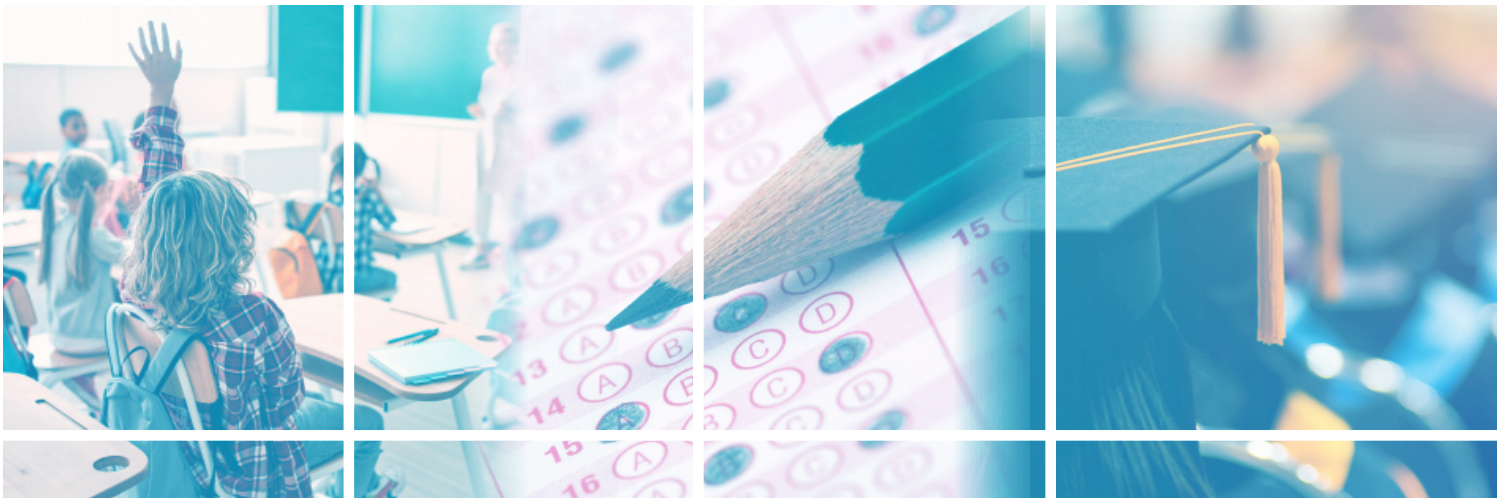
Commonwealth of Virginia
December 16, 2025

Report to the Governor and the General Assembly of Virginia

Virginia's K-12 School Accountability System

2025



COMMISSION DRAFT

JLARC
JOINT LEGISLATIVE AUDIT
AND REVIEW COMMISSION

JLARC staff for this report
Justin C. Brown, Senior Associate Director
Joe McMahon, Chief Legislative Analyst, Project Leader
Kate Hopkins, Senior Legislative Analyst
Sam Lesemann, Senior Legislative Analyst
Laura White, Senior Associate Legislative Analyst

Jessica Sabbath, Managing Editor

Information graphics: Nathan Skreslet

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Summary: Virginia's K–12 School Accountability System

WHAT WE FOUND

Virginia's new accountability system is more effective and useful than the state's prior system

The Virginia Board of Education (VBOE) approved new K–12 public school accountability regulations in October 2024. The new system—called the School Performance & Support Framework (SPSF)—replaced the prior school accountability system that had been in place since 2017 (figure next page). VBOE's two primary goals when designing the new accountability system were raising standards for public K–12 schools and increasing transparency into school performance. The board set these goals in response to perceived shortcomings in how the state's prior accountability system measured and reported school performance.

WHY WE DID THIS STUDY

In 2024, the Joint Legislative Audit and Review Commission (JLARC) directed staff to review Virginia's recently revised accountability standards for public K–12 education

ABOUT K–12 ACCOUNTABILITY

The Every Student Succeeds Act requires states to have an accountability system that evaluates K–12 public school performance and identifies schools that need support. The current Virginia Board of Education redesigned the state's school accountability system, measuring student and school performance across a variety of academic and non-academic indicators.

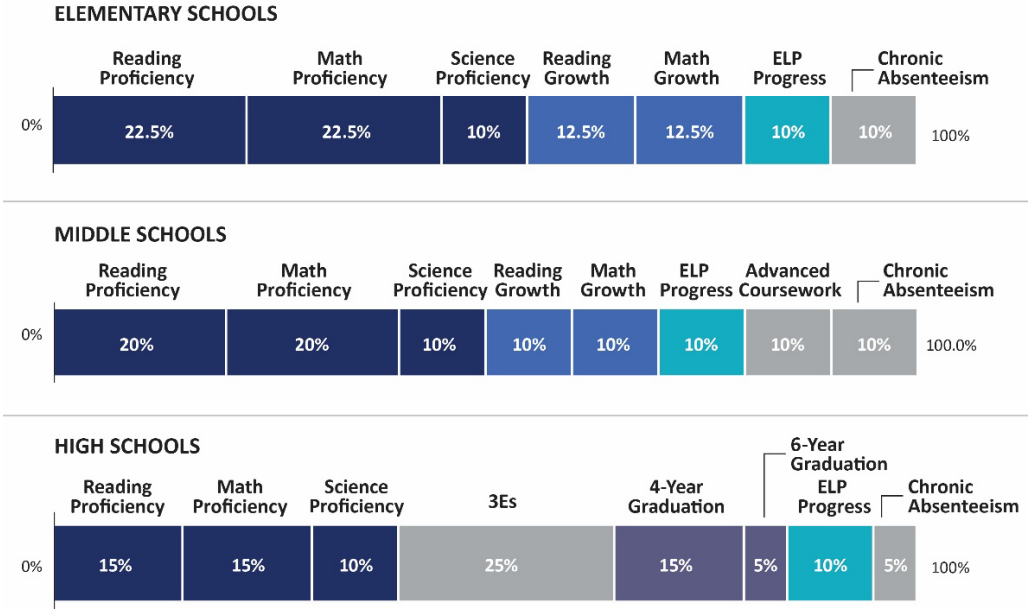
The SPSF is an improvement over the prior system. Rather than having separate federal and state systems, the SPSF combines Virginia's state and federal accountability systems, which reduces complexity and aligns policy goals. The SPSF also has design elements that more precisely and comprehensively measure performance than the prior system. For example, the SPSF better differentiates performance across schools, uses indicators that measure a single element of school performance (as opposed to combining multiple elements into a single indicator), and has elements that incentivize schools to focus on a greater proportion of students, especially those in specific subgroups.

The SPSF structure is generally sound, but refinements are needed

The SPSF is sufficiently effective and useful at measuring school performance, so its general structure should be used for school accountability in Virginia going forward. The SPSF's basic structural elements (e.g., indicators, weighting, measurement, and scoring) are generally consistent with federal and expert guidance and accountability systems in other states. Using the SPSF structure will also help maintain continuity and consistency, which is important for producing comparable results over time and reducing the administrative burden for school divisions.

Though the SPSF structure should be maintained, it can be improved by refining certain elements. These include refinements to the performance labels, category scoring thresholds, and technical rules related to certain individual indicators.

The SPSF uses a combination of indicators to measure school performance (2024–25 school year)



SOURCE: Virginia Department of Education School Performance & Support Framework, 2025.

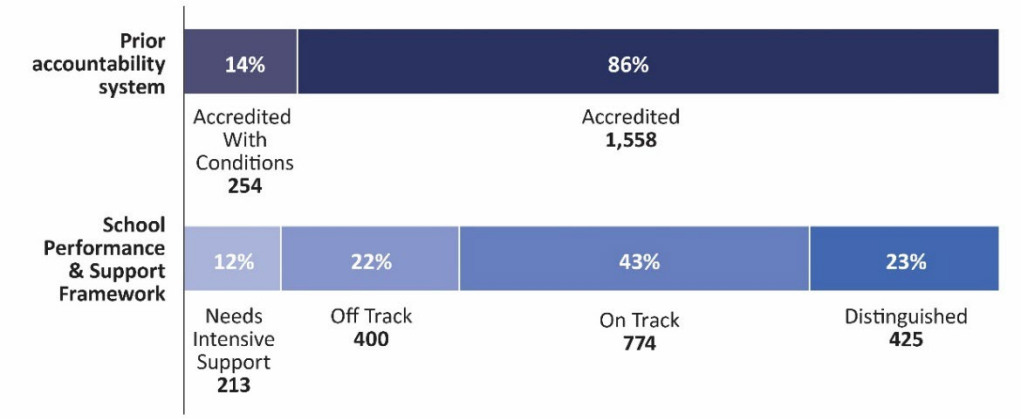
VBOE is also considering several changes to the framework as part of an amendment to the state ESSA plan. Several of these changes would implement JLARC recommendations or a policy option in this report.

School results are more distributed and generally lower in the SPSF than the prior system

The SPSF produced summative scores for all K–12 public schools in Virginia for the 2024–25 school year. Based on those scores, 425 schools (23 percent) were labeled *Distinguished*, 774 (43 percent) *On Track*, 400 (22 percent) *Off Track*, and 213 (12 percent) *Needs Intensive Support*.

The SPSF produced results that were more distributed across school performance categories than the prior system (figure next page). Rather than most schools receiving the highest label, a meaningful proportion of schools received each label.

SPSF assigns lower performance labels to more schools compared with prior system (2023–24 to 2024–25)



SOURCE: 2023–24 VDOE school accreditation results and 2024–25 School Performance & Support Framework results.
NOTE: Prior school accountability results exclude small number of schools that were *Accredited with Alternative Plan* or *Conditionally Accredited New School*. SPSF results exclude small number of schools without sufficient data to receive a performance label.

SPSF labels do not clearly communicate performance, nor do they clearly relate to each other as part of a continuous scale

The SPSF aggregates school performance across multiple indicators to produce a numerical summative score and corresponding performance label: *Distinguished*, *On Track*, *Off Track*, or *Needs Intensive Support*. The board chose to use descriptive labels because of "strong" feedback in favor of this format over others, such as an A–F grading system, during stakeholder listening sessions.

Subject-matter experts and research literature note that developing descriptive labels that are clear, widely understood, and broadly accepted can be challenging. Stakeholders bring different perspectives and many have strong opinions about accountability ratings, making it difficult to design ratings that satisfy everyone. According to VDOE and VBOE leadership, the terms are designed to use plain language easy for stakeholders to understand. However, the terms *On Track* and *Off Track* imply a school performance trajectory (improving or declining, respectively), which is not the intent of the performance labels and does not accurately characterize at least some schools with those labels. Division and school staff were particularly concerned about the use of the term *Off Track,* believing it to be overly negative. Additionally, the *Distinguished* label overstates the performance of at least some schools in the category that underperform on some individual indicators.

In addition, the four SPSF performance labels are not related to each other or part of a continuous scale, which could lead to further confusion. There is no intuitive progression through the SPSF labels, in part because the middle two labels focus on whether schools are "on" or "off" track, while the top and bottom labels use unrelated

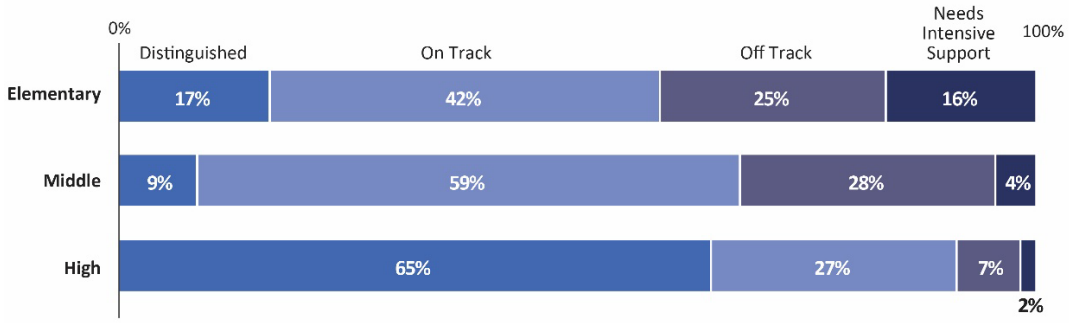
terms. This discontinuity may exist because the labels were drawn from multiple states' accountability systems rather than modeled after a single, internally consistent scale.

SPSF scoring thresholds ignore differences in how schools are measured, benefiting high schools

The SPSF evaluates elementary, middle, and high schools using different sets of indicators with varying weights. For example, graduation rate and career and college readiness indicators are used for high schools, whereas growth indicators are used for elementary and middle schools. Proficiency indicators have a different weight for each school level. Experts recommend that when indicators and weights are materially different, states should consider using different scoring thresholds for each school when assigning ratings.

Despite differences in how performance is evaluated for schools at different levels, the SPSF uses the same scoring thresholds for elementary, middle, and high schools. This reduces the comparability and fairness of results across school levels. For example, it is far easier for high schools to achieve higher overall ratings than elementary or middle schools because it is easier for them to achieve higher scores on certain indicators used only for the high school level (figure).

High schools are much more likely to have higher ratings than elementary and middle schools



SOURCE: JLARC analysis of School Performance & Support Framework data (2024–25).

The SPSF's proficiency weighting is higher than most states but is ultimately a policy decision

Proficiency and growth indicators are heavily weighted in the SPSF and are an improvement over the prior accountability system. The SPSF's proficiency and growth indicators are more transparent and useful because each indicator measures a single element of school performance (as opposed to being combined under the prior system). The SPSF's use of "indexing" to score proficiency and growth is also an improvement because it encourages schools to focus on improving *all* students'

performance; not just those with scores close to the threshold needed to "pass" an assessment.

The SPSF weights proficiency much more heavily than growth when compared with other states. Proficiency indicators collectively have 2.2 times the weight of growth indicators for elementary schools and 2.5 times the weight of growth indicators for middle schools. Other states are fairly evenly split among prioritizing proficiency, prioritizing growth, or weighting them equally. Only two states prioritize proficiency over growth more than Virginia.

Ultimately, though, the weighting between proficiency and growth is a policy decision. VDOE cited that parents, higher education representatives, employers, and military leaders emphasized the importance of graduates who are proficient. However, participants in VBOE "listening sessions"—which included parents, school and division staff, school board members, and other stakeholders—generally agreed that growth should be weighted at least the same as proficiency. Nearly all subject-matter experts interviewed by JLARC indicated that the SPSF could weight growth at least somewhat more than it does currently. Subject-matter experts and research literature indicate that student growth captures schools' contribution to student performance better than proficiency, which is typically closely related to student demographics.

Uncapped 3Es scoring allows individual students and some schools to score too many points, which distorts overall scoring

The SPSF includes an indicator to measure high school students' college, career, and military, referred to as the "3Es" indicator. The 3Es (employment, enrollment, and enlistment) indicator measures student achievements in three pathways that are intended to demonstrate student readiness for post-graduation. College, career, and miliary readiness indicators are commonly used in school accountability systems nationwide, and the criteria used in other states are generally similar to those in the SPSF's 3Es.

The board's design of the 3Es indicator is intended to (i) incentivize schools to make college, career, and military opportunities available to students, and (ii) encourage broad participation and exploration across each pathway. Therefore, to reward schools for students who pursue multiple opportunities and discourage schools from directing a student on a single pathway, the SPSF allows a student's points to be totaled across different pathways. As a result, the 3Es is unique among SPSF indicators because an individual student can score points across multiple pathways (up to 3.5 points). This means that a school can have a maximum unweighted indicator score of 350 for the 3Es but only 100 or 125 for all other SPSF indicators.

The 3Es scoring—which is not constrained or capped—means that a high school's summative score may be driven more by the 3Es indicator than was intended by the weight assigned to the indicator and that the scores of some students can be used to compensate for others. The 3Es indicator is weighted at 25 percent of the SPSF, but

actually comprises about 34 percent of the summative score, on average, for schools with a high 3Es indicator score. In addition, some high schools score so many points on the 3Es indicator that it produces a summative score that gives a misleading and distorted view of their actual overall performance across all indicators. Finally, because an individual student can score up to 3.5 points, a single high-achieving student can compensate for (i.e., "mask") lack of achievement by one or several lower-performing students.

Including more English learners is positive, but criteria for when to include those who have recently arrived could be adjusted

The SPSF includes more English learners when measuring schools' proficiency, growth, and English Language Proficiency (ELP) progress indicators than the previous accountability system, which Virginia needed to do to align the SPSF with federal requirements. The previous system excluded *all* English learners from counting toward these indicators until their sixth year of enrollment. This was an outlier nationwide, and subject-matter experts interviewed indicated this was a problem and were not aware of another state with similar practices.

The rules guiding when to include English learners' academic content assessments (e.g., SOLs) in schools' proficiency and growth performance calculations are among some of stakeholders' top concerns with the new framework. Virginia could consider an adjustment that would partially address schools' concerns while still maintaining compliance with federal requirements and alignment with experts' opinions.

ELP progress indicator reweighting for schools with few English learners should be adjusted

Despite an overall acceptable design, the English Language Proficiency (ELP) scoring and weighting in certain circumstances needs to be refined. For example, many schools do not have enough English learners for the ELP progress indicator to count toward their summative score, so the indicator's weight is redistributed to other indicators to calculate schools' scores. This meaningfully alters how a substantial portion of elementary and middle schools are evaluated, reducing the comparability and fairness of results. For schools at which the ELP progress indicator is excluded, this redistribution meaningfully increases the weight given to growth from 25 to 35 percent for elementary schools and from 20 to 30 percent for middle schools, while the weight of all other indicators remains the same.

VDOE is redesigning state's school improvement program, but it is too early to determine its effectiveness

Improving student performance in low-performing schools is difficult, and research on the success of these efforts is mixed. A 2020 JLARC evaluation found several serious problems with VDOE's approach to providing school improvement services.

VDOE has been redesigning and implementing a new school improvement program in conjunction with the development of the SPSF. The redesigned program has positive features and appears to be an improvement over prior approaches. VDOE is decentralizing school improvement, moving away from Office of School Improvement staff as the primary providers of support services and toward tailored services using staff from various VDOE offices. Under the new approach, specialists in the agency will provide support services based on schools' specific performance gaps. VDOE is hiring additional subject-matter specialist staff to help provide this new support, alongside the agency's existing staff.

Though the new approach appears promising, it is too early to determine whether it will ultimately be successful. While VDOE has included some high-level information on the new program in reports and presentations, the agency has not yet produced a formal consolidated plan for how it will provide support. The lack of such a plan for a large scale, complex undertaking may make it difficult for VDOE staff, school division staff, and school staff to clearly understand their roles and responsibilities. Ultimately, the effectiveness of the new program cannot be determined until services have been provided for long enough to be evaluated.

Currently, there is no statutory requirement for VDOE to deliver an effective school improvement program, nor for VBOE to ensure that a program is being effectively implemented. Because this function is critical, and these efforts require sustained attention, subsequent superintendents and the board will need to prioritize supporting an effective school support model over the long term.

WHAT WE RECOMMEND

Legislative action

- direct the superintendent of public instruction to consistently and effectively implement the state's program to support low-performing schools.
- direct VBOE to ensure the state administers an effective state program to support low-performing schools.
- direct VDOE to submit a detailed plan for the state's improvement program and annual status reports.

Board of Education action

- develop new performance labels that more clearly convey performance and are part of a continuous scale.

- develop new scoring thresholds that are unique to each school level and result in relatively comparable proportions of elementary, middle, and high schools receiving each label.
- change the scoring of the 3Es indicator by capping the total number of points a student or school can receive.
- redistribute the weight for the English language proficiency progress indicator proportionally across all other indicators for schools without sufficient English learners.
- contract for an independent evaluation of the effectiveness of the state's school improvement program and use the results to improve the program as needed.

The complete list of recommendations is available on page ix.

Recommendations and Options: Virginia's K–12 School Accountability System

JLARC staff typically make recommendations to address findings during reviews. Staff also sometimes propose policy options rather than recommendations. The three most common reasons staff propose policy options rather than recommendations are: (1) the action proposed is a policy judgment best made by the General Assembly or other officials, (2) the evidence indicates that addressing a report finding is not necessarily required, but doing so could be beneficial, or (3) there are multiple ways in which a report finding could be addressed and there is insufficient evidence of a single best way to address the finding.

Recommendations

RECOMMENDATION 1

The Virginia Board of Education should develop new terminology for the performance labels in the School Performance & Support Framework that more clearly communicate school performance as part of a continuous scale. (Chapter 4)

RECOMMENDATION 2

The Virginia Board of Education should develop new scoring thresholds for assigning the School Performance & Support Framework performance labels that are unique to each school level and result in relatively comparable proportions of elementary, middle, and high schools receiving each label. (Chapter 4)

RECOMMENDATION 3

The Virginia Board of Education should amend 8-VAC-20-132-280 A.1 of the Virginia Administrative Code to state that any school with a federal Comprehensive Support and Improvement designation shall be labeled as a school in the lowest performance category in the School Performance & Support Framework. (Chapter 4)

RECOMMENDATION 4

The Virginia Board of Education should reduce points awarded in the School Performance & Support Framework's mastery index calculations from 0.75 to 0.5 for students who score "Fail/Does Not Meet Proficiency" on assessments with three performance levels. (Chapter 5)

RECOMMENDATION 5

The Virginia Board of Education should change the scoring of the 3Es indicator in the School Performance & Support Framework by either capping the total number of points (i) a school can be awarded for an individual student or (ii) a school can receive for the indicator. (Chapter 6)

RECOMMENDATION 6

The Virginia Board of Education should change the "enlistment" category of the 3Es indicator in the School Performance & Support Framework so that points awarded for student achievements are more commensurate with the time and effort required to earn points in the enrollment and employment categories. (Chapter 6)

RECOMMENDATION 7

The Virginia Board of Education should change the English language proficiency progress indicator used in the School Performance & Support Framework to be scored based on a performance index. (Chapter 7)

RECOMMENDATION 8

The Virginia Board of Education should modify the business rules in the School Performance & Support Framework so that the weight for the English language proficiency (ELP) progress indicator is proportionally redistributed across all other indicators for all schools without sufficient English learners to include the ELP progress indicator in their summative score. (Chapter 7)

RECOMMENDATION 9

The Virginia Board of Education should amend 8-VAC-20-132-270 F of the Virginia Administrative Code to state that (i) no school with a federal Targeted Support and Improvement (TSI) designation for one year shall be labeled in the highest performance category and (ii) no school with a federal Additional Targeted Support and Improvement designation or TSI designation for two consecutive years and scoring in the second highest category shall be labeled in the two highest performance categories in the School Performance & Support Framework. (Chapter 8)

RECOMMENDATION 10

The General Assembly may wish to consider including language in the Appropriation Act directing the Virginia Department of Education to (i) develop and submit a one-time, detailed plan for the state's school improvement program by August 1, 2026, and (ii) annually develop and submit a status report that includes updates on key program activities, available and needed resources, program performance, and student and school outcomes. (Chapter 9)

RECOMMENDATION 11

The General Assembly may wish to consider amending §22.1-23 of the Code of Virginia to direct the superintendent of public instruction to consistently and effectively implement the state's program to support improvement of low-performing schools. (Chapter 9)

RECOMMENDATION 12

The General Assembly may wish to consider amending §22.1-253.13.3 of the Code of Virginia to direct the Virginia Board of Education to ensure the state administers an effective school improvement program to support low-performing schools. (Chapter 9)

RECOMMENDATION 13

The Virginia Board of Education should contract with a qualified expert to conduct an independent evaluation of the effectiveness of the state's school improvement program on a regular basis and use the evaluation results to direct changes to the program as needed. (Chapter 9)

Policy Options to Consider

POLICY OPTION 1

The Virginia Board of Education could increase the weight assigned to growth indicators in the School Performance & Support Framework to more fully account for schools' contribution to student learning. (Chapter 5)

POLICY OPTION 2

The Virginia Board of Education could direct the Virginia Department of Education to modify the state's Every Student Succeeds Act plan so that elementary and middle schools are subject to Exception B for excluding recently arrived English learners from schools' proficiency and growth calculations under the School Performance & Support Framework. (Chapter 7)

1 Introduction

In 2024, the Joint Legislative Audit and Review Commission (JLARC) directed staff to review Virginia's recently revised accountability standards for public K–12 education (Appendix A). The resolution required staff to review several elements of the state's new K–12 accountability system, including:

- the appropriate role and purpose of school accountability in ensuring a quality education system and incentivizing school performance;
- whether Virginia's system uses appropriate criteria and is sufficiently transparent and understandable;
- whether the system strikes the appropriate balance between accountability, assistance, and improving educational quality; and
- whether Virginia's school accountability system is sufficiently aligned with federal requirements and other states' accountability systems.

School Quality Profiles are virtual report cards that include state accountability system results and other information about school characteristics, demographics, and performance.

The Virginia Board of Education (VBOE) approved new K–12 public school accountability regulations in August 2024—called the School Performance & Support Framework (SPSF)—which replaced the prior system of school accountability in place since 2017. The framework produced school accountability results beginning with the 2024–25 school year. The framework measures school performance through several indicators (i.e., metrics) of school and student performance, such as test scores, graduation rates, and student attendance. Each school receives an overall rating that is made public (sidebar). Schools below a certain rating may be eligible for state or federal assistance. Several of the framework's indicators rely on student scores on the Standards of Learning (SOL) tests or alternative assessments; evaluating these assessments and student testing standards more broadly was outside the scope of this review.

JLARC staff conducted several different research activities to address the study resolution. These included reviewing federal Every Student Succeeds Act (ESSA) requirements and federal guidance, Virginia's prior school accountability system, Virginia regulations establishing the new framework, Virginia's ESSA plan, and school accountability systems and ESSA plans in 16 other comparison states. JLARC staff interviewed an extensive number of national subject-matter experts in school accountability, as well as experts familiar with school accountability in Virginia (sidebar). Staff also interviewed key stakeholders including school division superintendents, school principals and counselors, state education advocacy organizations, local school board members from localities across the state, current and former VBOE members familiar with the framework design process, and Virginia Department of Education (VDOE) staff. JLARC reviewed the input gathered by VDOE during public comment and listening sessions regarding framework design, which included perspectives of public K–

JLARC conducted more than 30 interviews with **subject-matter experts** on school accountability. Staff interviewed experts about the reporting of framework results, student growth models, the inclusions of student subgroups in state accountability systems, and school improvement. Experts were identified through reviewing research literature and asking experts to recommend others in their field who should be interviewed. These experts were from both academia and education policy research institutes.

12 education stakeholders, as well as parents, the business community, military leaders, and higher education. JLARC staff collected additional school division feedback through a survey of school divisions. Finally, JLARC staff conducted extensive analysis of the new framework's design and its results (Appendix B).

Federal law requires states to have a K–12 accountability system but grants flexibility

Indicator is the term used for measures of school performance in a state accountability system.

ESSA requires states to have an accountability system that evaluates K–12 public school performance and identifies schools that need support. Under ESSA, state accountability systems must measure and evaluate public school performance annually using a set of indicators (sidebar). Based on these results, states must "meaningfully differentiate" schools and identify low-performing schools for additional support.

ESSA requires state accountability systems to include at least four types of indicators to assess school performance. The indicators are:

- proficiency on state standardized assessments in reading and math;
- student growth for elementary and middle schools (or, at the state's discretion, a different academic indicator) and the four-year graduation rate for high schools;
- English learners' progress toward English language proficiency; and
- a measure of school quality or student success (SQSS) (e.g., student engagement, access to advanced coursework, postsecondary readiness, school climate, or assessments in other subject areas).

States can use additional indicators at their discretion. For example, some states use graduation rates beyond four years, in addition to the required four-year graduation rate, or use more than one SQSS indicator. However, all indicators must be "valid, reliable, [and] comparable" for all schools statewide, which can limit states' options if certain data is not available about all schools.

Title I, Part A of ESSA provides financial assistance through state educational agencies to school divisions and public schools with high numbers or percentages of children from low-income families to help ensure that all children meet state academic content and achievement standards.

States also have some flexibility in how they use these indicators to meaningfully differentiate school performance. ESSA sets broad parameters that states must "substantial[ly] weight" each indicator. In addition, the proficiency, growth, graduation, and English learners' progress indicators must have "much greater weight" in the aggregate than any SQSS indicator(s). Within these requirements, though, states can decide how much weight to assign each indicator, how to measure and score student performance, and how the results are combined to differentiate schools and identify those in need of support. States must use the results of their accountability system to identify low-performing schools that are eligible for federally funded school improvement grants (sidebar).

States must submit their K–12 accountability system to the U.S. Department of Education (U.S. ED) for review and approval through their state ESSA plan. U.S. ED

reviews each plan to ensure the accountability system complies with federal requirements and either grants approval or requires revisions. Some states operate a separate, state-specific accountability system in addition to their federally required system—one to meet federal ESSA requirements and another for state purposes.

Virginia adopted a new accountability system: the School Performance & Support Framework

VBOE redesigned the state's school accountability system to set higher standards and increase transparency. This effort culminated in the SPSF. The SPSF measures student and school performance across a variety of areas of academic and non-academic performance to produce an overall school rating.

Board's goals when designing the SPSF included higher standards and increased transparency

VBOE's two primary goals when designing the new accountability system were raising standards for public K–12 schools and increasing transparency into school performance. The board established an overarching philosophy "to create high expectations for every student in Virginia" and cited five guiding principles during design of the new accountability system:

- creating transparency and access to actionable information;
- prioritizing every student's achievement of proficiency;
- producing transparent and easy-to-understand reporting;
- providing necessary supports to schools in need of help; and
- being responsive to input from stakeholders such as teachers, parents, students, and education leaders.

The board set these goals in response to perceived shortcomings in how the state's prior accountability system measured and reported school performance. Particularly, VBOE members were concerned about its lack of transparency and failure to accurately reflect recent declines in student performance. Key transparency problems with the prior system included its combination of school accountability and school accreditation into one system and its combination of several different measures of student performance into single indicators (Chapter 2, 5, and 7). Furthermore, VBOE members and other stakeholders indicated that the prior system did not produce meaningful differentiation of schools' performance (Chapters 2, 3, and 4). In addition, the prior system's accountability results changed only minimally despite recent meaningful declines in student performance. For example, only 58 schools moved down to the lower rating of *Accredited with Conditions* from the 2018–19 to the 2021–22 school year—just a 3.2 percentage point change. This was despite notable declines in student performance following the pandemic, such as a 24-percentage-point decline in the 8th grade math pass rate (Appendix D).

The SPSF measures school performance using multiple indicators and assigns schools an overall rating

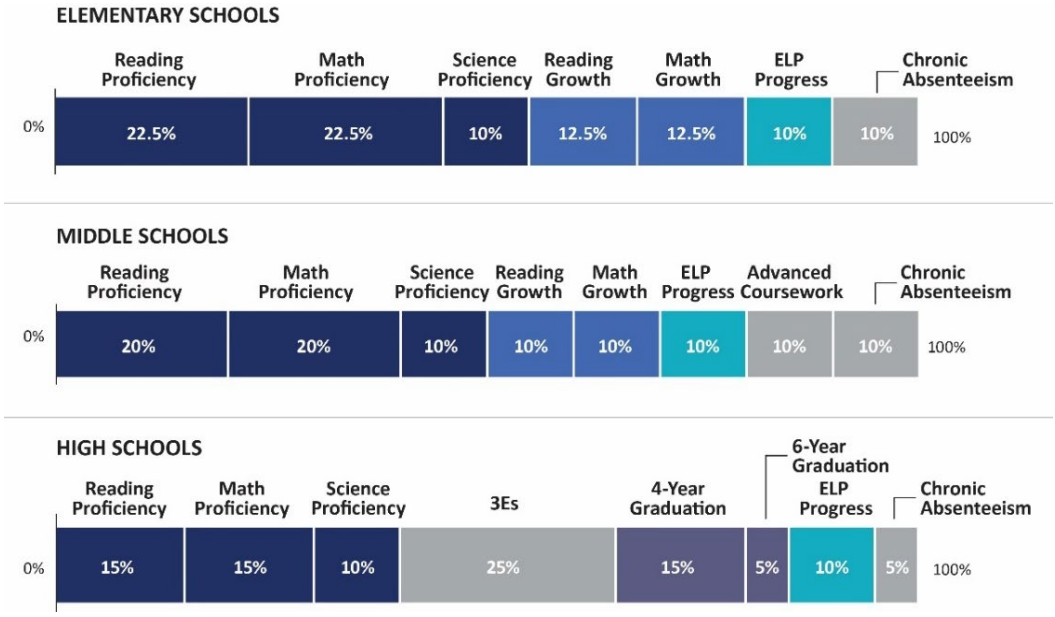
Virginia regulations state that "school quality for the purposes of accountability shall be measured for each school using multiple indicators…[which] include student academic outcomes and other factors that are associated with student learning." VBOE established parameters for selecting indicators to be used in the state's new accountability system, including whether research concludes the indicator is related to student academic outcomes and if performance on the indicator can be affected by division- or school-level policies and actions.

SOLs are Virginia's state standardized testing system, which include the subject areas of reading, math, writing, science, and social studies. A small number of students with disabilities take the Virginia Alternate Assessment Program (VAAP) instead of SOLs, and those results are used for accountability purposes.

VBOE selected a mix of indicators to measure school performance. For the 2024–25 school year, the framework has seven or eight indicators that are applicable to schools depending on their level (e.g., elementary, middle, or high) (Figure 1-1). A weight is assigned to each indicator, representing the proportion of a school's summative score attributed to that indicator. Proficiency indicators—comprising student scores on reading, math, and science SOL tests—account for the greatest proportion of the summative score for all school levels (sidebar). Student growth in reading and math, which is measured by comparing two or more years of SOL test scores for each student, accounts for the next largest proportion of schools' elementary and middle schools' scores. The framework's college, career, and military readiness indicator, the "3Es," accounts for the second largest proportion of high school scores (sidebar). Indicators measuring English learners' progress toward English language proficiency, chronic absenteeism, graduation rates, and student participation in advanced coursework account for the remaining portion of overall scoring and vary in use and weight, depending on school level.

The **3Es** indicator is a measure of student achievement in Enrollment, Employment, and Enlistment experiences during high school.

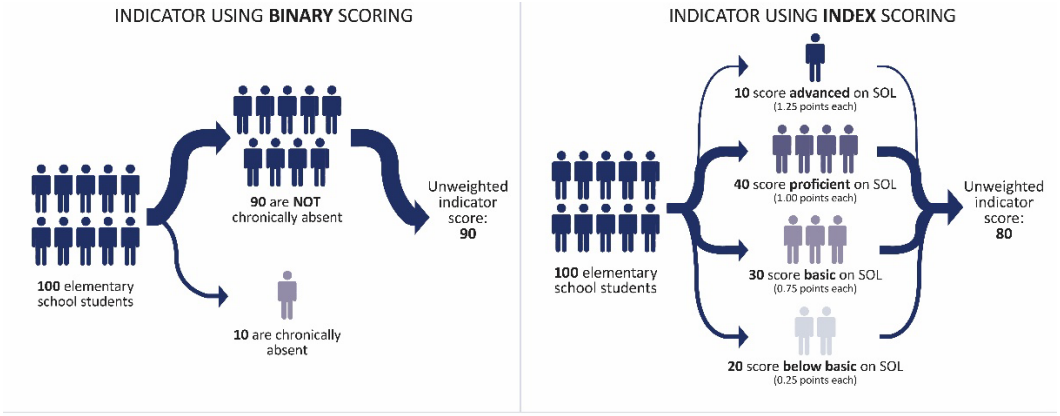
FIGURE 1-1
The SPSF uses a combination of indicators to measure school performance



SOURCE: VDOE School Performance & Support Framework, 2025.

The SPSF calculates a summative score for each school and assigns schools a corresponding performance label. The framework awards points to schools based on individual students' performance and produces a score for each indicator (Figure 1-2). Scoring for some indicators is produced by awarding points on a binary basis, with a school receiving one point for each student who meets an achievement threshold. For other indicators, scores are produced using an "index" that awards points based on each student's achievement level. The framework then combines indicator scores using the prescribed weights and produces a summative score for each school. Each school receives one of four labels that correspond with its summative score: *Distinguished*, *On Track*, *Off Track*, or *Needs Intensive Support* (in descending order of score).

FIGURE 1-2
Scores are calculated for each individual indicator, then weighted and added to produce a summative score (Example: Elementary School)



	Unweighted indicator score		Percent weight		Indicator score
Reading Proficiency	80	X	22.5%	=	18.0
				+	
Math Proficiency	85	X	22.5%	=	19.125
				+	
Science Proficiency	100	X	10%	=	10.0
				+	
Reading Growth	85	X	12.5%	=	10.625
				+	
Math Growth	70	X	12.5%	=	8.75
				+	
ELP Progress	65	X	10%	=	6.5
				+	
Chronic Absenteeism	90	X	10%	=	9.0
			Summative score (sum of indicator scores)		**82.0**

Performance label: **On Track**

SOURCE: VDOE School Performance & Support Framework, 2025.
NOTE: Illustrative example of School Performance & Support Framework calculations to produce a score for elementary school. Graduation, ELP progress, advanced coursework, and chronic absenteeism indicators use binary scoring. Proficiency, growth, and 3Es indicators use index scoring. Chronic absenteeism is calculated as an inverse measure (Chapter 6); the school in this example has a chronic absenteeism rate of 10 percent, not 90 percent.

Recently arrived English learners—a subset of English learners—are excluded from some accountability calculations for their first year of enrollment in accordance with federal rules (Chapter 7).

All students in each school, including students with disabilities and English learners, are included in the calculations used to produce the school's overall SPSF rating (sidebar). This practice aligns with ESSA, which requires states to evaluate performance for all students. For example, all students participating in SOL testing (including students with disabilities that take the VAAP) are counted in proficiency calculations. This enhances transparency and accountability, giving stakeholders insight into the performance of all students, maintaining schools' focus on students with the greatest needs, and helping direct resources to lower schools and students.

Board implemented the SPSF for the 2024–25 school year and continues to make adjustments

VBOE began a multi-year process to design a new school accountability system in 2022. VBOE discussed design aspects of the framework over 18 work sessions and board meetings from 2022 to 2024. Initial discussions revolved around which indicators to include in the framework and decisions about measuring and scoring those indicators. Subsequently, the board made many key decisions, such as the weighting of each indicator, scoring thresholds used to assign the performance labels, and the terminology used to label school performance. The process culminated when the board approved regulations establishing the framework in August 2024. The 2024–25 school year was the first year schools were evaluated using the framework.

The board sought and received input from experts and stakeholders as part of the process, including VDOE staff and subject-matter experts in school accountability. The board also contracted with two expert consultants as it designed the new framework. VDOE staff held meetings around the state to solicit stakeholder engagement and feedback (sidebar). The agency released draft regulations for public comment and received 34. VDOE also amended the state's ESSA plan to reflect the changes made to the system.

According to VDOE, **the board and the agency held listening sessions and stakeholder conversations throughout the state**, with 30 engagements that included more than 1,000 participants to discuss the proposed framework, as well as multiple rounds of public review of the framework and a public comment period.

