and withdrawal ("WD") due to illness or accident.

Students who have been "expelled" ("EX") or are suspended ("SU") at the end of the year are also treated as dropouts, unless their status changes by the beginning of the following year.

## **REFERENCES**

State of Utah, Legal Compliance Audit Guide, Appendix C, [March 2004].  
<http://www.sao.state.ut.us/sulcag/APPC5.htm>

Utah Administrative Code, R277-419 Pupil Accounting [January 1, 2004].  
<http://www.rules.utah.gov/publicat/code/r277/r277-419.htm>

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**PRINCIPLE 8: SEPARATE DECISIONS FOR ~~READING/LANGUAGE ARTS~~ AND MATHEMATICS**

**8.1** Accountability system holds schools and districts separately accountable for in ~~reading/language arts~~ **English language arts** and mathematics.

The AYP calculation examines separately the percent of students proficient in in ~~reading/language arts~~ **English language arts** and mathematics. In addition, participation rates are examined for each subject separately. Baseline values and annual measurable objectives are defined for each subject as well. AYP is determined for each student subgroup, school, LEA and the state as a whole for in ~~reading/language arts~~ **English language arts** and mathematics.

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## **PRINCIPLE 9: SYSTEM VALIDITY AND RELIABILITY**

### **9.1 Accountability system produces reliable decisions.**

Utah has incorporated several features into the accountability program to ensure reliable decisions.

- Core CRTs used as academic measures have been developed using industry standards to produce valid and reliable scores. Use of these tests to make AYP decisions sets a foundation for making reliable decisions.
- Use of statistical significance tests instead of an absolute minimum N for annual measurable objectives will reduce the probability of a Type 1 error (falsely identifying a school for program improvement).
- An LEA is identified for improvement only when it misses AYP in the same subject and in all grade spans for two consecutive years, or the other academic indicator in all grade spans for two consecutive years.
- Use of statistical significance tests and multiple years of data for making *safe harbor* decisions will reduce the probability of Type 1 errors.

## 9.2 Accountability system produces valid decisions.

Utah incorporates several key processes to ensure valid decisions about AYP.

- Tests of statistical significance allow all schools to be accountable for all student subgroups regardless of group size.
- All students are included in Utah's accountability plan, and monitoring processes are in place to verify inclusion.
- Appeals will be allowed at the school and LEA level. A school may have 30 days to appeal an AYP decision to the LEA. An LEA may have 30 days to appeal an AYP decision to USOE.
- **An appeal should be based on documented evidence based on the following criteria:**
  - **An error in the aggregating and merging of data and/or a calculation error, or other conclusion errors that directly affects school or LEA status**
  - **Extreme circumstances that affected data and/or test administration that had a significant impact on the school (e.g., flood, fire, natural disaster)**
- **The Local Educational Agency (LEA) determines whether a school is making adequate yearly progress (NCLB 1116 (a)(1)(A))**
- **The procedures and guidelines for the appeal process are approved by the Utah State Board of Education**
- USOE has a validation of data processing procedure in place consistent with the established timeline for data submission, processing, and return of results.

Schools may appeal the proposed identification of not making AYP for statistical or other substantive reasons, such as catastrophic events that may have caused errors in test results. The process for technical appeals is detailed here.

Quality control and a chance to correct any errors are critical to the process of creating a valid and reliable system. Student data (background & behavior) and student performance in the academic areas of math and language arts serve as foundations for determining AYP for student subgroups, schools, and LEAs. These student level data are submitted at certain intervals during the school year via the USOE clearinghouse (<http://www.usoe.org/Clearinghouse/Clearinghouse.htm>). These data are validated through quality assurance procedures, summarized and forwarded to the USOE data warehouse (<http://www.usoe.org/upass/>). AYP analysis will be performed on the needed USOE warehouse data elements.

Formal and informal appeals processes occur at numerous steps along the way. The following are key data submissions, their timeline and how each element and the overall school status may be appealed.

**Student Pre-Print Data (March/April)** - Preprint student data is submitted to USOE. This data includes student demographic data. At the district and school level, this data is summarized and sent to districts to approve or make corrections in their operational student data and then resubmit it. This individual information is used to pre-print Core

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CRT answer sheets **or prepare computer tests**. This process both reduces work for the students and improves student data. Districts provide written approval of their pre-print data before answer sheets are printed **or computer tests prepared**.

**Validation and Appeals:** Districts can make corrections and resubmit data up to testing window.

**Core CRT Scanning & Scoring (May/June) - Math and Language Arts, math and science** Core CRTs are scanned and scored by USOE **or the computer based contractor**. Utah is one of only a few states that do in-house scanning and scoring. This approach leads to faster scoring turnaround, stronger quality assurance procedures and more accurate test data transfer to our USOE Data Warehouse. Throughout the scanning process, inconsistencies and problems with student answer sheets are identified and corrected. Depending on the issue, either the district or school is directly involved. USOE scoring staff is assigned certain districts. This has enabled a relationship to develop with the districts and increases the cooperation as scanning or scoring issues arise. Scoring turnaround and testing procedures are well documented in Utah Board rule, R277-473-3. Time Periods for Administering and Returning Test Materials.

**Validation and Appeals:** Districts and schools work directly with USOE scoring staff to resolve any inconsistencies or possible errors. These issues and their resolution are documented and dated by USOE staff. Basic score distributions are also examined to assure students are being scored against the correct answer key. Districts must signoff on preliminary raw score results in June. In addition, USOE Scoring staff compare raw score results at the school and grade level with previous years' results to check for testing irregularities and assure quality data.

