

**NEW HAMPSHIRE'S STATE
ACCOUNTABILITY SYSTEM:
Recommendations of the
Accountability Task Force**

June 8, 2026

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Task Force Membership

Name	Roles (according to RSA 193-E:3-c)	Organization	Region
David Backler	Superintendent	SAU 20	North Country
Heather Barker	Student Services Director	School Administrators Association	At Large
Gina Bergskaug	Superintendent	SAU 41	South Central
Daniel Black	Superintendent	SAU 12	South Central
Jacqueline Coe	Superintendent	SAU 24	Southwest
Patrick Connors	Principal	Epsom Central School (SAU 53)	Lakes Region
Derek Earle	Assistant Director of CTE	Pinkerton Academy (SAU 202)	South Central
Stephanie Erickson	High School Teacher	SAU 63	Southwest
Robert Malay, Chair	Superintendent	SAU 29	Southwest
Erin Maskwa	Assessment Specialist (educational expert)	Cognia	Southeast
Sam Natti	Principal	Lisbon Regional School (SAU 110)	North Country
Erica Pappalardo	Curriculum Coordinator (administrator)	Inter-Lakes School District (SAU 2)	Lakes Region
Lisa Stone	Elementary Teacher	Hollis Upper Elementary School (SAU 41)	South Central
Patricia Wons	Assistant Superintendent	SAU 31	Southeast

Report prepared on behalf of the Task Force by: Carla Evans, Nathan Dadey, and Scott Marion, Center for Assessment

June 30, 2026

To Commissioner Davis, the State Board of Education, and the New Hampshire Legislature:

On behalf of the State Accountability System Task Force, I am pleased to present our consensus final report and recommendations for updating our state's school accountability framework. Over the past year, our committee members have worked to design a more unified system that drives meaningful progress and continuous improvement across all of our public schools. Collectively, we believe that all Granite Staters can be proud of the foundation this will provide for our public schools and, more importantly, for generations of students.

The findings detailed in this document reflect a deep dive into research, fully engaged group discussions, feedback gathered from local communities, and comprehensive statewide outreach. Throughout our process, we shared an intentional desire to shift from a compliance checklist to a collaborative model in which the state, districts, and local schools are mutually dedicated to student growth and success.

This important work would not have been possible without the deep commitment and collaborative efforts of many partners. I ask that you join me in expressing my deepest gratitude to the thirteen dedicated educators and administrators on this committee. Their unique viewpoints, insights, and experiences, paired with their diverse professional backgrounds and demonstrated dedication, were invaluable during every working session.

We want to thank the New Hampshire Department of Education (NHED) for assembling this group through an impartial nomination process, ensuring representation from all corners of the state, and for providing foundational assistance, historical context, and data necessary to guide our efforts.

Our external partners also provided indispensable guidance along the way. Specifically, we thank the Center for Assessment staff members for their expert facilitation and deep understanding of educational policy. And lastly, we thank RMC Research Corporation for managing our logistics, public communications, and record-keeping throughout the process.

Our team appreciated the autonomy we were given to fully engage in this work, free from external pressures or unnecessary distractions. This independence allowed us to have open, honest dialogue to ground our recommendations on what is best for New Hampshire's unique educational landscape.

Thank you for the opportunity to serve Granite Staters in this capacity, and we look forward to seeing the positive impact of these recommendations.

Most Respectfully,

Robert H. Malay, Task Force Chair
Superintendent of Schools (School Administrative Unit 29)

Executive Summary

The New Hampshire Department of Education (NHED) convened a State Accountability Task Force in response to [RSA 193-E:3-c](#) to review and potentially revise the state’s performance-based accountability system (PBAS). The PBAS is intended to evaluate whether schools are providing New Hampshire students with the opportunity to receive an adequate education as defined in [RSA 193-E:2-a](#). The Task Force intentionally redesigned the system to promote continuous improvement across all NH schools. In doing so, the redesigned system is meant to foster a culture of continuous improvement and learning among educators in the state.

NHED staff solicited applications from members of the New Hampshire educational community to apply for membership on the Task Force. Ultimately, fourteen (14) New Hampshire leaders and educators were selected to serve on the New Hampshire State Accountability System Task Force, pursuant to the composition specified in RSA 193-E:3-c. The Task Force elected Robert Malay, Superintendent of SAU 29, as the chairperson. The National Center for the Improvement of Educational Assessment, Inc. (Center for Assessment) and RMC Research Corporation, both New Hampshire-based firms, were selected through a competitive bid process to support the Task Force and provided expertise throughout the process.