The SPSF has undergone some changes since the VBOE initially passed the regulations establishing the system, and the board is considering additional changes. For example, following the framework's adoption, VBOE made changes related to the 3Es indicator (sidebar). Additional proposed changes are still under consideration by VBOE and would need to be approved by U.S. ED as amendments to the state's ESSA plan.

In **May 2025**, VBOE added high-quality work-based learning as a qualifying student achievement under the 3Es indicator and changed the definition for what types of CTE credentials qualify toward the 3Es indicator.

Complexity of K–12 education and varied priorities mean there is no "best" accountability system

This report assesses the state's K–12 accountability system using a rigorous mix of quantitative and qualitative methods, but there is no single standard against which to assess an accountability system. Designing an accountability system generally requires balancing state policy priorities, stakeholder concerns, and transparency, and is limited to use of indicators for which data is produced consistently and reliably statewide. As a result, there are multiple valid approaches to measure school performance through state accountability systems, and no single state serves as a "best" model. This is in part why the federal government grants states latitude in designing their individual accountability systems. In addition, states have similar but different K–12 goals—and emphasis among those goals—which are reflected in the range of accountability systems across states.

As a state develops an accountability system to serve its intended purpose(s), there are inherent tradeoffs. For example, creating a system that provides clear and easy-to-

understand information to the public might prioritize simplicity and transparency, while more precisely measuring school performance likely requires a more complex approach. Tradeoffs can also come with decisions about which measures the state prioritizes through its accountability system.

Any accountability system will have limitations. Accountability results provide a useful, but not comprehensive, overview of school quality. Accountability systems generally do not capture other important aspects of the educational environment in schools, such as school climate, working conditions, or other qualitative factors. Furthermore, because many accountability systems rely on readily available, easy-to-use, and federally required measures such as proficiency and graduation rates, they can produce results that are closely related to schools' characteristics and student demographics which are outside schools' control (Chapters 3 and 5). Finally, accountability systems are designed to be consistent and uniform across all schools and therefore may not fully account for unique school circumstances.

Accountability systems can also have unintended consequences, such as incentivizing certain behaviors that do not fully align with the state's broader education goals. For example, scoring schools on students' reading and math performance but not on other subject areas can lead schools to focus disproportionately on reading and math at the expense of other subjects. Furthermore, the pressure to be labeled as high performing can lead schools to engage in strategic behaviors that might not serve students' best interests, such as requiring unnecessary testing or deprioritizing programs that are not measured by the accountability system. In addition, low performance ratings can stigmatize schools and discourage prospective teachers or other school staff from applying to work at the schools, further exacerbating existing performance challenges.

Despite their tradeoffs, limitations, and unintended consequences, accountability systems remain important. They serve several important purposes, including establishing state educational policy priorities; holding school leaders accountable for school improvement and student performance; motivating leaders to improve school and student performance; providing stakeholders, such as local school board members, parents, and the public with information about school performance; and identifying schools and students that need additional support. In addition, they are necessary to meet federal requirements.

2 Improving School Accountability in Virginia

The School Performance & Support Framework (SPSF) was implemented for the 2024–25 school year and replaced Virginia's prior K–12 school accountability system that had been in place since 2017. The SPSF includes many of the same indicators as the prior system for measuring school and student performance—proficiency on standardized tests, student growth, English learners' progress to proficiency, chronic absenteeism, and graduation. However, the new SPSF has many notable differences. These differences include the weighting, measuring, and scoring of indicators; which students are included in calculations; how school performance is quantified; and the performance labels assigned to schools.

Virginia's new accountability system is more effective and useful than the state's prior system

Overall, the SPSF makes several key improvements over Virginia's prior school accountability system. Additionally, the SPSF has a similar overarching philosophy and design elements to accountability systems used in many other states, generally aligns with federal guidance, and incorporates features generally supported by experts in school accountability.

New framework aligns Virginia's state and federal accountability system, which reduces complexity and aligns policy goals

The federal government requires states to implement a school accountability system under the Every Student Succeeds Act (ESSA). While most states operate a single accountability system in compliance with federal requirements (like the SPSF), some states choose to create an additional separate state system that is not subject to those requirements (like Virginia's prior system). The main reason some states implement a separate state system is to give flexibility to include a state's unique policy goals and priorities without being constrained by ESSA's requirements.

Virginia's SPSF is a single accountability system used for state and federal purposes. This means the state and federal accountability systems have identical indicators, weighting, measurement, scoring, and business rules for calculating schools' summative scores. The SPSF also uses the same criteria and process for both federal designations and state ratings. The only difference is the terminology used for state labels and federal designations to categorize school performance results (sidebar).

For state reporting, schools receive one of four **state performance labels**: *Distinguished*, *On Track*, *Off Track*, or *Needs Intensive Support*. For federal reporting, **federally required designations** of Targeted Support and Improvement (TSI), Additional Targeted Support and Improvement (ATSI), or Comprehensive Support and Improvement (CSI) are used.

The **SPSF's approach to designating TSI, ATSI, and CSI schools** meets federal standards and was approved by the U.S. Department of Education.

Virginia previously operated separate state and federal accountability systems that measured school performance in different ways. The two systems used different indicators to measure graduation rates and different approaches to measuring proficiency, growth, and English language proficiency (ELP) progress (standalone vs. combined indicators). Furthermore, the state maintained different rules for which students the state included in certain calculations, such as English learners, to measure proficiency and growth. The prior system also used a different set of rules for assigning state rating and for assigning federal designations to schools.

Aligning the state accountability system with the federal system decreases complexity and allows schools to focus on requirements for just one accountability system. Subject-matter experts agreed that a single system has benefits, explaining that it is easier for school staff to understand which students and areas of performance the system is measuring. When states have separate state and federal accountability systems, schools may have to decide between prioritizing meeting the requirements of one system over the other. Fifty-five percent of school divisions responding to the JLARC survey indicated that the new system's unified approach to federal and state accountability is a better approach than the prior system; just 21 percent of schools felt it is a worse approach (sidebar).

JLARC staff surveyed school division superintendents or their designee on the new accountability system. A total of 106 school divisions (80 percent) responded to the survey (Appendix B).

New framework has several design elements that are more precise and inclusive than the prior accountability system

Several other design elements of the SPSF are improvements over Virginia's prior accountability system. They include the potential for greater differentiation across schools, disaggregated indicators for enhanced transparency, and inclusion of a greater proportion of schools and students in accountability calculations.

SPSF better facilitates performance differentiation across schools

The SPSF can better differentiate performance across schools. The prior system had three levels of performance, but all schools were sorted into just two of those categories in recent years, with most schools receiving the highest designation. In contrast, the SPSF has four performance categories and distributes schools across all four. Meaningful differentiation is a federal requirement and is important for transparency and incentivizing performance. (For more information, see Chapters 3 and 4.)

SPSF disaggregates previously combined indicators

Each indicator in the SPSF measures a single element of school performance, which is an improvement over the prior system. Under the prior system, the reading achievement indicator combined reading proficiency, growth, and English learners' progress to proficiency (ELP progress), and the math achievement indicator combined math proficiency and growth. This practice of combining or aggregating individual elements reduced transparency and the usefulness of results because stakeholders and the public could not readily identify areas of performance or underperformance. In addition, it

was difficult to identify how much each individual element contributed to the combined indicator (Chapter 5).

Most other states' accountability systems use separate performance indicators for each individual aspect of school performance that the system measures, and school accountability experts widely agree that use of separate or disaggregated indicators is a better approach.

SPSF uses more precise indexing, rather than binary scoring

SPSF's use of "indexing" to score several indicators is an improvement over the prior binary pass/fail approach. Indexing assigns different point values for each student's performance based on their achievement level. The prior system used a binary pass/fail approach that gave schools either one point or zero points for each student based on their performance. Research literature and experts indicate that indexing student performance encourages schools to focus on improving all students' performance. In contrast, a pass/fail approach can cause schools to focus only on students near the target threshold ("bubble kids") (Chapters 5 and 7).

SPSF's lower minimum student threshold means more students are included in accountability measures

School accountability systems must have a minimum threshold of students required for a student subgroup or indicator to be included in a school's accountability calculations and reported results (sidebar). The minimum threshold is a necessary safeguard for protecting student confidentiality as reporting results of one or a few students could reveal how each individual student performed.

The minimum threshold of students is referred to as "N-size." ESSA requires states to establish an N-size and that the chosen N-size is "sufficient to not reveal personally identifiable information" about students.

The minimum threshold applies to accountability calculations in two main ways. Performance is calculated and reported for subgroups (certain racial, ethnic, and demographic groups) in a school if the subgroup has enough students to meet the minimum threshold. The performance of student subgroups that *do not* meet the minimum threshold is not reported but still counts as part of the "all students" calculation to produce a school's indicator scores and summative score. In addition, an indicator is excluded altogether from a school's performance calculation (and the weighting is redistributed to other indicators) when the number of students that count toward that indicator does not meet the minimum threshold. For example, the ELP progress indicator would not be calculated for a school with fewer than the minimum number of English learners.

The SPSF includes the performance of a greater proportion of students. The framework has a lower minimum threshold (15 students) than the prior system (30 students). The lower minimum threshold means fewer student groups and indicator scores are excluded from schools' accountability calculations and reporting. According to the Virginia Department of Education (VDOE), the lower minimum threshold will allow the inclusion of more than (i) 10,000 students with disabilities in subgroup calculations

at nearly 450 additional schools and (ii) 6,500 Black students in subgroup calculations at more than 300 additional schools.

This new, lower minimum threshold is consistent with expert recommendations and other states' accountability systems. Subject-matter experts and research literature favor a lower threshold because schools are more likely to focus on performance for students and in areas that they know will be counted for calculations and reporting. Because these subgroups with fewer students are most often racial and ethnic minority groups, English learners, or students with disabilities, accountability systems should include these student groups to the maximum extent practicable. Furthermore, the SPSF's minimum threshold of 15 is in line with other states; 40 states use a threshold between 10 and 20 students. Virginia's prior system was just one of eight states with a threshold of 30 students (sidebar).

Other states' N sizes are according to the Education Commission of the States 50-state comparison of school accountability systems (2024).

The primary disadvantage, though, of a lower minimum threshold is greater fluctuation in results due to a smaller sample size. In practice, the performance of one or a few students within a small group can have a greater effect on that group's overall results. Moreover, measuring and reporting on smaller groups of students can result in greater fluctuations of results each year. However, subject-matter experts generally indicate that the advantages of using a lower threshold that includes more students outweighs these disadvantages.

New framework appropriately separates school accreditation and accountability; new accreditation process is still being implemented

The SPSF separates school accreditation from the school accountability system (sidebar). Accountability and accreditation each serve their own purpose and measure different aspects of school operations. The framework solely addresses school accountability, which evaluates school and student performance. Conversely, the prior accountability system also included the school accreditation process as a factor in school performance results. Accreditation addresses schools' compliance with state requirements, such as academic program offerings, staffing ratios, health and safety, and community communications.

The **Virginia Standards of Accreditation** (8VAC20-132-20) are meant to ensure that an effective educational program is established and maintained in all of Virginia's public schools.

SPSF's separation of accreditation and accountability is a preferable approach. Combining both elements into a single system—as they were in the state's previous system—conflates schools' compliance with their performance. For example, a school could comply with all accreditation requirements but have low student achievement. Likewise, a school with high student achievement may still not fully comply with state requirements under accreditation. Subject-matter experts widely agree that measuring each separately provides better insight into educational operations. Fifty-six percent of school divisions indicated that the framework's separation of accountability and accreditation is a better approach than Virginia's prior system; just 15 percent felt it was worse.

In addition to separating it from accountability, the Virginia Board of Education (VBOE) is reforming Virginia's accreditation process to address longstanding weaknesses. Virginia's previous process for monitoring division and school compliance with accreditation requirements lacked specificity and independent verification (sidebar). VBOE approved a new "Accreditation Report" to be completed by superintendents and principals beginning in the 2025–26 school year. The report is intended to be more thorough, requiring schools to certify compliance with each individual requirement and submit supporting evidence (i.e., documentation and data). The board approved the new approach in November 2025, but it has not yet been implemented and is not evaluated as part of this review.

In 2020, JLARC recommended that **VDOE's supervision of school divisions' compliance with state requirements be strengthened** given the substantial amount of funding the state provides to the public education system, the extensive standards schools must comply with, and the importance of providing a quality education to each child.

The SPSF structure is generally sound, but refinements are needed and board is considering proposed changes

The SPSF as constructed for the 2024–25 school year is sufficiently effective and useful at measuring school performance that its general structure should be used for school accountability in Virginia going forward. As discussed in other chapters of this report, the current SPSF's structural elements (e.g., indicators, weighting, measurement, and scoring) are generally consistent with federal guidance, expert guidance, and accountability systems in other states. In addition, though school divisions pointed to parts of the SPSF they would prefer to change, they (i) thought the SPSF was an improvement over the prior system (only 22 percent responding to JLARC's survey indicated that the prior system was better) and (ii) rated the SPSF as good (14 percent) or adequate (57 percent).

Moreover, changing to a new structure would be unnecessarily disruptive. Fundamental changes to the SPSF would hinder the state's ability to begin consistently monitoring performance by reviewing comparable performance results over time. Changing the system again would also be administratively burdensome to school divisions and schools that must learn and adapt to new requirements.

Fundamental changes are not needed, but framework can be improved in several ways

While fundamental changes to the SPSF's structure are not needed, this report makes recommendations to refine and strengthen the framework. These include changes to the performance labels and the methods for assigning those labels, and the scoring and weighting used for some indicators. This report's recommendations to refine the framework are directed to VBOE because the board has general supervisory authority of school divisions and responsibility to develop accountability regulations under the Code of Virginia.

VBOE is considering making changes to the framework

Amendment IX to the state ESSA plan is an ongoing effort to adjust Virginia's ESSA plan, which guides the SPSF. Any changes to the state ESSA plan must be submitted to the U.S. Department of Education for review and approval.

VBOE is also considering several changes to the framework as part of an amendment to the state ESSA plan (sidebar). The changes were first proposed in detail at the board's November 2025 meeting and have not yet been finalized or approved. As a result, JLARC was unable to conduct a full evaluation of each proposed change. However, most of the proposed changes are discussed at least in some detail in this report.

Several proposed changes would implement JLARC recommendations or a policy option. These include proposed changes to the scoring index point values for assessments with three performance categories (Recommendation 4, Chapter 5), changes to the achievements required to meet the enlistment category of the 3Es indicator (Recommendation 6, Chapter 6), and changes to the rules regarding inclusion of recently arrived English learners in proficiency and growth calculations (Policy Option 2, Chapter 7).

Several proposals would represent substantial changes but were made too recently for JLARC to evaluate. These include a new approach for measuring student growth; the creation of new indicators for social studies proficiency, middle school advanced coursework for social studies and science, and integrated reading and writing; and a new weighting for indicators to account for these proposed new indicators.

Several other of the proposed changes do not appear substantial. These are narrow or technical adjustments and therefore not addressed in this report.

Changes must be considered in context of broader framework and implemented effectively

Any future changes to the SPSF should ensure that the framework continues to be a useful and effective tool for measuring school performance. This requires several considerations when making changes in the future (including recommendations in this report).

VBOE will need to consider whether changes are consistent with the existing framework. Maintaining a clear and consistent philosophy is important for transparency and understandability. For example, the existing framework awards schools' points based on student achievement (e.g., meeting a target) rather than simply participating in an opportunity. Any departure from this approach would be inconsistent with the system's prioritization of student outcomes. Likewise, ensuring similar indicators have similar relative weighting across different grade levels maintains a consistent message regarding the board's priorities.

VBOE will need to consider whether and how changes could affect framework results. Changes to scoring or indicator measurements will likely affect schools' summative scores and the performance labels they receive. This would include a shift to a value-added growth approach (Chapter 5). Therefore, these changes should be considered along with changes to scoring label thresholds (Chapter 4).

VBOE will also need to consider whether changes could affect schools' priorities. Creation of a new indicator can provide useful information about additional areas of school performance and increase accountability. However, additional indicators can shift schools' priorities, reducing the emphasis placed on other performance areas. Likewise, new indicators require weighting to be re-allocated from existing indicators, which reduces the importance of each.

Finally, VBOE will need to consider when changes should occur. Some could be made immediately because schools would need little or no advanced notice or time to prepare. For example, changing the label terminology (Chapter 4) to describe school performance could be done immediately. Other changes, though, should be made so that schools have sufficient time to prepare. This includes changes that affect schools' decisions about course offerings, staff assignments, or student scheduling or selection of college, career, and military readiness experiences. Furthermore, some changes cannot, or should not, be made until other changes have been implemented. For example, changing the scoring thresholds used for assigning performance labels should not be done until all other changes are in place and their effects on schools' summative scores are known.

These considerations are also important for ensuring effective implementation. The SPSF's implementation was an area of great concern for school staff during the initial shift from the prior accountability system to the SPSF (sidebar). On JLARC's survey, 80 percent of divisions disagreed that they had sufficient time to prepare for the first year of the framework's implementation (only 14 percent agreed), the highest level of disagreement among all survey topics. School division and school leaders indicated that changes need to be finalized and disseminated with sufficient time to prepare for the first school year for which they will be in effect, generally citing late June to mid-July as the latest timeframe for doing so.

VBOE members supported the SPSF's implementation timeline, citing the need for higher standards and increased transparency to be put in place as soon as practicable because of declines in student performance. They also indicated that all schools were subject to the same timeline and that most of the elements being measured by the SPSF were activities that schools were already conducting.

3 Framework Results

Providing transparent performance information about each school is a central goal of the state's accountability system. The School Performance & Support Framework (SPSF) assigns each school a summative score, which results in a school being placed in one of four performance categories. The summative score, performance label, and individual indicator scores will be released annually to education stakeholders and the public as part of reporting on each school's performance.

Analysis of SPSF results in this report uses the latest data available at the time of the report's release. The school level results for 2024–25 school year, the first year officially subject to the new framework, were released by the Virginia Department of Education (VDOE) in early December 2025 (sidebar). Summary analysis in this report uses these 2024–25 school-level results. However, individual student level data for 2024-25 was not made available to JLARC. Therefore, some analyses that rely upon individual student level data use 2023–24 school year data, which was released by VDOE as part of unofficial projections for informational purposes prior to the framework's implementation.

The first year of official SPSF results based on the 2024–25 school year were expected to be released in early October 2025. However, VDOE spent time working with school divisions and a higher education institution to perform data verification and quality control which delayed the release.

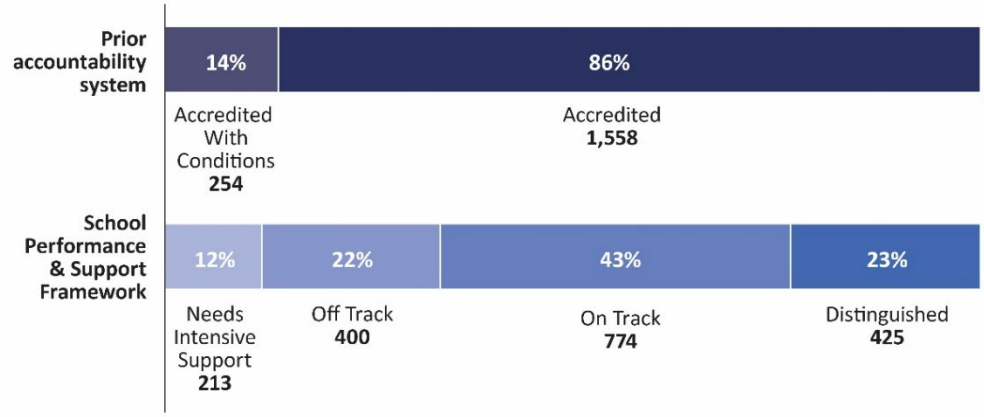
School results are more distributed and generally lower in the SPSF than the prior system

The SPSF produced summative scores for all K–12 public schools in Virginia ranging from 49 points to 117 points for the 2024–25 school year. Based on those scores, 425 schools (23 percent) were labeled *Distinguished*, 774 (43 percent) *On Track*, 400 (22 percent) *Off Track*, and 213 (12 percent) *Needs Intensive Support*. See Appendix E for information about school performance on each indicator.

As noted in Chapter 1, the Virginia Board of Education (VBOE) sought to develop a new accountability system that more meaningfully differentiated among schools' performance. Under the prior system, nearly 90 percent of schools achieved the highest performance label (*Accredited*), and no schools received the lowest label (*Accreditation Denied)* in recent years. This grouped all but the very lowest performing schools in the same category. Giving the same label to most schools did not meaningfully differentiate among very high performing schools, average schools, and schools that needed to improve but were not among the state's lowest performing.

The SPSF produced results that were more distributed across school performance categories than the prior system (Figure 3-1). Rather than most schools receiving the highest label, a meaningful proportion of schools received each label.

FIGURE 3-1
SPSF assigns lower performance labels to more schools compared with prior system (2023–24 to 2024–25)



SOURCE: 2023–24 VDOE school accreditation results and 2024–25 School Performance & Support Framework results.
NOTE: Prior school accountability results exclude small number of schools that were *Accredited with Alternative Plan* or *Conditionally Accredited New School*. SPSF results exclude small number of schools without sufficient data to receive a performance label.

Some schools that performed well in the prior system received lower performance labels from the SPSF. Of schools labeled Accredited by the prior system in 2023–24, the SPSF labeled approximately 434 (28 percent) as either *Off Track* or *Needs Intensive Support*, which are considered lower categories. In addition, 75 schools (30 percent) previously labeled as Accredited with Conditions received a relatively higher label of *On Track* or *Distinguished* from the SPSF. While some of these differences may be due to changes in school performance from 2023–24 to 2024–25, most of the variation stems from differences in how the two accountability systems calculate and label school performance.

Schools with more economically disadvantaged students tend to receive lower overall ratings, which is common in school accountability

School accountability results almost always correlate with certain student demographic characteristics, as do many aspects of K–12 education. Research consistently shows a connection between student demographics and educational performance and outcomes. For example, students from economically disadvantaged backgrounds often have unequal access to resources at school and at home, are more likely to have parents with lower educational attainment, and may face challenges related to housing stability, health, and safety.

School accountability systems' performance indicators typically are moderately or highly correlated with student demographics such as economic disadvantage, race and

ethnicity, and English learner status. This includes several of the performance indicators required by the Every Student Succeeds Act (ESSA), such as student performance on assessments and graduation rates. In addition, states must use data that is uniformly collected for all schools statewide, which tends to be measures of performance and outcomes that correlate with student demographics (e.g., test scores, graduation, student attendance). Additionally, accountability systems often aggregate performance across indicators that each individually correlate with student demographics, and that aggregation can further increase demographics' influence on school ratings.

Lack of consensus among experts about how much accountability results should reflect student demographics

There is no consensus on the extent to which school accountability results should reflect student demographics. Some subject-matter experts and stakeholders interviewed by JLARC assert that the accountability system *should* highlight performance disparities among schools with different demographic compositions to maintain the same expectations for all students and to help address disparities through targeted resources or support. Conversely, others argue that school accountability results that are overly reflective of student demographics evaluate schools on factors outside of their control rather than on schools' effectiveness. In addition, experts suggest that results overly reflective of student demographics may be unfairly negative in their characterization of schools and perpetuate existing challenges (sidebar).

According to subject-matter experts and research literature, **low ratings can have negative effects** on schools' reputations, incentivize parents to move their children elsewhere, and make it more difficult to recruit and retain qualified staff.

Schools with more economically disadvantaged students tend to receive lower ratings, partially due to the SPSF's design

The SPSF produces summative scores that are highly related to schools' student demographics, as is common for school accountability systems. Student demographics (e.g., economic disadvantage, race and ethnicity, disability, English learner status) accounted for over half of the variation in schools' summative scores for elementary (55 percent), middle (51 percent), and high schools (61 percent) for the 2024–25 school year. When compared to other school characteristics (e.g., geography, region, teacher workforce composition, school size, per-pupil funding), student demographics have the strongest relationship with the framework's results (Appendix F). Virginia's prior accountability system also produced results that reflected differences in student demographics (Appendix G).

Economically disadvantaged students are students who are eligible for free or reduced-price meals, receive Temporary Assistance for Needy Families (TANF), are eligible for Medicaid, or are identified as either migrant or experiencing homelessness.

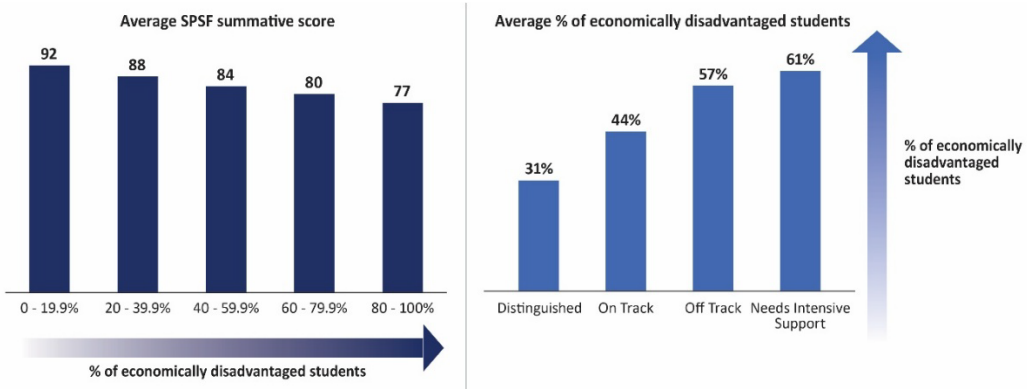
The remainder of this discussion focuses on student *economic disadvantage* because it has the strongest correlation among all student demographic characteristics with schools' SPSF results (sidebar). Appendix F includes information about how student race and ethnicity relate to SPSF results, as well as other school characteristics such as geography, teacher workforce challenges, and per-pupil spending.

Schools with more economically disadvantaged students tend to score lower on the SPSF. There is a negative relationship between the percentage of economically disadvantaged students and schools' summative scores, and that relationship is especially

Schools with higher percentages of economically disadvantaged students are also **more likely to be federally designated**, in part because ESSA mandates that the lowest-performing 5 percent of Title I schools in the state receive the "Comprehensive Support and Improvement" federal designation. Federal designations contribute to lower performance labels because of the SPSF's labeling rules (Chapter 8).

strong for elementary and middle schools (Appendix G). For the 2024–25 school year, schools whose enrollment comprises 80 percent or more economically disadvantaged students received a summative score averaging 15 points lower than schools with less than 20 percent economically disadvantaged students (Figure 3-2). Likewise, schools labeled *Needs Intensive Support* or *Off Track* had almost double the percentage of economically disadvantaged students as schools labeled *Distinguished* (sidebar).

FIGURE 3-2
Schools with more economically disadvantaged students receive lower SPSF scores and labels, on average (2024–25)



SOURCE: VDOE School Performance & Support Framework data and fall membership data for 2024–25.
NOTE: In 2024–25, 207 schools had between 0-<20 percent economically disadvantaged students, 472 between 20-<40 percent, 718 between 40-<60 percent, 333 between 60-<80 percent, and 80 schools had 80 percent or more economically disadvantaged students.

Although the SPSF's results tend to strongly reflect a school's percentage of economically disadvantaged students, some schools were exceptions. For example, of the 413 schools with 60 percent or more economically disadvantaged students, 30 were labeled *Distinguished* and 111 were labeled *On Track*. Conversely, 67 of the 679 schools with a relatively lower percentage of economically disadvantaged students (<40 percent) were labeled *Off Track* or *Needs Intensive Support*.

The SPSF's emphasis on proficiency contributes to the relationship between results and student demographics. Proficiency indicators have the strongest correlation with student economic disadvantage of all the framework's indicators and also receive the greatest weight (Chapter 5). Consequently, the relationship between schools' summative scores and their percentage of economically disadvantaged students is strongest at the school levels where proficiency has higher weight—elementary and middle schools (Appendix G).

SPSF results will fluctuate over time, and measured performance will decline if "cut scores" increase

Results produced by the SPSF will fluctuate in future years because of several factors, although these fluctuations could be relatively modest. Student performance tends to move incrementally from year to year; a single year rarely produces substantial changes (assuming the framework or its underlying assessments do not change). Results could also be affected if VBOE makes changes to the framework as part of a proposed amendment to the state ESSA plan or in response to the options and recommendations contained in this report.

In contrast, VBOE's decision to raise "cut scores" on standardized tests will likely result in substantial reductions in school performance as measured under the SPSF (sidebar). Changes to cut scores would not represent a change to the SPSF itself, but rather how student assessment results are characterized and reported. Raising cut scores will almost certainly result in fewer students scoring advanced and proficient and more students scoring basic or below basic on SOL tests. VBOE has proposed a phase-in of new cut scores over multiple years and to incorporate a fifth "approaching" proficiency performance level during the phase-in period. VDOE staff indicate that students scoring in the "approaching" level would receive the same 1 point as those scoring in the proficient level. This would partially mitigate the extent to which schools' proficiency indicator scores decrease during the phase-in period.

Once fully implemented, the cut score changes would correspond to a decline in schools' scores on proficiency indicators and overall, based on JLARC analysis of 2023–24 results (sidebar). For example, if the new cut scores were applied to elementary school assessments, the average decline in schools' proficiency indicator scores is projected to be approximately 21 points for reading and 17 points for math, which would correspond to an average 8.5-point decline in schools' summative scores. As a result of the projected decline in scores, approximately 63 percent of elementary schools would receive a lower performance label—with schools labeled as *Distinguished* and *On Track* prior to the cut score changes being the most likely to receive a lower label.

In September 2025, VBOE approved increases to the "**cut scores**" used to delineate performance levels on the state's standardized assessments. Cut scores convert a student's numerical score on an assessment to a performance level (e.g., basic, proficient, advanced).

The board's goal is to raise standards and better align Virginia's cut scores with those used in other states and for the National Assessment of Educational Progress (NAEP).

The cut scores will not be in effect for the 2025–26 school year; the timeline to implement the changes had not been finalized and approved by the board as of early December 2025.

Analysis to project the **impact of cut scores on SPSF results** uses four performance levels and the cut scores that will be in place at the conclusion of the proposed phase-in period.

4 Labeling School Performance

The federal Every Student Succeeds Act (ESSA) requires states to use their accountability systems to "meaningfully differentiate" schools' performance each year. Differentiating school performance serves two key purposes of school accountability. First, it provides stakeholders with information about how schools are performing and how they compare to other schools in the state. Second, differentiating performance enables states to identify schools or student subgroups with lower performance so they can direct resources and interventions where they are most needed (sidebar).

Student subgroups include students from "major" racial and ethnic groups in the state, economically disadvantaged students, English learners, and students with disabilities (Chapter 8).

ESSA gives states flexibility in how to differentiate school performance in their state accountability systems. Some states, including Virginia, meet ESSA's requirement by combining schools' results across the various indicators in their accountability system into a single overall rating. Other states choose not to issue a single overall rating, instead reporting schools' performance separately for each indicator.

As part of meaningful differentiation, ESSA also requires state accountability systems to identify low-performing schools and schools with low-performing subgroups—a process referred to as "federal designation." These designations are an important component of differentiating school performance and guiding support.

In addition to federal designations, states can produce their own school ratings to differentiate school performance. States vary in how these state-specific ratings relate to federal designations. In some states, the state rating and federal designation systems operate separately, while in others, like Virginia, they are linked or combined into a single measure of school performance.

SPSF has a reasonable approach for aggregating and categorizing school accountability results

The School Performance & Support Framework (SPSF) aggregates school performance across multiple indicators to produce a numerical summative score and corresponding performance label: *Distinguished*, *On Track*, *Off Track*, or *Needs Intensive Support* (Table 4-1) (sidebar). The performance labels are intended to reflect how well each school meets the state's performance expectations. Together, the summative score and performance label comprise a school's overall rating.

Federal designation can also affect a school's performance label, which is discussed later in this chapter and in Chapter 8.

TABLE 4-1
SPSF summative scores translate to one of four performance labels, which are a description of how the school is performing relative to the state's expectations

Performance label	Summative score	Definition
Distinguished	≥90.0	Schools are exceeding the state's expectations for achievement, growth, readiness, and graduation. Schools serve as best practice models.
On Track	80.0-89.9	Schools are meeting the state's expectations for achievement, growth, readiness, and graduation.
Off Track	65.0-79.9	Schools are not meeting the state's expectations for achievement, growth, readiness, and graduation.
Needs Intensive Support	<65.0	Schools are significantly not meeting the state's expectations for achievement, growth, readiness, and graduation.

SOURCE: Virginia Department of Education website.
NOTE: Federal designations can affect schools' performance labels: According to VBOE regulations, Targeted Support and Improvement schools and Additional Targeted Support and Improvement schools have their performance label lowered by one level, and Comprehensive Support and Improvement schools cannot be labeled as *Distinguished*.

SPSF aggregates school performance into an overall rating, which generally aligns with other states but has tradeoffs

SPSF's approach to reporting school performance using an overall rating (i.e., combining multiple measures into a single result) aligns with practices in other states. While ESSA does not require states to give schools an overall rating, many states do. A 2024 review of state ESSA plans from the nonprofit EdTrust suggests that about half of states use overall ratings. Among 16 states compared to Virginia for this study, 14 use an overall rating system.

Using overall ratings to report school performance involves tradeoffs. A single overall rating can make results easier for the public to understand and allows the state to emphasize certain indicators through weighting. However, combining multiple measures into one result can mask performance variation across indicators both within a school and when compared with other schools. For example, two schools might have very different scores in proficiency and growth but have the same overall rating, making them appear similar. This provides little guidance on how to address the specific performance issues in these schools. Additionally, the public and other stakeholders may conclude that schools' overall ratings are a comprehensive measure of school quality, which they are not.

Experts suggest states can attempt to mitigate these limitations by reporting contextual information alongside overall ratings, such as indicator-level ratings, student demographics, inputs (e.g., per-pupil spending, teacher licensure), and comparisons to state- and division-wide averages and similar schools (Appendix H).

SPSF uses fewer rating categories than other states but provides greater differentiation than state's prior system

The SPSF uses four categories to differentiate school performance—fewer than most peer states. Federal guidance recommends that states differentiate schools into at least three different categories of performance; experts generally prefer more categories to create greater differentiation in school performance. Most states selected for comparison (11 of 16) use five or more categories, often as a byproduct of using A–F or 1–5-star rating systems, which include five levels. However, the Virginia Board of Education (VBOE) deliberately chose *not* to use five categories of performance labels to prevent the labels from being conflated with letter grades (sidebar).

Virginia previously considered an A–F grading system for reporting school performance. In 2013, the General Assembly passed legislation requiring VBOE to report school performance on an A–F scale. However, this legislation was delayed for two years, and the General Assembly passed legislation repealing the grading system in 2015.

As noted in Chapters 2 and 3, the SPSF differentiates school performance better than the state's prior accountability system. The prior system used three categories, but all schools were rated in the top two in recent years. In contrast, the SPSF uses four categories, and schools are distributed across all four.

Greater differentiation in school performance is important for several reasons. Increased differentiation provides more information to stakeholders about school performance. A system with little differentiation suggests all schools are performing relatively similarly, even when they are likely not. Additionally, greater differentiation in ratings can better motivate schools to improve because the label they receive is more directly related to student performance. Finally, greater differentiation helps the state better identify schools that need support.

Changes should be made to improve how the SPSF labels school performance

In school accountability systems, any ratings that convey school performance are highly visible to the public and carry implications for schools. Research shows school ratings can shape public perceptions, affect school staff morale, and influence state and local policy, such as funding decisions (sidebar). Negative perceptions associated with low ratings can have tangible negative consequences for schools such as making it harder to recruit and retain high-quality teachers—a critical component of maintaining or improving school performance. Therefore, it is essential for states to purposefully design such ratings.

Other factors influence perceptions of school quality in addition to school accountability ratings, such as word-of-mouth and websites such as GreatSchools.

States use different formats for their accountability ratings, including letter grades, stars, colors, numerical scores, and descriptive labels—which use plain language (i.e., terminology) to characterize school performance, often relative to one another or to the state's standards or expectations. Research literature does not suggest one overall rating format is inherently superior to another.

According to research, effective accountability ratings—regardless of format—are clear and easily understood by the public. This is especially important because, as one expert noted, school ratings are often "the first and only piece of information that

most of the public gets" about school quality. States should avoid ratings with negative connotations, such as "failing," and use ratings that clearly convey the state's intended message. Additionally, effective ratings provide actionable information to schools, ensuring the accountability system is a useful tool for both accountability and school improvement.

Descriptive labels are challenging to develop, but some SPSF performance labels do not clearly communicate school performance or function as part of a continuous scale

The SPSF uses descriptive labels to convey schools' overall performance. In the SPSF, these labels serve as the primary way of communicating Virginia schools' performance. The board chose to use descriptive labels as the overall rating format given "strong" feedback in favor of this format over others—most notably an A–F scale—during stakeholder listening sessions. School staff and other stakeholders reiterated their support for VBOE's use of descriptive labels in interviews, preferring this format to other options.

Subject-matter experts and research literature note that developing descriptive labels that are clear, widely understood, and broadly accepted can be challenging. Stakeholders bring different perspectives and many have strong opinions about accountability ratings, making it difficult to design ratings that satisfy everyone. As one expert explained: "It's very clear this is one of the most important things to a lot of stakeholders." Descriptive labels can be particularly challenging to develop because they are less intuitive and often require more explanation than more familiar formats, such as letter grades. One expert observed that descriptive labels can be "pretty challenging" compared with other formats, like letter grades, "because nobody knows how many [labels] there are, the order, [or] what they actually mean without digging a little further."

The challenges associated with developing descriptive labeling are evident in the contrasting views of Virginia's education stakeholders about the SPSF performance labels' terminology. According to VDOE and VBOE leadership, the four terms used for the performance labels use plain language that stakeholders understand (i.e., are not overly academic), are not "ambiguously neutral," and are intended to motivate schools to improve to achieve a more favorable label. Some local school board members reported in interviews with JLARC that they liked the terms and found them accurate and simple. However, other stakeholders, including some superintendents, principals, other local school board members, and some subject-matter experts view the terms as unclear or overly negative.

Three of four SPSF performance labels do not clearly communicate school performance

The *Distinguished*, *On Track* and *Off Track* labels do not clearly communicate schools' performance. *On Track* and *Off Track* imply a school performance trajectory (improving or declining, respectively), which is not the intent of the performance labels and

likely does not accurately characterize at least some schools with those labels. As one division leader explained, "A school can be making growth, yet still receive a rating of *Off Track*, which the general public will likely misunderstand." In addition, the *Distinguished* label overstates the performance of at least some schools that score in the category. "Distinguished" is defined as "marked by eminence, distinction" or "successful, authoritative, and commanding great respect." However, a school labeled as *Distinguished* may underperform on some indicators or have weaknesses outside the accountability system, which the label does not convey. Finally, the *On Track* label does not clearly convey that a school's performance is meeting expectations; for example, one principal perceived *On Track* as indicating "almost below average," illustrating how the terminology can be misinterpreted.

Many division and school staff were particularly concerned with the *Off Track* label. Although VDOE's website clarifies that none of the SPSF labels are intended to "categorize any school as failing," many division and school staff viewed the *Off Track* label as "too negative," calling it "harsh," and "demoralizing." School division leaders viewed *Off Track* least favorably of the four performance labels on JLARC's survey (sidebar).

