

ESSA Public Comment Period: Accountability Feedback

Positive Feedback

1. The Beyond the Core indicator is an important component.
2. CCRPI is simplified and more transparent.
3. The fewer number of indicators is a positive.
4. The elimination of bonus points is desirable.
5. State intervention (CSI and TSI) entrance and exit criteria is clearer.
6. There is support for the emphasis on career preparation – WBL, EOPA, pathways, TCSG.
7. There is support for individual school improvement targets as opposed to aggregate state targets.
8. There is support for the balance between Content Mastery and Progress.
9. There is support for weighting performance by achievement level in Content Mastery.
10. There is support for the alignment with state performance contracts.
11. There is support for the minimum N size of 15, with some feedback requesting 10 and other feedback requesting 20.

Commentary: This feedback echoes the intentions of the working committee. ESSA Accountability Committee Members received similar feedback in their conversations. Members noted they received support for the reduced number of indicators but there were still some questions about specific indicators.

Feedback That is Required in State or Federal Statute

<i>Feedback</i>	<i>Context</i>
Eliminate standardized testing and/or CCRPI.	Both are required in state and federal law.
Place most of the emphasis in CCRPI on Readiness.	Federal law requires the non-school quality or student success indicators carry “substantially more weight.”
Include science and social studies in Progress.	State law limits the number of science and social studies assessments administered, prohibiting the calculation of growth in these content areas.
Do not penalize schools for students who opt-out of state assessments.	Federal law requires that at least 95% of all students and all subgroups of students participate in mandated state assessments. Furthermore, federal law requires that accountability systems account for insufficient participation rates (< 95%). It is not permitted to remove students who opt-out from the participation rate calculation.

Commentary: This feedback was noted; however, state and/or federal law does not allow for this feedback to be addressed in a different manner than what is currently proposed.

Key Issues to Discuss

Indicators

1. Should additional indicators be included in CCRPI?
 - a. Suggestions include soft skills assessment; science in additional grades; utilization of the counselor specific evaluation instrument; points for performance based assessments; a CTAE content mastery measure; Test of Adult and Basic Education (TABE – workforce development); access to and use of extracurricular and expanded learning opportunities; in-school and out of school suspensions; use of corporal punishment; number and percentage of students enrolled in Georgia’s Pre-K, Head Start, and Early Head Start; access to and use of extracurricular and expanded learning opportunities; accessibility of quality rated early care for all children under the age of six; a developmentally appropriate indicator(s) of readiness for younger children that capture grades K-2; school climate and safety; library media programs; mental health programs; students receiving 150 minutes (ES) or 225 minutes (MS) of physical education per week; completing SAT/ACT prep classes; admission into TCSG/USG before the end of their senior year; eligibility for HOPE their senior year; actively involved in clubs and sports in high school; tardiness; STEM/STEAM certification; capstone project.

One of the guiding principles of the CCRPI redesign was to develop a simple, streamlined accountability system that focuses on the opportunities and outcomes expected of all students. A common critique of the current CCRPI is that the system is too complex and includes too many indicators, rendering it difficult for school leaders to set clear goals and work towards them effectively. Many complained that the current CCRPI encouraged schools to “chase points” by implementing programs valued by CCRPI. The ESSA Accountability Working Committee wanted to ensure that the redesigned CCRPI focused on key outcomes, leaving schools with the flexibility to determine the best way to serve their communities and improve outcomes for all students.

It is also necessary to make it clear that CCRPI is not a compliance tool. There are many valuable programs and policies that school communities may choose to implement because they meet their needs. To encourage innovation and focusing on the needs of students, CCRPI will award points for improved outcomes and not for implementing specific programs. While CCRPI no longer provides points for specific programs, that should not be viewed as a policy statement that the program is not valuable. Such programs can have value when implemented well, leading to improved outcomes for students. CCRPI can shine a light on the great work schools are doing and areas in need

of improvement, but it must be used as a tool by communities and other stakeholders to engage in meaningful conversations around the opportunities their schools are providing and how to improve student opportunities, outcomes, and preparedness for college, career, and life.

2. Should we have more emphasis on career readiness? Should we have career readiness at the elementary and middle school levels?