**Clearinghouse "End of Year" data submission (July) -** From an accountability perspective, this student level data submission provides background characteristics, grade level data, enrollment date, exit date, graduation status, and attendance. This serves as the foundation of student level identification to which test data is matched. These data are passed on to the USOE Data Warehouse for integration with the other data systems.

**Validation and Appeals:** Districts are encouraged to submit this large data file at the start of June. Once data are submitted, USOE analysts verify the structure and format of the data. An edit check program is run against the data to verify its quality and completeness. Written reports and diagnostics are sent to districts regarding this data. Districts are to make necessary corrections and modifications. Final clearinghouse data are due July 15. By that point, districts must provide written verification that data are accurate and complete.

**Teacher and Course Data (i.e., CACTUS) submission (July) -** Teacher and course level data is maintained in the CACTUS database. This database is centralized by USOE. CACTUS serves as the operational teacher system and is updated throughout the school year. Districts are required to have all changes into the system finalized by July 1<sup>st</sup>.

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**Validation and Appeals:** USOE staff work on a case-by-case basis with districts. Regular training on CACTUS and updates to the data system are conducted during the year. Districts receive written notification reminding them of the CACTUS data submission deadline. The role of schools and districts is to assure the data is accurate and up to date by the end of the school year.

**Behavior and Assessment Data Merge (July/August)** - USOE data warehouse merges various data systems needed for AYP calculations. Utah has a State-wide Student Identifier used to merge student data.

**Validation and Appeals:** USOE data warehouse staff will provide districts and their schools data on the success rate and issues regarding matching and merging of student data. Depending on the nature and extent of the problem and overall timelines, districts may resubmit a data element. The State Associate Superintendent in charge of data will ultimately make this decision.

**Appeals and Consequences of missing data deadlines** - Board Rule R277-484. *Data Standards, Deadlines and Procedures* gives clear and specific detail regarding data deadlines. Districts must meet data deadlines or funds will be withheld. This rule also specifies procedures to get an extension for a deadline.

**District and School review of AYP status** – Utah schools and districts will have 30 days to appeal the AYP decision as long as they meet all of their data submission requirements. All data elements (outlined above), statistical procedures, merging of student data (outline above) and AYP status will be reviewed. Appeals must be submitted in writing between schools and the LEA and between the LEAs and the SEA. The SEA and the LEA will follow all necessary procedures detailed above. The State Superintendent and the Utah State Board of Education will make final decisions regarding appeals and missing data deadlines.



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### 9.3 State has a plan for addressing changes in assessment and student population.

Core CRTs are post-equated using established psychometric methods and procedures. As new or revised assessments are administered, they will be included in the AYP determination.

~~The baseline for newly opened schools and schools experiencing significant changes in student population due to boundary changes will be based upon the LEAs most recent data. Charter school baseline data will be based on the district in which it is located. These data will be compared to the school's actual data generated during its first year of operation for AYP calculations. In subsequent years, data generated by the school will be used for making AYP determinations. The goal of 100 percent proficiency by 2013-2014 will be established for new schools.~~

New schools/districts are defined as a school/district that has had no prior enrollment or a school/district with significant (40%) change in population or staffing due to boundary changes, school closures, or changes in grade level configurations that now serves a different population such that fair comparisons cannot be made to the prior year's performance. A new school/district will begin a new base line for purposes of calculating AYP. In subsequent years, data generated by the school/district will be used for making AYP determinations. The goal of 100 percent proficiency by 2013-2014 will be established for new schools/districts.

## **PRINCIPLE 10: PARTICIPATION RATE**

**10.1** Accountability system has the means for calculating the rate of participation in the statewide assessment.

Utah has several processes in place to account for all students and make a determination of participation rate.

- Answer documents are generated by the pre-print file and submitted to the USOE by each LEA. Each Core CRT answer sheet includes a special codes box that is completed for each student. Participation and non-participation are indicated in the special codes box. All answer documents are returned regardless of student participation.
- Computer tests are generated by the pre-print file and submitted to the Computer Based contractor by each school. Each computer test file include a special codes box that is completed for each student. Participation and non-participation are indicated in the special codes box. Computer files indicate the participation of the student on each test.
- The all-students files submitted by LEAs are used as part of the scoring system. Student records are matched with test results.
- The final participation rate is based on participants divided by both participants and non-participants as defined by the participation special codes boxes on the answer documents and computer tests.
- ~~The final participation rate is based on the number of students tested compared with the number of students enrolled at the end of the test administration window.~~

The 95 percent participation rate will apply to student subgroups and schools with a minimum size of 40. Utah will, however, implement the new flexibility allowed for multi-year averaging of participation. For any subgroup, school, or LEA that does not achieve 85% or greater participation in any one year, they will not meet the criteria as an average of 95% is not attainable.

The 95 % participation rate will be based on membership at the school or LEA. All students enrolled at a school must participate in testing whether or not the student's score will be part of the academic achievement determination as part of AYP. Students not included in the school academic achievement determination may, in fact, be counted at the LEA level, necessitating a test score.

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**10.2** Accountability system has a means of applying the 95 percent assessment criteria to student subgroups and small schools.

Schools buildings and LEAs will be required to administer Core CRTs to all students enrolled at the time of test administration. Schools and LEAs that include 95 percent of the enrolled students meet this requirement for AYP. Participation is calculated for in ~~reading/language arts~~ **English language arts** and mathematics separately. Those schools and LEAs in which less than 95 percent of any student subgroup participates in testing do not meet the AYP standard, provided that the subgroup size is at least 40.