JLARC staff surveyed school division superintendents or their designee on the new accountability system. A total of 106 school divisions (80 percent) responded to the survey (Appendix B).

SPSF performance labels do not clearly relate to each other as part of an intuitive, continuous scale

The four SPSF performance labels are not related to each other or on a continuous scale, which could lead to further confusion. There is no intuitive progression through the SPSF labels, in part because the middle two labels focus on whether schools are "on" or "off" track, while the top and bottom labels use unrelated terms. Using disconnected terms can make it more difficult for stakeholders to understand the order of the labels and how they compare to each other. For example, some principals and experts misperceive *Off Track* as a lower rating than *Needs Intensive Support*, with one principal stating, "I'd rather be labeled [*Needs Intensive Support*] than *Off Track*…*Off Track* sounds worse." The continuity of only two terms (*On Track* and *Off Track*) could also cause confusion, with one subject-matter expert noting that someone could perceive the scale as having only two binary ratings—just *On Track* and *Off Track*—if they did not know about the other two.

The discontinuity across the terms used for the four SPSF performance labels may occur because they were drawn from multiple states' accountability systems rather than modeled after a single, internally consistent scale (sidebar).

VBOE discussed the proposed labels briefly at the end of the SPSF development process. During this discussion, board members considered only the terms that were ultimately adopted and were not presented any alternative options. Additionally, although the board's consultants engaged stakeholders on possible options, board members appeared to receive very limited information about stakeholders' perspectives during public meetings.

Changing SPSF performance label terminology would be a small change that could strengthen stakeholder buy-in

Given many stakeholders' concerns and the potential for confusion, VBOE should change the terminology used for the performance labels. Subject-matter experts emphasized that no set of accountability ratings will satisfy every stakeholder; however, they noted that changing the current labels would be a relatively minor adjustment that

could meaningfully improve stakeholder buy-in to the SPSF, since the terms themselves do not affect how schools are scored or how the accountability system functions.

Experts and research literature highlight several characteristics that descriptive labels should include, which the board should consider when developing new terms. Foremost, new descriptive labels should accurately reflect school performance and avoid over- or understating results. They should also clearly communicate meaningful information, such as schools' performance relative to one another and state expectations. In addition, new descriptive labels should form an intuitive, continuous scale—which the current labels do not—so that stakeholders understand the labels' meaning and their relation to one another.

The board could consider several models for new performance labels that align with research literature and expert recommendations for effective descriptive labels. The board could start with the definitions of the current performance labels, which are based on how schools perform relative to state expectations. *Distinguished* schools are defined as "exceeding the state's expectation," *On Track* schools as "meeting the state's expectation," *Off Track* schools as "not meeting the state's expectation," and *Needs Intensive Support* schools as "significantly not meeting the state's expectation." The board could incorporate this language into new descriptive labels. Alternatively, the board could consider other states' labels that are more consistent with expert recommendations. For example, West Virginia uses (i) Exceeds Standard, (ii) Meets Standard, (iii) Partially Meets Standard, and (iv) Does Not Meet Standard; Wyoming uses (i) Exceeding Expectations, (ii) Meeting Expectations, (iii) Partially Meeting Expectations, and (iv) Not Meeting Expectations.

RECOMMENDATION 1

The Virginia Board of Education should develop new terminology for the performance labels in the School Performance & Support Framework that more clearly communicate school performance as part of a continuous scale.

Changing the terminology used for the SPSF performance labels may require updating the state's ESSA plan. This change does not necessarily affect other aspects of the framework or need to be sequenced with any other changes. However, VBOE should solicit and purposefully consider stakeholder feedback during the development process, because school ratings are highly visible, have implications for schools and staff, and can be one of the most controversial elements of an accountability system.

SPSF scoring thresholds ignore differences in how school levels are measured, significantly benefiting high schools

States that use overall ratings to describe school performance have wide latitude to determine the proportion of schools that fall into each performance category. According to experts, there is no single "right" way to do this; some states aim for a normal distribution of schools across rating categories, while others intentionally distribute

schools so more are rated as meeting or exceeding standards. If certain ratings make schools eligible for support from the state's department of education, states can—and should—also consider their available capacity to help low-performing schools when determining how many schools will receive lower ratings.

Experts recommend that states consider using different scoring thresholds when assigning ratings for each school level—elementary, middle, and high school—if the indicators and weighting for each school level are materially different. The SPSF evaluates elementary, middle, and high schools using different sets of indicators, and the weight of each indicator generally varies by school level. Some indicators are associated with higher scores than others; for example, the two graduation rates and the 3Es indicator, which apply only to high schools, tend to generate higher scores than some of the measures used for elementary and middle schools, such as reading and math growth (Appendix E).

Using the same scoring thresholds for all three school levels despite each level being measured using different indicators and weights, reduces the comparability and fairness of SPSF results. For example, it is much easier for high schools to achieve higher overall ratings than elementary or middle schools because of the different indicators used and their scoring.

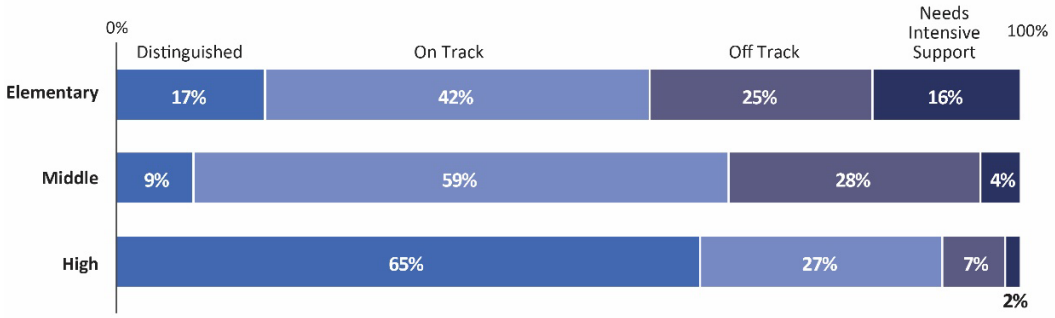
One factor contributing to **many high schools receiving higher ratings in 2024–25 is their performance on the 3Es indicator**. The approach used to score this indicator can inflate high schools' summative scores and corresponding performance labels, as discussed in Chapter 6.

According to experts, the distribution of ratings should generally be comparable across school levels unless there is evidence that a certain level of schools consistently outperforms others. However, the 2024–25 SPSF results illustrate significant differences across school levels even though there is no evidence that any level performs better than others. Under the new system, high schools are much more likely to be labeled *Distinguished* and much less likely to be labeled *Off Track* or *Needs Intensive Support* than elementary and middle schools (sidebar). Conversely, elementary schools are more likely to be labeled *Needs Intensive Support* and less likely to be labeled *On Track* than the other school levels (Figure 4-1).

VBOE should re-evaluate and develop new scoring thresholds that are specific to elementary, middle, and high schools (sidebar). Experts recommend using different thresholds for each school level, and some other states use this approach. For example, Kentucky uses three different scales to assign ratings to elementary, middle, and high schools. Unless the board wants to focus differently on a specific school level, it should seek to set thresholds at scores that result in relatively comparable proportions of elementary, middle, and high schools receiving each of the four performance labels. VBOE will need to also ensure the thresholds enable a sufficient proportion of schools to receive each of the four labels, so that meaningful differentiation is maintained. Finally, the board will need to consider VDOE's capacity to support low-performing schools and ensure the thresholds do not lead to more schools being labeled in the lower performance categories than VDOE can meaningfully and reasonably support.

The board would also need to develop **thresholds for the 77 combined schools**, such as combined elementary-middle schools.

FIGURE 4-1
Distribution of SPSF performance labels varies by school level; high schools are much more likely to have higher ratings than elementary and middle schools



SOURCE: JLARC analysis of School Performance & Support Framework data (2024–25).
NOTE: Excludes 77 schools that are combined elementary, middle, and/or high schools and 15 schools without performance labels. Reflects schools' labels after accounting for federal designation (if applicable).

RECOMMENDATION 2
The Virginia Board of Education should develop new scoring thresholds for assigning the School Performance & Support Framework performance labels that are unique to each school level and result in relatively comparable proportions of elementary, middle, and high schools receiving each label.

VBOE will need to set new score thresholds for the SPSF's performance labels after other changes to the framework are implemented. Several of the recommendations in this report and changes being considered by VBOE as part of Amendment IX to the state ESSA plan likely will affect schools' summative scores and therefore performance labels. In addition, any changes made to how federal designations affect school labels (discussed later in this chapter and in Chapter 8) will affect some schools' ratings, which could influence decisions about where scoring thresholds are set. Finally, the new cut scores for the state's standardized tests will likely result in substantially lower school ratings in general under the SPSF and therefore should be considered when setting thresholds (Chapter 3). As a result, the new thresholds will need to be set after changes are made and one full school year of data is available to use.

A **percentile-based approach** assigns ratings based on how schools rank relative to one another, rather than to a fixed standard (e.g., a summative score threshold).

In the interim, VDOE could assign performance labels using a percentile-based approach until permanent thresholds are established (sidebar). However, this approach should not be a long-term solution because it has drawbacks, such as leading schools to compete against each other for a fixed number of spots in each category, not providing schools with a consistent target to aim for, and keeping the proportion of high- and low-performing schools constant regardless of fluctuations in overall statewide performance.

SPSF should ensure that CSI schools receive the lowest state label

In addition to assigning overall ratings, the SPSF designates low-performing schools to meet federal accountability requirements. Under ESSA, states must designate as Comprehensive Support and Improvement (CSI) (i) the lowest-performing 5 percent of Title I schools, (ii) any high school with a four-year graduation rate below 67 percent, and (iii) Title I schools with student subgroups that continue to underperform after multiple years (sidebar). CSI designation affects schools' performance labels in the SPSF; under VBOE regulations, schools designated as CSI cannot receive the highest performance label, *Distinguished*.

States must **also designate Targeted Support and Improvement (TSI) and Additional Targeted Support and Improvement (ATSI) schools** based on performance among subgroups (Chapter 8).

According to subject-matter experts, effective school accountability systems ensure that federal designations and state ratings send a consistent and coherent message about school performance. The schools identified as lowest-performing through the federal designation process—CSI schools—should also be identified as the lowest-performing based on state ratings. This alignment is especially important in systems like the SPSF that assign schools both a state-specific rating and federal designation, as it helps ensure stakeholders receive a clear picture of school performance.

Most CSI schools do not receive the lowest performance label under the SPSF's approach to categorizing schools. Although CSI schools are generally, by definition, the lowest-performing 5 percent of Title I schools in the state (sidebar), most CSI schools did not receive the state's lowest performance label: *Needs Intensive Support*. In 2024–25, just 14 CSI schools (18 percent) were labeled *Needs Intensive Support*; the remaining 82 percent received a label in a higher category because they earned summative scores above the thresholds for receiving these labels. This occurred in part because the summative score threshold for the *Off Track* category is set too low, leading to many CSI schools qualifying for the *Off Track* label and too few falling within the *Needs Intensive Support* category (sidebar).

Based on 2023–24 data, **most CSI schools are designated as CSI for being in the bottom 5 percent of Title I schools** (which is based on their SPSF summative score), rather than for low graduation rates or continued underperforming subgroups.

Because most CSI schools do not receive summative scores that would assign them the lowest performance label, the SPSF scoring thresholds—particularly the one separating *Off Track* and *Needs Intensive Support*—need to be changed to identify schools with the lowest performance and greatest needs. Recommendation 2, which proposes revising the scoring thresholds, could help address this problem. For example, if VBOE set the new threshold separating *Off Track* and *Needs Intensive Support* at 72 points rather than 65 points, 67 percent of CSI schools would have been labeled *Needs Intensive Support* in 2024–25. Therefore, the majority of CSI schools would have received the lowest state label, sending a clear and consistent message about these schools' performance and need for intensive support.

A small number of **CSI schools that did not score below the Off Track threshold in 2024–25 were designated as CSI** because they were identified under the prior federal accountability rules and had not yet exited CSI status. These schools scored in the *On Track* or *Off Track* categories but are required to remain CSI until they show two consecutive years of growth.

However, even if the scoring threshold separating the bottom two categories is changed to better align CSI-designated schools with the *Needs Intensive Support* category, some CSI schools could still receive a score corresponding with the *Off Track* label.

For example, under the illustrative threshold separating *Off Track* and *Needs Intensive Support* at 72 points, in 2024–25, some of the remaining 33 percent of CSI schools would have scored above the threshold and earned an *Off Track* label.

To avoid adjusting the threshold each year, VBOE should implement a policy that all CSI schools receive a performance label of *Needs Intensive Support*. This would ensure that even if any CSI schools score above the threshold, they are still labeled *Needs Intensive Support*. Subject-matter experts generally supported this approach in interviews, noting that a CSI designation indicates serious school performance issues that warrant attention and therefore should be categorized accordingly.

During the SPSF design process, VBOE signaled its intent to automatically assign the state's lowest performance label to schools receiving a CSI designation. However, due to a technical issue with how the SPSF's regulatory language was written, the rule was not implemented.

RECOMMENDATION 3

The Virginia Board of Education should amend 8-VAC-20-132-280 A.1 of the Virginia Administrative Code to state that any school with a federal Comprehensive Support and Improvement designation shall be labeled as a school in the lowest performance category in the School Performance & Support Framework.

Changing the CSI designation's effect on schools' SPSF performance label could be done immediately and would affect some schools' performance labels. The change is not contingent on any other changes to the framework and should be made regardless of whether revisions are made to TSI and ATSI labeling rules (Chapter 8). Based on 2024–25 data, 64 schools would have had their label lowered to *Needs Intensive Support* under this recommendation.

5 Proficiency and Growth Indicators

Although the Every Student Succeeds Act (ESSA) broadened the focus of state accountability systems, student performance on standardized assessments remains a core component through measures of student proficiency and—for nearly all states—student growth. Proficiency measures whether students are meeting grade-level standards in academic content areas, while student growth assesses their academic progress over time.

Student proficiency and student growth are key components of the School Performance & Support Framework (SPSF). Each is measured based on student performance on the Standards of Learning (SOL) tests or the Virginia Alternate Assessment Program (VAAP) for students with significant cognitive disabilities (sidebar). Proficiency and growth are substantially weighted when calculating school performance.

Most students with disabilities take SOL assessments. Federal requirements limit the number of students taking alternate assessments to no more than 1 percent of all assessed students for a subject.

SPSF's proficiency indicators are generally well designed, though a scoring refinement is needed

ESSA requires that state accountability systems include proficiency indicators that are measured by performance on statewide standardized assessments for reading and math (sidebar). While accountability systems must assign "substantial" weight to these indicators when differentiating school performance, states have flexibility in how to measure and score proficiency and whether to include additional subject areas.

ESSA requires states to assess students in reading and math annually in grades 3–8 and once in high school. Students must also be periodically assessed in science.

ESSA also requires that at least 95 percent of all students participate in assessments. The SPSF penalizes schools' proficiency indicator scores if more than 5 percent of their students do not take an assessment (e.g., parent opt outs).

Proficiency is the highest weighted component of the SPSF. Together, student proficiency in reading, math, and science comprise 55 percent of elementary schools' summative scores, 50 percent of middle schools' scores, and 40 percent of high schools' scores.

Framework's proficiency indicators are generally well designed

The SPSF's proficiency indicators are generally well designed. The framework includes separate indicators for reading, math, and science proficiency. Although ESSA does not require a science proficiency indicator, it is commonly included by other states and was part of Virginia's prior system. The proficiency indicators are scored using indexes; therefore, students receive partial credit for scores below proficiency and extra credit for advanced scores.

In the prior accountability system, student proficiency, growth, and ELP progress were **combined into a single reading achievement indicator.** Math proficiency and growth were **combined into a single math achievement indicator**. Only science achievement was a standalone proficiency measure.

The SPSF's proficiency indicators represent an improvement over the "achievement" indicators used in the prior accountability system. Reading and math proficiency were part of combined indicators that included assessment pass rates, student growth, and—for reading achievement—English learners' progress toward English language proficiency (ELP) (sidebar). The combined rates and performance categories

produced by these indicators made it difficult to identify which factors were driving school performance. Further, the scoring of these indicators produced very little differentiation among schools. Schools were awarded full credit if a student demonstrated sufficient performance in just *one* of the two or three areas comprising the combined indicator (e.g., a student who did not pass their assessment but made sufficient growth received full credit). As a result, 95 percent of schools received the highest performance rating for both the reading and math achievement indicators for the 2023–24 school year (sidebar).

Other design elements contributed to little differentiation in the prior system's achievement indicators. Schools could receive a higher category for their overall performance even when falling short of benchmarks if they made sufficient improvement from the prior year. They could also use either their performance from the most recent year or combined over three years.

Furthermore, school leaders and subject-matter experts generally prefer the SPSF's use of performance indexes over the prior system's use of pass rates because they encourage schools to focus on a broader range of students. With index scoring, schools receive credit for students who score proficient on their assessment but also receive (i) partial credit for students who score basic, below basic, or does not meet proficiency and (ii) extra credit for those scoring advanced. While pass rates are more straightforward for reporting student results, research shows that pass rates encourage schools to focus on a narrower subset of students near the pass/fail line (i.e., students "on the bubble"), because schools can improve their indicator score only when more students pass their assessment. In contrast, performance indexes incentivize schools to focus on students across the achievement spectrum, including those furthest behind and unlikely to reach proficiency, since any student moving up a performance level earns additional points for the school.

> *"It's changed a lot. Every kid matters…Kids aren't being put in the corner because you did really well, or because you don't stand a chance of passing. Before, it was 'we've got to get these bubble kids to tutoring.'"*
>
> **– Elementary principal**

Proficiency scoring for assessments with a single failure level should be refined

The SPSF scores its proficiency indicators with one of two indexes, depending on whether an assessment has three or four levels for categorizing student performance (sidebar). Elementary and middle school reading and math SOLs have four performance levels, including two levels for students scoring below proficiency—basic and below basic. Science SOLs, high school SOLs in all subjects, and VAAP assessments have three performance levels with a single failure level for any score below proficient (Table 5-1). The Virginia Board of Education (VBOE) is considering changing the elementary and middle school science assessments to four performance levels beginning in the 2025–26 school year. In addition, the board is also considering adding a social studies proficiency indicator, which would be based on assessments with three performance levels (Chapter 6).

The number of performance levels, as well as the scoring thresholds that determine those levels ("cut scores"), are based on how state assessment results are categorized and reported. They are not a product of the new accountability framework.

Schools earn points ranging from 0.25 to 1.25 for each student, depending on the index applied and the student's achievement level. For assessments with four performance levels, schools earn 0.25 points for students scoring below basic, 0.75 for basic, 1 for proficient, and 1.25 for advanced. For assessments with three performance levels, schools earn the same amount of points for proficient and advanced students as the four-level index but receive 0.75 points for all students who score below proficient (i.e., fail their assessment).

TABLE 5-1
Scoring for SPSF proficiency indicators

Performance levels	Points	Assessments
Four	0.25 pts: Fail/Below basic 0.75 pts: Fail/Basic 1 pt: Proficient 1.25 pts: Advanced	Grades 3–8 reading SOLs Grades 3–8 math SOLs
Three	0.75 pts: Fail/Does not meet proficiency 1 pt: Proficient 1.25 pts: Advanced	Science SOLs High school reading and math SOLs VAAP assessments

SOURCE: JLARC summary analysis.
NOTE: The number of performance levels for each assessment is determined by the VBOE as part of the state's standardized assessment system. The board is considering changing the elementary and middle school science assessments to four performance levels beginning in the 2025–26 school year. The board is also considering adding social studies proficiency—which has three performance levels—to the framework.

The SPSF's scoring index for assessments with four performance levels is appropriately designed. Its point values sufficiently distinguish among the different levels of student achievement and school performance. The index also incentivizes schools to focus on lower-performing students, as the largest point increase occurs between the lowest two performance levels. Students that score basic receive 0.5 points more than those scoring below basic. The board designed this point increase to encourage schools to focus on improving the lowest-performing students and acknowledge the effort required to move them up to a higher performance level.

However, the SPSF's scoring index for assessments with three performance levels awards too many points to failing students, including those who are far from proficiency. Awarding 0.75 points to *all* students scoring Fail/Does not meet proficiency is problematic because:

- The high point value (0.75 points) given to all failing students regardless of performance could incentivize schools to deprioritize assessments subject to the three-level scoring index.
- Schools that want to improve their indicator scores have less incentive to focus on the lowest-performing students. The uniform point increase between each performance level means that moving a student from failing to proficient yields the same point gain as moving a student from proficient to advanced.
- Indicator scores are less responsive to schools improving or declining in performance because of the narrower range of points a school can receive for any given student (0.75 to 1.25 points).

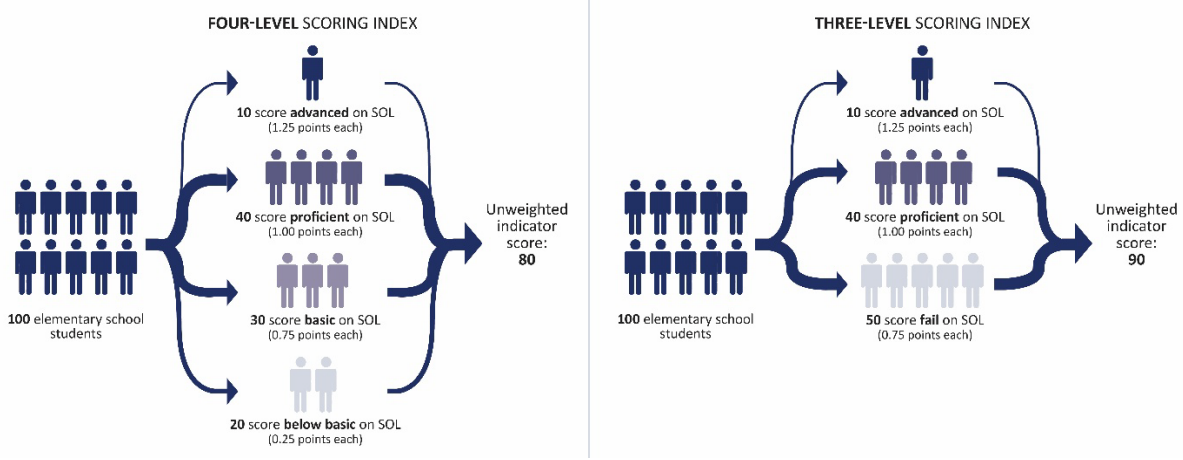
> *"Even if a student fails, you get 0.75. So science doesn't really matter anymore… Now we're shifting focus to [other areas]. In general, it's a great example of how…practitioners will learn how to play the game."*
>
> **– Division superintendent**

- The same point differential between a failing and proficient student (0.25 points) and proficient and advanced student (0.25 points) is contrary to federal guidance about performance indexes. This enables a "masking" effect, through which an advanced student can fully compensate for a failing student (sidebar).

U.S. Department of Education guidance says that states measuring proficiency with an index should ensure that extra points awarded to advanced students do not fully compensate for (i.e., cancel out) the performance of non-proficient students. Indexes that allow masking create a risk that schools will focus more on advanced students than those with the greatest academic needs.

The three-level index can also produce misleading results. The relatively high point value awarded to the lowest-performing students inflates indicator scores for subjects using the three-level index (Figure 5-1). For example, the SPSF produced a *higher* average score for the science indicator (subject to the three-level index) than for reading and math indicators for elementary and middle schools (subject to the four-level index) for the 2023–24 school year. The underlying assessment pass rates, though, were lower for science than for reading and math (Table 5-2).

FIGURE 5-1
Schools can more easily score points for assessments with only three performance levels



SOURCE: JLARC staff.

TABLE 5-2
Science had the highest indicator score for elementary and middle schools despite having the lowest SOL pass rate (2023–24)

School rating	Reading	Math	Science
Average SPSF indicator score	91	90	95
Average SOL pass rate	72%	71%	69%

SOURCE: JLARC analysis of Virginia Department of Education data (2023–24).
NOTE: High schools are not included because all subjects have only one level for failing. Calculations include combined elementary and middle schools but not combined schools with high school grade levels.

The shortcomings in the three-level scoring index can be addressed with a relatively modest change to the point values used. Point values awarded to students who fail their assessment should be reduced from 0.75 points to 0.5 points.

RECOMMENDATION 4

The Virginia Board of Education should reduce points awarded in the School Performance & Support Framework's mastery index calculations from 0.75 to 0.5 for students who score "Fail/Does Not Meet Proficiency" on assessments with three performance levels.

The board is currently considering changes to the framework that would address Recommendation 4 as part of an amendment to the state ESSA plan. The proposed change would award 0.5 instead of 0.75 points for students scoring "Fail/Does Not Meet Proficiency" on assessments with three performance levels beginning in 2025–26. This change would impact the scoring index applied to high school SOLs, VAAP tests, and (if added to the SPSF) social studies SOLs. Science would no longer be impacted if changed from three to four performance levels. The board discussed potential changes at its November 2025 meeting but had not finalized and approved those changes at the time of publication of this report.

Changing the point values for failing students in the three-level proficiency index would reduce some schools' proficiency indicator scores. Based on 2023–24 data, JLARC estimates suggest an average decrease of three points for the high school reading indicator, five points for the high school math indicator, and eight points for the science proficiency indicator (if elementary and middle school science assessments remained with three levels).

SPSF's growth indicator is an improvement, but still has shortcomings and will likely change

ESSA requires that state accountability systems include either a measure of student growth based on annual statewide reading and mathematics assessments *or* a different additional academic indicator for elementary and middle schools. Almost all states, including Virginia, use a student growth measure to fulfill this requirement. ESSA provides flexibility for how states measure and score growth, and states approach growth in a variety of ways. There is little consensus from research, subject-matter experts, and stakeholders on the best approach for including student growth in an accountability system.

The SPSF's growth indicators measure each student's performance on assessments in reading and math relative to that student's performance in prior years and the performance of all other students who took the assessment. Growth indicators are the second highest weighted area of school performance for elementary and middle schools. Together, growth in reading and math comprise 25 percent of elementary schools' summative scores and 20 percent of middle schools' scores. Student growth is not

used as an indicator for high schools because of students' variation in course progression and the grade level in which they take assessments.

Several aspects of the SPSF's growth indicators are an improvement over the prior system. The SPSF produces stand-alone reading and math growth scores, which improve transparency over the prior system's combined achievement indicators. The SPSF's growth indicators also measure growth for all students, whereas the prior system measured only growth for students who did not achieve proficiency on their assessments. As a result, the prior system did not track or award credit for progress made by proficient or advanced students.

The SPSF measured growth in reading and math for students in grades four–eight using a value-added model, Virginia's Visualization and Analytics Solution (VVAAS), for the 2024–25 school year. However, VBOE will likely select a new approach for measuring growth for the 2025–26 school year because funding for the VVAAS model was not included in the 2025 Appropriation Act.

Model used to measure student growth for 2024–25 is complex but appropriate

Value-added models, such as VVAAS, are commonly used in other states' accountability systems and are generally viewed by subject-matter experts as an appropriate and methodologically rigorous option for measuring student growth. Value-added models aim to measure a school's impact on student learning by attempting to separate the school's contributions from other factors influencing student outcomes that are outside the school's control.

The SPSF's growth indicators use VVAAS model outputs to measure student growth. VVAAS produces an "expected score" for each individual student in both reading and math based on the amount of growth expected by the model. The model's expectations for growth are based on a student's prior test performance in all subjects, English learner status, and grade level, as well as the performance of other students in the state. Student growth is quantified by comparing each student's *actual* test scores to their individualized expected scores. The model does not produce students' expected growth scores until *after* students have taken their assessments, because expected score calculations rely in part on the statewide distribution of scores from the most recent year of assessments.

While the VVAAS model is generally appropriate for measuring student growth, its main drawback is its complexity. Stakeholders frequently expressed confusion about how VVAAS calculates growth scores. Value-added models are technical and difficult to understand, and because VVAAS is a proprietary model, the exact specifications behind its calculations are not publicly available—further reducing transparency.

SPSF's approach to scoring growth indicators for 2024–25 could unfairly penalize schools and differs from other states

Though the VVAAS model is an appropriate measurement of student growth, the SPSF's approach to *scoring* growth indicators for the 2024–25 school year may not accurately and fairly reflect growth. These concerns do not reflect shortcomings of the VVAAS model, but rather how its results were used to produce scores for the framework's growth indicators.

The SPSF uses a scoring index that awards points to individual students based on their actual assessment performance relative to their expected score. Students receive 1 point for meeting or scoring up to one standard error above their expected score and 1.25 points if they exceed their expected score by more than one standard error. However, students receive only 0.5 points if their actual score is up to one standard error below their expected score and no points if it is more than one standard error below (sidebar).

The **standard error** is a measure of uncertainty for each student's expected growth score. This includes uncertainty in the model's ability to predict a student's expected score based on their testing history.

Scoring may unfairly penalize students and schools with acceptable growth

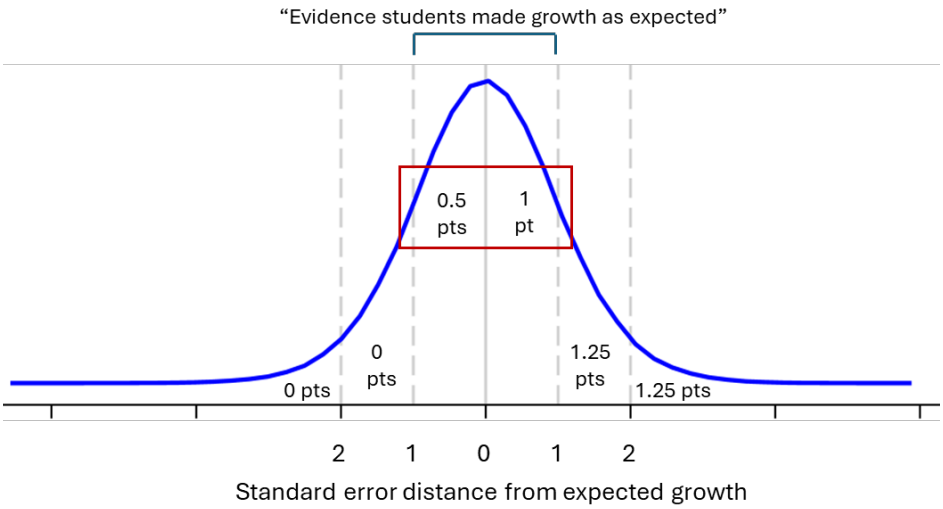
The scoring index used for the SPSF's growth indicators may unfairly penalize schools with a high number of students who come close to but do not quite achieve their expected score. Students who meet or exceed their expected score by up to one standard error receive twice as many points as those who fall short of their expected score by the same amount (Figure 5-2). However, performance within this plus or minus one standard error range has the greatest statistical uncertainty, making it difficult to determine whether students' actual scores meaningfully differ from their expected scores. In fact, the VVAAS technical manual groups performance in the plus or minus one standard error range in the same category, describing it as "evidence that students made growth as expected" (sidebar). Likewise, all four other states using a VVAAS peer model for school accountability treat performance in the plus or minus one standard error range as the same result (sidebar).

SAS Institute Inc. developed the VVAAS model for Virginia and provided a manual describing the methodology and outputs of the VVAAS model. This manual was created for VVAAS's initial use as a tool for schools and divisions to monitor student growth, prior to its use in accountability.

SAS has developed similar models for North Carolina, Ohio, Pennsylvania, and Tennessee's accountability systems.

Other value-added models are used in additional states.

FIGURE 5-2
SPSF growth indicator scoring awards different point values to students whose performance may not meaningfully differ from one another



SOURCE: JLARC staff.

Use of VVAAS student estimates rather than "school effects" may be less accurate

A minimum number of students is required in every subject-grade to produce a school effect. While these minimums are relatively low, it is possible that some small schools may not meet the threshold.

VBOE chose to base scoring on individual student estimates to (i) score growth indicators similarly to proficiency indicators, (ii) use a simpler scoring method that school staff could more easily understand, and (iii) ensure every student with sufficient testing data is included (sidebar). However, the model also produces school effects, which are aggregated growth estimates of all students in a school. School effects are calculated with statistical techniques that better account for uncertainty and for which the model can quantify the statistical confidence in each school's estimated growth.

All four other states using a VVAAS peer model for school accountability use school effects for scoring growth indicators rather than individual student growth estimates. Using school effects would likely produce indicator scores that more accurately characterize student growth; however, JLARC cannot quantify how their use would affect indicator scores or schools' relative performance.

Student growth measure under board consideration for 2025–26 is a substantial change from current approach

Value tables are a common approach to measuring student growth. Other states that use value tables include Florida, Mississippi, and West Virginia.

VBOE is considering a shift from the current value-added model to a value table approach for the reading and math growth indicators as part of an amendment to the state ESSA plan (sidebar). Value tables categorize students based on their standardized assessment performance, and schools receive points based on how each student's current performance level compares to their performance level from the prior year. The proposed value tables being considered by VBOE would establish eight "ranges"

based on SOL and VAAP performance levels (sidebar). Schools would earn 0.25, 0.5, 0.75, 1, or 1.25 points for each student, with higher point values awarded when lower-achieving students advance into a higher range from one year to the next, or when higher-achieving students maintain or improve their performance from the prior year.

Like the current value-added model, a value table approach can be appropriate for measuring student growth as part of an accountability system, but the two methods are substantially different. While value-added models produce individual growth expectations that vary annually based on the performance of students statewide, value tables set targets tied to grade-level standards. Value tables are generally more transparent and easier to understand because they use consistent targets (e.g., ranges) and a simpler methodology than value-added models. However, subject-matter experts and research literature identify some tradeoffs. For example, unlike value-added models and other more sophisticated approaches, value tables do not account for measurement error, which can reduce their precision. In addition, because value tables are typically linked to proficiency standards, they tend to produce growth indicator scores that have a higher correlation with proficiency scores—and consequently, student demographics—than peer comparison-based approaches such as value-added models. See Appendix I for further comparison of growth measures.

Thresholds for each range are defined using a **vertical scale** that spans all grade levels where growth is measured. A vertical scale is a continuous measurement scale that applies to standardized tests spanning across grade levels to monitor student progress over time. The vertical scales used for the proposed value tables range from 900 to 2000.

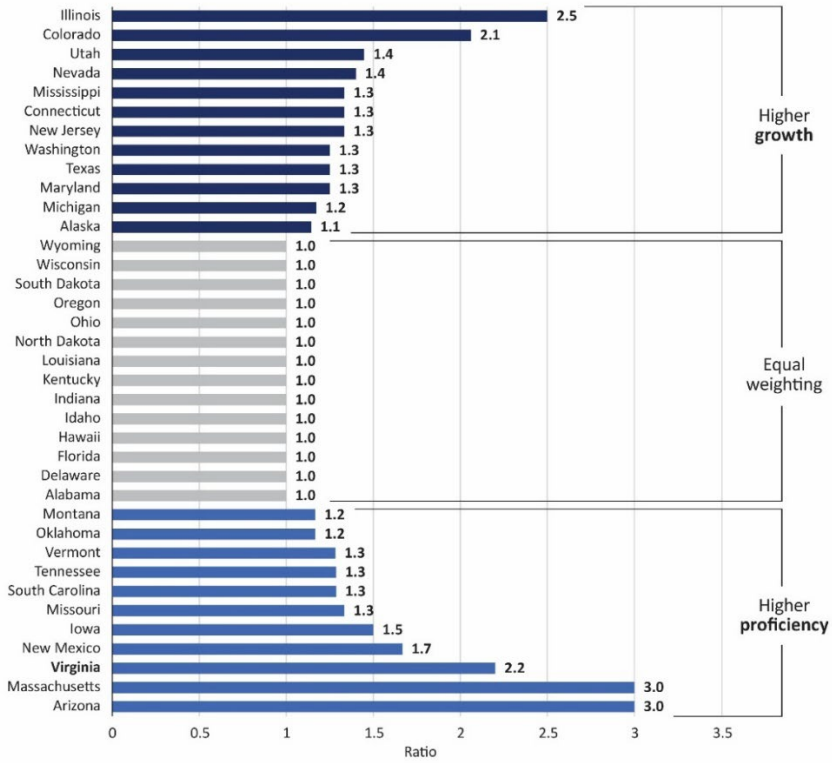
The effectiveness of a value-table approach for measuring student growth depends on its design (sidebar). Key considerations include the number of performance categories used, the assessment score thresholds that define each category, and scoring (how points are awarded for each student). The value table approach was first proposed at the November 2025 VBOE meeting, and the board had not finalized or approved changes to the growth indicators at the time publication of this report. The board may want to consider engaging an expert to evaluate the value tables' design, particularly whether the thresholds defining the performance ranges and indicator scoring are appropriate. Additionally, modeling could help assess the impact of the new growth indicator on schools' overall ratings and the correlation between growth indicator scores and schools' student demographics.

Virginia's prior accountability system used a value table approach to measuring student growth (called "progress tables"). However, the value tables currently under consideration for the SPSF have substantial design and scoring differences.

Proficiency weighting is higher than most states and captures less of schools' contribution to student learning

The SPSF weights proficiency more than growth when compared to other states. ESSA requires that "substantial weight" be given to both proficiency and growth indicators, but states have broad flexibility in how to weight each indicator relative to one another. Under the SPSF, proficiency indicators collectively have 2.2 times the weight of growth indicators for elementary schools and 2.5 times the weight of growth indicators for middle schools. Other states are fairly evenly split among prioritizing proficiency, prioritizing growth, or weighting them equally. However, only two states have a greater ratio of proficiency relative to growth than Virginia (Figure 5-3).

FIGURE 5-3
Virginia weights proficiency higher relative to growth than most states



SOURCE: JLARC summary of elementary proficiency and growth weighting from state ESSA plans as of August 2025.
NOTE: States excluded from figure generally do not have simple indicator weights and instead use decision rules to differentiate school performance. Ratios include all proficiency and growth indicators in a state's accountability system.

Virginia's prior accountability system did not weight the contribution of proficiency and growth independently. Its combined indicators for reading and math awarded full credit to schools for students with sufficient performance in proficiency *or* growth.

The board purposefully designed the SPSF to prioritize proficiency over growth, citing the belief that (i) meeting grade-level standards is a key outcome for student success, (ii) maintaining high expectations for all students is essential, and (iii) parents care most about whether their child is proficient (sidebar).

JLARC staff surveyed school division superintendents or their designee on the new accountability system. A total of 106 school divisions (80 percent) responded to the survey (Appendix B).

School division leaders had mixed opinions on the framework's proficiency and growth weighting. Forty-two percent of divisions responding to JLARC's survey indicated the SPSF's weighting of proficiency and growth is an appropriate balance, while 41 percent thought too much weight is given to proficiency; just 9 percent thought too much weight is given to growth (sidebar).