Both college and career readiness are valued and are reflected in the redesigned CCRPI. At the high school level, several indicators measure both college and career readiness, such as literacy, student attendance, accelerated enrollment (earning advanced credit – academic or technical – through Advanced Placement, International Baccalaureate, Move On When Ready), and pathway completion (advanced academic, CTAE, fine arts, world language). An additional college and career readiness indicator focuses on both college readiness (college readiness scores on SAT, ACT, AP, or IB; and entering TCSG/USG without needing remediation) and career readiness (national or state credentials; work-based learning). The elementary and middle school levels focus on preparing students for their next step by emphasizing student achievement, student growth, literacy, student attendance, and exposure to courses beyond the traditional academic core. At the middle school level, the Beyond the Core indicator includes career exploratory courses.

The ESSA Accountability Working Committee stressed the need for students to be both college and career ready; however, it is necessary that all CCRPI indicators be measurable, valid, and reliable. Additionally, the Committee felt that activities mandated in state law (career awareness lessons, career assessments/inventories, and individual graduation plans) should not be included in CCRPI given that CCRPI is not a compliance document. Given that these are required by state law, students should be exposed to these career readiness activities even if they are not included in CCRPI.

3. Should Closing Gaps include graduation rate targets for high schools?

Closing Gaps should be consistent across grade band in order to maximize comparability. Therefore, graduation rate targets are not included in Closing Gaps at the high school level. Both four- and five-year graduation rate targets, along with Progress Towards English Language Proficiency targets, will still be calculated and reported as part of CCRPI.

4. Attendance – We received a lot of support for attendance; some thought the definition should be more stringent than 10%; some thought attendance should be removed.

Given the variety of feedback received, the proposed definition of student attendance (absent less than 10% of enrolled days) strikes a balance between making attendance a priority while giving some flexibility based on circumstances outside of a school's

control. Additionally, the 10% definition accounts for the varying length of school calendars across the state.

Early Learning

5. How can K-3s be issued an overall CCRPI score? There is a need for early learning measures.

While K-3 schools do not receive Progress scores, they do receive scores for Content Mastery, Closing Gaps, and Readiness. Two of the three Readiness indicators, Student Attendance and Beyond the Core, include K-3 students.

The Accountability Working Committee acknowledged that early learning needs to be a priority; however, given the lack of measures available at these grade levels, there are not currently any viable options for CCRPI. The Committee supports the GaDOE bringing together a group of Georgia stakeholders to further explore this issue.

6. How can the accountability system support readiness and literacy in early childhood (K-2)?

Stakeholders have voiced competing interests – a desire for less emphasis on standardized testing but a desire for more K-3 measures for accountability. Currently, there is not a K-3 literacy assessment utilized by all districts, nor is there a desire for the state to mandate what is used by districts since districts choose what is best for their students. Additionally, formative assessments are designed to improve student learning and should not be used for accountability. DOE is currently developing a developmentally appropriate grades 1 and 2 formative assessment for literacy and numeracy. This assessment will be diagnostic and not high stakes (included in CCRPI) but will provide a bridge of data from K through 3rd to districts and parents.

Subgroups

7. Should subgroup performance on each indicator be included in scoring?

ESSA maintains a focus on subgroup performance and ensuring that all students can be successful. It is important that subgroup performance on all indicators be made available to the public as part of the CCRPI reporting system. However, including subgroup performance on all indicators in the scoring system would make the system complex and difficult for the public to understand, thereby diminishing the value and impact of the system. In particular, this could be challenging as schools have different numbers of subgroups with different N sizes and could affect comparability. The Accountability Working Committee desires to maintain a focus on subgroups without complicating the accountability system. Therefore, subgroup performance on all indicators will be reported for informational purposes and transparency. Furthermore,

the Closing Gaps component provides a scored opportunity within the accountability system to hold schools accountable for the performance of individual subgroups.

8. Should ED, EL, and SWD subgroups be weighted in Closing Gaps?

The ESSA Accountability Committee noted that providing additional weight (1.5 points) to ED, EL, and SWD subgroups for meeting higher improvement targets (e.g., a 6% improvement target) would highlight and incentivize working with these traditionally disadvantaged subgroups. There were some questions among committee members as to how this would be operationalized in schools, if it would add complexity to the CCRPI system, and how the Community Eligibility Provision impacts the ED subgroup. However, one committee member noted that if these are areas we are struggling with, we should put a little more emphasis on them to encourage schools to focus on them.