The Task Force studied key aspects of accountability system design by engaging with the research literature on the efficacy of accountability systems and by reviewing experiences from other states. The Task Force then created a theory of action to guide the design of the proposed accountability system (see [Figure 3](#), page 42). The Task Force also identified a set of (re)design principles to serve as touchstones throughout the process.

In addition to extensive Task Force deliberations, the Task Force collected input from a range of constituencies. The Task Force conducted a survey of key constituencies during the fall of 2025, and more recently, NHED and key Task Force members hosted four listening sessions in Concord, Derry, Berlin, and Keene to present the draft Task Force recommendations and to gather feedback from attendees. The Task Force members considered this feedback and used it to finalize their recommendations.

Recommendations for Redesigned State Accountability System

The Task Force recommends revising the state accountability system based on the design principles, the desire to integrate the two systems—the Input-Based Accountability System (IBAS) and Performance-Based Accountability (PBAS)—in statute, and the belief that a redesigned state accountability system should prioritize supporting continuous improvement work in schools and identify schools not providing students with the opportunity for an adequate

education. The accountability system proposed in this report represents a philosophical shift in how accountability systems can operate in New Hampshire. Rather than simply identifying low-performing schools, this system seeks to foster continuous improvement in New Hampshire schools through reciprocal approaches to accountability, introspection, and high-quality feedback.

Specifically, the Task Force proposes a system in which school identifications occur every three years under the PBAS. At the same time, an annual reporting system that helps local leaders monitor performance trends and a six-year comprehensive peer review process are intended to support school-level continuous improvement efforts.

As shown in [Table A](#) (page 7), the redesigned state accountability system has multiple components:

- The **state PBAS results** will be calculated and reported **annually**. This annual reporting includes a **trend report** for all schools that summarizes performance over the previous 2-3 years. Schools and districts can use these trend reports as a means to monitor improvement efforts and to provide an early signal for schools that are likely to be identified as not providing the opportunity for an adequate education. The Task Force also recommends that NHED provide opportunities for technical assistance to help interpret and use the information in the reports. The PBAS system includes the following indicators (see [Table 3](#), page 17) designed to provide an overall picture of school quality:
 - Academic achievement
 - Student longitudinal growth (elementary/middle schools only)
 - The progress of English learners towards English proficiency
 - The growth of the lowest achieving 25% of students (elementary/middle schools only)
 - Student attendance
 - Graduation and completion rates (high schools only)
 - Postsecondary readiness (high schools only)
- A **streamlined IBAS data collection** will be required **every other year**. The current system asks school officials to complete between 11 and 14 yes/no questions, depending on the grade span, tied to the requirements of an adequate education as defined in RSA 193-E:2-a. Additionally, school leaders must provide a narrative response for each aspect of an adequate education biannually. The revised state system would require completing the yes/no questions only biannually and the narrative responses every six years. The narrative responses are part of the comprehensive peer-review system detailed below.

- **Adequacy determinations** will be produced every **three years**. Adequacy determinations will be made by NHED using three years of the PBAS results. **Three years of state PBAS results** will provide a more stable estimate of each school’s performance than a single-year determination.
- Each school will participate in a **comprehensive peer-review** system once every **six years**. The peer-review process will include (1) a self-study that includes state PBAS results as well as inputs and processes that lead to those outcomes, (2) review of the self-study, as well as IBAS and PBAS results, by a panel of peers, and (3) feedback from the peers and NHED that includes recommendations for continued improvement by the school.

The Task Force recommends that the implementation of the state accountability system involve careful and purposeful communication from NHED, especially in relation to other systems of accountability in the state (e.g., the federal and charter accountability systems). Clear and consistent messaging, supported by the proposed accountability implementation advisory committee, will help ensure that the field understands the unique role the state accountability system plays, as well as the roles of other accountability systems.

Table A. Summary of Redesigned State System Components

	Definition	Frequency	Rationale
Performance-Based Data Collection & Trend Reporting	Annual reporting of performance indicators for the current year and the prior 2-3 years.	Annually	Provides all schools with targeted information for school improvement. Encourages all schools to monitor their performance and engage in continuous improvement activities.
IBAS Survey	A revised survey made up of the yes/no questions from the current IBAS Survey.	Every 2 years	Encourages self-reflection on whether the educational opportunities are being provided and helps inform the later peer review, while also reducing the reporting burden.
Performance-Based Identification	Three years of PBAS results will be used to identify schools that are not providing students with an opportunity for an adequate education.	Every 3 Years	Indicates that a school is in need of support to provide its students with an opportunity for an adequate education. NHED provides or organizes technical assistance and funds for school improvement.