Other stakeholders expressed varying opinions on proficiency and growth weighting throughout the SPSF development process. VDOE cited that parents, higher education representatives, employers, and military leaders consistently shared the importance of graduates who are proficient. However, participants in listening sessions held in each of Virginia's eight superintendent regions—which included 375 parents, school and division staff, school board members, and other stakeholders—generally

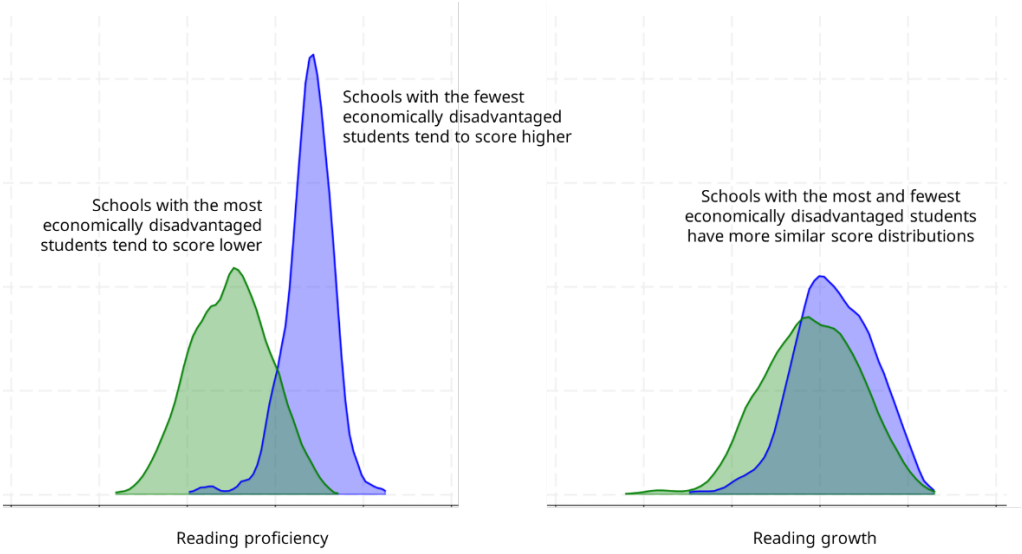
agreed that "growth should be, at least, weighted equally to achievement [proficiency] if not more," according to a summary presented to the board in January 2024.

Subject-matter experts and research literature indicate that student growth better captures schools' contribution to student performance than proficiency, which is typically closely related to student demographics, especially economic disadvantage. Students enter school with widely varying levels of prior knowledge and skills. Because student populations differ significantly across schools, some schools may score well on proficiency measures because they have a more advantaged student population, not because the school itself is contributing more to student learning. By measuring student progress relative to their own past performance, student growth better accounts for differences in student populations across schools and represents a fairer evaluation of school effectiveness.

> *"If you want to say something about the effectiveness of a school, it's much more helpful to learn about growth... The strongest predictors of mastery are just the demographic characteristics of students."*
>
> **– Subject-matter expert**

JLARC analysis of the SPSF's results reached a similar conclusion. The SPSF's proficiency indicators had the strongest correlation with schools' percentage of economically disadvantaged students among all indicators, while its growth indicators have the weakest correlation for elementary and middle schools (Appendix G) (Figure 5-4). The SPSF's overall results are correlated with student demographics, especially economic disadvantage, in part because of the framework's heavy emphasis on proficiency (Chapter 3).

FIGURE 5-4
SPSF proficiency indicators are more closely related to student economic disadvantage than growth indicators (2024–25)



SOURCE: JLARC analysis of Virginia Department of Education data. Indicator scores from Virginia Department of Education school-level accountability data for the 2024–25 school year. Economic disadvantage data from Virginia Department of Education 2024–25 fall membership data.
NOTE: For this analysis, schools with the fewest economically disadvantaged students are the bottom quartile of percentage of disadvantaged students, while schools with the most economically disadvantaged students are the top. Reading proficiency and growth scores are standardized. Math indicators display a similar pattern.

While subject-matter experts generally see both proficiency and growth as important dimensions of student academic performance, nearly all experts interviewed by JLARC indicated that the SPSF's weighting on growth could be increased. Of 14 experts interviewed on this topic, 12 preferred increasing the weight on growth, while two had no preference. Most of those 12 preferred weighting growth equal to or more than proficiency.

Ultimately, the weighting between proficiency and growth is a policy decision. Both proficiency and growth measure important aspects of student academic achievement. Proficiency measures how students perform against state standards for core skills and knowledge, identifying schools with the greatest proportions of students not meeting grade-level standards. Growth better isolates schools' impact on student performance, encourages a focus on continuous improvement for students, and identifies schools whose students are not making enough progress.

There are limits, though, to how much the correlation between overall results and student demographics can be reduced by weighting growth more heavily. Shifting weight from proficiency to growth would likely have only a modest impact on schools' results, both in reducing the overall correlation with student demographics and changing how schools perform relative to each other (Appendix G). The exact effect would depend both on the magnitude of the weight adjustment and future design of the growth indicators. Other approaches to reducing the correlation between the SPSF's results and student demographics would require more substantial changes to the framework and would also likely have only a small impact (sidebar).

Other approaches to reduce the relationship between student demographics and accountability results include adding indicators that are less correlated with student demographics (e.g., school climate survey results) or reporting scores for each indicator or component separately rather than aggregating school performance into a single summative score.

The board could increase the SPSF's growth weighting relative to proficiency to better account for schools' contribution to student learning each year and to be more aligned with weighting used in other states.

POLICY OPTION 1

The Virginia Board of Education could increase the weight assigned to growth indicators in the School Performance & Support Framework to more fully account for schools' contribution to student learning.

Any changes to growth weighting should not be considered until the board finalizes the SPSF's future approach to measuring student growth. Decisions about weighting should incorporate information about the growth measure and its scoring to understand how any potential weighting changes would affect schools' summative scores and their correlation with student demographics.

6 Graduation and Other Indicators

Virginia's new accountability system—the School Performance & Support Framework (SPSF)—includes two graduation indicators, as well as several others that serve as the federally required school quality or student success (SQSS) measures. The federal Every Student Succeeds Act (ESSA) requires states to include *at least* one SQSS measure in their accountability systems; Virginia has incorporated four:

- chronic absenteeism rate, used for elementary, middle, and high schools;
- extended-year graduation rate, used for high schools;
- performance and participation in advanced coursework, used for middle schools; and
- college, career, and military readiness activities (the 3Es), used for high schools.

The Virginia Board of Education (VBOE) is considering several additional indicators as part of proposed changes to the state ESSA plan, as of December 2025. These include a social studies proficiency indicator for all school levels, an integrated reading and writing indicator for elementary and middle schools, and social studies and science advanced coursework indicators for middle schools.

SPSF's graduation measures are appropriate and well designed

ESSA requires state accountability systems to include graduation rates as one of the indicators of high school performance. At a minimum, states must measure performance using each high school's four-year adjusted cohort graduation rate (sidebar). States also may use one or more extended-year adjusted cohort graduation rates, such as a five-, six-, or seven-year rate, which incorporate students who take longer to graduate. ESSA requires the graduation rate indicator be given "substantial" weight in the accountability system.

Virginia's SPSF includes two graduation measures. The first is a four-year adjusted cohort graduation rate, which is the primary graduation measure and represents the share of students in each school who graduated with a standard or advanced diploma within four years (sidebar). In a typical year, most Virginia students (90 percent) graduate with one of these diplomas within four years. This measure fulfills ESSA requirements and accounts for 15 percent of a high school's summative score.

The framework also includes a second extended-year graduation rate that counts for 5 percent of a high school's summative score. This measure includes students earning

An **adjusted cohort graduation rate** measures the number of students who entered ninth grade and graduated high school with a regular high school diploma within a set period (e.g., four years), adjusted for students that transfer into or out of the school (including to a prison or juvenile facility), emigrate, or die during the time period.

Advanced diplomas include the Advanced Studies and International Baccalaureate diplomas.

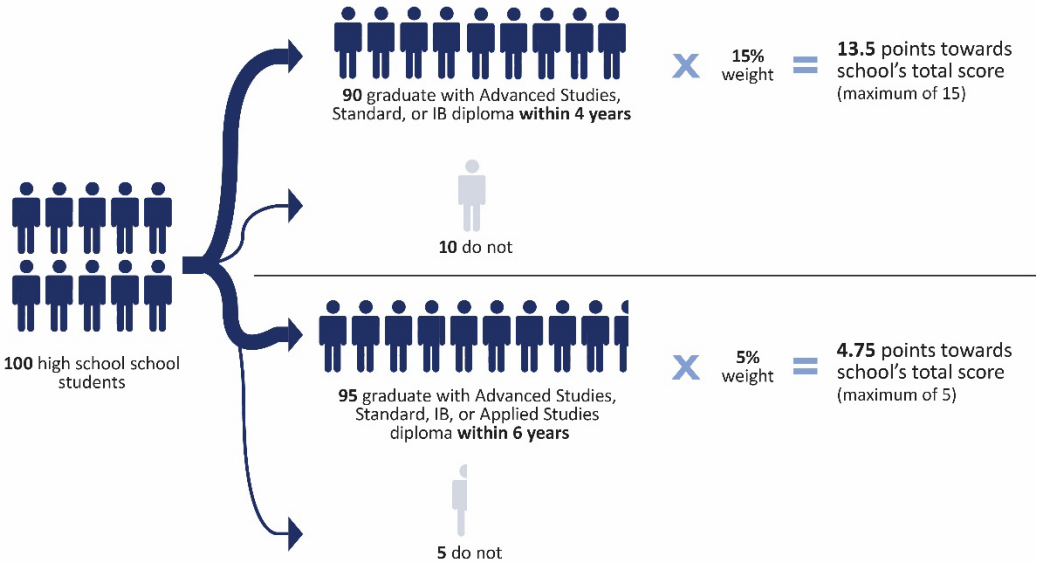
Virginia students with disabilities can earn an **applied studies diploma** instead of other diplomas to show they completed high school. Unlike other diplomas, the applied studies diploma does not require meeting specific academic standards or curriculum requirements—only the completion of the student's individualized education program (IEP).

a standard, advanced, or applied studies diploma within four, five, or six years. VBOE added this graduation measure, which includes the applied studies diploma, in response to stakeholder concerns about the exclusion of students with disabilities and other students that need more than four years to graduate. Because Virginia's applied studies diploma is not a federally approved alternative diploma, it does not fulfill ESSA's graduation indicator requirement and is included as an SQSS indicator rather than a graduation measure (sidebar).

According to Virginia Department of Education (VDOE) staff, **the applied studies diploma is offered to too many students and not sufficiently aligned with the state's academic standards** to be considered by the U.S. Department of Education as an approved alternate diploma.

Figure 6-1 illustrates how the SPSF determines the points a high school receives for each graduation measure.

FIGURE 6-1
Graduation measures reflect percentage of students graduating within four and six years and together account for 20 percent of high schools' scores



SOURCE: JLARC staff.

Virginia's graduation measures are well designed because they meet federal requirements, align with practices in other states and expert recommendations, and reflect VBOE's policy goals. The four-year graduation rate fulfills the federal requirement to measure high schools' four-year adjusted cohort graduation rate, and the inclusion of an extended-year rate aligns with practices in other states and expert guidance. Extended-year graduation rates are recommended because they account for students who often take longer to graduate, such as English learners and students with disabilities, and incentivize schools to continue to support these students. Together, the two graduation measures account for 20 percent of a high school's summative score, which is similar to the weighting used in other states. The measures are also consistent with VBOE's goal for students to graduate within four years with a standard or advanced diploma, which the framework incentivizes by placing more weight on the four-year rate than the extended-year rate.

Most stakeholders did not express concerns with the SPSF's graduation measures. Graduation was the most positively viewed indicator in the new system on JLARC's survey of school divisions (sidebar), and stakeholders generally did not express concerns with either measure in interviews. Stakeholders who had concerns about the indicator said it was because the SPSF's graduation measures are more stringent than those used in the previous accountability system. In contrast with the prior system, (i) the four-year graduation rate does *not* provide credit for students graduating with an applied studies diploma, and (ii) students who earn a GED or other non-diploma alternative are not counted in either rate. However, these new graduation measures reflect VBOE's intent to have a unified state and federal accountability system and its broader policy goals.

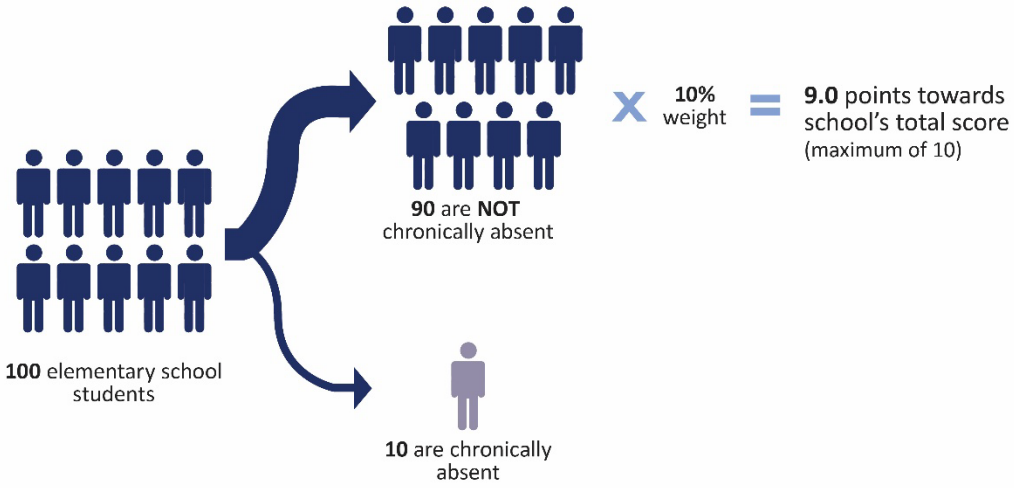
JLARC staff surveyed school division superintendents or their designee on the new accountability system. A total of 106 school divisions (80 percent) responded to the survey (Appendix B).

Despite some concerns, chronic absenteeism is reasonable to include in the SPSF

The SPSF includes chronic absenteeism as an SQSS measure of elementary, middle, and high school performance (sidebar). Chronic absenteeism accounts for 10 percent of elementary and middle schools' summative scores and 5 percent of high schools' scores. Schools receive points toward the indicator relative to the percentage of students who are not chronically absent (Figure 6-2). VBOE selected chronic absenteeism as an SQSS measure in the SPSF because research demonstrates a clear correlation between student attendance and achievement.

Chronic absenteeism refers to students who miss 10 percent or more days in the school year (approximately 18+ of 180 days), including excused and unexcused absences and suspensions. It is the primary measure available for assessing attendance statewide.

FIGURE 6-2
Chronic absenteeism indicator reflects percentage of students not chronically absent and accounts for 5 or 10 percent of schools' scores



SOURCE: JLARC staff.
NOTE: Indicator weighted 10 percent for elementary and middle schools and 5 percent for high schools.

Attendance was one of three pillars of **ALL IN VA**, the state's plan to improve student outcomes following the pandemic. The plan included a task force on improving chronic absenteeism, resources and guidance for schools on how to improve attendance, and state funding to support local efforts.

The chronic absenteeism indicator is well designed because it meets federal requirements, aligns with commonly used practices in other states and expert recommendations, and reflects VBOE's priorities. The indicator meets the SQSS requirements and is simple and easy to understand, which is recommended by best practices and experts. The indicator is also measured, scored, and weighted similarly to how it is calculated and used in other states that include chronic absenteeism in their accountability systems, including 11 of 16 other comparison states. Finally, including the indicator in the new accountability system aligns with the board's focus on reducing chronic absenteeism, which has been a key priority since student attendance declined significantly during and after the COVID-19 pandemic (sidebar).

Schools may have more difficulty performing well on SPSF's chronic absenteeism indicator compared with in the previous accountability system, but chronic absenteeism has less influence on a school's overall rating in the SPSF. In contrast with the old system, the SPSF does not give schools credit for reducing chronic absenteeism compared to the prior year. In addition, the SPSF uses only the most recent year of data. The previous system considered the previous year's chronic absenteeism rate or the average of the past three years (whichever was better). Despite these changes, chronic absenteeism now has less effect on schools' overall ratings. In the prior system, chronic absenteeism—as with any indicator—could unilaterally determine a school's accreditation status. If a school performed at Level Three (the lowest level) for chronic absenteeism, the school was labeled as *Accredited with Conditions* (a lower rating), even if it performed at a higher level for all other indicators. In the SPSF, chronic absenteeism comprises up to 10 percent of a school's summative score, which some stakeholders noted is a fairer approach.

Some school division or school staff believe it is unfair to include chronic absenteeism in the SPSF, asserting that attendance is largely out of schools' control. Thirty-nine percent of school division leaders responding to JLARC's survey considered chronic absenteeism an inappropriate measure to include in the SPSF because of their lack of control over student attendance. In focus groups, about half of principals voiced concerns with using chronic absenteeism as a measure of school performance in the state's accountability system for similar reasons. For example, one middle school principal noted "absenteeism involves so many factors that to hold us solely accountable is unfair." Staff emphasized student attendance is based on students' and parents' behavior, and research notes other factors, such as access to transportation and students' physical health, can affect attendance, too.

Despite these concerns, chronic absenteeism is widely used in state accountability systems because it is a simple, easy-to-understand measure, is strongly linked with academic outcomes, and can be influenced by schools to some extent. Research shows that students who attend school regularly are more likely to be engaged students, earn higher grades, and graduate, which is why many states prioritize chronic absenteeism in their accountability systems. A 2024 report by the nonprofit Attendance Works found 37 states include chronic absenteeism in their accountability systems. Moreover,

states' focus on chronic absenteeism has intensified following the COVID-19 pandemic in response to attendance decreases nationwide. In 2024, the U.S. Department of Education recommended that states use chronic absenteeism as an SQSS measure in their accountability systems. Finally, research suggests that schools and teachers can take steps to improve student attendance. Teachers can positively influence student attendance by building strong relationships with students and providing engaging learning experiences, and schools can reduce chronic absenteeism by implementing targeted attendance support programs.

VBOE took steps in response to concerns about including a chronic absenteeism indicator. Most notably, the board made the indicator less consequential to schools' scores by giving it a relatively small weight. VBOE also continued the policy of allowing schools to improve their chronic absenteeism rate if students "earn back" attendance (sidebar). Both reflected preferences stakeholders expressed during listening sessions.

VDOE allows students to **make up absences by completing additional instructional time**. For example, if a student completes three hours of make-up instruction, it can offset one absence day. These adjustments are included in the chronic absenteeism rates used for the SPSF.

SPSF's college, career, and military readiness indicator has appropriate criteria, but scoring is problematic

The SPSF includes an indicator to measure high school students' college, career, and military readiness (CCMR), referred to as the "3Es" indicator. The 3Es measures student achievements in three pathways that are intended to demonstrate student readiness for post-graduation (Figure 6-3). The board cited feedback from stakeholders such as parents, the business community, military leaders, and higher education as helping to inform the development of the pathways and corresponding achievement measures. They include:

- **Enrollment** – Earning an associate degree; earning credits and/or passing exams in Advanced Placement (AP), International Baccalaureate (IB), Cambridge, or College Level Examination Program (CLEP) courses; or completing dual enrollment courses.
- **Employment** – Being a career and technical education (CTE) completer (sidebar), earning an industry-recognized credential, or completing a high-quality work-based learning experience.
- **Enlistment** – Scoring above the minimum on the ASVAB test (Armed Services Vocational Aptitude Battery).

A **CTE completer** for the SPSF is a student who has met the requirements for a CTE concentration (sequence) and all requirements for high school graduation or an approved alternative education program.

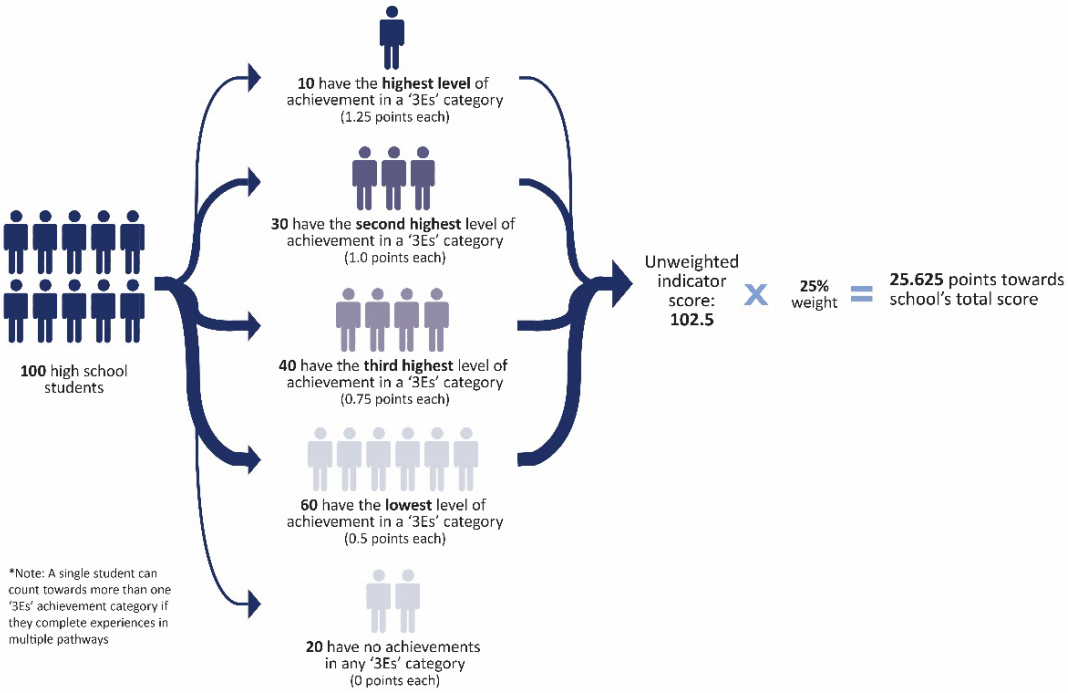
The 3Es indicator is an SQSS measure and accounts for 25 percent of high schools' summative scores.

The indicator awards points for a student's completion of achievements in each of the three pathways, with the highest achievements in each pathway earning the most points (sidebar) (Figure 6-3). See Appendix J for a more detailed description of the achievements and scoring associated with each area of the 3Es pathways.

The 3Es indicator assigns points to schools using students in the **12th-grade /on-time graduation rate cohort.**

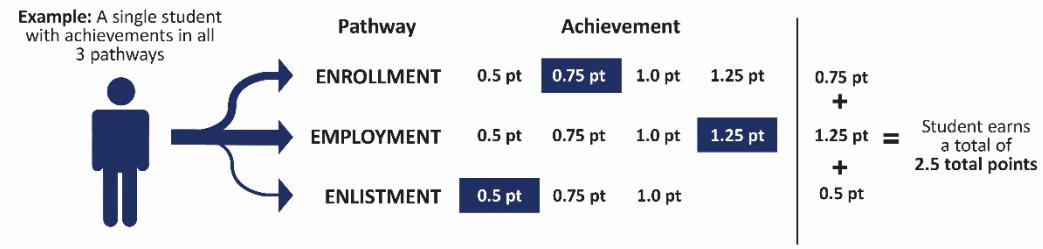
The board's design of the 3Es indicator is intended to (i) incentivize schools to make college, career, and military opportunities available to students, and (ii) encourage broad participation and exploration across each pathway. Therefore, to reward schools for students who pursue multiple opportunities and discourage schools from directing a student on a single pathway, the SPSF allows a student's points to be totaled across different pathways. As a result, a student can earn more than the 1.0 or 1.25-point maximum for each individual pathway by completing achievements in other categories for a theoretical maximum score of 3.5 points per student (Figure 6-4).

FIGURE 6-3
Schools earn points for student achievements in 3Es each pathway



SOURCE: JLARC staff.
NOTE: For 2024–25 school year, students meeting the highest achievement level were awarded 1.25 points for the enrollment and employment pathways and 1.0 point for the enlistment pathway.

FIGURE 6-4
A single student can earn points for achievements across multiple pathways



SOURCE: JLARC staff.

Stakeholders generally viewed 3Es indicator positively, but school leaders had concerns about ability to offer certain opportunities

College, career, and miliary readiness indicators are commonly used in school accountability systems nationwide, and the criteria used generally are similar to those in the SPSF's 3Es. Forty-one states and the District of Columbia include a CCMR indicator. The 3Es' specific achievements are similar to those mostly commonly used in Virginia's 16 comparison states. Virginia's prior system also featured a CCMR indicator, which gave schools credit for several of the same student achievements as the 3Es (sidebar). The primary difference is that under the prior system, schools did not receive extra points for students with more than one achievement.

Virginia's prior school accountability system used the College, Career, and Civic Readiness Indicator (CCCRI), which awarded schools points based on student achievements in advanced coursework, CTE, work-based learning, service learning, and JROTC.

School leaders and staff generally had a positive view of the 3Es indicator but also expressed concerns with their ability to provide 3Es opportunities and the indicator's prioritization of certain experiences. Superintendents, principals, and school counselors generally supported the achievements included in the 3Es indicator. However, they commonly expressed concerns about some schools having more difficulty offering sufficient 3Es opportunities to students and therefore not able to score as highly. For example, staff at small and/or rural schools cited the inability to offer enough advanced courses or an inability to hire CTE teachers for "high demand" industries. In addition, school staff cited costs to students associated with taking AP and other advanced testing as a barrier, as well as limitations in the availability of U.S. Department of Defense employees to proctor the ASVAB test at their schools. School staff also were concerned that the 3Es indicator incentivizes schools to guide students toward experiences for which they can be awarded points, rather than experiences not included in the 3Es (such as extracurricular activities or coursework/activities in the arts and humanities).

Uncapped 3Es scoring allows individual students and some schools to score too many points, which distorts overall scoring

Though the board's emphasis on the 3Es is intentional to encourage greater opportunities for students, the way the indicator is scored results in several problems. First, the scoring means that a high school's summative score may be driven more by the 3Es indicator than was intended by the weight assigned to the indicator. The 3Es is unique among SPSF indicators because an individual student can score points across multiple pathways (up to 3.5 points). This means that a school can have a maximum unweighted indicator score of 350 for the 3Es, but only 100 or 125 for all other SPSF indicators. As a result, the indicator actually comprises about 34 percent of the summative score, on average, for schools with a high 3Es indicator score (those schools with an unweighted indicator score of greater than 125 points) (Table 6-1).

TABLE 6-1
3Es indicator effectively accounts for more than its intended weight for schools with high 3Es scores (2024–25)

	Intended weight (SPSF 3Es weighting)	Effective weight (Proportion of summative score comprised of 3Es)
Schools with an unweighted 3Es indicator score >125	25%	34%

SOURCE: JLARC analysis of Virginia Department of Education data (2024–25).
NOTE: Represents high schools with an unweighted 3Es indicator score of 125 points or more, which is greater than the maximum score achievable for any other indicator. Analysis includes only high schools with an English learners' progress toward English language proficiency (ELP progress) indicator score. Schools without an ELP progress indicator are excluded because reweighting produces different, albeit similar, results.

JLARC could not conduct analysis of the extent to which "masking" occurs in 3Es scoring because the 3Es i*ndividual student-level* data had limitations for the 2023–24 school year (missing or incomplete data) and was not available for the 2024–25 school year at the time of finalization of this report.

Next, because an individual student can score up to 3.5 points, a single high-achieving student can compensate for (i.e., "mask") lack of achievement by one or several lower-performing students (sidebar). Ultimately, this can incentivize a school to focus more on high-achieving students rather than lower-achieving students. Federal guidelines recommend against using scoring approaches that make it more likely for schools to do so.

In addition, some high schools score so many points on the 3Es indicator that it can potentially cause a misleading and distorted view of their actual performance. Ten percent of high schools earned an unweighted 3Es indicator score greater than 125 during the 2024–25 school year, which exceeds the maximum achievable score for each of the other indicators. Among these schools, the average unweighted 3Es indicator score was 138, compared with an average score of 94 across all other indicators. This resulted in an average summative score of 106 for these schools, which gives the perception of higher overall performance in these schools than is reflected in their results across all indicators.

Moreover, allowing a school to score so many points on the 3Es also risks less emphasis on student performance in other areas within the SPSF. Because of the potential to accumulate a high number of points on the 3Es indicator, high schools could place too much priority on increasing their 3Es scoring as the primary way to improve their overall rating. This could come at the expense of efforts to improve student performance in areas, such as proficiency and graduation.

Finally, as referenced above regarding the difference in opportunity across schools, the 3Es scoring approach could exacerbate inequities in high schools' ability to achieve higher overall ratings. Schools that can offer more 3Es opportunities to students will have the potential to earn more points for the 3Es indicator, which is an advantage toward achieving a better overall rating.

VBOE should address problems resulting from 3Es indicator scoring by capping either the points each student can earn or the total that each school can earn for the indicator. Each approach has its own advantages, but either approach would improve the current 3Es indicator scoring.

- Either approach would reduce the maximum number of points a school can earn for the 3Es indicator, which would reduce the indicator's disproportionately high effect on schools' summative scores and address the risk that high schools place too much emphasis on this indicator relative to other performance areas. Either approach would also help address concerns about students in different schools having unequal access to 3Es opportunities, because capping scores reduces the extent to which schools with greater access can earn higher scores that benefit their overall rating.

- Capping student scores would prevent high-performing students from masking lower-performing students. This would incentivize schools to focus on encouraging students with fewer 3Es achievements to earn more points (i.e., participate in more opportunities), rather than on ways for high-achieving students to earn more points. Most other states limit an individual student to earning no more than one point on the CCMR indicator, or they cap student scoring (sidebar). However, this approach could hinder the board's goal of incentivizing student pursuit of opportunities in multiple pathways because schools would have less incentive to encourage that behavior.

Delaware and Mississippi award students up to one point for achievements in one CCMR pathway and 0.1 points for additional achievements.

- Capping schools' scores would maintain the board's goal of allowing students to score points across multiple pathways and incentivize schools to encourage that behavior. However, this approach would not directly address the issue of high-performing students masking lower performers.

A student-level or school-level scoring cap could be designed to allow students to earn at least some additional points for completing achievements in more than one pathway, remaining consistent with the board's goal to incentivize student participation in multiple pathways. For example, a cap could be set at 1.5 points per student, which is comparable to the 1.25-point-per-student maximum for proficiency and growth indicators, but would still allow schools to receive at least some additional point value for students with achievements in more than one category. Likewise, a cap could be set at 125 unweighted points per school, which aligns with the maximum number of points that can be scored for the proficiency and growth indicators.

RECOMMENDATION 5

The Virginia Board of Education should change the scoring of the 3Es indicator in the School Performance & Support Framework by either capping the total number of points (i) a school can be awarded for an individual student or (ii) a school can receive for the indicator.

Far less time and effort are required to score enlistment points than in other two 3E indicator pathways, which risks "gaming" scores

The scoring for the enlistment category is problematic because it requires much less effort to achieve than the indicator's other pathways. Schools are awarded points for students earning above certain scores on the ASVAB test even if they do not enlist in the military or participate in other enlistment-related activities such as JROTC (Appendix J). The ASVAB is a one-time test that typically takes 1.5 to two hours to complete. Other 3Es achievements, for which schools are awarded comparable points, require substantially more time and effort from students. For example, a student earning one point in the employment pathway must have completed at least two sequential CTE courses, earned an industry recognized credential, *and* completed a high-quality work-based learning experience. Likewise, the achievements in the enrollment pathway generally require completion of an entire credit bearing course. These employment and enrollment achievements require far more time and effort than taking the ASVAB test.

The relatively lower effort required for the enlistment achievement incentivizes schools to "game" the system by encouraging students to take the ASVAB test, regardless of their interest in a military career. In interviews with JLARC staff, school leaders noted that they adopted the practice of having all high school students complete the ASVAB. Subject-matter experts also highlighted the potential for the enlistment category to be exploited to increase schools' scores. In support of the enlistment scoring approach, VBOE suggested widespread participation in the ASVAB could introduce students to armed services-related opportunities.

The board should reduce the potential for the enlistment category of the 3Es to be used mainly to inflate schools' overall ratings. This could be accomplished in several ways. The board could maintain the same achievements (i.e., test score thresholds) but award fewer points for students meeting each test score threshold. Alternatively, additional achievement requirements could be added to the enlistment category that are more commensurate with other 3Es categories.

RECOMMENDATION 6

The Virginia Board of Education should change the "enlistment" category of the 3Es indicator in the School Performance & Support Framework so that points awarded for student achievements are more commensurate with the time and effort required to earn points in the enrollment and employment categories.

The board is currently considering changes to the framework that would address Recommendation 6 as part of an amendment to the state ESSA plan. The proposed changes would require students to achieve military service-related requirements in addition to earning a certain ASVAB score for schools to receive higher points in the enlistment category. These achievements include (i) signing up to serve in a branch of the armed services, (ii) committing to attending a military service academy, or (iii)

participating in one year of JROTC during high school (Appendix J). The board discussed these potential changes at its November 2025 meeting but had not finalized and approved those changes when this report was published.

Advanced math coursework indicator is rare but aligns with state policy goals

The SPSF includes the advanced math coursework indicator as an SQSS measure for middle schools, accounting for 10 percent of their summative score (sidebar). The indicator is designed to (i) measure eighth grade advanced math proficiency and (ii) incentivize schools to place students that received advanced scores on their prior math Standards of Learning (SOL) assessment into an advanced math course in eighth grade.

The advanced math coursework indicator score is calculated as the number of students achieving a passing score (i.e., proficient or advanced) on an eighth grade SOL for an advanced math course (Algebra I or higher) divided by the total number of eighth graders taking that assessment *plus* any eighth grader who scored advanced on their seventh grade assessment the previous year but who did not take an eighth grade advanced math course.

The SPSF's advanced math coursework indicator incentivizes schools to measure student participation and proficiency in advanced math coursework by eighth grade, which has benefits. According to subject-matter experts, the primary benefit of advanced math coursework by eighth grade is the opportunity to take Calculus by 12th grade, an important prerequisite for several higher education fields of study. In addition, the indicator can help promote equity because it incentivizes schools to enroll any student with an advanced score on their seventh grade math SOL in eighth grade advanced math. Finally, research suggests that students who participate in advanced coursework are more engaged in school and achieve better academic outcomes.

The 2025 Appropriation Act included $1 million in grant funding for school divisions to expand access to online advanced math programming and for advanced math teacher credentialing.

The advanced math coursework indicator, however, is not popular with school divisions and is not commonly used in other states' school accountability systems. Fifty-three percent of the divisions responding to JLARC's survey felt the advanced math coursework indicator was "not appropriate" to measure school performance, the highest negative rate among the SPSF's indicators. The most common reason cited was that it is "not a suitable factor to consider." School leaders said determining whether a student should participate in advanced coursework should be based on more factors than just prior year test scores (e.g., a student's organizational skills, motivation, interests). Furthermore, school leaders expressed concern about the ability of every middle school to offer eighth grade advanced math coursework, citing challenges such as too few students to justify having an advanced math course section or the inability to hire qualified teachers (sidebar). Finally, advanced math coursework indicators are not typical in school accountability systems; among comparisons states, only Florida uses a similar indicator (sidebar).

Florida's "Middle School Acceleration" indicator was cited during VBOE meetings as the model for the SPSF advanced coursework indicator.

However, most middle schools are meeting the advanced math coursework indicator, and the indicator aligns with a recent General Assembly priority. Schools are placing nearly all students who scored advanced on their seventh grade math SOL into an eighth grade advanced math course. Only 266 such students statewide were not placed in eighth grade advanced math for 2023–24. Not placing these students into advanced math had a meaningful negative effect on only three schools' advanced coursework

HB 2686 defines **eligible students** as any student who receives a score on an end-of-year SOL math assessment that is in the statewide, grade-level upper quartile.

indicator score (i.e., contributed to an indicator score of less than 80). In fact, students who *took* eighth grade advanced math but did not pass the course's SOL more commonly caused lower scores for schools. In addition, the indicator aligns with the policy intent of recently passed legislation. HB 2686 (2025) encourages school divisions to set policies to automatically enroll "eligible students" in advanced or accelerated mathematics based on prior years' SOL scores (sidebar). The law's threshold for "eligible students" is set at a level that includes students scoring advanced *and* some scoring proficient on their assessment in the previous year; this is *more* inclusive than the requirements of the advanced coursework indicator (i.e., only students scoring advanced).

Adding more indicators are policy decisions and would increase complexity of accountability system

As of December 2025, VBOE is considering several additional indicators as part of proposed changes to the state ESSA plan. The board had not finalized or approved any new indicators when this report was published. JLARC did not fully evaluate the specifics of the newly proposed indicators because they were first proposed at VBOE's November 2025 meeting and limited information was available about them when this report was published.

Adding new indicators to the SPSF would require thoughtful consideration of the advantages and disadvantages. Each indicator signals state priorities and provides insight into school performance. However, additional indicators would increase the complexity of the system and could further divide schools' focus, which might result in less attention to existing indicators that are higher priorities. Likewise, adding new indicators would require reducing the weight of existing indicators, diminishing their effect on schools' scores.

Social studies indicator would add accountability for a core subject but would reduce assessment flexibility

The board is currently considering adding a social studies proficiency indicator to the framework as part an amendment to the state ESSA plan. The proposed social studies indicator would be applicable to each school level and use a proficiency scoring index to award points based on student performance on social studies SOLs. Under the proposal, VBOE would weigh the indicator at 5 percent for elementary schools, 7.5 percent for middle schools, and 5 percent for high schools. Scoring would be based on the index applicable to other subject areas (social studies tests have 3 performance levels). The indicator has been proposed to be put in place for the 2026–27 school year.

The state may want to consider adding a social studies indicator to the SPSF for several reasons. Social studies is the only core subject area that is not included in the framework, and some school leaders expressed concern about its exclusion. For example, an

elementary principal noted: "If not monitored, it doesn't get done. If you're a reading teacher who also teaches Virginia Studies, you're incentivized to skip Virginia Studies to continue the reading lesson." Furthermore, eight of 16 comparison states include a social studies indicator in their system.

However, adding a social studies proficiency indicator would reduce or eliminate school divisions' assessment flexibility. Schools currently are permitted to offer local alternative assessments instead of end-of-course SOL tests for social studies courses that would become subject to the accountability system under the proposal (sidebar). Adding the social studies proficiency indicator would require schools to administer a social studies SOL in lieu of or in addition to a local alternative assessment for certain social studies courses (sidebar). School leaders and advocates for history and social studies instruction have noted that this loss of flexibility could be detrimental. They emphasized local alternative assessments can be more useful than a multiple-choice SOL test for allowing students to demonstrate their skills and understanding, such as through a project, presentation, or writing assignment.

HB1957 (2025) permits schools to use a **local alternative assessment** for school social courses. At the high school level, local alternative assessments can be used to award students with the verified credit necessarily to meet graduation requirements.

The proposed social studies indicator would be based on SOL tests for **Virginia Studies (5th grade), Civics & Economics (8th grade), and Virginia & U.S. History (typically 11th grade).**

Advanced coursework in social studies and science could benefit some students but could be difficult to implement for some schools

As part of an amendment to the state ESSA plan, the board is also currently considering expanding the framework's middle school advanced coursework indicator to include social studies and science for the 2027–28 school year. Under the proposal, advanced coursework would be defined as taking certain high school level courses and completing an end-of-course assessment during middle school (sidebar). The 10 percent weight currently allocated to advanced math coursework would be reallocated as 6 percent for advanced math coursework and 2 percent each for social studies and science. Half of a school's indicator score would be based on the percentage of students taking an advanced social studies or science assessment who passed (the same approach used for the existing advanced math coursework indicator). The other half of a school's indicator score would be based on student "access" to advanced coursework. The exact method for calculating the access portion of the score has not been released with sufficient detail to be evaluated at the time of this report.