Targets

9. Are 3% targets ambitious enough?

The 3% improvement targets align with state performance contracts. While the concerns about the targets not being ambitious are noted, it is critical that the state and federal accountability systems align. If there is a strong desire for more rigorous targets, the targets for both accountability systems should be addressed simultaneously. Additionally, the Committee believes that the 3% improvement targets are ambitious but attainable – schools can take action to make improvements and not feel defeated by over-ambitious targets.

Based on preliminary impact data from 2015 and 2016, approximately 49.63% of targets were met across all schools. The following table shows the percent of targets met by subgroup.

	ELA	Mathematics	Science	Social Studies	4-Year Graduation Rate
All Students	45.97%	60.63%	41.82%	44.75%	50.24%
American Indian / Alaskan Native	NA	NA	NA	NA	NA
Asian	69.84%	83.17%	68.91%	76.95%	43.82%
Black	44.19%	52.18%	42.35%	45.02%	53.86%
Hispanic	44.29%	57.59%	45.33%	45.05%	56.99%
Multi-Racial	56.19%	65.17%	55.10%	68.06%	46.43%
White	57.00%	70.03%	49.44%	49.83%	50.29%
Economically Disadvantaged	43.58%	55.79%	38.72%	41.02%	49.59%
English Learner	40.16%	56.41%	37.68%	38.56%	51.09%
Students With Disabilities	41.64%	52.83%	44.15%	43.31%	51.17%

Given that just under one-half of targets are currently being met, with that figure as low as 37.68% depending on the content area and subgroup, the 3% improvement targets are ambitious and will incentivize continuous, sustainable improvements for all students.

10. Should the same long-term goal (i.e., a percentage) be set for all subgroups?

This would be similar to the previous Annual Measurable Objectives (AMOs) that were difficult to meet, especially for schools further behind. The proposed 3% improvement targets take into account a school's starting point and encourage continuous, sustainable improvement. Additionally, schools and subgroups that are further behind will be expected to make greater annual improvements under this target structure.

11. Can there be better alignment with the SWSS and Charter System performance contracts?

Federal law (ESSA) requires that all states set long-term goals and measurements of interim progress for academic achievement, graduation rates, and progress towards English language proficiency. In order to align these goals and targets with the existing state accountability system (SWSS and Charter System contracts), Georgia has set 3% improvement targets for its goals under ESSA. The ESSA Accountability Working Committee favors this alignment between the accountability systems, noting that school leaders are becoming familiar with the language (3% improvement) and value similar targets across both systems.

There are key differences between the state performance contracts and federal requirements that make full alignment impossible. First, the SWSS and Charter System contracts have different accountability structures. The federal accountability system must have the same system of goals and targets for all schools. Additionally, the state performance contracts are based on overall CCRPI scores, whereas ESSA requires goals and targets for specific indicators. However, if schools are meeting their 3% improvement targets for academic achievement, graduation rates, and progress towards English language proficiency, they should be well positioned to meet the 3% overall CCRPI targets for their state performance contract.

Finally, the state performance targets have a "maintenance level" set at the top quartile of performance on CCRPI. This is the level at which schools meet their targets as long as they remain at or above that level of performance. However, setting a similar maintenance level for CCRPI targets for the specified indicators would not be ambitious enough for some groups, as required by ESSA, or would be too ambitious for other groups. The tables below show the 75th percentile achievement score¹ (top quartile) for

¹ Achievement scores include weighting by achievement level where Beginning Learners earn 0 points, Developing Learners earn 0.5 points, Proficient Learners earn 1.0 point, and Distinguished Learners earn 1.5 points.

academic achievement and four-year graduation rates by subgroup for elementary, middle, and high schools in 2016.

Elementary Schools	ELA	Mathematics	Science	Social Studies
All Students	68.81	76.26	69.70	68.44
American Indian / Alaskan Native	TFS	TFS	TFS	TFS
Asian	105.07	117.74	107.86	109.72
Black	58.07	62.45	51.56	54.49
Hispanic	63.21	71.65	56.67	56.56
Multi-Racial	81.25	86.00	76.00	76.79
White	80.94	87.31	84.04	80.49
Economically Disadvantaged	56.87	65.85	58.09	56.67
English Learner	48.86	63.04	38.24	41.86
Students With Disabilities	40.29	50.00	47.14	48.33