Comprehensive Peer Review	Each school will complete a self-study that includes IBAS and PBAS results. This self-study will be reviewed by a panel of peers drawn from schools and districts in the state.	Every school participates once every six years	The self-study and high-quality feedback from trained peer reviewers will help support a continuous improvement process that strengthens local capacity and distributes responsibility among the school, district, and the state to guide improvement.
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The full report presents details about each component of the proposed system.

Policy Recommendations

Accountability systems are policy instruments designed to represent the values of state policymakers and key constituencies. These systems instantiate policy by signaling and incentivizing key behaviors among school personnel. Additionally, the consequences and supports associated with accountability decisions have noticeable policy impacts. The New Hampshire Legislature is ultimately responsible for determining the consequences for schools identified as not providing an opportunity for an adequate education. With full recognition of the legislature’s role in creating the policies associated with the accountability system determinations, the Task Force offers the following consensus recommendations for New Hampshire policy and education leaders.

1. **Schools identified as not providing their students with an opportunity for an adequate education should be supported** in improving through legislatively funded technical support facilitated by NHED. After an NHED needs assessment, identified schools may be eligible for increased adequacy funding.
2. The **legislature should provide sustained financial support** to NHED to:
 - a. Hire additional personnel to manage and support the proposed peer review system. The NHED staff would be responsible for leading the peer review system and providing professional learning to help schools/districts with ongoing continuous improvement and program evaluation efforts related to the peer review process.
 - b. Support an ongoing implementation advisory committee. The Task Force recommends that the redesigned state accountability system detailed in this report undergo a piloting and verification process for two to three years, depending on the extent to which new data collections are required, prior to implementation. This onramp would provide NHED, along with external consultants and a smaller

group of Task Force members, the chance to verify the integrity and adequacy of the system, conduct accountability standard-setting procedures, refine the indicators and measures based on impact analyses, and operationalize all aspects of the system so that it could go into effect after two to three years. This advisory committee should meet at least quarterly to provide NHED with guidance on key implementation issues. After the accountability system is operational, the advisory committee, at NHED's discretion, could shift to a twice-yearly meeting schedule.

- c. Convene a group of interest holders representing unique schools (e.g., alternative high schools; schools with extremely small enrollments) and others to help define a potential exceptional school accountability system built on the framework of the proposed redesigned state accountability system.
 - d. Provide state support for improved data collection, including staff training, clearer local data-collection responsibilities, a system for capturing data, and partnerships with relevant organizations.
3. **Substantially rework the accountability system**, including eliminating the six-year comprehensive peer review, if funding is not appropriated.
 4. **Create a coherent policy framework to support the implementation of the PBAS by reviewing existing policies that may conflict with the proposed accountability system's intentions.** For example, allowing parents to opt their children out of any statewide assessment runs counter to the notion of a PBAS that is supposed to produce comparable results for schools and districts across the state.

The full legislatively required report describes the process and outcomes of NHED's engagement with an Accountability Task Force to develop guiding principles and recommendations for the design and implementation of a revised state accountability system.

Introduction

The New Hampshire Department of Education (NHED) convened a legislatively mandated State Accountability Task Force pursuant to [RSA 193-E:3-c](#) to review and potentially revise the state's performance-based accountability system (PBAS). The PBAS is designed to evaluate whether schools are providing New Hampshire students with the opportunity to receive an adequate education as defined in [RSA 193-E:2-a](#). The composition of the Task Force, the role of NHED, the duties of the State Accountability Task Force, considerations, and outcomes are detailed in the statute (RSA 193-E:3-c). (All applicable state statute sections are provided in [Appendix A](#)).

This legislatively required report describes the process and outcomes of NHED's engagement with an Accountability Task Force to develop guiding principles and recommendations for the design and implementation of a revised state accountability system.

This report is organized into five sections:

- Section I presents the Task Force's recommendations for the indicators, measures, and overall system design features for a revised state accountability system.
- Section II provides the policy and implementation recommendations to help NHED move from design to implementation.
- Section III steps back to describe the project background and the Task Force's membership and engagement process.
- Section IV highlights the development of a theory of action for the state accountability system and critical (re)design principles that guided the Task Force's recommendations.
- Section V describes how the NHED conducted public listening sessions to collect feedback on the Task Force's proposed state accountability system.