According to VDOE, **Earth Science** would qualify for advanced science coursework and **World Geography** or **World History I** would qualify for advanced social studies coursework.

Board members and VDOE staff cited benefits of taking advanced (i.e., high school) social studies and/or science courses in middle school. These benefits include building a foundation for subsequent high school courses and "freeing up" space in students' high school schedules for other courses and opportunities (e.g., dual enrollment, AP courses, work-based learning experiences, etc.). They also indicated completing advanced courses demonstrates "readiness" for high school.

Some schools could find it difficult to meet the requirements of the expanded advanced coursework indicator. According to a VDOE presentation to the board, far more middle schools had at least one student pass an SOL assessment for advanced math (96 percent) than advanced science (38 percent) or social studies (36 percent). This likely indicates that relatively fewer middle schools offer advanced science or

Middle school students are required to complete **Civics & Economics (typically 8th grade) and 8th Grade Science** prior to entering high school.

social studies courses. Some middle schools do not currently offer these courses because of a lack of qualified teachers or too few students who would take the course to justify a course section. Finally, the indicator could make student scheduling more difficult. Students would have to be placed in accelerated coursework prior to 8th grade *or* take two courses of the same subject during 8th grade in order to both meet the state's middle school coursework requirements *and* participate in advanced coursework while still in middle school (sidebar).

Board is considering adding an integrated reading and writing indicator as a measure of student readiness

The **IRW SOL** comprises technology-enhanced, multiple-choice items and a writing prompt based on history or science content. The Integrated Reading and Writing assessment has been required for 5th and 8th grade since 2024.

The board is currently considering adding an integrated reading and writing (IRW) indicator to the framework as part the amendment to the state ESSA plan. Under the proposal, the IRW indicator would be in place beginning in the 2026–27 school year and would comprise 5 percent of elementary and middle schools' scores. The indicator would be based on the IRW SOL test, but it is currently unclear how the indicator would be scored (sidebar). According to VDOE, the IRW assessment would measure students' readiness for the next level of school because the assessment requires students to demonstrate skills—such as reading, writing, creativity, and critical thinking—that are acquired throughout their time in elementary and middle school.

7 Accounting for English Learners

The federal Every Student Succeeds Act (ESSA) increased the emphasis on schools' roles in educating English learners. ESSA introduced new requirements for how English learners are measured and included in school accountability. Under ESSA, states must consider English learners' (i) progress toward English proficiency and (ii) achievement in grade-level content when evaluating school performance. These requirements are an effort to ensure that English learners are making progress toward language proficiency and that their academic progress is tracked alongside other student groups. The emphasis reflects a recognition that English learners face unique challenges understanding academic content instruction while also learning English, and that schools play a central role in supporting these students' language development and overall academic success.

English learners are students whose native language is one other than English and whose difficulties speaking, reading, writing, or understanding English may hinder their education (sidebar). The majority of English learners are born in the United States; however, some are born in other countries and immigrate to the U.S. Students who immigrate to the U.S. are considered "recently arrived English learners" for the first 12 months they are enrolled in a U.S. public school. Recently arrived English learners can include students with refugee status, unaccompanied minors, students with limited or interrupted formal education, and those with more formal schooling.

Students are **identified as English learners** through a home language survey and English proficiency assessment. Once identified, these students receive language instruction and academic support until they become proficient in English. Schools reassess their language proficiency each year to track progress and determine continued eligibility.

In fall 2024, Virginia had more than 146,600 English learners, speaking over 280 languages. English learners made up 12 percent of the state's K–12 student population, similar to the nationwide proportion of 11 percent. The number of English learners in Virginia has grown substantially over the past decade. Between the 2015–16 and 2024–25 school years, the English learner population increased 48 percent. English learner enrollment varies by school and division. Urban and suburban divisions—particularly those in Northern Virginia—tend to serve the most and highest shares of English learners, while many rural divisions have relatively few.

This chapter focuses on the two ways Virginia's new accountability system—the School Performance & Support Framework (SPSF)—includes English learners when evaluating school performance. First, it considers the timeline used by the SPSF for counting English learners' assessment scores toward the calculations for proficiency and growth indicators. Second, it examines how the SPSF accounts for English learners' progress toward English language proficiency (ELP).

SPSF's inclusion of more English learners in proficiency, growth, and ELP progress is positive

Federal ESSA requirements permit short-term exclusion of *recently arrived* English learners when calculating school performance on proficiency, growth, and ELP progress indicators. The requirements provide states with options for phasing in recently arrived English learners into calculation of these indicators after their first 12 months of enrollment.

ESSA's 12-month exclusion for recently arrived English learners is operationalized as three semesters or students' second year of enrollment because only the months when school is in session are counted. Federal law intends the test scores of recently arrived English learners' to be excluded for only a single yearly testing cycle.

SPSF's timeline to include recently arrived English learners aligns with federal requirements and is supported by experts

The SPSF excludes recently arrived English learners from proficiency, growth, and ELP progress indicators, phasing in their inclusion in these indicators beginning in their second year (after three semesters), which aligns with federal requirements (sidebar). Unifying Virginia's state and federal accountability systems required bringing state exclusion criteria for English learners into compliance with federal requirements. The Virginia Board of Education's (VBOE) consultants estimated that because of its stricter exclusion criteria, the SPSF incorporates an additional 35,000 English learners compared with the prior accountability system.

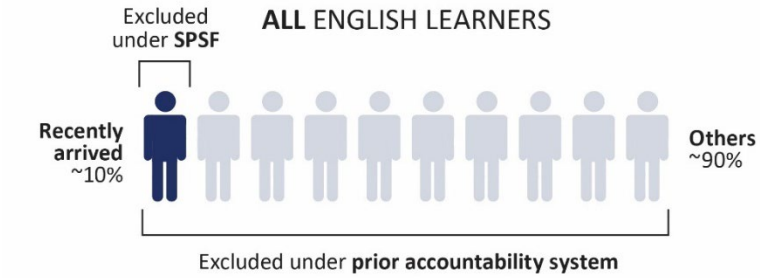
> *"That says 'We don't care if English learners learn academic content.' That sends the wrong message to schools. I've never heard of that."*
>
> **– Subject-matter expert**

Virginia's prior accountability system allowed the exclusion of *all* English learners from proficiency, growth, and ELP progress calculations until their sixth year of enrollment in Virginia public schools (i.e., after 11 semesters). These rules far exceeded both the timeline (five years versus one year) and scope (all English learners versus the ~10 percent who are recently arrived) of ESSA's allowable exclusions for recently arrived English learners (Figures 7-1 and 7-2). These prior divergences from federal requirements were possible because Virginia's *state* accountability system operated separately from Virginia's *federal* accountability system. The rationale for these practices was that English learners need sufficient time for language acquisition before schools should be held accountable for their performance.

> *"When I learned [the prior English learner exclusion rules], I had to take a walk. It's beyond what I've seen in any other state. Just crazy given how we know English learners acquire language. It's very important to do early intervention, especially in earlier grades."*
>
> **– Subject-matter expert**

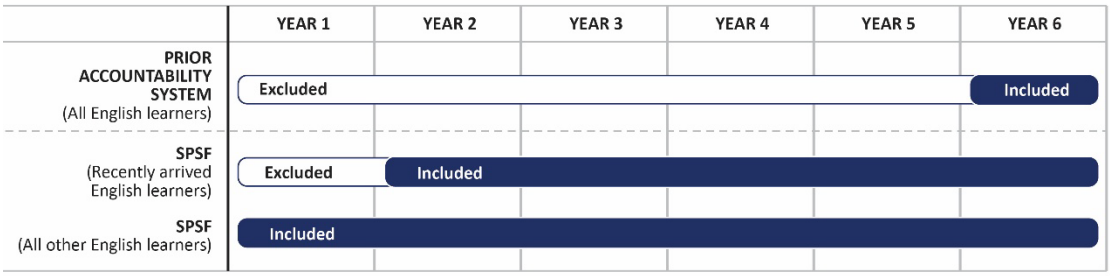
Subject-matter experts agree that the SPSF's shorter and more limited exclusion of English learners is an improvement over the prior accountability system. Earlier inclusion of English learners in proficiency, growth, and ELP progress indicators is important to (i) baseline and track students' progress in these areas, (ii) direct resources to students who are struggling, and (iii) maintain schools' attention on students that face the greatest challenges. The expectation, though, is *not* that students should reach language proficiency by their second year. Because of its exclusion rules, the prior system was unable to adequately measure English learners' academic performance or language acquisition progress and risked schools underprioritizing English learners' performance.

FIGURE 7-1
Prior accountability system excluded more English learners than permitted by ESSA



SOURCE: JLARC summary of the School Performance & Support Framework change to criteria for English learner exclusion.
NOTE: Other English learners include those born in the United States and students who were previously considered recently arrived but who have been enrolled in U.S. public schools for longer than 12 months. Exclusion of all English learners applied only to Virginia's prior state accountability system, which operated separately from its federal accountability system.

FIGURE 7-2
Prior accountability system excluded all English learners for up to five years



SOURCE: JLARC summary of the School Performance & Support Framework change to timeline for English learner exclusion.
NOTE: The prior exclusion timeline applied only to Virginia's state accountability system, which operated separately from its federal accountability system. The SPSF includes recently arrived English learners in ELP progress, proficiency, and math growth in year two and in reading growth in year three. Excluding recently arrived English learners for three semesters under the SPSF generally results in taking assessments in the second year of enrollment, since those assessments are administered in the spring.

Virginia's prior English learner exclusion practices were an outlier nationwide. Experts interviewed were not aware of another state excluding all English learners from proficiency, growth, and ELP progress calculations *or* excluding recently arrived English learners for such a long time period. Likewise, JLARC could not identify any other states using similar practices.

SPSF criteria for when to include recently arrived English learners could be adjusted to help address schools' concerns

The rules guiding when to include English learners' academic content assessments (e.g., SOLs) in schools' proficiency and growth performance calculations are among

some stakeholders' top concerns with the new framework. Principals, superintendents, and education advocacy groups expressed dissatisfaction with changes from the prior system, citing that (i) expecting English learners to reach academic proficiency by their second year is not reasonable and (ii) counting test scores of students with limited language proficiency toward school performance is unfair to schools, especially those with more English learners. Ninety percent of divisions responding to JLARC's survey indicated that the SPSF's rules for including English learners in proficiency calculations by their second year is too soon (sidebar). The perception that the new framework is overly strict likely stems at least in part from its contrast with the prior state system, which allowed for atypically broad and long-term exclusion of English learners.

JLARC staff surveyed school division superintendents or their designee on the new accountability system. A total of 106 school divisions (80 percent) responded to the survey (Appendix B).

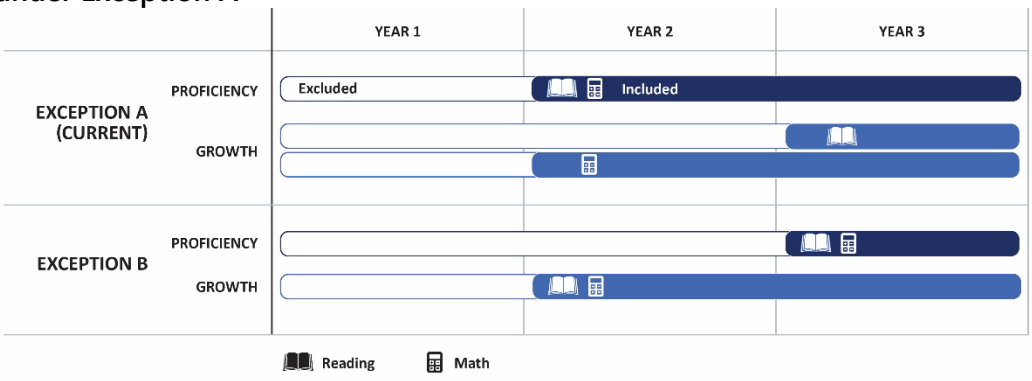
ESSA provides two "exceptions" that allow states to delay including recently arrived English learners in proficiency, growth, and ELP progress indicators until their second or third year (Figure 7-3):

- Exception A (used by the SPSF) allows states to delay including recently arrived English learners in reading, math, and science proficiency; math growth; and ELP progress until their second year and reading growth until their third year (sidebar).
- Exception B allows states to delay including recently arrived English learners in reading and math growth and ELP progress until their second year and reading and math proficiency until their third year (science proficiency would be delayed to the second rather than the third year because there is no growth measure for science).

Exception A exempts recently arrived English learners from taking the reading standardized test in their first year of enrollment, which means a reading growth score is not available in year two.

Virginia previously used Exception A for its federal accountability system, which operated separately from the state accountability system. The SPSF's use of Exception A represents no change from that federal system.

FIGURE 7-3
Recently arrived English learners are included in proficiency calculations sooner under Exception A



SOURCE: JLARC summary of federal law.

NOTE: Under Exception A, recently arrived English learners are included in math growth but not in reading growth in year two because they are exempt from one administration of the reading Standard of Learning assessment in their first year. For both exceptions, recently arrived English learners are included in the ELP progress indicator beginning in year two. Because there is no growth measure for science, recently arrived English learners would be counted for science proficiency in year two if they are in a grade assessed for science during that year (the same would apply to history/social studies tests if a social studies proficiency indicator were added to the framework).

Most states adopt one of the two ESSA exceptions and are fairly evenly split on which approach they use. Of other states examined by JLARC, eight of 18 use Exception A, nine use Exception B, and one takes a hybrid approach (sidebar). There is no consensus among experts favoring one exception over the other.

States can treat recently arrived English learners the same as any other student (i.e., no exclusion from calculations), or **states can apply a hybrid of Exception A and B**, as long as the criteria for when each exception is used is consistently applied (e.g., based on the school level).

Virginia could change from using Exception A to Exception B for elementary and middle schools to partially address division and school concerns, while still aligning with ESSA requirements (sidebar). Exception B may be preferable to division and school staff because it is generally more feasible for a student with limited English proficiency to demonstrate growth than achieve academic proficiency. Additionally, Exception B's exclusion timeframe for reading and math proficiency (third year) is closer to the timeframe considered appropriate by school leaders in response to the JLARC survey—respondents generally supported excluding recently arrived English learners until their fourth year, on average. This change, though, would still align with both federal requirements and subject-matter experts' recommendations on the importance of early inclusion of English learners' academic performance in accountability systems.

Exception B cannot be applied to high schools under the current SPSF because the SPSF does not include growth indicators at the high school level. A hybrid approach could be used to apply Exception B to elementary and middle schools and maintain Exception A for high schools.

Changing the exception would result in one additional test being required for recently arrived English learners in elementary and middle school. Under Exception A, recently arrived English learners are exempted from taking the reading assessment for their first year; they still take math and science (when applicable). Under Exception B, they would be required to take the reading assessment in their first year to create the baseline needed to measure growth in year two. This additional reading assessment could increase the amount of stress experienced by recently arrived English learners, who likely face challenges when taking assessments in English, especially a reading assessment.

POLICY OPTION 2

The Virginia Board of Education could direct the Virginia Department of Education to modify the state's Every Student Succeeds Act plan so that elementary and middle schools are subject to Exception B for excluding recently arrived English learners from schools' proficiency and growth calculations under the School Performance & Support Framework.

The board is currently considering changes to the framework that would address Policy Option 2 as part of an amendment to the state ESSA plan. The proposed change would apply Exception B rather than Exception A to recently arrived English learners in grades 3 through 8. The board discussed potential changes at its November 2025 meeting but had not finalized and approved those changes at the time of publication of this report.

A switch from Exception A to B for elementary and middle schools would affect only a small number of students and have a minimal effect on most schools' summative

scores. Recently arrived English learners are a small subset of the total student population. They represented 5 percent or more of tested students in only 14 elementary and middle schools in the state in the 2023–24 school year.

If the ESSA exception for elementary and middle schools is changed, it should be done so by the June prior to the school year it takes effect to allow schools and students sufficient preparation time. Because recently arrived English learners would need to take a reading assessment earlier under Exception B, schools might need to shift staffing and other resources to prepare. This would also allow recently arrived English learners and their teachers to be aware from the beginning of the school year that these students will be expected to take the reading assessment in their first year.

SPSF's ELP progress indicator should be refined to credit incremental and significant progress

Under ESSA, states are required to **assess English learners' ELP annually**.

ESSA requires state accountability systems to include an indicator that measures English learners' progress toward achieving ELP. This requirement is intended to encourage or incentivize K–12 schools to provide English learners with the resources and instruction necessary to develop English language vocabulary and skills, which are critical for students to succeed academically. This indicator must be based on English learners' performance on each state's annual ELP assessment (sidebar), compare students' proficiency from one year to the next, and be given "substantial" weight in the accountability system. Beyond these requirements, states have flexibility in how they score and weight the indicator.

A school must have **at least 15 English learners** with two years of ELP assessment results for the ELP progress indicator to count toward their accountability rating; schools with fewer are not measured on this indicator.

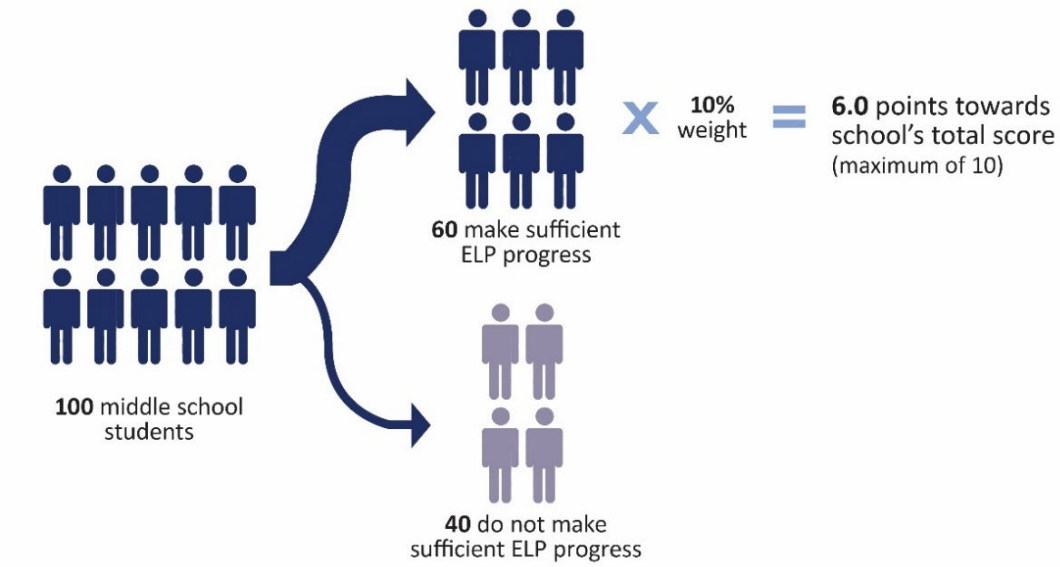
The ELP progress indicator is 10 percent of each school's summative score in the SPSF. Schools receive credit toward the indicator based on the percentage of their English learners that make progress toward achieving ELP (sidebar). Progress is measured annually using the WIDA ACCESS assessment (sidebar), with each student's scores compared to their scores from the previous year. Students who meet their target—which is set by the Virginia Department of Education (VDOE) and is relative to each student's grade and proficiency level in the previous year—earn credit for their school on the ELP progress indicator. Figure 7-4 illustrates how the ELP progress indicator is calculated.

The **WIDA ACCESS** assessment was developed by WIDA, a consortium of 36 states' departments of education based at the University of Wisconsin–Madison, which develops English language standards and assessments. Virginia has been using the WIDA ACCESS as the statewide ELP assessment since 2007.

The SPSF's ELP progress indicator aligns with federal requirements and reflects commonly used practices in other states and subject-matter expert recommendations. Like other states, Virginia's indicator is based on the percentage of students making measurable progress toward ELP. The majority of other states also use the WIDA ACCESS assessment to measure ELP, and it is well regarded by experts. Further, the indicator is weighted similarly in comparison states' accountability systems, which typically accounts for between 5 and 10 percent of schools' overall ratings. Subject-matter experts confirmed the SPSF's approach is comparable to other states and consistent with best practices.

The SPSF's ELP progress indicator improves on the state's prior accountability system. The prior accountability system combined ELP progress with reading proficiency and growth measures into a single indicator. This obscured and de-emphasized ELP progress results (Chapter 2). The SPSF's distinct ELP progress indicator gives better visibility into English learners' outcomes, which is in line with ESSA's intent. Further, the SPSF measures schools based on all English learners' progress, not just those who are doing well. As with the proficiency and growth indicators, the prior accountability system excluded students' ELP progress scores until their sixth year of enrollment if they were not making sufficient progress. The SPSF includes students on the ELP progress indicator after one year, which helps schools and the state track progress, target support, and focus on students with the greatest needs much earlier in their academic career.

FIGURE 7-4
ELP progress indicator measures percentage of English learners in a school who are making sufficient progress toward language proficiency



SOURCE: JLARC staff.
NOTE: Progress considered "sufficient" if student meets VDOE's target, which is relative to student's grade and English language proficiency level in the previous year.

While most stakeholders did not express concern with the SPSF's ELP progress indicator, some stakeholders thought the indicator has too much weight in the framework. As one school division leader described on JLARC's survey, the indicator "has a heavy percentage considering that some school systems have a very low percentage of [English learners]." However, this weighting reflects the federal requirement for the ELP progress indicator to have "substantial" weight and aligns with other states. In addition, subject-matter experts indicated its weight is appropriate.

VDOE would need to **set the targets for partial and significant progress**.

> *"Performance indexes, which give students credit all along the distribution vs a yes/no binary measure of performance, are superior. They create better incentives to focus on achievement all along the distribution. They're less likely to be subjected to statistical distortions."*
>
> **– Subject-matter expert**

Despite an overall acceptable design, the ELP progress indicator could be strengthened by using index scoring. The current scoring method only provides credit (i.e., awards a point) for students who meet their growth target. This means that students who make some progress but fall short of the target receive no credit. As discussed in Chapter 5, research indicates this binary approach can incentivize schools to focus only on students near the growth target ("bubble kids") and focus less or not at all on students who are far below the target. Additionally, the scoring method does not differentiate between meeting and exceeding a student's growth target, meaning schools are not rewarded for high-performing students. With index scoring, schools could receive credit for English learners making sufficient progress but also receive (i) partial credit for students who make progress but fall short of their growth target and (ii) extra credit for those making significant progress (sidebar). This is more likely to incentivize schools to focus on students across the entire performance spectrum and more thoroughly reflect students' actual progress.

Using index scoring for the ELP progress indicator would be consistent with VBOE's policy rationale for other SPSF indicators and reflect the scoring approach supported by subject-matter experts. VBOE determined that an index "is both fairer for schools and values students who advance along the full performance spectrum" and therefore used index scoring for other indicators in the framework. It is unclear why the board did not apply an index to the ELP progress indicator. In addition, in interviews, subject-matter experts supported scoring the ELP progress indicator with an index.

RECOMMENDATION 7

The Virginia Board of Education should change the English language proficiency progress indicator used in the School Performance & Support Framework to be scored based on a performance index.

Changing the ELP progress indicator's scoring would not need to be sequenced after any other changes made to the framework. VDOE leadership indicated the department "can evaluate and determine whether to incorporate this [recommendation]" after it updates its WIDA ACCESS assessment standards using data from WIDA's assessment update, anticipated in July 2026.

Using an index approach to score the ELP progress indicator would affect schools' overall ratings. Two scenarios modeled by JLARC staff using 2023–24 data showed that scoring the ELP progress indicator using a performance index would likely increase schools' ELP progress indicator scores (Appendix G). Because the ELP progress indicator accounts for 10 percent of schools' scores, this would translate to a small increase in schools' summative scores and could potentially improve a school's performance label if its summative score was near the threshold.

Reweighting should be changed for schools with too few English learners for ELP progress indicator

Many schools do not have enough English learners for the ELP progress indicator to count toward their summative score, and therefore the indicator's weight is redistributed to other indicators to calculate schools' scores. In the 2023–24 school year, 740 schools (42 percent) did not have 15 English learners with two years of WIDA scores, the minimum threshold for inclusion (sidebar). For elementary, middle, and combined schools—which comprised 87 percent of schools not measured on ELP progress—its weight was redistributed to reading and math growth indicators. For high schools, which have no growth indicators, the weight was proportionally redistributed across all other indicators.

Indicators are excluded from accountability calculations when a school has fewer than 15 qualifying students or does not serve the grade level(s) where an indicator is measured. For example, science proficiency—the second most commonly excluded indicator after ELP progress—was not measured for 45 elementary schools without a fifth grade, the year when science testing occurs.

Redistributing the weight of an excluded indicator should minimize the difference in how schools with and without the indicator are being evaluated. Meaningful differences in how schools are evaluated can undermine the utility of the results for comparing performance across schools and subject schools to different standards. One acceptable approach is to redistribute the missing indicator's weight proportionally across *all* remaining indicators, which maintains their same relative influence on the summative score. Alternatively, the missing indicator's weight can be redistributed to one or more indicators that measure *similar* aspects of school performance to minimize changes to the substantive composition of schools' summative scores.

By redistributing the ELP progress indicator's weight to student growth, the SPSF meaningfully alters how a substantial portion of elementary and middle schools are evaluated, reducing the comparability and fairness of results. Student growth represents a different aspect of school performance than ELP progress (i.e., all students' academic progress on reading and math assessments versus English learners' progress toward language proficiency). For schools where the ELP progress indicator is excluded, this redistribution meaningfully increases the weight given to growth from 25 to 35 percent for elementary schools and from 20 to 30 percent for middle schools, while the weight of all other indicators remains the same.

The ELP progress indicator's weight should be proportionally redistributed across the remaining indicators for elementary and middle schools. Proportional redistribution would improve consistency in how schools with and without the ELP indicator are evaluated. This in turn would produce results across schools that are more comparable and fairer.

RECOMMENDATION 8

The Virginia Board of Education should modify the business rules in the School Performance & Support Framework so that the weight for the English language proficiency (ELP) progress indicator is proportionally redistributed across all other indicators for all schools without sufficient English learners to include the ELP progress indicator in their summative score.

Changing the reweighting rules for schools with too few students to count the ELP progress indicator could be done immediately and does not need to be sequenced or coordinated with any other changes made to the framework. According to VDOE leadership, they intend to make this change for the 2025–26 school year, although the change has not been discussed or presented to the board publicly as of early December 2025.

The change would impact overall ratings of some elementary, middle, and combined schools without enough English learners to receive a score for ELP progress. While the effect on schools' summative scores depends on each school's growth indicator score relative to their scores on all other remaining indicators, this change would result in a modest increase (1.6 points) in summative scores for the average school. This could result in a change to the performance label received by schools that are close to a threshold.

8 Accounting for Student Subgroups

The federal Every Student Succeeds Act (ESSA) requires states to hold schools accountable for student subgroup performance through both reporting and federal designation. States must report subgroup performance for each school, including on each indicator in its accountability system. States must also federally designate schools with underperforming student subgroups to identify schools needing additional resources and support to address achievement gaps. These designations include:

- Targeted Support and Improvement (TSI) if any subgroup is significantly underperforming, or
- Additional Targeted Support and Improvement (ATSI) if the underperformance of a subgroup is persistent.

At a minimum, ESSA requires states to hold schools accountable for students from each "major" racial and ethnic subgroup in the state as well as economically disadvantaged students, English learners, and students with disabilities (sidebar). In Virginia, the "major" racial and ethnic groups are those present in 5 percent or more of the student population, which includes Asian, Black, Hispanic, and white students and students of multiple races. Schools are held accountable for student subgroups only when they meet the minimum threshold, which is 15 in Virginia; subgroups with fewer than 15 students are included when calculating schools' overall ratings but are not calculated and reported individually.

ESSA's focus on student subgroups reflects a broader goal of promoting equity in education. Without explicit attention to subgroup performance, a school's accountability results could mask significant disparities between different student groups' performance. By requiring states to monitor subgroup outcomes and intervene when any groups are underperforming, ESSA aims to ensure that all students have access to a high-quality education.

Economically disadvantaged students are those who are eligible for free or reduced-price meals, receive Temporary Assistance for Needy Families (TANF), are eligible for Medicaid, or are identified as either migrant or experiencing homelessness.

English learners are students whose native language is a language other than English and whose difficulties speaking, reading, writing, or understanding English may hinder their education.

Students with disabilities are those who receive special education and related services under the Individuals with Disabilities Education Act.

SPSF lowers TSI & ATSI schools' performance labels, which emphasizes subgroups but has tradeoffs

Virginia's new accountability system—the School Performance & Support Framework (SPSF)—designates TSI and ATSI schools when reporting and identifying underperformance among student subgroups. In Virginia, a school is designated as TSI if one or more of its student subgroups' summative scores are below a certain threshold, which is set at the level of the highest-performing Comprehensive Support and Improvement (CSI) school (sidebar). TSI schools are designated annually. ATSI schools

CSI schools are the lowest-performing 5 percent of Title I schools in the state, as well as certain schools with low graduation rates or that did not exit ATSI status within a given timeframe. See Chapter 4 for more discussion about CSI schools.

are designated every three years and, in Virginia, include schools that have consistently underperforming subgroups for at least two consecutive years.

The SPSF automatically lowers schools' performance labels by one level if they have a TSI or ATSI designation. This means a school with a summative score of 85, which would normally be labeled *On Track*, would instead be labeled *Off Track* if it is designated as TSI. This adjustment applies uniformly, regardless of whether the school is newly TSI, TSI for multiple subgroups, or ATSI because of persistent low performance.

Lowering performance labels of TSI and ATSI schools is uncommon but emphasizes student subgroup performance

The Virginia Board of Education (VBOE) adopted the policy of lowering TSI and ATSI schools' performance labels to ensure subgroup performance is explicitly factored into school accountability results. Without this practice, student subgroups would only influence a school's summative score and performance label as part of the "all students" calculation for each indicator (sidebar). The board also adopted this policy to ensure schools' SPSF performance labels align with federal designations. Because TSI and ATSI designations indicate performance problems, VBOE intends for these schools to generally be labeled *Off Track* or *Needs Intensive Support*, signaling they are not meeting the state's expectations.

Each indicator in the SPSF is calculated using the performance of **all students** in the school, except the ELP Progress indicator, which is specific to English learners.

The SPSF's approach to lowering schools' performance labels based on TSI and ATSI designations emphasizes student subgroup performance. Because underperformance in one student subgroup can lower the school's performance label, schools are more incentivized to focus on subgroup performance. In addition, the approach is simple to understand and avoids complicated calculations required with other methods of incorporating student subgroup performance into school accountability results, such as separate subgroup indicators or different subgroup weighting.

Virginia appears to be in the minority of states that emphasize student subgroups in accountability results, and its approach to doing so is not commonly used. Virginia is one of few states—if not the only—that lowers a school's rating based on TSI or ATSI status.

More broadly, most states do not explicitly factor subgroup performance into their method for assigning school ratings. Thirteen of 16 comparison states identified for this study do not factor subgroup performance into their state accountability system results. Instead, these states consider subgroup performance only when designating TSI and ATSI schools or reporting on subgroup outcomes. As a result, these states lack a mechanism for prioritizing subgroup performance in their accountability results, which means that schools with large achievement gaps among subgroups may still receive high ratings. This can have the effect of reducing their accountability for addressing subgroup disparities, according to experts.

States that *do* account for student subgroup performance in their school ratings typically take one of two approaches. Some states use a separate subgroup indicator that contributes to the overall school rating. For example, Georgia's accountability system includes a "Gap Closing" indicator, which measures whether student subgroups increase their academic performance annually. The indicator accounts for 10 or 15 percent of a school's rating. Other states weight subgroups' performance when calculating a school's rating. For example, Colorado weights subgroup performance as one-third of each indicator's score, and those scores are then aggregated into a rating.

However, both approaches have disadvantages. They add complexity to the accountability system, making it more difficult for stakeholders and the public to understand how school ratings are determined. Furthermore, a separate subgroup indicator must be assigned weight in the accountability system, which means other indicators receive less weight and therefore less priority. Finally, using a student subgroup indicator does not guarantee that schools will prioritize subgroup performance because these indicators typically account for a relatively small portion of a school's score.

Lowering TSI and ATSI schools' performance labels is unpopular among schools but supported by some experts

The SPSF's practice of lowering the performance labels of TSI and ATSI schools reinforces the importance of subgroup performance but is unpopular among schools and divisions. By design, the performance of a relatively small subgroup can significantly affect a school's performance label, which some stakeholders view as punitive. On JLARC's survey, 70 percent of division leaders disagreed with the practice; only 10 percent agreed (sidebar). Division and school leaders also expressed frustration with this practice in interviews, with some noting that a lower performance label could have tangible consequences for public perceptions and staff morale (Chapter 4). For example, a principal stated that lowering their school's label from *On Track* to *Off Track* because of a TSI designation "would be devastating."

JLARC staff surveyed school division superintendents or their designee on the new accountability system. A total of 106 school divisions (80 percent) responded to the survey (Appendix B).

Subject-matter experts acknowledged that the SPSF's approach to lowering TSI and ATSI schools' performance labels can have negative implications for schools, but some considered these implications worth tolerating given the benefits of emphasizing subgroup performance and incentivizing schools to prioritize improvement. All experts interviewed for this study agreed that schools should not receive the highest performance label if they do not educate subgroups effectively.

> *"If TSI [status] is meaningless and has no impact, are we losing sight of disparities that need attending to?"*
>
> **– Subject-matter expert**

Experts disagreed somewhat about Virginia's specific approach to adjusting performance labels based on these federal designations, however. Some experts indicated that lowering the performance labels for *all* TSI- and ATSI-designated schools can be overly harsh and lacks transparency. One described the practice as a "manipulation" of a school's rating that obscures its true performance. However, other experts highlighted the benefits of the approach, noting that it sends a strong signal that subgroup performance matters and that schools should be held accountable for <u>all</u> students' performance. One expert described it as the most effective way to account for student

subgroup performance, emphasizing that subgroup performance *should* meaningfully influence a school's overall rating.

SPSF rules for how TSI and ATSI affect performance labels are imprecise and can be overly punitive

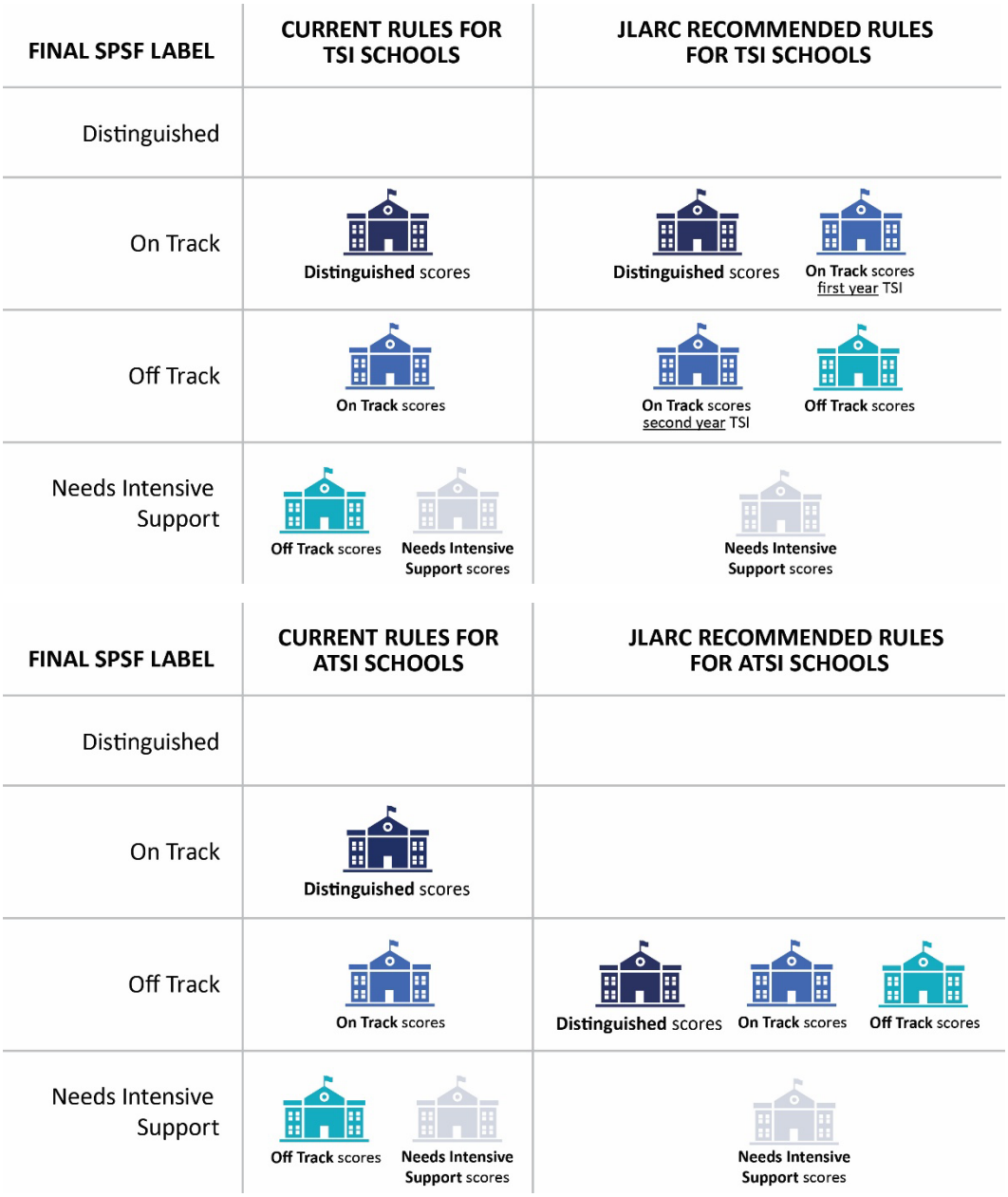
The SPSF's use of TSI and ATSI designations to account for student subgroup performance emphasizes subgroups, but the current practice needs refinement. By tying a school's performance label directly to subgroup outcomes, the SPSF incentivizes schools to focus on historically underperforming students, aligning the SPSF with ESSA's focus on subgroup outcomes. However, the current practice needs refinement to better align with federal intent and improve fairness.

The first issue requiring attention is that lowering the performance label of *all* TSI and ATSI schools does not account for the difference between the two federal designations. Under ESSA, TSI and ATSI designations serve distinct purposes: TSI is intended to serve as an early warning that a school is at risk of becoming ATSI, while ATSI carries more serious implications. In Virginia, ATSI schools are those that have been persistently identified as TSI over consecutive years. However, the SPSF's current practice treats TSI and ATSI schools the same by lowering performance levels equally for both designations.