Middle Schools	ELA	Mathematics	Science	Social Studies
All Students	68.71	74.7	63.76	70.00
American Indian / Alaskan Native	TFS	TFS	TFS	TFS
Asian	96.97	110.98	101.95	111.36
Black	58.49	59.72	48.13	56.90
Hispanic	64.65	71.83	58.82	64.67
Multi-Racial	77.94	80.95	84.62	86.67
White	80.14	87.06	77.78	81.82
Economically Disadvantaged	57.86	63.89	52.58	57.31
English Learner	33.02	46.25	25.68	25.00
Students With Disabilities	34.43	41.50	36.28	40.00

High Schools	ELA	Mathematics	Science	Social Studies	4-Year Graduation Rate
All Students	68.75	66.20	67.80	72.38	90.50
American Indian / Alaskan Native	TFS	TFS	TFS	TFS	TFS
Asian	97.06	106.82	100.00	102.94	96.40
Black	57.19	52.34	50.78	62.42	90.30
Hispanic	65.63	63.33	61.15	73.44	88.90
Multi-Racial	83.33	77.78	76.92	86.67	91.30
White	82.18	81.20	80.73	85.65	91.80
Economically Disadvantaged	58.04	55.53	55.52	62.59	87.90
English Learner	29.25	40.00	30.95	40.63	75.80
Students With Disabilities	29.29	31.08	30.16	39.77	73.50

As these tables demonstrate, the top quartile of performance ranges from a low of 25.00 to a high of 117.74 and varies greatly depending on the subgroup, content area, and grade band. Setting a policy in which schools were no longer required to make

improvements once a subgroup of students reached an achievement score of 25.00 would not be ambitious and would not be a good policy for the state of Georgia. Conversely, requiring schools to continue making improvements until a subgroup of students reaches an achievement score greater than 100 (which would require increasing numbers of students moving to Distinguished Learner) would be overly ambitious.

The proposed maintenance level for CCRPI targets is 90. In other words, once all students or a subgroup of students attains an achievement score greater than or equal to 90, the target for that group is to remain above 90. This represents an ambitious target centered on continuous improvement for all students while also acknowledging the ceiling effects associated with continued improvement at the highest levels of performance.

Weighting and Scoring

12. Is there too much weight on Milestones scores?

In the proposed CCRPI, the weight placed on indicators based on Georgia Milestones is 83.2% for elementary and middle schools and 70% for high schools. Unlike elementary and middle schools, high schools have graduation rates included (15%), which accounts for the discrepancy.² The ESSA Accountability Working Committee agrees with the concern of having too much weight placed on Georgia Milestones, even if most of that weight is on growth and improvement over status (46.5% vs. 36.7% for elementary and middle schools and 37% vs. 33% for high schools). The Committee recommends having approximately 70% of the CCRPI score be based on state assessments, as is the case of high schools; however, the options for achieving that weight for elementary and middle schools are limited.

The only way to achieve a reduction in weight on Georgia Milestones at the elementary and middle school levels is to increase the weight on Readiness (and potentially include additional Readiness indicators, which would re-complicate the system). This becomes complicated as one of the Readiness indicators is also based on Georgia Milestones (Literacy). Additionally, increasing the weight on this component may be problematic in light of USED's stance that science and social studies achievement (and, by extension, gap closure) must be considered a "school quality or student success" indicator. ESSA also requires that the non-school quality or student success indicators carry "much greater weight" than the school quality or student success indicators. The crosswalk below shows the relationship between the CCRPI categories and ESSA categories and the associated weights.

² In the current CCRPI (2015-2017), elementary and middle schools have a "predictor for high school graduation rate" indicator based on Proficient/Distinguished rates on Georgia Milestones. The Committee believed this led to a discrepancy in CCRPI scoring as the elementary/middle school "predictor" indicator was not comparable to the high school graduation rate indicator. Therefore, in the redesigned CCRPI, the Committee recommended not having a "predictor" indicator at the elementary and middle school levels.