The second issue is that lowering the performance label for all TSI and ATSI schools can be overly punitive. A school may be designated as TSI because a small number of students underperformed in a single year, so lowering its overall performance label is a substantial consequence for what could be a limited issue. Further, the same reduction is applied to *all* TSI and ATSI schools, even those that would *already* be labeled as low performing based on their SPSF performance label. For example, the performance label for an *Off Track* school designated as TSI is further lowered to the lowest category of *Needs Intensive Support*, even though *Off Track* already conveys the school is not meeting the state's expectation.

The SPSF's labeling practices should be refined to place more focus on *persistent* student subgroup underperformance and better align with federal designations. To accomplish this, the SPSF's rules should be changed to specify that (i) TSI schools should not be able to receive the top SPSF performance label; (ii) ATSI schools should not be able to receive the top two performance labels; and (iii) schools scoring in the second highest category and designated as TSI for two consecutive years should not be able to receive the top two performance labels. Figure 8-1 illustrates how this would compare to current practice.

FIGURE 8-1
Recommended rules would improve some TSI and ATSI schools' performance labels and better reflect differences between the federal designations



SOURCE: JLARC staff.
NOTE: Distinguished scores: ≥90.0; On Track: 80.0-89.9; Off Track: 65.0-79.9; Needs Intensive Support: <65.0.

These changes would maintain VBOE's emphasis on subgroup performance, while better aligning with federal intent and being less punitive. First, these changes would better differentiate between early-warning and persistent performance problems. Nearly all TSI schools (except those who would have been labeled *Distinguished*) could work to improve subgroup performance before their performance label is affected,

> *"If a school continues to be TSI the next year, there should be…something more serious because [that's] an elevated problem."*
>
> **– Subject-matter expert**

allowing the initial TSI designation to serve as a warning. Schools that remain TSI or are designated as ATSI, reflecting persistent student subgroup underperformance, would face the more significant consequence of losing eligibility for the *On Track* label. Second, these changes would also maintain the board's goal of aligning TSI and ATSI schools with those identified as not meeting the state's expectations. All ATSI schools would be labeled *Off Track* or *Needs Intensive Support,* and many TSI schools—particularly those with ongoing subgroup performance issues—would be labeled *Off Track* or *Needs Intensive Support.* Finally, limiting the ability of TSI and ATSI schools to achieve higher performance labels is less punitive than lowering the label in all cases, but still ensures that schools with low student subgroup performance do not receive the SPSF's highest labels.

These changes would partially address the concern that a small number of students could disproportionately affect a school's performance label, but not fully. If a subgroup underperformed in one year, resulting in an *On Track* school's first TSI designation, the school's label would not be affected. However, if a subgroup continued to underperform, the *On Track* school's performance label *would* be lowered to *Off Track*—even if the subgroup was just a small group of students.

RECOMMENDATION 9

The Virginia Board of Education should amend 8-VAC-20-132-270 F of the Virginia Administrative Code to state that (i) no school with a federal Targeted Support and Improvement (TSI) designation for one year shall be labeled in the highest performance category and (ii) no school with a federal Additional Targeted Support and Improvement designation or TSI designation for two consecutive years and scoring in the second highest category shall be labeled in the two highest performance categories in the School Performance & Support Framework.

This change does not need to be sequenced with other changes to the SPSF; however, it would require regulatory action, which would affect the implementation timeframe. It *would* directly affect the performance labels of some TSI and ATSI schools. Based on 2024–25 data, at least 199 schools could have received a higher label under the rules proposed in the recommendation than they received under the current system.

Additionally, changing how TSI and ATSI designations affect schools' performance labels would further underscore the need for VBOE to adjust the summative score thresholds used to determine each school's performance label (Recommendation 2 in Chapter 4). In 2024–25, nearly all schools labeled as *Needs Intensive Support* received that label because their TSI or ATSI designation lowered them from *Off Track*—not because they scored below the threshold to be labeled for *Needs Intensive Support*. Without implementing Recommendation 2 (Chapter 4), Recommendation 9 would result in very few schools receiving the *Needs Intensive Support* label. As such, VBOE will need to review and adjust the lowest score threshold as recommended in Chapter 4, ensuring that the updated thresholds continue to meaningfully differentiate school performance considering the revised TSI and ATSI rules.

9 School Improvement Program

A key purpose of a school accountability system is to identify schools that need improvement and provide them with the resources and support needed to advance their academic performance to an acceptable level. An effective school improvement program is one of the critical components for ensuring that Virginia meets its constitutional requirement to "seek to ensure that an educational program of high quality is established and continually maintained." The state and local governments share responsibility for supporting school improvement through both financial assistance and services. The Virginia Department of Education (VDOE) has the responsibility to deliver basic support services to all schools (sidebar) in the state as well as more extensive services for lower- and lowest-performing schools. VDOE is also responsible for allocating supplemental support resources, such as federal school improvement grants, to these schools.

Local school division leaders and staff are responsible for ensuring ongoing school improvement and coordinating with state school improvement efforts when required. School boards, which are responsible for direct oversight and operation of schools, must also monitor school performance and ensure that schools have the foundational components necessary for improvement to succeed, such as high-quality teachers, effective leadership, and use of evidence-based instructional materials and practices.

VDOE is redesigning and implementing a new school improvement program in conjunction with the development of the School Performance & Support Framework (SPSF). VDOE has several roles in supporting lower-performing schools. VDOE staff provide training and technical support, prepare materials, share best practices related to school improvement, and help schools diagnose the causes of low student performance. VDOE also distributes federal school improvement grants, made available through Title I, Part A of the Every Student Succeeds Act. These grants total $13.9 million for the 2025–26 school year (sidebar).

Examples of support services intended to improve student performance include leadership or teacher training, provision of high-quality instructional materials, or assistance in properly using existing materials or teaching methods.

Schools can use **federal school improvement grants** for any activities the school and state education agency agree will improve student outcomes, as long as those activities align with schools' federally required improvement plan and are supported by evidence.

The federal government also allows states to distribute some additional **Title I, Part A** funding to support direct student services, such as paying for course enrollment or Advanced Placement exam costs. VDOE plans to distribute $10.4 million in direct student services grants in the 2025–26 school year. According to VDOE, these funds will be available for all schools, but the agency will prioritize funds for schools with a federal designation.

Providing effective school improvement services is difficult, but certain models can succeed

Improving student performance in low-performing schools is exceptionally difficult, and research on success of these efforts is mixed. A 2021 meta-analysis of school improvement literature found that some school improvement efforts had a positive impact on student performance. However, other research has found no or even negative effects.

"The influence of factors beyond the control of schools is part of what makes achieving sustained improvement at schools such a challenge."

– 2014 JLARC report: Low Performing Schools in Urban High Poverty Communities

Research indicates that not all school improvement strategies are successful, but states can improve the likelihood of success by providing high-quality support for school improvement. In general, school improvement programs should:

- **Take a holistic view of student performance.** School leaders and/or state staff should conduct a broad review of student performance and outcomes, school staffing, school climate, and community attributes to identify factors that hinder student learning and the causes of those factors. Other states, education stakeholders, and the federal government commonly refer to these reviews as "needs assessments."
- **Use high-quality, evidence-based practices.** School leaders and state staff should ensure that school improvement interventions are backed by high-quality evidence. States can also support struggling schools by providing information about evidence-based interventions and counseling school leaders on selecting and implementing improvement interventions proven to be effective in their schools' circumstances.
- **Have sufficient staffing and resources**. States must have a school improvement program with sufficient staff and resources to meet schools' needs.
- **Be sustainably resourced and implemented**. Research indicates that meaningful school improvement can take several years of sustained effort. This means that a program must be consistently delivered and supported with sufficient resources over the long term. Temporary injections of resources or disruptions to school improvement efforts make it less likely that those efforts will have lasting effects on student and school performance.
- **Be regularly evaluated for effectiveness and adapted when needed**. The state education agency, as well as schools receiving state support, should regularly assess the effectiveness of school improvement efforts. Schools and the state should modify efforts, as needed, based on those results.

VDOE is redesigning its school improvement program, but it is too early to determine its effectiveness

A 2020 JLARC evaluation found several serious problems with VDOE's approach to providing school improvement services. Based on the report's conclusions, the General Assembly directed VDOE to develop a plan to create a more effective school improvement program. After development of this plan, changes in VDOE leadership and philosophy about school improvement resulted in either changing or stagnating efforts to develop and implement more effective school improvement services.

VDOE requested a one-time $50 million increase in funding for school improvement services for schools labeled as *Off Track* or *Needs Intensive Support* during the 2025

General Assembly. These funds, however, were not included in the Appropriation Act. VDOE has been attempting to use existing resources to develop a new approach for its school improvement program.

VDOE staff reported that the agency continues to provide support services to school divisions under existing memorandums of understanding and to schools that have received a federal designation in past years (e.g., comprehensive support and improvement [CSI]). However, the delay in the release of the SPSF results meant VDOE had not begun delivering support to all schools identified as needing support as of early December (which could be several hundred schools).

Current VDOE leadership prioritized redesigning school improvement program

VDOE has been led by three superintendents of public instruction during the current administration, which has contributed to a lack of a sustained, continued effort to make the school improvement program more effective. The prior superintendent had begun efforts to change the program, and a proposal was developed in 2024 for a new program. VDOE, though, discarded that version and began developing its current approach in late spring 2025.

The state's current superintendent expressed that developing an effective school improvement program has been a top priority for her since her tenure began in spring 2025. She said organizational, staffing, and other changes were initiated to redesign the school improvement program.

Redesigned program has positive features and appears to be an improvement over prior approaches

Based on its overall structure, VDOE's new school improvement program has the potential to deliver more effective support services than the agency's prior program. The prior program, which stakeholders described as inflexible and overtly focused on teacher lesson plans, relied heavily on Office of School Improvement staff (OSI) to deliver a relatively uniform set of support services to all schools identified as needing support (sidebar). VDOE's new system, if implemented properly, will instead have subject-matter specialists deliver tailored support to schools based on individual schools' specific performance gaps. Appendix K includes additional descriptive information about VDOE's newly redesigned school improvement program.

VDOE's **Office of School Improvement** was formerly called the Office of School Quality (OSQ).

VDOE's new program is decentralizing school improvement, moving away from OSI staff as the primary providers and toward a program using staff from various VDOE offices. VDOE is hiring additional subject-matter specialist staff to provide this new support, alongside the agency's existing staff in those positions. This approach will allow VDOE staff who specialize in academic and other school performance areas to provide support directly to schools. VDOE has also established several new offices and divisions to provide additional assistance.

VDOE's new school improvement program is designed to provide more tailored support to address specific classroom performance gaps. Rather than relying on a standard set of services like the prior system, VDOE staff will tailor school improvement services to specific areas of low performance and learning gaps identified in student performance data.

VDOE also intends to provide new tiered levels of support, under which lower-performing schools would receive the most intensive services. VDOE expects to base the amount of support provided on schools' needs. For example, the agency plans to reserve access to intensive support services, including support from OSI staff and regional student success specialists, for federally designated schools and schools labeled as *Needs Intensive Support*. Prioritizing intensive support services to the lowest performing schools is similar to other states' approaches.

VDOE is also changing how federal and state funding is allocated to schools needing support. VDOE is extending the length of time federal school improvement grants will be available to federally designated schools from nine months to four years. This change will give schools more time to plan and implement sustainable interventions, as school improvement efforts can take several years to succeed.

While developing its new school improvement program, VDOE staff are also creating new support resources. These resources include items appropriate for all schools, as well as more time- or labor-intensive resources for schools with a federal designation or labeled as *Off Track* or *Needs Intensive Support*.

Lack of written plan for program and staffing workloads may hinder implementation, though a full evaluation cannot occur until services have been provided

Though the new approach appears promising, it is too early to determine whether it will ultimately be successful. VDOE has not produced a formal consolidated plan detailing the program but provided high-level information in a report submitted to the General Assembly in June and to the Virginia Board of Education (VBOE) at the August, September, October, and November 2025 board meetings. (A recommendation to produce a detailed plan is included later in this chapter.)

Lack of a written plan for the large-scale, complex redesign of state's school improvement program could impede successful implementation

VDOE's plan to deliver tailored support services will require significant coordination among OSI staff, VDOE subject-matter specialists across other agency offices and divisions, school division staff, and principals, teachers, and other school staff, to deliver tailored improvement services to hundreds of schools. While the agency has defined the program's scope across several VBOE presentations and other documents, it has not developed a formal, consolidated planning document to clearly define roles and responsibilities for VDOE staff, create protocols for interacting with and

delivering services to schools, and outline the types of services that will be available to which schools. This lack of a detailed, consolidated plan could make it difficult for VDOE staff to deliver these services in a consistent and timely manner.

The lack of a formal plan or planning documents also makes it difficult for external stakeholders to understand and evaluate VDOE's school improvement program. Schools and school divisions, without a formal planning document, may find it difficult to understand or anticipate their responsibilities in the school improvement process or services they will receive. Additionally, the lack of a formal, consolidated plan makes it difficult for General Assembly members or other stakeholders to evaluate whether VDOE has established a program that will allow it to effectively deliver the services necessary to improve the academic performance of struggling schools.

New school improvement program's emphasis on tailored support will be labor intensive and may be difficult to effectively execute with planned staff

VDOE staff emphasize that a key tenet of the new school improvement program will be providing tailored services to address schools' specific performance gaps—a positive and needed component. Providing these tailored services will be labor intensive, however, as VDOE staff noted that support services would be developed to address schools' unique student performance gaps. This will require identifying the specific root cause of the gaps, then determining, designing, and delivering services to address those gaps at each school receiving these services.

VDOE's planned staffing levels may not be sufficient to deliver tailored improvement services to all lower-performing schools. While OSI staff are no longer solely responsible for delivering improvement services, they will still be responsible for delivering time intensive services like individualized leadership support and help completing documentation requirements. Under current staffing levels and using 2024–25 data, each of the 14 OSI staff members would be responsible for providing services to an estimated 30 schools labeled as *Needs Intensive Support* or with a federal designation. This would be 36 percent more schools than OSI staff were responsible for delivering support to in 2020 (22), and it is unclear whether staff will be able to effectively serve that many schools.

In addition, VDOE subject-matter offices, even once fully staffed, will have high school improvement workloads. For example, the math (10 staff), reading (six), and science (four) instructional teams within the Office of Instruction will be responsible for providing direct support in their respective subject areas to low-performing schools. While these staff will be responsible for delivering only a portion of VDOE's improvement services, each staff member from these instructional teams may still be responsible for providing some tailored support to between 40 and 80 schools, depending on the instructional area and VDOE's allocation of services (sidebar).

These workload calculations assume VDOE will provide some level of subject-matter support services to schools labeled as *Off Track* and *Needs Intensive Support,* as well as schools with a federal designation that have math, reading, and science proficiency or growth scores at or below the 25th percentile of all schools.

Redesigned school improvement program's effectiveness cannot be fully known until support services have been provided and rigorously evaluated

Ultimately, the effectiveness of the new program cannot be determined until services have been provided for long enough to be evaluated. A full evaluation of the program's effectiveness would entail a range of qualitative and quantitative analysis. For example, potential evaluators would need to:

- review VDOE staff experience, qualifications, and workload;
- interview staff at schools receiving support about whether they found the support helpful, adequate, and effective;
- examine whether VDOE support was sufficiently evidence based; and
- analyze data to determine whether schools were demonstrating improvement, and to the extent feasible, VDOE staff's contribution to that improvement.

Because VDOE has only recently begun to provide support services under its redesigned school improvement program, the agency has not provided services long enough for these evaluation activities to be conducted.

School improvement needs sustained attention and evaluation

VDOE needs to develop and submit a detailed plan for the newly redesigned school improvement program to the General Assembly. In addition, VDOE needs to provide annual status updates to the legislature on program progress, including updates on key program activities, available and needed resources, program performance, and student and school outcomes. Both the detailed plan and annual updates should be directed through the Appropriation Act and required to be submitted to the House Appropriations Committee, Senate Finance and Appropriations Committee, the standing education committees, and VBOE.

RECOMMENDATION 10

The General Assembly may wish to consider including language in the Appropriation Act directing the Virginia Department of Education to (i) develop and submit a one-time, detailed plan for the state's school improvement program by August 1, 2026, and (ii) annually develop and submit a status report that includes updates on key program activities, available and needed resources, program performance, and student and school outcomes.

Providing improvement services to lower-performing schools is a critical state responsibility that should be established in law, especially given the SPSF's renewed commitment to holding schools more accountable for performance. In 2020, JLARC recommended responsibility for school improvement be directed in statute because the Code

of Virginia did not require VDOE to provide effective school improvement services or specify the agency's responsibilities related to this function. The 2020 recommendation was partially implemented through 2021 budget language directing VDOE to develop a specific plan for school improvement, but that language is no longer in the Appropriation Act.

Considering the critical role of supporting low-performing schools and the sustained effort required for success, this responsibility needs to be established in the Code of Virginia. This will help ensure that future superintendents devote the necessary and sustained attention to this important responsibility.

RECOMMENDATION 11

The General Assembly may wish to consider amending §22.1-23 of the Code of Virginia to direct the superintendent of public instruction to consistently and effectively implement the state's program to support improvement of low-performing schools.

VBOE currently has statutory responsibility to develop the state's accountability framework but no express responsibility related to the state's school improvement program. In addition to directing the superintendent to implement an effective school improvement program, VBOE should be expressly directed in statute to regularly monitor and ensure school improvement effectiveness.

RECOMMENDATION 12

The General Assembly may wish to consider amending §22.1-253.13.3 of the Code of Virginia to direct the Virginia Board of Education to ensure the state administers an effective school improvement program to support low-performing schools.

Successful state support for school improvement requires analyzing the outcomes of state support and making improvements as needed based on results. Because VDOE has just begun to implement the new school improvement program, it will be at least a year until there is any useful data or evidence to review its effectiveness. VDOE staff and school division leaders will need to regularly evaluate the program's effectiveness in improving student outcomes and school performance. VDOE will also need to periodically evaluate how the state selects which schools receive support and the types of support they receive (i.e., intensive vs. general support services).

Given the agency's history of challenges designing and implementing a sustained school improvement program and the importance of an objective, thorough review, VBOE should hire a third-party expert in educational performance improvement to evaluate the program after it has been fully implemented for at least one year.

RECOMMENDATION 13

The Virginia Board of Education should contract with a qualified expert to conduct an independent evaluation of the effectiveness of the state's school improvement program on a regular basis and use the evaluation results to direct changes to the program as needed.

Finally, effective school improvement efforts require sustained implementation, including consistency in leadership and vision. During the last four years, the superintendent position has been occupied by three different people and the deputy superintendent position, which oversees school improvement, has experienced similar turnover. If the VDOE school improvement program continues to suffer from discontinuity or ineffectiveness, further structural changes may be warranted. For example, the leader of VDOE's school improvement program could report directly to VBOE, which may provide additional, external accountability and could help provide stability if high turnover of superintendents and deputy superintendents continues.

Appendix A: Study resolution

K–12 Accreditation

Authorized by the Commission on November 7, 2024

WHEREAS, the Constitution of Virginia directs that the General Assembly "shall seek to ensure that an educational program of high quality is established and continually maintained;" and

WHEREAS, the General Assembly has granted the Virginia Board of Education statutory authority to provide general supervision of the public school system, and established the Standards of Quality consisting of seven standards related to instruction, staffing, student achievement, and accreditation; and

WHEREAS, JLARC's Virginia's K–12 Funding Formula (2023) addressed funding and the staffing components of the Standards of Quality, but did not address accreditation; and

WHEREAS, the Standards of Accreditation are intended to ensure an effective educational program in all of Virginia's public schools; and

WHEREAS, the Board of Education's "Regulations Establishing Standards for Accrediting Public Schools in Virginia" were adopted in 2024, replaced the previous accreditation standards in place since 2017, and will be fully implemented in the 2025-2026 school year; and

WHEREAS, Virginia public K–12 schools are also subject to Federal accountability requirements as outlined in the federal Every Student Succeeds Act (ESSA); and

WHEREAS, some school officials have expressed concern about the new Standards of Accreditation, including how they will be implemented and the implications of a school not being fully accredited; now, therefore, be it

RESOLVED by the Joint Legislative Audit and Review Commission that staff be directed to review Virginia's recently revised accreditation standards for public K–12 education. In conducting its review, staff shall determine: (i) the appropriate role and purpose of school accreditation in ensuring a quality education system and incentivizing school performance; (ii) whether Virginia's system uses appropriate criteria, and is sufficiently transparent and understandable; (iii) whether the implications and consequences of accreditation results strike the appropriate balance between accountability, assistance, and improving educational quality; and (iv) whether Virginia's school accreditation standards and process are sufficiently aligned with federal and other applicable accountability frameworks.

JLARC may make recommendations as necessary and review other issues as warranted.

All agencies of the Commonwealth, including the Board of Education, Virginia Department of Education, and all public school boards and divisions, shall provide assistance, information, and data to JLARC for this study, upon request. JLARC staff shall have access to all information in the possession of agencies pursuant to § 30-59 and § 30-69 of the Code of Virginia. No provision of the Code of Virginia shall be interpreted as limiting or restricting the access of JLARC staff to information pursuant to its statutory authority.

Appendix B: Research activities and methods

Key research activities performed by JLARC staff for this study included:

- interviews with state agency staff, local K–12 staff, and education stakeholder groups,
- interviews with subject-matter experts in school accountability;
- focus groups of local K–12 school staff, including principals and school counselors, as well as local school board members;
- survey of school division superintendents;
- analysis of students' academic and non-academic performance and outcome data;
- review of recordings, minutes, and materials from Virginia Board of Education (VBOE) meetings;
- review of other states' accountability systems; and
- review of other documents, research literature, and media sources.

Interviews

Structured interviews were a key research method for this report. JLARC staff conducted more than 60 interviews and 10 focus groups with approximately 130 individuals. Key interviewees included:

- Virginia Department of Education (VDOE) staff;
- current and former VBOE members;
- subject-matter experts;
- local K–12 school staff, including principals and school counselors;
- local school board members; and
- education stakeholder associations.

VDOE staff

JLARC staff conducted 12 interviews with VDOE staff, primarily from the Division of Student Outcomes and School Quality. These interviews focused on understanding the functioning of the School Performance & Support Framework (SPSF), federal school accountability requirements and limitations, VDOE's role in school support and improvement, and the availability of relevant data.

Current and former VBOE members

JLARC staff conducted six interviews with current and former VBOE members that were involved in the development of the SPSF. All members serving as of June 2025 were invited to participate. These interviews focused on the SPSF development and implementation processes and their opinions on the design of the SPSF, including the indicators, weighting, performance labels, and other reporting elements.

Subject-matter experts

JLARC staff conducted more than 35 interviews with subject-matter experts, including the two consultants VBOE worked with to develop the SPSF. These interviews focused on K–12 accountability, reporting accountability results, student growth models, including student subgroups in state accountability systems, and school improvement.

JLARC staff conducted interviews with university researchers specializing in school accountability and education policy at Arizona State University, the College of William & Mary, University of Delaware, University of Massachusetts Amherst, University of Virginia, and Virginia Commonwealth University and in student growth models at Arizona State University, Harvard University, and University of Southern California.

JLARC staff also conducted interviews with staff from research institutes focused on education policy, specifically the American Institutes for Research, Innovations for Poverty Action, National Center for the Improvement of Educational Assessment, and NORC at the University of Chicago, about student growth models. Staff also conducted interviews with SAS Institute—which developed Virginia's Visualization and Analytics Solution (VVAAS)—about VVAAS and value-added growth models more generally.

JLARC staff conducted interviews with subject-matter experts regarding the inclusion of student subgroups in state accountability systems—specifically English learners and students with disabilities—including university researchers at California State University, Northridge, and University of California, San Diego and staff from research institutes specializing in education policy for specific student populations: the Migration Policy Institute and UnidosUS for English learners and the National Center for Learning Disabilities for students with disabilities.

JLARC staff conducted interviews with staff from the Data Quality Campaign, Education Commission of the States, EdTrust, ExcelinEd, and KnowledgeWorks— national education advocacy organizations—about school accountability, other states' school accountability systems, and student growth models.

Finally, JLARC staff conducted multiple interviews with the two consultants VBOE hired to assist with developing the SPSF. These interviews focused on the SPSF development process; the design of the SPSF, including the indicators, weighting, performance labels, and other reporting elements; and school accountability more generally, such as other states' school accountability systems and best practices.

School principals and counselors

JLARC staff conducted six focus groups with 20 school principals, representing elementary, middle, and high schools. Principals were chosen from school divisions of various sizes, demographics, and geographic locations around the state. The purpose of these interviews was to gather perspectives on the design and implementation of the SPSF, including positive aspects of the framework, the implementation timeline, indicators, weighting, performance labels and other reporting elements, as well as how accountability results affect schools and their staff.

JLARC staff conducted four focus groups with 15 high school counselors representing school divisions of various sizes, demographics, and geographic locations around the state. The purpose of these interviews was to discuss the 3Es indicator, which is intended to measure college, career, and military readiness through student achievements in the pathways of "enrollment," "enlistment," and "employment." High school counselors play a key role in advising and assisting students in identifying and participating in opportunities and pathways for the 3Es indicator. The topics covered during the interviews included the appropriateness of criteria being measured by the 3Es indicator, indicator scoring, framework implementation, schools' ability to provide students with access to 3Es opportunities, and how accountability results affect schools and their staff.

Division superintendents

JLARC staff conducted interviews with 13 school division superintendents who represented divisions of various sizes, demographics, and geographic locations around the state. The purpose of these interviews was to gather perspectives on the design and implementation of the SPSF, including the indicators, weighting, performance labels, and other reporting elements.

Local school board members

JLARC staff conducted three focus groups with 15 local school board members who represented school divisions of various sizes, demographics, and geographic locations around the state. The purpose of these interviews was to gather perspectives on the design and implementation of the SPSF, including specifically the indicators, weighting, performance labels, and other reporting elements, as well as how school board members use accountability results.

Education stakeholder associations

JLARC staff interviewed representatives from stakeholder organizations that interact with or have a role in K–12 education in Virginia, including the Virginia Association of School Superintendents; Virginia Association for Teaching, Learning, and Leading; Virginia Education Association; Virginia School Boards Association; and the School Board Member Alliance of Virginia. The purpose of these interviews was to gather stakeholder perspectives on the design and implementation of the SPSF, including specifically the indicators, weighting, performance labels, and other reporting elements.

Survey

JLARC staff administered an electronic survey to all division superintendent offices in Virginia. One hundred and six divisions submitted a response to the survey (80 percent). The survey was implemented in July 2025, which was after the SPSF had been in place for the 2024–25 school year but prior to the results from that school year being released.

Survey topics included questions about familiarity with and understanding of the framework; development and implementation of the framework; the framework's indicators, design, and reporting of results; and the state's school support function.

Data collection and analysis

Analysis in this report primarily relies on SPSF data provided to JLARC by VDOE, including individual student- and school-level indicator data, as well as the framework's aggregated results. JLARC staff also accessed and analyzed publicly available data from VDOE regarding school enrollment and student demographics; teacher vacancies, provisionally licensed teachers, and out-of-field teachers; per-pupil spending; and results of Virginia's prior accountability system.

Analysis of SPSF results in this report uses the latest data available at the time of the report's release. The school level results for 2024–25 school year, the first year officially subject to the new framework, were released by the Virginia Department of Education (VDOE) in early December 2025 (sidebar). Summary analysis in this report uses these 2024–25 school-level results. However, individual student level data for 2024-25 was not made available to JLARC. Therefore, some analyses that rely upon individual student level data use 2023–24 school year data, which was released by VDOE as part of unofficial projections for informational purposes prior to the framework's implementation.

SPSF and prior accountability system results (Chapter 3)

JLARC staff used VDOE's aggregated SPSF results and its publicly available results from the most recent year of the prior state accountability system to compare school performance under the two systems, including (i) the distribution of schools receiving each performance label and (ii) the number and percentage of schools receiving lower or higher ratings under the SPSF compared to the prior system.

School characteristics and SPSF results (Chapters 3 and 5, Appendixes F and G)

JLARC analyzed the relationship between SPSF results and school and student characteristics using aggregated SPSF results, VDOE Fall Membership data, School Quality Profiles data, and VDOE Positions and Exits data. JLARC staff calculated correlations between schools' summative scores and schools' percentage of economically disadvantaged students, English learner students, students with disabilities, students in racial and ethnic groups, provisionally licensed teachers, out-of-field teachers, and teacher vacancies, as well as schools' enrollment and per-pupil spending. JLARC staff also calculated correlations between individual indicator scores and schools' percentage of economically disadvantaged students.

JLARC conducted several ordinary least squares regression analyses with schools' summative scores as the dependent variable. The first group of regressions included only student demographic characteristics (race and ethnicity, economic disadvantage, English learner status, and disability) as predictors to examine how much variation in schools' summative scores is associated with these characteristics. A separate model was run for elementary schools, middle schools, and high schools, which had an R^2 of 0.55, 0.51, and 0.61, respectively. Models were run separately for each level because of their varied indicators and weighting. Schools with combined levels (e.g., elementary-middle schools) were not included in this analysis. An additional regression assessed the statistical significance and substantive effect size of student and school characteristics. This analysis included the student demographic characteristics from the first analysis, as well as schools' percentage of provisionally licensed teachers, out-of-field teachers, and teacher vacancies, student enrollment, per-pupil spending,

VDOE region, geographic type (suburban, urban, rural, rural city), and school level. See Appendix G for more information about the regression results.

JLARC performed two dominance analyses to assess the relative importance of various school characteristics in explaining variability in schools' summative scores. Both analyses included the same characteristics included in the second regression analysis, but the first grouped variables into sets (student demographics, school attributes, teacher workforce, and geography), while the second examined variables individually.

Student demographics and prior accountability system results (Chapter 3, Appendix G)

JLARC staff used publicly available results from the most recent year of the prior state accountability system (based on 2023–24 school year performance) and Fall Membership data to examine the relationship between the prior system's results and student demographics. The average percentage of economically disadvantaged students, Asian students, Black students, Hispanic students, white students, English learners, and students with disabilities for schools that received *Accredited* and *Accredited with Conditions* labels are reported in Appendix G.

Cut score modeling (Chapter 3)

JLARC staff used the new proficiency cut scores approved by VBOE in September 2025 to recalculate schools' reading and math proficiency indicator scores, summative scores, and performance labels. Analysis was limited to elementary schools, excluding schools with combined levels (e.g., combined elementary-middle schools) and elementary schools missing the science proficiency indicator. Points awarded for students who took a VAAP assessment were not changed. The recalculated indicator scores, summative scores, and performance labels were compared with the original results. This analysis assumes no steps are taken to mitigate the effect of the new cut scores on schools' overall ratings and does not include adjustments for the proposed "approaching" category of student performance during the cut scores' phase-in period.

SPSF results (Chapters 4 and 8)

JLARC staff used VDOE's aggregated SPSF results to analyze (i) the distribution of schools receiving each performance label by school level, (ii) how federal designation varies by performance label, and (iii) and how recommendations related to federal designation would affect schools' performance labels.

Proficiency indicator scores vs. SOL pass rates (Chapter 5)

JLARC staff used VDOE's SPSF school-level proficiency data to compare proficiency indicator scores and SOL pass rates. Average SPSF reading, math, and science proficiency indicator scores were calculated based on the indicator scores of all elementary and middle schools for each subject. SOL pass rates for each subject were calculated based on the number of students across all elementary and middle schools who scored proficient or advanced, divided by the total number of students who took the assessments.

Three-category proficiency scoring index (Chapter 5)

JLARC staff used VDOE's SPSF school-level proficiency data to model how a change to the three-category proficiency scoring index would impact schools' proficiency indicator scores. For assessments subject to the three-category scoring index (science, high school reading and math, VAAP), students that failed their assessment were assigned 0.5 points instead of 0.75 points. Indicator scores were then recalculated with this scoring change and compared with the original scores.

Proficiency and growth weighting (Chapter 5, Appendix G)

JLARC staff used VDOE's aggregated SPSF data to model how changes to proficiency and growth weighting would impact correlations between schools' summative scores and schools' percentage of economically disadvantaged students, as well as impact schools' relative performance. Schools' summative scores were recalculated in two different scenarios where different weighting was applied to the proficiency and growth indicators: (i) weighting proficiency and growth components equally, and (ii) reversed weighting, where growth indicators were assigned the SPSF's current weighting for proficiency and proficiency indicators were assigned the SPSF's current weighting for growth. Correlations between summative scores and schools' percentage of economically disadvantaged students were recalculated for each set of scores and compared against the original correlations. In addition, the bottom quartile of summative scores from each new set of scores was compared against the original bottom quartile of schools. The change in the bottom quartile of schools was calculated by dividing the number of schools in the bottom quartile in the original data but not in the modeled scenario by the total number of schools in the bottom quartile. Schools with combined levels (e.g., combined elementary-middle schools) were not included in this analysis.

3Es indicator analysis (Chapter 6)

JLARC analyzed high school 3 Es indicator results to determine the extent to which 3Es indicator scoring affects schools' summative scores. This analysis used the SPSF's 2024–25 school level summary results.

Middle school advanced coursework (Chapter 6)

JLARC analyzed school level middle school advanced math SOL assessment results to determine (i) the pass/fail rate of students taking an SOL for an advanced math course, and (ii) the number of students who scored advanced on their 7th grade math SOL but *did not* take 8th grade advanced math, and therefore counted against their school as part of the indicator calculation (e.g., included in the denominator). The purpose of the analysis was to determine how each factor affects schools' advanced coursework indicator score.

ELP progress index (Chapter 7)

JLARC staff used VDOE's individual student data for the ELP progress indicator to model how implementing a scoring index rather than binary scoring would impact schools' indicator scores. Schools' ELP indicator scores were recalculated using two hypothetical approaches to scoring an index: (i) 0.5 points awarded for making half the progress currently required and 1.25 points for making 1.5 times the progress currently required, and (ii) an approach similar to the first but with

scoring that mirrors the four-category proficiency scoring index. Each set of hypothetical scores were then compared with the original ELP indicator scores. See Appendix G for more information about the progress thresholds and point values used in each hypothetical approach.

Proportional reweighting of ELP (Chapter 7)

JLARC staff used VDOE's aggregate SPSF results data to model how a change to the reweighting rules for schools missing the ELP progress indicator would impact schools' summative scores. The summative scores of elementary and middle schools missing the ELP progress indicator were recalculated with different weighting, where ELP progress's weight was proportionally redistributed across all remaining indicators rather than reallocated to growth indicators. The new scores for those schools were then compared against their original scores. Schools with combined levels were not included in this analysis.

VBOE meetings

JLARC staff watched the recordings and reviewed the minutes and materials from all of the meetings (work sessions, business meetings, and special meetings) in which VBOE discussed accreditation and accountability and developed the SPSF. These included the September, October, and November 2022; February, March, July, August, and September 2023; and January, March, April, June, July, August, and September 2024 meetings.

Additionally, JLARC staff monitored VBOE meetings during this study, including all presentations related to the SPSF and school support.

Review of school accountability systems in other states

Comparing Virginia's new accountability system to other states' systems was a key research method for this study. Staff conducted a full 50-state comparison for certain high-level elements of school accountability systems, such as the weighting of proficiency versus growth and the presence of certain indicators, such as college, career, and military readiness and chronic absenteeism. However, it was not feasible to compare every single aspect of the SPSF to every other state's system because that would require conducting an in-depth review of the accountability system in each state, which is challenging given the breadth and complexity of each system. Instead, the team selected a sample of states for in-depth comparisons.

The main criteria for selecting the sample of comparison states was (i) whether the state is a neighbor or is in the mid-Atlantic region; (ii) whether the state has similar demographic attributes to Virginia (similar size, student population, etc.); (iii) whether the state has been cited by experts as an example of a good school accountability system; and (iv) whether the state has recently updated its accountability system—as this could provide examples of recent trends and how to implement a new system (Table B-1). In addition, staff used three additional states with high proportions of English learners as comparisons when analyzing the SPSF's approach to holding schools accountable for English learners' outcomes (Chapter 7).

JLARC staff reviewed other states' ESSA plans, school accountability manuals, and guidance documents, examining, among other things, each system's indicators, weighting, overall ratings, school report cards, other reporting elements, and student growth model (if applicable).

TABLE B-1
Other states used for comparison

State	Similar demographics	Neighboring or regional state	Cited by experts as a good example	Recently updated K–12 acct. system	Comparison for a specific indicator
Colorado			✓		
Delaware	✓	✓			
Florida	✓		✓		
Georgia	✓	✓			
Illinois	✓				
Louisiana			✓	✓	
Kentucky		✓			
Maryland	✓	✓			
Massachusetts			✓		
Mississippi			✓		
New York	✓				
North Carolina	✓	✓			
Ohio		✓		✓	
Pennsylvania	✓	✓			
Tennessee	✓	✓			
West Virginia		✓			
California					Growth, ELP
New Mexico					ELP
Texas					ELP

SOURCE: JLARC staff.
NOTE: ELP = English learners' progress toward English language proficiency.

Review of documents and literature

JLARC staff reviewed documents and literature pertaining to school accountability, such as:

- the Every Student Succeeds Act (ESSA) and related federal regulations;
- Virginia's ESSA plan;
- Virginia's regulations for the SPSF and the state's prior accountability system;
- publications from national organizations specializing in K–12 education and/or school accountability;
- research literature related to school accountability and measuring school performance and student achievement;
- publications and guidance documents from VDOE related to the SPSF and the state's prior accountability system; and
- state and local media reports.

Appendix C: Agency responses

As part of an extensive validation process, the state agencies and other entities that are subject to a JLARC assessment are given the opportunity to comment on an exposure draft of the report. JLARC staff sent an exposure draft of this report to the secretary of education and the Virginia Department of Education (VDOE) and shared an exposure draft with the president of the Virginia Board of Education (VBOE).

Appropriate corrections resulting from technical and substantive comments are incorporated in this version of the report. This appendix includes response letters from the secretary of education, VDOE, and the president of the VBOE.

COMMONWEALTH of VIRGINIA
Office of the Governor

Aimee Rogstad Guidera
Secretary of Education

December 9, 2025

Dear Director Greer,

Throughout my four years in this role, I have appreciated JLARC's analytic research as a tool to improve decision-making so that Virginia continues to be the best place to live, work, and raise a family. It has been a pleasure to work with and learn from your team. Thank you for the opportunity to provide comments on *Virginia's K-12 Accountability System*. This report documents the strength and quality of our new accountability system, the School Performance and Support Framework. The Framework is a core component of Governor Youngkin's Day One commitment to restore excellence to education in every corner of the Commonwealth and to ensure that every Virginia graduate is prepared for success in life after high school.

The new School Performance and Support Framework has been designed with two main goals:

1) All education stakeholders—parents, teachers, principals, superintendents, taxpayers, and policymakers—will have access to quality, timely, actionable information about how well each K-12 public school is serving all students, and
2) That every school not meeting performance goals will receive timely and productive assistance to improve.

As the JLARC analysis states, this new accountability system is a marked improvement on the previous "accreditation system" that was complex, unclear, and produced meaningless analysis. For example, as the Commonwealth emerged from damaging pandemic school closures that contributed to the largest learning loss in the country in 4th grade math and reading, the former accountability system told Virginians that not a single school in Virginia was not "accredited." At that critical moment, and always, our education stakeholders deserve a clear picture of school performance so that tailored actions to support and improve school and student success can be implemented quickly and effectively.