ESSA Category	CCRPI Component	CCRPI Indicator	ES	MS	HS
Academic Achievement (i)	Content Mastery	ELA Achievement	11.25	11.25	7.50
Academic Achievement (i)	Content Mastery	Mathematics Achievement	11.25	11.25	7.50
Academic Achievement (i)	Closing Gaps	ELA and Mathematics	7.50	7.50	5.00
Academic Achievement (i)	Progress	ELA growth			13.50
Academic Achievement (i)	Progress	Mathematics growth			13.50
Student Growth (ii)	Progress	ELA growth	15.75	15.75	
Student Growth (ii)	Progress	Mathematics growth	15.75	15.75	
Graduation Rate (iii)	Graduation Rate	4-Year Adjusted Cohort Graduation Rate			10.00
Graduation Rate (iii)	Graduation Rate	5-Year Adjusted Cohort Graduation Rate			5.00
English Language Proficiency (iv)	Progress	Progress Towards English Language Proficiency	3.50	3.50	3.00
School Quality or Student Success (v)	Content Mastery	Science Achievement	3.75	3.75	7.50
School Quality or Student Success (v)	Content Mastery	Social Studies Achievement	3.75	3.75	7.50
School Quality or Student Success (v)	Closing Gaps	Science and Social Studies	7.50	7.50	5.00
School Quality or Student Success (v)	Readiness	Literacy	6.67	6.67	3.00
School Quality or Student Success (v)	Readiness	Student Attendance	6.67	6.67	3.00
School Quality or Student Success (v)	Readiness	Beyond the Core	6.67	6.67	
School Quality or Student Success (v)	Readiness	Accelerate Enrollment			3.00
School Quality or Student Success (v)	Readiness	Pathways			3.00
School Quality or Student Success (v)	Readiness	College and Career Readiness			3.00
		i - iv Total	65.00	65.00	65.00
		v Total	35.00	35.00	35.00
		Total	100	100	100

While the Committee shares the concern about too much weight being placed on Georgia Milestones scores, they acknowledged that is where most of the state’s accountability information comes from and there is not currently a viable alternative.

13. Should Graduation Rate carry more weight?

Adding weight to the Graduation Rate component would further exacerbate the differences between the elementary/middle school CCRPI and the high school CCRPI.

14. Should Readiness carry more weight?

Readiness and Graduation Rate should be equally weighted to set the tone that students need to not only graduate from high school, but graduate prepared for college or career.

15. Should the weight of science (and social studies) be increased in Content Mastery for elementary and middle schools?

The reduced weight associated with science and social studies is not intended to portray those content areas as less important; rather, the reduced weight is a reflection of the number of tests administered within each content area. This is the fairest solution given the different number of students participating in assessments in each content area.

16. Should middle schools with students enrolled in EOC courses earn extra points for their EOC performance (e.g., a Proficient Learner earns a 1.25 instead of a 1.0)?

There is a concern about the unintended consequences associated with extra weight applied to EOC scores in middle school. Such a policy could conflict with the philosophy of offering accelerated opportunities to students in a purposeful way, incentivizing placing students in high school courses even if it is not in their best interest. Additionally, it would penalize schools that do not offer high school courses in middle school. Furthermore, previous impact analyses show that students enrolled in EOC-related courses perform just as well, if not better, on the EOC compared with the EOG as the EOC better aligns to the instruction they received.

17. In Closing Gaps, should a school earn a .5 point if any progress is made or should a certain amount of progress be made to earn the .5 point?

The purpose of the 0.5 point is to acknowledge and incentivize making progress, even if targets are not met. Therefore, the 0.5 point will be awarded as long as progress is made without specifying a certain amount of progress.

18. Should a minimum N of 15 or 40 be used for participation rate?

Participations rates will be reported when $N \geq 15$ for transparency; however, requiring a minimum of 40 for achievement scores to be adjusted provides some flexibility to account for the realities of why some students do not participate in state assessments.

19. Is the redesigned CCRPI too complex and cumbersome to calculate, communicate, and use in improving schools?

The redesigned CCRPI is significantly simplified from its current form. The number of indicators has been reduced from 30 to 15 for high schools, from 19 to 11 for middle schools, and from 21 to 11 for elementary schools. The components are clearly defined and there are no longer subcomponents nested within components. Bonus indicators are no longer included in the system, providing additional simplification. Each component will be reported on a 100 point scale (with the possibility of additional points in Content Mastery and Progress) in order to simplify scoring and interpretation. In addition to the indicators proposed in the state ESSA plan, the GaDOE will develop a calculation guide to provide further clarification on how indicators will be calculated and combined.

The ESSA Accountability Working Committee stressed that communication may still be a challenge, even with these updates, and it will be important to communicate the redesigned CCRPI clearly. However, they also noted that chasing additional simplicity could impact the validity and reliability to measure school performance as “grading” schools quantitatively is not a simple task.

CSI and TSI

20. Should a school be identified for TSI support after 2 years of red flags (as opposed to 3)? Should schools be identified for TSI support after 2 (or 3) years of red or yellow flags (as opposed to only red flags)? Should the exit criteria be meeting the subgroup target/green flag (as opposed to making progress/yellow flag)?

The Accountability Working Committee agreed that requiring only two years of red flags, as opposed to three, would provide a better opportunity to impact change, as opposed to letting schools struggle for three years before identifying it. Additionally, if it takes multiple years of no progress for a school to be identified, there should be a more rigorous exit criteria. The criteria will be revised to require a green flag (target met) for the applicable subgroup(s) and content area(s) or two years of yellow flags (progress made but target not met). The Committee also noted that, if impact data becomes available prior to the submission of the ESSA plan, it should be reviewed to determine how many schools could be identified under this criteria. While it is important to highlight schools that have underperforming subgroups, given available resources, the TSI identification and available resources should be directed to the schools most in need of support.

Possible Clarifications Needed

Commentary: Clarifications were added where applicable and appropriate.

1. Include a crosswalk that shows each indicator in terms of the CCRPI categories and the ESSA categories. Show the weight associated with each indicator and how ESSA provisions are met.
2. Clarify that long-term goals will not change; only the interim targets will be reset every 5 years. Further clarify that the interim targets will be reset every 5 years, but the annual target is an improvement target (e.g., a + 2.5 points) from the previous year’s score and remains the same for 5 years. Further clarify that once a performance rate of 90% is attained, the annual target is to remain at or above that level (thereby addressing ceiling effects).
3. Clarify that the Progress Toward English Language Proficiency (ELP) goal is based on the percent of students making progress towards attaining ELP and is not the percent of students achieving the ELP criterion.
4. For the weighting of Milestones scores in Content Mastery, clarify that there are two levels below Proficient Learner (Beginning Learner and Developing Learner) which carry weights of 0 and .5, respectively, which, when combined, do not offset the 1.5 earned

for Distinguished Learner. Additionally, Developing Learners can be promoted to the next grade level as they have demonstrated partial proficiency. Finally, given the percentages of students at each achievement level, the significant number of students scoring at the Beginning and Developing Learner levels do not offset the percentage of students scoring at Distinguished Learner.

5. Clarify that every indicator will be calculated and reported separately for all students and each subgroup of students. Component scores are calculated for summary purposes and are utilized in attaining an overall CCRPI score.
6. Clarify that Closing Gaps is measuring progress towards long-term goals and is not measuring within-school gaps between subgroups.
7. Remove erroneous language referring to a fourth Readiness indicator at the middle school level (college and career planning).
8. Clarify weighting within component and how weights are redistributed if an indicator is not applicable.
9. Clarify that the School Climate and Financial Efficiency Star Ratings will continue to be calculated and reported in compliance with state law.
10. Provide more information on Georgia's intent to request a waiver to the 1% alternate assessment cap and the state's plan for improvement. Provide additional data on the analyses conducted to inform the minimum N size.
11. Clarify if CSI identification due to low graduation rate should be $< 67\%$ or $\leq 67\%$.
12. Clarify that Closing Gaps only includes achievement targets.
13. Clarify that the high school college and career readiness indicator is lagging data.
14. Clarify that Beyond the Core could include additional content areas in the future (such as STEM/STEAM and/or career exploratory at the elementary school level) upon the adoption of state standards in such courses.
15. Clarify that the high school College and Career Readiness indicator could add additional components in the future as additional measures of readiness are available.
16. Provide more information on how the SGP ranges were determined.
17. Clarify how CTAE and career readiness is represented in CCRPI.
18. Clarify work-based learning (WBL) requirements (i.e., a successful employer evaluation is required to earn credit, the WBL opportunity must be linked to at least one course in the same pathway).
19. Change the language for Beyond the Core from "earning credit" to "earning a passing score."
20. Clarify that CSI/TSI support starts in January because it utilizes the most recently-released data from the previous fall. This is the earliest implementation can begin given the availability of data. The alternative is to begin implementation the next school year, utilizing year-old data.