With that goal in mind, over the past four years, the Governor's office, the State Board of Education and the Virginia Department of Education have relied on a set of guiding principles; my hope is that the next administration and future Boards will continue to embrace the following fundamental values:

1. Our guiding principle is high expectations for every student. Proficiency definitions will be set by benchmarking against the demands of Virginia employers and higher education demand as well as against states who have the most rigorous definitions of proficiency in the nation.
2. Transparency and access to actionable information will be a hallmark of our approach and our new system.

3. Student academic growth and proficiency are both vital measures, but the system must prioritize getting every student to proficiency.
4. The purpose of accountability is to build trust between schools, parents, and students. We must provide necessary supports and work alongside schools in need of help.
5. Stakeholder input is critical to this change process. Educators, parents, students, and education leaders will inform the Board's process to build a state-of-the-art assessment and accountability system.

We have operated with fidelity to these principles, engaging educators, parents, students, and education leaders through listening sessions and thoughtful conversation at every stage of development. We remained true in our values, successfully integrating continuous feedback into the process and final product, and the Student Performance and Support Framework is better as a result.

JLARC's analysis captures how the School Performance & Support Framework provides a more clear and useful picture of school performance that prioritizes greater transparency, accountability for results, and targets resources to the communities, schools, and students that the data tells us need the most support. Every Virginian can visit the VDOE website and find how well their community school is serving all students. This process is not intended to punitively label schools; our efforts are grounded in the belief that data is a tool of improvement and should be used not as a hammer, but as a flashlight. To this end, the Virginia Department of Education has been restructured to focus on this new high quality actionable data to support schools that need assistance, to learn from our high performing schools, and to ensure that every student receives what he or she needs to get back on track for success. Every school can be "distinguished," and every student can graduate prepared for life. This is the foundational premise of every part of this new system and of the Department's mission.

Virginia is leading the nation in its embrace of excellence. While other states are dismantling their graduation requirements, gutting proficiency levels and minimizing merit, Virginia is doubling down on high expectations for every student and school, and has been recognized by respected national voices for this leadership. Virginia's students, teachers, and schools deserve the dignity to be held to high expectations. The School Performance and Support Framework is critical to that promise of excellence for every student because it builds trust through transparency and capacity through data-guided supports. Your team points out that there are areas that could be improved upon; the Superintendent, her team, and the Board are already addressing many of the points you identify. My hope is that the next administration, General Assembly, and State Board of Education continue to embrace the high expectations agenda and guiding principles that have created the nation-leading accountability system now in place in the Commonwealth. Virginia's students and schools thrive when our policy and education leaders maintain their steadfast commitment to ensuring every student is on track for success in life.

With appreciation,

Aimee Rogstad Guidera

COMMONWEALTH of VIRGINIA

Emily Anne Gullickson, M.Ed. J.D.
Superintendent of Public Instruction

DEPARTMENT OF EDUCATION
P.O. BOX 2120
RICHMOND, VA 23218-2120

Office: (804) 225-2057
Fax: (804) 371-2099

December 9, 2025

Hal E. Greer
Joint Legislative Audit and Review Committee (JLARC)
919 East Main Street, Suite 2101
Richmond, VA 23219

Dear Director Greer:

Thank you for the comprehensive report on Virginia's K-12 Accountability System. The review offers valuable insights that contribute to the continued improvement of the School Performance and Support Framework. I appreciate the work and time invested in this review and welcome the opportunity to clarify several elements, address inaccuracies, and highlight areas for refinement.

Organizational Redesign and Talent Strategy
Since March 2025, the Virginia Department of Education (the Department) has executed a significant organizational redesign to improve coherence, collaboration, and operational effectiveness. These changes were informed by best practices and have positioned the Department to better serve schools and divisions in alignment with requirements defined in the School Performance and Support Framework. The Department has recruited high-caliber national talent and promoted exemplar staff into leadership roles to expand organizational capability. This positions the Department to meet the needs of students across the Commonwealth with greater precision and expertise.

For example, a new Division of Student Outcomes and School Quality now connects assessment data, accountability measures, educator preparation, best practices, and school improvement. A new Division of Innovation, Student Pathways, and Opportunities supports key elements of the 3E Readiness Framework through advanced learning, military pathways, career and technical education, virtual learning, and innovative school models. The Office of Behavioral Health under the Division of Specialized Populations continues to provide critical support to combat chronic absenteeism as attendance matters deeply for student learning to occur.

School Improvement Redesign
The Department has modernized its approach to school improvement by implementing a research-informed model that promotes coordinated support across offices. This redesign streamlines communication and expands the expertise available to divisions and schools. Resources are directed towards best practices supported by strong empirical evidence. School and division leaders have more flexibility to prioritize investments that produce measurable gains for students, supported by a clear expectation for improvement in student outcomes. School improvement is now a shared responsibility across the Department, resulting in more robust and consistent support to schools statewide.

Alignment of Federal and State Accountability Systems
The report recommends automatically placing comprehensive support and improvement schools in the lowest state performance category. This recommendation conflicts with federal expectations and research-

based practices for school improvement. Federal identification is designed to direct targeted resources to schools that need support. Under the Every Student Succeeds Act (ESSA), these schools must demonstrate two consecutive years of growth to exit federal status. Analysis of the 2024-2025 data revealed that all newly identified comprehensive support and improvement schools already fall within the two lowest performance categories in the state's framework. As such, this already reflects alignment between state and federal systems. Many schools identified for comprehensive support and improvement in the 2023-2024 school year are making significant improvement and are on track to exit their designation once they meet the required two years of improvement, causing these schools to be identified as on track in the state's accountability system.

Recognizing such progress is essential to maintaining credibility in the accountability system, reinforcing effective practices, and sustaining momentum in schools that are moving toward successful exit from federal identification status.

The 3E Readiness Framework Expands Opportunities

The 3E Readiness Framework expands meaningful opportunities for students by strengthening preparation for postsecondary enrollment, employment, and military enlistment. It encourages schools to offer multiple routes to readiness, supported by skills, credits, and credentials that matter for postsecondary success. The report states that the 3E Framework masks the performance of lower-achieving students and recommends capping student and school scores. The Department respectfully disagrees. Such a cap would place an unnecessary ceiling on students' ability to earn credits, credentials, and engage in experiences that directly contribute to their readiness for college, career, and military pathways. High schools across the Commonwealth have invested deeply in expanding these opportunities for all students and Virginia will soon realize the benefits of more prepared, skilled and credentialled graduates in its higher education, workforce and military settings. The revised accountability system recognizes the work schools have done and the achievement of students who have fully engaged in the opportunities afforded by the 3E Readiness Framework.

Proficiency as a Priority, Growth as a Complement

The Department affirms the value of student growth as one component of a balanced accountability system. The recommendation to weight growth equally or more heavily than proficiency does not align with stakeholder perspectives or research. Parents, higher education leaders, employers, and military representatives have consistently emphasized that graduates must demonstrate proficiency to experience success beyond high school. Research reinforces this perspective, showing that proficiency is a strong predictor of long-term student outcomes. While growth provides important information about student progress, an outsized emphasis on growth compared to proficiency risks signaling that mere progress toward proficiency is acceptable in place of actual readiness. The current framework prioritizes proficiency and incorporates growth to offer a more complete picture of student performance. This balance ensures that schools demonstrating strong outcomes are recognized, schools requiring additional support are accurately identified, and resources are allocated where they will have the greatest impact on student success.

Thank you again for your thoughtful analysis and continued partnership in supporting students across the Commonwealth.

Sincerely,

Emily Anne Gullickson, M.Ed. J.D.
Superintendent of Public Instruction

EAG/TBD

CC: President Grace Turner Creasey, Virginia Board of Education
The Honorable Aimee Rogstad Guidera, Virginia Secretary of Education

COMMONWEALTH of VIRGINIA

VIRGINIA BOARD OF EDUCATION
P.O. BOX 2120

December 9, 2025

Hal E. Greer
Joint Legislative Audit and Review Committee (JLARC)
919 East Main Street, Suite 2101
Richmond, VA 23219

Dear Director Greer:

Thank you for the opportunity to provide feedback on the Virginia's K-12 Accountability System report. I appreciate the thorough analysis and confirmation of the direction that the Virginia Department of Education (the Department), under the direction of the Board, is moving to strengthen the accountability system. The Department is implementing an accountability system designed to see every student, enabling us to celebrate success, elevate bright spots, and direct resources to the schools and students who need them the most. The Department has also redesigned its approach to school improvement to align to research-based practices and leverage internal expertise to strengthen supports for divisions and schools.

I appreciate the effort invested in this review and welcome the opportunity to clarify key elements and outline areas of refinement.

Broader Stakeholder Perspectives Are Essential

The Board values the voice of stakeholders across the Commonwealth, including educators, parents, higher education partners, workforce representatives, military leaders, and students, to inform accountability and school improvement initiatives. These groups consistently offer insight into the knowledge and skills students need to succeed.

The report heavily relies on feedback from division superintendents, school-based staff, and advocacy organizations. These voices are important. However, they represent a portion of the stakeholder landscape. Broader engagement of stakeholders would create a more complete picture of statewide expectations and would strengthen future analyses and recommendations.

School Improvement Remains a Core Board Priority

Improving school performance and student outcomes remains one of the Board's highest priorities. Each month, the Board includes a standing agenda item dedicated to school improvement. This structure holds the Department accountable for progress and provides transparency to the public regarding the agency's action to support improved outcomes.

Under Board guidance, the Department has revised its approach to supporting schools and divisions through a research-informed, collaborative model. This approach shifts school improvement from the responsibility of one isolated office to making it a core focus of the entire Department.

It is important to note that throughout the summer and fall, during discussions on the proficiency cut scores, the Board emphasized its joint responsibility with the Department to ensure that resources are prioritized for schools that need support and funding is being utilized on proven and effective practices. At the December Board meeting, the Board will review refinements in how the Department supports divisions operation under a memoranda of understanding.

High Expectations Must Anchor the Accountability Systems

Priority 1 of the Virginia Board of Education's Comprehensive Plan is "To set and help every learner meet high expectations." Growth is an important indicator of progress. However, placing too much weight on growth risks masking underperformance in critical areas. A student may demonstrate growth yet remain significantly below proficiency in reading. Under the report's approach, this performance could be masked, resulting in schools not being identified for the targeted resources necessary to improve student outcomes.

The report also recommends capping points for the 3E Readiness Framework. Providing multiple opportunities for students to demonstrate readiness for career, military, and college pathways supports the Board's priority of high expectations. The accountability framework encourages divisions and schools to prioritize meaningful experiences that prepare students for success in career, military, and college pathways. Limiting this component would undermine that goal.

Thank you again for the opportunity to share feedback on the Virginia's K-12 School Accountability System report. I look forward to continued partnership to improve student outcomes across the Commonwealth.

Sincerely,

Grace Turner Creasey

Grace Turner Creasey, M.Ed.
President of the Virginia Board of Education

GTC/EAG

CC: Superintendent Emily Anne Gullickson, M.Ed. J.D., Virginia Department of Education
The Honorable Aimee Rogstad Guidera, Virginia Secretary of Education

Appendix D: Decreases in student performance

Virginia student performance declined in recent years across several areas measured by the state's school accountability system. Virginia student performance on reading and math Standards of Learning (SOL) assessments declined following the pandemic. The average 3rd grade reading SOL score declined 16 points between the 2018–19 and 2020–21 school years; math SOL scores declined by 47 points over the same period (Table D-1). Overall pass rates also declined; 3rd graders were 12 percent less likely to pass the reading SOL and 35 percent less likely to pass the math SOL in 2020–21 than in 2018–19. Eighth graders experienced similar declines in SOL scores and pass rates.

TABLE D-1
Third and 8th grade SOL performance dropped during and after the COVID-19 pandemic

SOL		2018–19	2020–21	2021–22	2022–23	2023–24	2024–25
3rd Grade Reading	Pass rate	70.3%	61.1%	67.5%	66.1%	66.9%	66.9%
	Average score	426	410	419	419	419	420
3rd Grade Math	Pass rate	82.2%	53.2%	66.7%	69.1%	70.1%	72.9%
	Average score	445	398	417	422	422	428
8th Grade Reading	Pass rate	75.9%	69.1%	71.6%	70.7%	71.6%	73.4%
	Average score	429	417	423	423	423	428
8th Grade Math	Pass rate	67.6%	28.5%	46.0%	48.4%	50.1%	50.5%
	Average score	410	365	383	386	388	394
8th Grade Science	Pass rate	76.7%	56.3%	59.9%	60.7%	63.0%	65.7%
	Average score	434	403	407	409	413	418

SOURCE: JLARC analysis of Virginia Department of Education data.
NOTE: The Virginia Board of Education changed scoring thresholds for proficiency on math (2018–19) and reading (2020–21) Standards of Learning assessments. These changes likely resulted in more students passing their assessment than otherwise would have, potentially understating the true decline in pass rates.

Virginia students' performance on the National Assessment of Educational Progress (NAEP) assessments also declined following the pandemic. The proportion of Virginia 4th and 8th graders scoring as proficient or better on NAEP math and reading tests declined by an average of 6.5 percentage points between 2019 and 2022. NAEP performance stagnated between 2022 and 2024, with the proportion of students scoring as proficient or better declining by an average of 2 percentage points on 8th grade reading and math and 4th grade reading and increasing by 2 percentage points on 4th grade math. While many states saw declines in student performance during the pandemic, Virginia students saw relatively steeper declines. For example, in 2019 Virginia 4th graders scored the 2nd highest in the nation on the NAEP math assessment (Table D-2). In 2022, Virginia 4th graders' math performance had dropped to 20th and maintained that ranking in 2024. Virginia experienced similar declines in its state ranking for NAEP test performance for 4th grade reading and 8th grade math.

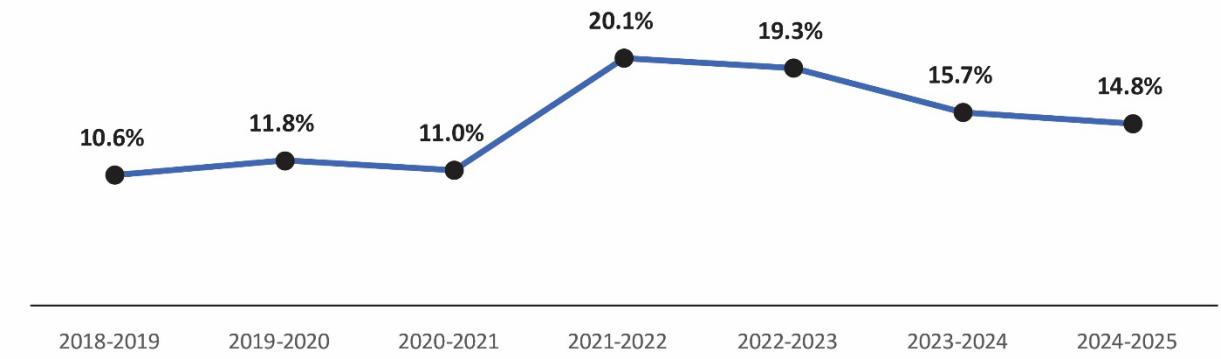
TABLE D-2
Virginia student performance on the NAEP declined relative to other states

NAEP Assessment	2019 national ranking	2022 national ranking	2024 national ranking
4th Grade Reading	7	32	27
4th Grade Math	2	20	20
8th Grade Reading	30	18	29
8th Grade Math	5	9	22

SOURCE: JLARC analysis of National Center of Education Statistics data.

Student attendance as measured by chronic absenteeism rates increased substantially following the COVID-19 pandemic. Just 10.6 percent of students were chronically absent during the 2018–19 school year (Figure D-1). That rate nearly doubled to 20.1 percent in the 2021–22 school year and declined to 14.8 percent for 2024–25.

FIGURE D-1
Statewide chronic absenteeism rate increased following the COVID-19 pandemic



SOURCE: JLARC analysis of Virginia Department of Education data.

Appendix E: School performance on individual indicators

This appendix provides information about the distribution of school performance on all indicators in the School Performance & Support Framework. Schools' indicator scores are weighted and combined to produce their overall summative scores, which are the basis for assigning performance labels (*Distinguished*, *On Track*, *Off Track*, *Needs Intensive Support*). Each school level has distinct weighting, and some indicators are not used at all school levels.

Table E-1 presents school performance on each indicator during the 2024–25 school year, the first year of official results for the SPSF. It reports the average unweighted score for each indicator, as well as the standard deviation and the 25th, 50th (median), and 75th percentile scores. Table E-2 presents this information for the unofficial 2023–24 school year projections, which were used for some analyses in this report.

TABLE E-1
Distribution of 2024–25 school performance by indicator

Indicator	Average	Standard deviation	25th percentile	50th percentile	75th percentile
Reading proficiency	92	9	87	93	99
Math proficiency	92	8	87	94	98
Science proficiency	95	6	92	95	99
Reading growth	71	7	67	71	76
Math growth	70	12	63	71	78
ELP progress	56	13	48	55	64
Chronic absenteeism	87	7	83	88	91
MS advanced coursework	95	10	95	98	100
4-year graduation rate	89	11	87	92	95
6-year graduation rate	92	10	90	94	97
3Es readiness	99	25	85	99	113

SOURCE: 2024–25 Virginia Department of Education School Performance & Support Framework data.
NOTE: Indicator scores are unweighted.

TABLE E-2

Distribution of 2023–24 unofficial school performance projections by indicator

Indicator	Average	Standard deviation	25th percentile	50th percentile	75th percentile
Reading proficiency	93	9	87	93	99
Math proficiency	90	9	84	91	96
Science proficiency	95	7	91	95	99
Reading growth	72	7	67	72	76
Math growth	71	12	63	72	79
ELP progress	55	13	46	55	64
Chronic absenteeism	84	8	81	86	90
MS advanced coursework	94	11	94	97	99
4-year graduation rate	89	10	86	91	94
6-year graduation rate	92	8	90	94	97
3Es readiness	69	20	56	69	82

SOURCE: 2023–24 Virginia Department of Education School Performance & Support Framework data.
NOTE: Indicator scores are unweighted. 3Es indicator data for unofficial 2023–24 projections were incomplete; the Virginia Department of Education improved collection for the 2024–25 school year.

Appendix F: Relationship between the SPSF's results and school characteristics

Chapter 3 discusses the relationship between the School Performance & Support Framework (SPSF)'s results and student demographics, with a focus on student economic disadvantage. This appendix provides additional information on how *other* student and school characteristics relate to school accountability ratings, including student race and ethnicity, students with disabilities, English learners, teacher workforce challenges, geography, and per-pupil spending.

All analysis in this appendix is based on the first year of official SPSF results, reflecting school and student performance during the 2024–25 school year.

SPSF ratings vary by other student demographics

Schools that received lower performance labels from the SPSF had student populations with different racial and ethnic compositions than schools that received higher ratings, on average (Table F-1).

Among racial and ethnic subgroups, schools' proportions of white and Black students had the strongest associations with summative scores, with correlations of 0.43 and -0.39, respectively. Schools with higher proportions of white students tended to receive higher summative scores, whereas schools with higher proportions of Black students tended to receive lower scores. When controlling for other student demographics such as economic disadvantage and school characteristics, schools' racial and ethnic student composition generally had a statistically significant (i.e., independent) relationship with schools' scores. Schools' percentage of Hispanic students was not statistically significant; however, this likely reflects its very strong correlation (0.91) with schools' percentage of English learners, which was significant (Appendix G).

TABLE F-1
Student racial and ethnic composition varies across performance labels, on average (2024–25)

	Avg. % Asian students	Avg. % Black students	Avg. % Hispanic students	Avg. % white students
Distinguished	11	12	11	58
On Track	5	19	17	52
Off Track	4	30	22	37
Needs Intensive Support	4	31	29	29

SOURCE: 2024–25 VDOE School Performance & Support Framework data, 2024–25 VDOE Fall Membership data.

Schools that received lower performance labels were also more likely to have higher proportions of English learners (Table F-2). Schools' percentage of English learners had a moderate negative correlation with their summative scores (-0.35), and this relationship remained statistically significant when controlling for other student and school characteristics. Notably, this relationship was much stronger for high schools (Appendix G).

TABLE F-2
Schools that received lower performance labels have higher percentages of English learners, on average (2024–25)

	Avg. % English learners
Distinguished	6
On Track	9
Off Track	15
Needs Intensive Support	21

SOURCE: 2024–25 VDOE School Performance & Support Framework data, 2024–25 VDOE Fall Membership data.

Schools that received lower performance labels generally have comparable rates of students with disabilities to schools that received higher performance labels. However, *Distinguished* schools tended to have a slightly lower proportion of students with disabilities (14 percent)—about two percentage points less, on average, than schools with other labels (16 percent). However, while the correlation between percentage of students with disabilities and summative scores was weak (-0.13), when controlling for other student demographic factors and school characteristics, the percentage of students with disabilities had a modest, statistically significant relationship with summative scores (Appendix G).

Schools with teacher workforce challenges tend to receive lower ratings

Schools that received lower performance labels were more likely to have an understaffed and less qualified teacher workforce (Table F-3). Schools' percentage of provisionally licensed teachers, out-of-field teachers, and teacher vacancies had modest negative correlations with summative scores across all school levels (-0.25, -0.25, and -0.28, respectively), however, these correlations were strongest for middle schools (Appendix G).

While teacher workforce challenges are associated with other school characteristics like student demographics and geography, analysis indicates that schools' teacher vacancy rate had a statistically significant relationship with accountability scores when controlling for student demographics and other school characteristics. Schools' percentage of provisionally licensed teachers and percentage of out-of-field teachers were not statistically significant (Appendix G).

TABLE F-3
Schools facing greater teacher workforce challenges tend to perform worse under the SPSF (2024–25)

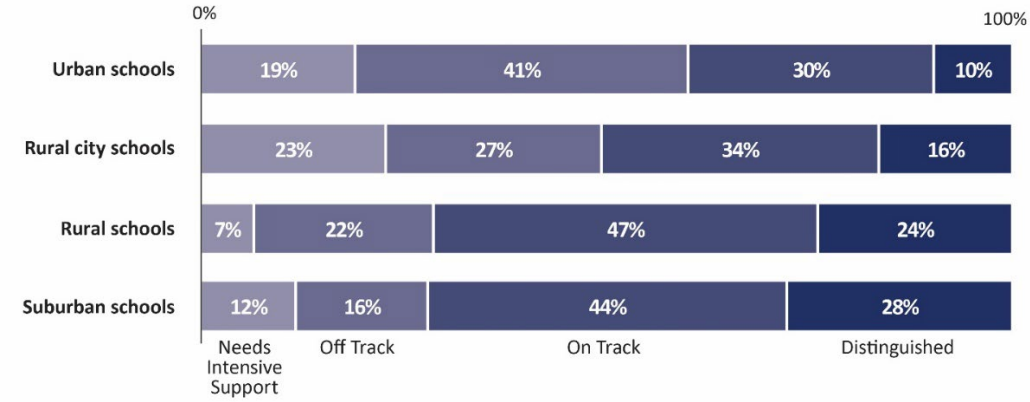
School rating	Avg. % provisionally licensed teachers	Avg. % out-of-field teachers	Avg. % unfilled teacher FTEs
Distinguished	7%	6%	2%
On Track	9%	7%	3%
Off Track	11%	10%	5%
Needs Intensive Support	11%	10%	6%

SOURCE: 2024–25 VDOE School Performance and Support Framework data, 2024–25 School Quality Profiles Data, and 2024–25 Positions and Exits data

Schools' ratings vary by geography

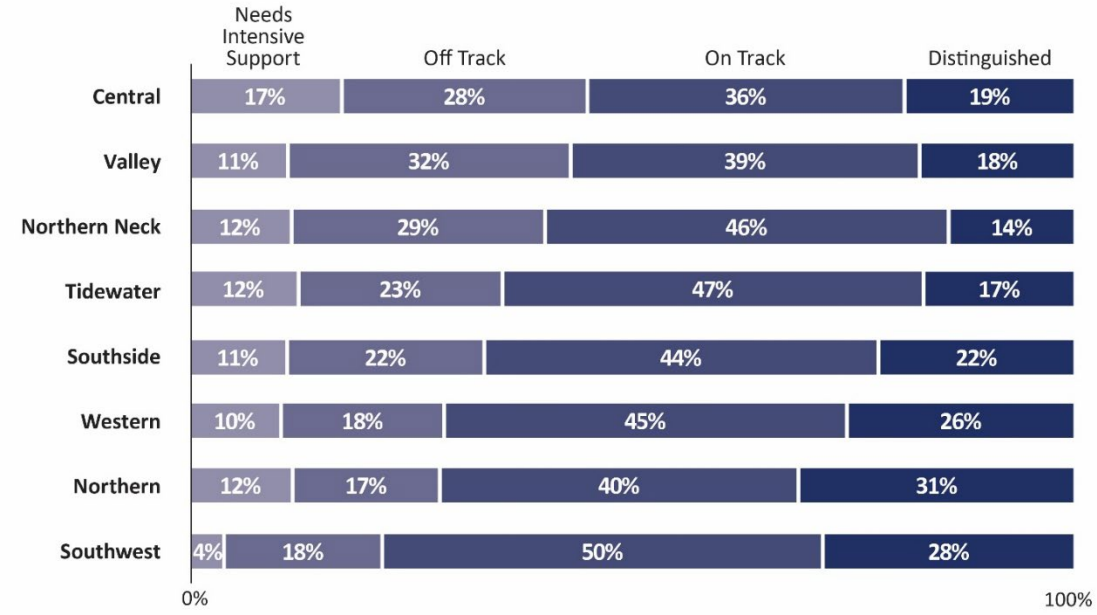
The SPSF's results also varied by schools' geographic characteristics (Figures F-1 and F-2). Much of the geographic differences in scores likely reflect patterns in student demographics and teacher workforce challenges across geographic designations and regions. However, some regional variation in summative scores was statistically significant even after accounting for these other factors (Appendix G).

FIGURE F-1
Higher proportions of urban and rural city schools receive lower ratings (2024–25)



SOURCE: 2024–25 VDOE School Performance and Support Framework data.
NOTE: Geographic designations calculated by JLARC staff using locality population density and city/county designation.

FIGURE F-2
Higher proportions of Central, Valley, and Northern Neck schools receive lower ratings (2024–25)



SOURCE: 2024–25 VDOE School Performance and Support Framework data.
NOTE: Regions correspond to VDOE Superintendent's Regions.

There are no notable differences in ratings based on school spending

There is not a meaningful relationship between school ratings and per-pupil spending. While *Needs Intensive Support* schools spend slightly more per-pupil on average than other schools (Table F-4), the difference is small, and the correlation between schools' summative scores and total per-pupil spending was weak (-0.13) (Appendix G).

TABLE F-4

No meaningful relationship between SPSF ratings and per-pupil spending (2024–25)

School rating	Average 2023–24 total per-pupil expenditures
Distinguished	$16,614
On Track	$16,245
Off Track	$16,958
Needs Intensive Support	$17,648

SOURCE: 2024–25 VDOE School Performance and Support Framework data and 2023–24 School Quality Profiles finance data.
NOTE: Total per-pupil expenditures include federal, state, and local expenditures. 2024–25 per-pupil expenditure data was not available as of early December 2025.

Appendix G: Additional analysis of SPSF data

This appendix provides information about additional analyses of School Performance & Support Framework (SPSF) data.

School characteristics and SPSF results

These analyses assess the relationship between SPSF results and school characteristics, both to evaluate the strength of the relationship between results and various characteristics and to compare their relative importance.

Several data sources from the Virginia Department of Education (VDOE) were used for this analysis, including aggregate and school-level indicator data for the SPSF; Fall Membership data on student enrollment and demographics; Positions and Exits data on teacher vacancies; and School Quality Profiles data on provisionally licensed teachers, out-of-field teachers, and per-pupil spending. Regions correspond to VDOE's superintendent regions, and geographic designations were assigned by JLARC staff using locality population density and city/county designations.

Student demographic characteristics considered in this analysis include:

- Major racial and ethnic groups: Asian, Black, Hispanic, and white students and students of multiple races;
- Economically disadvantaged students;
- English learners; and
- Students with disabilities

Table G-1 displays the percentage of students statewide represented by each category of student demographics.

TABLE G-1
Percentage of students statewide in each demographic group (2024–25)

Student group	% of all students statewide
Economically disadvantaged	43
English learner	12
Students with disabilities	15
Asian	8
Black	21
Hispanic	20
White	43
Students of multiple races	7

SOURCE: 2024–25 Virginia Department of Education Fall Membership data
NOTE: Does not sum to 100 percent because a single student can be included in more than one subgroup (economically disadvantaged, English learner, and/or student with disabilities), although students can only be categorized in a single racial or ethnic category.

School characteristics and summative scores

Table G-2 displays correlation coefficients between all schools' summative scores and student demographic characteristics, teacher workforce, school spending, and school enrollment. It also contains the correlations between summative scores and these student and school characteristics for elementary, middle, and high schools.

TABLE G-2
Correlations between summative scores and school characteristics (2024–25)

	Correlation with summative score			
	All schools	ES	MS	HS
% economically disadvantaged students	-0.55	-0.69	-0.61	-0.37
% English learner students	-0.35	-0.28	-0.31	-0.64
% students with disabilities	-0.13	-0.07	-0.12	-0.03
% Asian students	+0.25	+0.36	+0.38	+0.04
% Black students	-0.39	-0.47	-0.48	-0.31
% Hispanic students	-0.34	-0.31	-0.31	-0.61
% white students	+0.43	+0.42	+0.42	+0.62
% students of multiple races	+0.06	+0.19	+0.21	+0.05
% provisionally licensed teachers	-0.25	-0.30	-0.49	-0.26
% out-of-field teachers	-0.24	-0.35	-0.42	-0.14
% teacher vacancies	-0.28	-0.32	-0.35	-0.20
Per-pupil spending (2023–24)	-0.13	-0.03	+0.01	-0.34
Enrollment	+0.20	+0.07	+0.09	-0.17

SOURCE: 2024–25 Virginia Department of Education School Performance & Support Framework data, 2024–25 Virginia Department of Education Fall Membership data, 2024–25 Positions and Exits data, and 2023–24 and 2024–25 School Quality Profiles Data.
NOTE: Per-pupil spending includes federal, state, and local expenditures. 2024–25 per-pupil expenditure data was not available as of early December 2025.

JLARC performed two dominance analyses to assess the relative importance of various student and school characteristics in explaining variability in schools' summative scores. This methodology fits a series of regression models with all possible combinations of independent variables, comparing each model's fit statistic (R^2) to assess each variable's contribution. Analysis can be performed on individual variables or groups of variables.

Table G-3 displays the results of the first dominance analysis, which grouped student and school characteristics together. Dominance statistics for each group of variables represent the amount of variation in summative scores that is explained by that group of variables, on average. Across all groups, the dominance statistics sum to the model's R^2. Standardized dominance statistics sum to 1, with each standardized dominance statistic representing that group's proportion of explained variance relative to all variables examined.

TABLE G-3
Dominance analysis for summative scores – grouped variables (2024–25)

Variable	Ranking	Dominance statistic	Standardized dominance statistic
Student demographics	1	0.32	0.53
School attributes	2	0.17	0.28
Geography	3	0.06	0.10
Teacher workforce	4	0.05	0.09

SOURCE: 2024–25 Virginia Department of Education School Performance & Support Framework data, 2024–25 Virginia Department of Education Fall Membership data, 2024–25 Positions and Exits data, and 2023–24 and 2024–25 School Quality Profiles Data.
NOTE: Student demographic variables include percentage of economically disadvantaged students; students with disabilities; students who are English learners; and Asian, Black, Hispanic students, and white students. School attribute variables include school level (elementary, middle, high school), 2023–24 per-pupil spending, and student enrollment. Teacher workforce variables include percentage of provisionally licensed teachers, out-of-field teachers, and vacant teacher FTE positions. Geography includes Virginia Department of Education superintendent's regions and whether a school is urban, suburban, rural, or in a rural city as assigned by JLARC staff using locality population density and city/county designation. Per-pupil spending includes federal, state, and local expenditures. 2024–25 per-pupil expenditure data was not available as of early December 2025.

Table G-4 displays the results of an additional dominance analysis where all variables making up the groups in the first analysis are considered *individually*. Only the 15 variables with the highest dominance statistics (i.e., explain the greatest share of variation in summative scores) are listed.

TABLE G-4
Dominance analysis for summative scores – individual variables (2024–25)

Variable	Ranking	Dominance statistic	Standardized dominance statistic
% economically disadvantaged	1	0.10	0.17
Level – high school	2	0.09	0.15
% white students	3	0.05	0.09
% Black students	4	0.04	0.08
% English learners	5	0.04	0.07
% Hispanic students	6	0.04	0.07
Level – elementary school	7	0.03	0.06
% Asian students	8	0.03	0.05
Level – middle school	9	0.02	0.04
Enrollment	10	0.02	0.03
% teacher vacancies	11	0.02	0.03
% out-of-field teachers	12	0.01	0.02
Region – Northern	13	0.01	0.02
% provisionally licensed teachers	14	0.01	0.02
% students with disabilities	15	0.01	0.02

SOURCE: 2024–25 Virginia Department of Education School Performance & Support Framework data, 2024–25 Virginia Department of Education Fall Membership data, 2024–25 Positions and Exits data, and 2023–24 and 2024–25 School Quality Profiles Data
NOTE: Regions correspond to Virginia Department of Education superintendent's regions. Geographic designations assigned by JLARC staff using locality population density and city/county designation. 2024–25 per-pupil expenditure data was not available as of early December 2025. Not all variables included in analysis are shown in table.

Table G-5 displays the results of an ordinary least squares regression, where schools' summative scores served as the dependent variable. Figure G-1 displays predicted summative scores from that regression

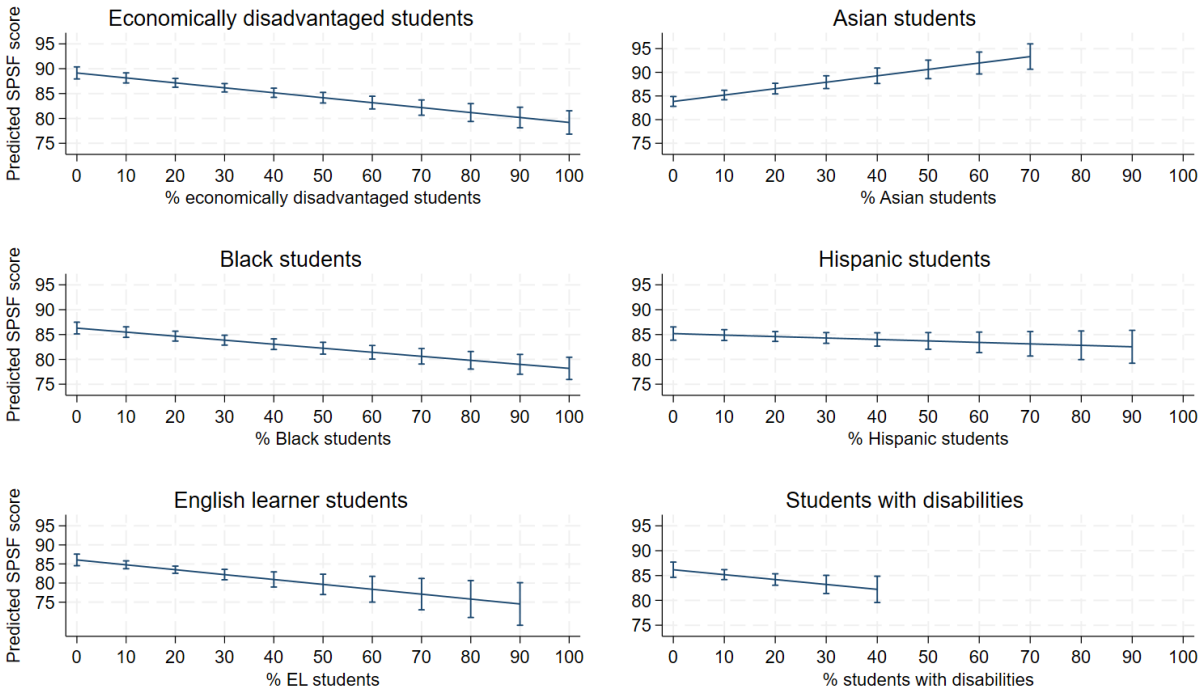
at different percentages of students who are economically disadvantaged, Asian, Black, Hispanic, English learners, and students with disabilities. Predicted scores are calculated at 10 percentage point intervals for each demographic variable, with confidence intervals shown as vertical bars. All other continuous variables are held constant at their means, and categorical variables are held constant at the most common value. The range of values used for each student demographic variable is selected based on its minimum and maximum percentages across all schools analyzed.

TABLE G-5
Linear regression for SPSF summative score (2024–25)

Variable	Coefficient	Standard error	t	P>|t|	LB	UB
% economically disadvantaged students	-0.10	0.02	-6.38	<0.001	-0.13	-0.07
% English learner students	-0.13	0.04	-3.36	0.001	-0.20	-0.05
% students with disabilities	-0.10	0.05	-2.13	0.03	-0.19	-0.01
% Asian students	0.14	0.02	6.72	<0.001	0.10	0.18
% Black students	-0.08	0.01	-5.97	<0.001	-0.11	-0.05
% Hispanic students	-0.03	0.02	-1.28	0.20	-0.07	0.02
% students of multiple races and other students	-0.01	0.05	-0.17	0.86	-0.10	0.09
Enrollment divided by 100	-0.27	0.06	-4.62	<0.001	-0.39	-0.16
Per-pupil spending (2023–24) divided by 1,000	-0.08	0.10	-0.79	0.43	-0.28	0.12
% provisionally licensed teachers	-0.05	0.03	-1.79	0.07	-0.10	0.00
% out-of-field teachers	-0.02	0.02	-0.98	0.33	-0.06	0.02
% teacher vacancies	-0.07	0.03	-2.76	0.01	-0.12	-0.02
Suburban	0.51	0.48	1.06	0.29	-0.43	1.44
Rural	0.05	0.61	0.09	0.93	-1.14	1.25
Rural city	-0.34	0.83	-0.41	0.68	-1.97	1.30
Region – Northern	2.48	0.69	3.61	<0.001	1.13	3.83
Region – Northern Neck	1.03	0.63	1.62	0.10	-0.21	2.27
Region – Southside	3.19	0.90	3.52	<0.001	1.41	4.96
Region – Southwest	1.88	0.84	2.23	0.03	0.23	3.53
Region – Tidewater	2.24	0.48	4.71	<0.001	1.31	3.17
Region – Valley	-1.10	0.64	-1.72	0.09	-2.35	0.15
Region – Western	1.40	0.62	2.25	0.03	0.18	2.62
Level – elementary school	-9.80	0.90	-10.86	<0.001	-11.57	-8.03
Level – middle school	-9.98	0.68	-14.60	<0.001	-11.32	-8.64
Level – combined levels	-6.07	1.04	-5.82	<0.001	-8.12	-4.03

SOURCE: 2024–25 Virginia Department of Education School Performance & Support Framework data, 2024–25 Virginia Department of Education Fall Membership data, 2024–25 Positions and Exits data, and 2023–24 and 2024–25 School Quality Profiles Data
NOTE: R^2 = 0.591. n=1,726. Robust standard errors used. Percentage white students, urban, central region, and high school are excluded as reference categories. Students of multiple races and other students includes Native Hawaiian or Pacific Islander students, American Indian or Alaska Native students, and students of two or more races. Per-pupil spending includes federal, state, and local expenditures. 2024–25 per-pupil expenditure data was not available as of early December 2025. Regions correspond to Virginia Department of Education superintendent's regions. Geographic designations assigned by JLARC staff using locality population density and city/county designation.

FIGURE G-1
Predicted summative scores by schools' student demographic makeup (2024–25)



SOURCE: 2024–25 Virginia Department of Education School Performance & Support Framework data, 2024–25 Virginia Department of Education Fall Membership data, 2024–25 Positions and Exits data, and 2023–24 and 2024–25 School Quality Profiles Data
NOTE: Predicted scores are calculated from the regression in Table G-5, with continuous variables set at their means and categorical variables set at the most frequent value. The range of values predicted for each demographic variable is based on the minimum and maximum value for schools included in the analysis. Maximums are rounded up to the nearest 10 percent.

Student economic disadvantage and indicator scores

Table G-6 displays correlation coefficients between schools' percentage of economically disadvantaged students and the unweighted scores on every indicator in the SPSF.

TABLE G-6
Correlations between indicator scores and percent economically disadvantaged students (2024–25)

Indicator	Correlation with % economically disadvantaged students
Reading proficiency	-0.68
Math proficiency	-0.66
Science proficiency	-0.63
Reading growth	-0.18
Math growth	-0.22
ELP progress	-0.27
Chronic absenteeism	-0.38
Middle school advanced coursework	-0.30
4-year graduation rate	-0.43
6-year graduation rate	-0.39
3Es readiness	-0.21

SOURCE: 2024–25 Virginia Department of Education School Performance & Support Framework data, 2024–25 Virginia Department of Education Fall Membership data.
NOTE: ELP progress is measured for English learners only, who have higher rates of economic disadvantage (about 64 percent of English learners in 2023–24). It is likely there is a stronger relationship between ELP progress indicator scores and economic disadvantage than implied by the correlation with the *schoolwide* percentage of economically disadvantaged students.

Student demographics and prior accountability system results

Table G-7 displays the average percentage of students who are economically disadvantaged, Asian, Black, Hispanic, white, English learners, and students with disabilities for schools rated *Accredited* and *Accredited with Conditions* by Virginia's prior accountability system after the 2023–24 school year.

TABLE G-7
Student demographics by performance rating under prior accountability system (2023–24)

	% disadvantaged	% Asian	% Black	% Hispanic	% white	% ELs	% SWDs
Accredited	44	6	18	17	51	11	15
Accredited with Conditions	63	2	43	17	32	9	15

SOURCE: VDOE school accreditation results based on 2023–24 performance, 2023–24 VDOE fall membership data
NOTE: ELs = English learners. SWDs = Students with disabilities.

Modeled change to the SPSF's proficiency and growth weighting

JLARC modeled two examples of changes to the SPSF's proficiency and growth weighting to estimate the impact on (i) the correlation between schools' percentage of economically disadvantaged students and summative scores and (ii) schools' performance relative to each other. Analysis was performed for elementary and middle schools using 2023–24 school year data, where growth indicator scores were produced using the VVAAS value-added model.

Equally weighting proficiency and growth reduced the correlation between the percentage of students who are economically disadvantaged and summative scores from -0.68 to -0.60 for elementary and middle schools. Reversing the weighting of proficiency and growth—where growth was given the

weight assigned to proficiency by the SPSF and proficiency was given the weight assigned to growth—reduced the correlation from -0.68 to -0.50.

Equally weighting proficiency and growth resulted in a modest shift of schools' performance relative to one another. About 10 percent (34 out of 345) of the schools scoring in the bottom quartile of summative scores changed. Under the reversed weighting scenario, 18 percent (63 of 345) of schools in the bottom quartile of summative scores changed.

ELP progress hypothetical indexes

Using 2023–24 school year data, JLARC modeled two examples of how an ELP progress index could be scored based on the composite proficiency level gains that are currently required for students to earn credit on the ELP indicator (Table G-8) (Chapter 7).

TABLE G-8
Current WIDA proficiency level increase required to earn credit for ELP progress

Prior year score	**Current K-2**	**Grades 3-5**	**Grades 6-12**
1.0-2.4	1.0	0.7	0.4
2.5-3.4	0.4	0.4	0.2
3.5-4.4	0.2	0.2	0.1

SOURCE: School Performance & Support Framework (SPSF) handbook provided by the Virginia Department of Education.
NOTE: Under the current SPSF, students receive 1 point if they meet their progress threshold and 0 points otherwise. WIDA = the WIDA ACCESS assessment, Virginia's English language proficiency assessment.

The first modeled hypothetical index awarded half credit for students achieving half of the progress currently required and 1.25 points for achieving 1.5 times the progress currently required (Table G-9). The second hypothetical index also awarded points for progress that is half or 1.5 times the progress currently required, but the scoring was designed to mirror the scoring of the four-category mastery index where students receive 0.25, 0.75, 1, or 1.25 points (Table G-10). However, because some students make no progress or score lower than the previous year on the WIDA, an additional zero-point category was included.

TABLE G-9
ELP progress hypothetical index 1

Increase in score required for grades K–12				
Prior year score	**0 pts**	**0.5 pts**	**1 pt**	**1.25 pts**
1.0-2.4	Less than 0.5	0.5	1.0	1.5
2.5-3.4	Less than 0.2	0.2	0.4	0.6
3.5-4.4	Less than 0.1	0.1	0.2	0.3
Increase in score required for grades 3–5				
Prior year score	**0 pts**	**0.5 pts**	**1 pt**	**1.25 pts**
1.0-2.4	Less than 0.4	0.4	0.7	1.1
2.5-3.4	Less than 0.2	0.2	0.4	0.6
3.5-4.4	Less than 0.1	0.1	0.2	0.3
Increase in score required for grades 6–12				
Prior year score	**0 pts**	**0.5 pts**	**1 pt**	**1.25 pts**
1.0-2.4	Less than 0.2	0.2	0.4	0.6
2.5-3.4	Less than 0.1	0.1	0.2	0.3
3.5-4.4	Less than 0.1	n/a	0.1	0.2

SOURCE: JLARC staff.
NOTE: If 0.5 or 1.5 times the current required progress results in two decimal places, that value was rounded up. If the existing required increase is 0.1, no partial credit is given.

TABLE G-10
ELP progress hypothetical index 2

Increase in score required for grades K-2					
Prior year score	**0 pts**	**0.25 pts**	**0.75 pt**	**1 pt**	**1.25 pts**
1.0-2.4	0 or negative	0.1	0.5	1.0	1.5
2.5-3.4	0 or negative	0.1	0.2	0.4	0.6
3.5-4.4	0 or negative	n/a	0.1	0.2	0.3
Increase in score required for grades 3-5					
Prior year score	**0 pts**	**0.25 pts**	**0.75 pt**	**1 pt**	**1.25 pts**
1.0-2.4	0 or negative	0.1	0.4	0.7	1.1
2.5-3.4	0 or negative	0.1	0.2	0.4	0.6
3.5-4.4	0 or negative	n/a	0.1	0.2	0.3
Increase in score required for grades 6-12					
Prior year score	**0 pts**	**0.25 pts**	**0.75 pt**	**1 pt**	**1.25 pts**
1.0-2.4	0 or negative	0.1	0.2	0.4	0.6
2.5-3.4	0 or negative	n/a	0.1	0.2	0.3
3.5-4.4	0 or negative	n/a	n/a	0.1	0.2

SOURCE: JLARC staff.
NOTE: If 0.5 or 1.5 times the current required progress results in two decimal places, that value was rounded up. If the existing required increase is 0.1, no partial credit is given.

Compared to the SPSF's current approach to scoring the ELP indicator, schools' ELP indicator scores increase by an average of approximately 16 points using the first hypothetical index and 21 points using the second hypothetical index. Table G-11 compares the distribution of students in each point

category under the current indicator scoring, the first hypothetical index, and the second hypothetical index.

TABLE G-11
Distribution of students under different ELP scoring scenarios (2023–24)

	0 pts	0.25 pts	0.5 pts	0.75 pts	1 pt	1.25 pts
SPSF scoring	47%	-	-	-	53%	-
Hypothetical index 1	35%	-	13%	-	13%	40%
Hypothetical index 2	29%	6%	-	13%	13%	40%

SOURCE: JLARC analysis of 2023–24 Virginia Department of Education School Performance & Support Framework data.

Appendix H: Reporting accountability results

The federal Every Student Succeeds Act (ESSA) requires states to report each school's performance on the state accountability system annually via "school report cards." These report cards must include performance data for all students as well as disaggregated data by student subgroup. Additionally, states must indicate which schools have been identified for support and improvement—specifically, those federally designated as Targeted Support and Improvement (TSI), Additional Targeted Support and Improvement (ATSI), or Comprehensive Support and Improvement (CSI).

Clearly reporting results on school report cards is a critical aspect of accountability

Subject-matter experts emphasize that reporting is a central part of school accountability, particularly in conveying the state's message about school performance. They also note that states can include *additional* metrics and information on school report cards beyond ESSA requirements, which can provide context and help mitigate some limitations of accountability systems, such as overall ratings being an oversimplification of school performance (Chapter 4) or being overly reflective of school demographics (Chapter 3).

Subject-matter experts recommend presenting information on school report cards in a clear, user-friendly format. This includes using plain language; explanatory text; visual elements, such as colors, icons, and arrows; and interactive features that allow users to explore more detailed data as needed. If a state assigns schools an overall rating, subject-matter experts also recommend reporting a school's performance on each individual accountability indicator, ideally with the same format used for the overall rating. In addition, subject-matter experts recommend states clearly identify schools designated as TSI, ATSI, or CSI, as well as specific improvement actions the school needs to take.

In interviews, stakeholders also emphasized the importance of including additional contextual information on school report cards. This includes data on student demographics, inputs (such as per-pupil spending and teacher licensure rates), comparisons to division and state averages, comparisons to similar schools, and multi-year trendlines. These elements can help parents, educators, and other stakeholders better understand school performance and the broader factors that affect student outcomes.

Several other states offer strong examples of these recommended practices, incorporating features such as trendlines, consistent rating scales, and accessible visuals to make school performance data more understandable. Figure H-1 shows examples of aspects of other states' report cards that reflect these best practices.

VDOE is updating the state's school report cards—the Virginia School Quality Profiles—but it is unclear if they will be an improvement

The Virginia Department of Education (VDOE) publishes the Virginia School Quality Profiles (SQPs), which serve as the state's school report cards. The SQPs provide information about student achievement; college, career, and military readiness; enrollment; finance; school climate; teacher quality; accreditation; and accountability results to the public. VDOE publishes an SQP for each school, division, and the state overall.

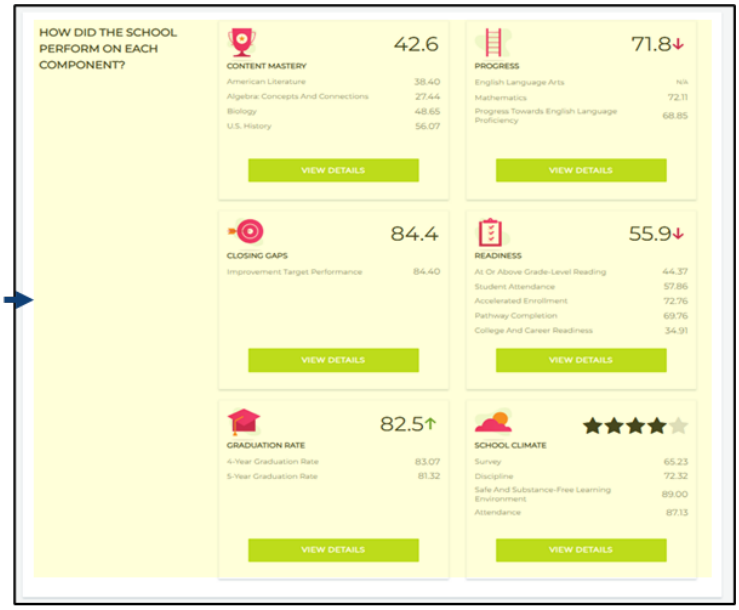
Historically, the SQPs were not as user friendly as some other states' school report cards. For example, a September 2024 report from the Center on Reinventing Public Education rated Virginia's SQPs as a "C" overall (on an A–F scale) and "Fair" (out of Great, Good, Fair, and Poor) in terms of usability.

VDOE is currently updating the SQPs to align with the state's new accountability system, the School Performance & Support Framework. According to VDOE staff, the agency is developing the new SQPs during the 2025–26 school year. An evaluation of the new SQP's effectiveness cannot be completed until they are fully implemented. It is therefore unclear whether the revised SQPs will be an improvement over the previous version or reflect best practices for reporting accountability results and clearly communicating school performance to the public.

FIGURE H-1
Examples of other states' school report cards reflecting best practices

Excerpts from Georgia's College and Career Ready Performance Index Reports

Comprehensive overview. Overview shows school's performance on each individual indicator.

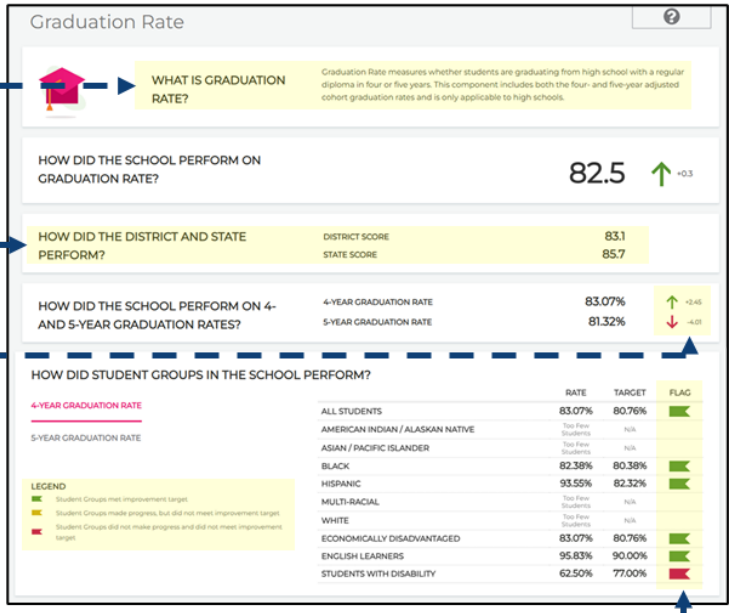


For each indicator:

Plain-language descriptions. Indicators are explained in clear, accessible terms.

Meaningful comparisons. School's results are shown alongside district and state averages.

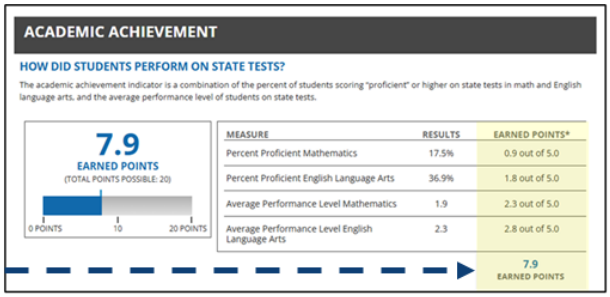
Visual cues. Colors and arrows show whether performance is improving or declining. Colors and icons show if student group met target.

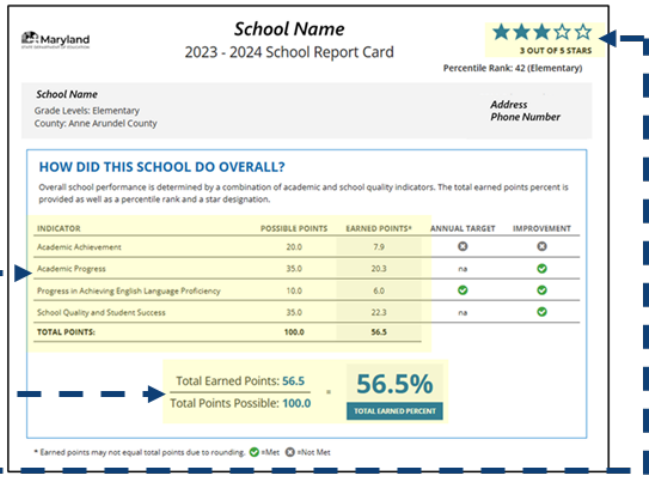


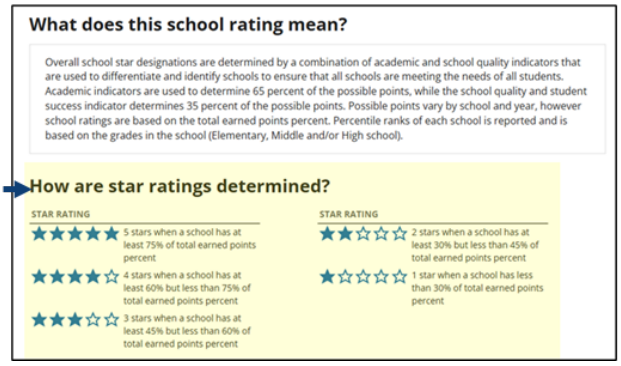
Excerpts from 2025 Maryland School Report Card

Transparent scoring with clear explanations. Report card clearly shows how each school's overall rating is derived by:

(i) calculating points for each indicator,
(ii) summing points earned across all four indicators,
(iii) expressing result as percentage,
(iv) converting percentage to star rating, and
(v) displaying star rating.

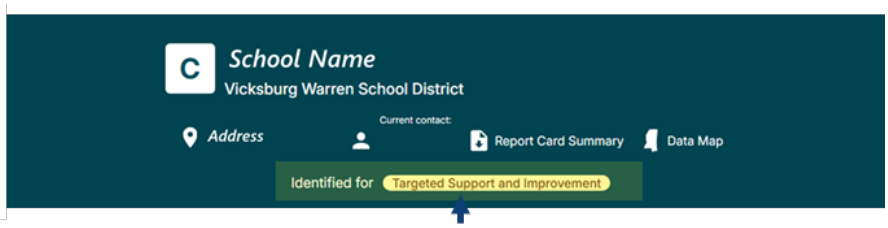






Excerpt from Mississippi Succeeds Report Card

Federal designation. Report card clearly labels if school is federally designated as TSI, ATSI, or CSI in addition to overall rating (i.e., letter grade).



Excerpts from Ohio School Report Cards

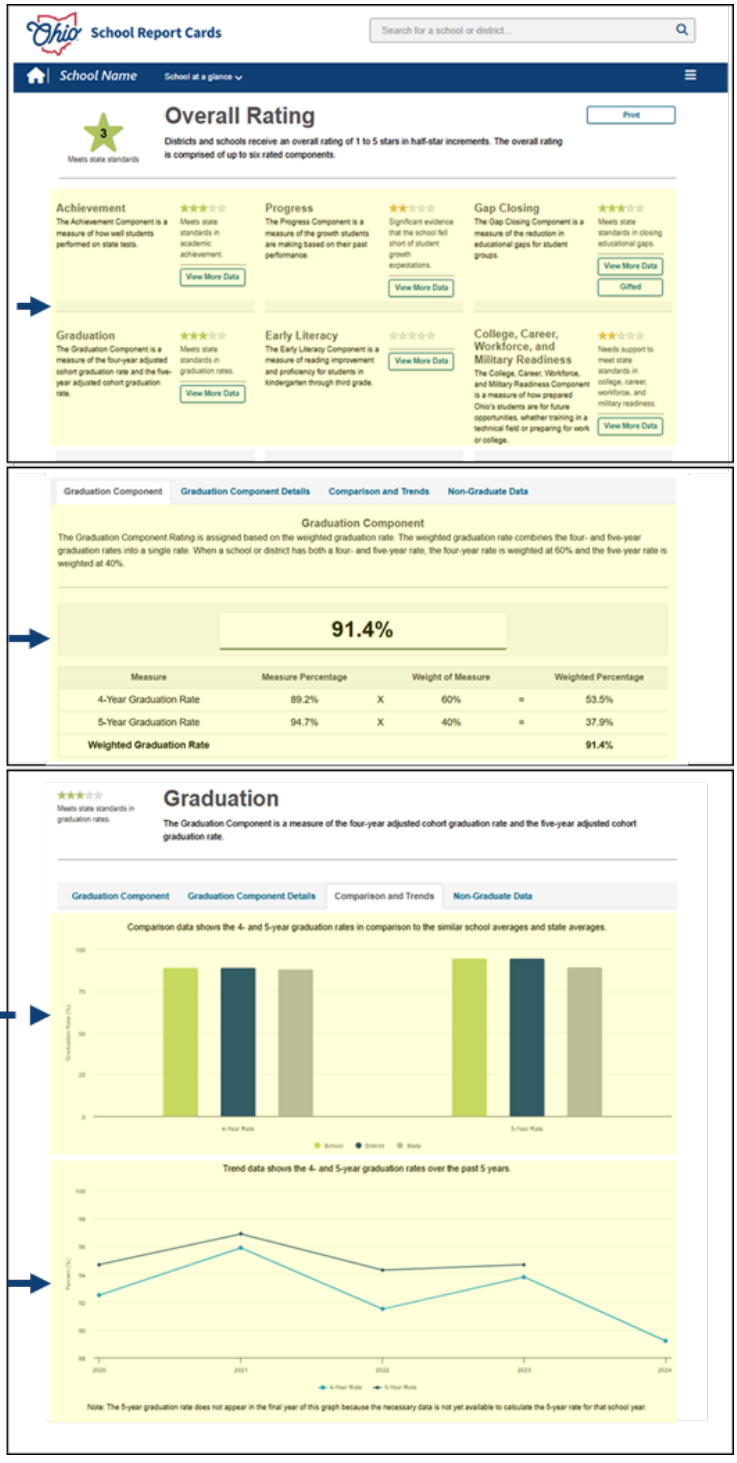
Comprehensive overview. Overview shows school's performance on each individual indicator.

For each indicator:

Transparent scoring with clear explanation. Report card clearly shows how each school's results are calculated.

Meaningful comparisons. School's results are shown alongside district and state averages.

Trendlines. Report card displays five year's worth of data.



SOURCE: JLARC staff excerpts from Georgia, Maryland, Mississippi, and Ohio school report card websites.

Appendix I: Student growth models

This appendix provides information about student growth models that are commonly used by other states and generally recommended by subject-matter experts. This information is intended to be a reference about the advantages and tradeoffs of these different approaches to measuring growth, especially if the Virginia Board of Education (VBOE) selects a new growth model for the 2025–26 school year.

Experts generally recommend three approaches to measuring growth, each of which is appropriate for the board to consider. These approaches include value tables, value-added models, and student growth percentiles. Experts do not have a consensus on the best approach. Each approach offers different advantages and limitations (Table I-1), although design choices can affect the quality of each measure. According to subject-matter experts and research literature, well-designed growth indicators should measure individual students' progress rather than comparing cohorts. They should be statistically reliable and valid, understandable to stakeholders, produce results that are comparable across schools and over time, and provide actionable insights to educators to drive improvement.

Value tables (also called progress tables) place students in performance categories based on their grade and assessment score. Students demonstrate growth by scoring in a higher category than the previous year or maintaining high performance. Value tables are tied to grade-level standards and provide easy to understand growth targets for each student. However, they incentivize focus on students closest to performance category thresholds and reward smaller gains that cross a threshold more than larger in-band growth. They are also more susceptible to measurement error by directly categorizing test scores into discrete performance levels. Virginia's prior accountability system used value tables for measuring student growth as part of its combined achievement indicators.

Value-added models use statistical modeling to more precisely estimate a school's impact on student learning and can incorporate data about students' prior academic achievement, student demographics, and/or school characteristics. However, their complex methodology is difficult for stakeholders to understand. Because growth is compared to peers rather than objective standards, not all students can demonstrate growth (i.e., only those that perform better than their peers), and targets for each student are less clear. The School Performance & Support Framework based its growth indicators on a value-added model for the first year of the framework's implementation. See Chapter 5 for discussion of that model's design and use in the accountability system.

Student growth percentiles (SGPs) use statistical modeling to measure how much a student has grown compared to academically similar peers, assigning each student a percentile rank. While both SGPs and value-added models have complex methodologies, SGPs' results are generally easier for stakeholders to understand. However, like value-added models, growth is not measured against objective standards, so not all students can demonstrate growth, and growth targets are less clear. In addition, acceleration beyond grade level, which is common in Virginia for math, can cause challenges for creating fair peer group comparisons.

Some states use hybrid models or create unique growth measures based on state priorities (e.g., South Carolina). Doing so effectively requires careful design, stakeholder engagement, and rigorous testing and validation.

TABLE I-1
Each approach to measuring growth has advantages and tradeoffs

	Value table	Value-added model	SGPs
Measures growth for individual students rather than cohorts	X	X	X
Compares growth to grade-level standards	X		
Compares growth to peers		X	X
Uses multiple prior test scores to contextualize growth		X	X
Controls for student demographics		X	
Accounts for measurement error		X	X
Provides clear growth targets for each student	X		
All students can show growth	X		
Methodology is easy to understand	X		
Results are easy to understand	X		X
Results tend to be less correlated with proficiency		X	X

SOURCE: JLARC summary of growth measures.
NOTE: Table characterizes the typical design of value tables, value-added models, and SGPs in the context of school accountability systems. It is possible to construct these measures differently (e.g., value-added models and SGPs can be designed to compare growth to grade-level standards).

The board will likely be selecting and implementing a new approach for student growth for the 2025–26 school year, which is already underway. If a new approach is used, the board should prioritize selecting the new measure and finalizing indicator design as soon as possible so schools can understand the new approach and prepare accordingly. Any changes to the growth indicators will not affect any other indicators and do not need to be sequenced after any other changes.

If VBOE chooses a new growth approach, selection should be guided by the board's overall philosophy regarding growth, the state's available data, and stakeholder input. Because of the technical nature of the different approaches to student growth, this process should be undertaken in consultation with experts in school accountability and student growth models. VBOE would need to ensure that any new growth measure is designed according to the best practices for that approach.

Appendix J: 3Es indicator achievements and scoring

The 3Es indicator measures high school students' readiness for three different post-secondary pathways: college (enrollment), career (employment), and the military (enlistment).

The college pathway is measured through students' completion of college prep courses and/or college credit courses. The career pathway is measured by students' completion of career and technical education (CTE) tracks and/or work-based learning experiences. The military pathway is measured by students' achievement of certain scores on the Armed Services Vocational Aptitude Battery.

Schools receive points for each student that meets certain achievement levels across each pathway (Table J-1). A school can receive points across multiple categories for the same student if that student meets achievement thresholds in multiple categories.

TABLE J-1
3Es indicator scoring (2024–25 school year)

	0.5 points	0.75 points	1 point	1.25 points
Enrollment	Passing 1 dual credit course (3 credits) with a "C" grade or better **-or-** Completing an AP, IB, Cambridge A/AS, or CLEP exam	Passing 1 to 2 dual credit courses (3 credits) with a "B" grade or better **-or-** Earning 1 or 2 credit-bearing / college-ready scores on an AP, IB, Cambridge A/AS, or CLEP exam	Passing 3+ dual credit courses (3 credits) with a "B" grade or better **-or-** Earning 3+ credit-bearing / college-ready scores on an AP, IB, Cambridge A/AS, or CLEP exam **-or-** Earning an Early College Scholar certificate	Earning an associate degree
Employment	CTE completer who completed a high-quality work-based learning experience	CTE completer who earned a state-approved industry recognized credential	CTE completer who earned a state-approved industry recognized credential: in a high-demand field **-or-** and completed a high-quality work-based learning experience	CTE completer who earned a state approved industry recognized credential in a high-demand field and completed a high-quality work-based learning experience
Enlistment	ASVAB score of 31 to 49	ASVAB score of 50 to 64	ASVAB score of 65 or higher	N/A

SOURCE: Virginia Department of Education.
NOTE: AP = Advanced Placement. IB = International Baccalaureate. CLEP = College Level Examination Program. A CTE completer is a student who has met the requirements for a CTE concentration (sequence) and all requirements for high school graduation, or an approved alternative education program. "Work-based learning experience" and "state approved industry recognized credential" are defined by the Virginia Board of Education. "High-demand field" is defined by the Virginia Office of Education Economics ASVAB = Armed Services Vocational Aptitude Battery. A score of 31 is the minimum military entrance score.

The Virginia Board of Education is considering making changes to the scoring for the enlistment pathway as part of an ongoing amendment to the state ESSA plan. Table J-2 includes proposed achievement and scoring levels, which were presented to the board at the November 2025 meeting. These changes have not been finalized or approved at the time of publication of this report.

TABLE J-2
Proposed enlistment scoring as part of amendment to the state ESSA plan

	0.25 points	0.5 points	0.75 points	1 point	1.25 points
Enlistment	A qualifying ASVAB score (31 or higher)	ASVAB score of 31 to 49 *and* completing a JROTC course with a minimum of a "B" grade	ASVAB score of 50 to 64 *and* completing a JROTC course with a minimum of a "B" grade	ASVAB score of 65 or higher *and* completing a JROTC course with a minimum of a "B" grade	A qualifying ASVAB score (31 or higher) *and* having signed up to serve in the Virginia National Guard, U.S. military, or to attend a military service academy

SOURCE: Virginia Department of Education.
NOTE: JROTC = Junior Reserve Officer Training Corps. ASVAB = Armed Services Vocational Aptitude Battery. A score of 31 is the minimum military entrance score.

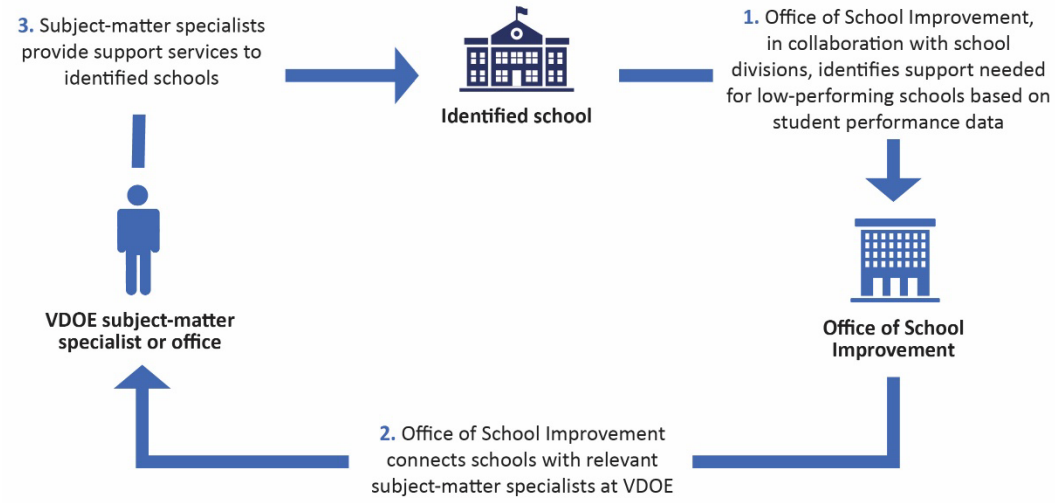
Appendix K: VDOE's school improvement program

This appendix provides information about the Virginia Department of Education (VDOE)'s new school improvement program (as of early December 2025).

VDOE intends to rely more on VDOE subject-matter specialists to provide school improvement services

VDOE intends to decentralize school support, moving away from Office of School Improvement (OSI) staff as the primary providers and toward a model using staff from various VDOE offices. (VDOE's Office of School Improvement was formerly called the Office of School Quality [OSQ].) This approach would allow VDOE staff who specialize in academic and other school performance areas to provide support directly to schools (Figure K-1). The agency's plan is for OSI staff to coordinate with existing and/or newly hired subject-matter specialists across VDOE to ensure schools receive assistance aligned with their specific needs. For example, the department expects that OSI staff will connect schools identified as low performing because of poor math performance with the math instructional team in VDOE's Office of Instruction.

FIGURE K-1
OSI staff will coordinate support services with subject-matter specialists at VDOE



SOURCE: Virginia Board of Education meeting materials and interviews with VDOE staff.

In addition, VDOE has established an Office of Excellence and Best Practices, which VDOE staff say will identify and publish best practices from schools labeled as *Distinguished* that schools, including lower-performing schools, can use. VDOE has also expanded or created other offices and divisions within the agency to provide support in other areas measured by the SPSF. For example, the Division of Innovation, Student Pathways, and Opportunity, which contains several suboffices, will provide support for college, career, and military readiness at schools. The Office of Behavioral Health and

Student Safety will also provide support for schools struggling with chronic absenteeism, according to VDOE.

Depending on its implementation, decentralization of support services may be a positive development because the staff resources needed to implement VDOE's prior school improvement program exceeded OSI's capacity. According to the 2020 JLARC report *Operations and Performance of the Virginia Department of Education*, 12 OSQ staff were responsible for supporting 262 schools in FY20—22 schools each—which meant staff could devote, at most, about two weeks of support per school annually. VDOE is hiring additional subject-matter specialist staff to provide this new support. If implemented properly, the amount of agency staffing resources dedicated to school support will increase by involving non-OSI staff, while ensuring that schools receive support directly from VDOE subject-matter specialists. Assuming VDOE subject-matter specialists have adequate expertise, this approach is more likely to result in schools receiving high-quality, evidence-based assistance.

Despite these changes, OSI staff will still be the primary contacts for schools needing state support and will provide services directly to schools. VDOE intends that OSI staff will provide leadership training for schools and school divisions, assist schools in implementing and monitoring improvement interventions, aid schools in reviewing student performance data for improvement areas, and coordinate support for schools from other offices within VDOE. OSI staff will also assist federally identified schools in meeting documentation requirements[1].

VDOE's new school improvement model will provide more tailored support to address specific classroom performance gaps

VDOE plans to provide school support services that are tailored to meet schools' individual needs. If implemented well, this would be an improvement over the agency's prior efforts. Under VDOE's plans for the new school improvement program, VDOE staff will tailor school support services to specific areas of low performance and learning gaps identified in student performance data. This represents a shift from the agency's prior model, which provided a more standardized and generic approach to school support. As discussed in the 2020 JLARC report *Operations and Performance of the Virginia Department of Education*, school division leaders and VDOE staff agreed that the agency's prior school improvement program was inflexible, overly focused on teacher lesson plans, and was a "one-size-fits-all" approach that often manifested as a "box-checking" exercise for schools.

VDOE plans to offer tiered levels of support, under which lower- performing schools would receive the most intensive services

VDOE expects to base support provided on the level of need with schools most in need of support receiving intensive services and those performing at acceptable levels receiving only general support. The agency plans to make general supports available to all schools, including state-level professional development seminars, certain high-quality instructional materials, and Office of Excellence and Best Practices materials. The state intends to provide additional technical assistance to schools labeled as

[1] The federal government requires CSI schools to complete a needs assessment and a school support plan. VDOE is responsible for monitoring implementation of support plans at CSI schools. Virginia also requires that Targeted Support and Improvement (TSI) and Additional Targeted Support and Improvement (ATSI) schools complete a needs assessment and school support plan.

Off Track (and in some cases may provide this to schools labeled as *Distinguished* or *On Track*), in addition to offering these schools other opportunities like professional learning networks or access to more specialized instructional material. The state plans to reserve access to intensive support services, including support from OSI staff and regional student success specialists, for federally designated schools and schools labeled as *Needs Intensive Support* (Table K-1).

Prioritizing intensive support services to the lowest performing schools is similar to other states' approaches. However, it is currently unclear whether these services will ultimately be effective or how well they will be implemented once provided.

TABLE K-1
VDOE plans to offer more intensive support services to schools with lower performance

					Federally designated	
	Distinguished	**On Track**	**Off Track**	**Needs Intensive Support**	**Off Track** (TSI, ATSI, CSI)	**Needs Intensive Support** (TSI, ATSI, CSI)
General support						
Statewide trainings and professional development	●	●	●	●	●	●
Office of Excellence and Best Practices materials and state-developed resources	●	●	●	●	●	●
Certain state grants	◑	◑	●	●	●	●
Federal direct student services grants	◑	◑	◑	◑	●	●
Additional support						
Technical assistance from VDOE staff and subject-matter specialists	◑[a]	◑[a]	●	●	●	●
Other support (learning networks, specialized instructional material)	○	○	●	●	●	●
Intensive support						
Federal school improvement grants	○	○	○	○	●	●
OSI and subject-matter specialist intensive support services	○	○	○	●	○	●
OSI assistance in meeting documentation requirements	○	○	○	○	●	●
Regional student success specialist services	○	○	○	●	●	●

SOURCE: Analysis of VDOE documentation and interviews with VDOE staff.
NOTE: All schools will have access to state grants and federal direct student services grants, but VDOE is prioritizing federally designated schools and schools labeled *Off Track* or *Needs Intensive Support* (state grants only). Federally designated schools also labeled as *Off Track* will have access to OSI assistance with meeting their documentation requirements. [a] VDOE staff reported that schools labeled as *Distinguished* or *On Track* may also receive technical assistance based on performance at the indicator level.

VDOE intends to reallocate existing funds toward low-performing schools

VDOE is also changing how federal and state funding is allocated to schools needing support. VDOE is extending the length of time federal school improvement grants will be available to federally designated schools from nine months to four years. This change will give schools more time to plan and implement sustainable interventions, as school improvement efforts can take several years to generate success. Additionally, VDOE reports that it has reprioritized all competitive state and federal grants toward schools needing support, including the Targeted Extended/Enriched School Year grant, the Comprehensive Literacy State Development grant, and the Math Innovation grant. VDOE's prioritization of lower-performing schools for these funds[2] will expand available resources for these schools, but it is unclear whether this will be adequate. This new approach toward prioritization could result in schools that are currently receiving these funds—but who are not identified as lower-performing—no longer receiving or receiving less funding in future years. Additionally, using grants to award school improvement funds could help incentivize schools to better identify student performance issues and schools' need for outside support.

VDOE staff have developed new support resources available for all schools

While developing its new school improvement program, VDOE staff are creating new support resources, many of which can be used by all school divisions. VDOE has made these resources publicly available under the agency's "Road to Readiness" online resource hub. These resources include items appropriate for all schools, as well as more time- or labor-intensive resources for schools with a federal designation or labeled as *Off Track* or *Needs Intensive Support*. For example, VDOE's resource hub page for chronic absenteeism includes has developed several resources for all, including a toolkit for school division superintendents, as well as resources for lower-performing schools. VDOE has also developed a new needs assessment template, which provides schools with a framework to identify student performance issues and develop strategies to improve student outcomes.

[2] Prioritization will be operationalized through the point system used for scoring grant applications. This means that, although federally designated schools and schools labeled as *Needs Intensive Support* or *Off Track* may be awarded more points during the grant application process, they are not guaranteed an award.

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919 East Main Street Suite 2101 Richmond, VA 23219