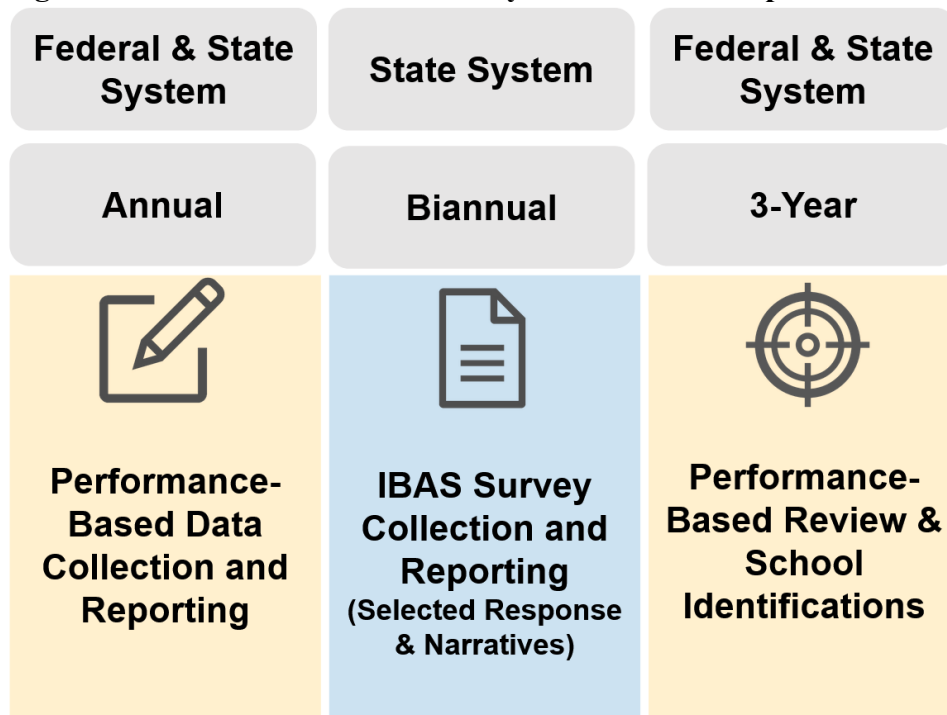
Section I. Recommended System Design

The New Hampshire Accountability Task Force wrestled with how best to meet its charge to create a performance-based accountability system (PBAS) that can evaluate the extent to which schools provide students with an opportunity to receive an adequate education under 193-E:2-a, which includes a list of 11 substantive educational programs, multiple cross-cutting competencies, and kindergarten learning experiences. The Task Force recognized that meeting this charge without also addressing the input-based accountability system (IBAS) could result in an overwhelming system. Additionally, the Task Force placed a high priority on crafting a state accountability system that supports school continuous improvement efforts. The Task Force wanted to create a state accountability system that values improving all participating systems—not simply identifying adequacy—which is why the redesigned system examines the inputs and processes that lead to outcomes more intentionally. In other words, the Task Force explored how to use the IBAS and PBAS systems to leverage each system's strengths.

Current IBAS and PBAS Systems

As shown in Figure 1, the current IBAS and PBAS systems operate in isolation from one another. There is annual performance-based data collection and reporting (federal and state systems), a biannual IBAS survey (state system), and every 3 years, schools are identified for support and improvement under the federal law (ESSA) based on their performance data (federal and state systems). Details for each are provided below.

Figure 1. Current IBAS and PBAS System in New Hampshire



Current: Annual Performance-Based Data Collection and Reporting

The state performance-based accountability and reporting (PBAS) system currently functions as the federal accountability system. The state collects and reports on the indicators in the federally approved accountability system each year in its iPlatform. Academic achievement and progress toward English language proficiency are indicators used for all schools with 11 or more students in a student group, while student growth and the equity indicators are used for elementary/middle schools only. Graduation rate and college- and career-readiness indicators apply only to high schools.

Current: Biannual IBAS Survey Collection and Reporting

The current IBAS system asks school personnel to respond every other year (biannually) to a series of questions affirming that they provide students with the opportunity for an adequate education as defined by 193-E:2-a. The IBAS data collection form includes a series of yes/no questions about each component of 193-E:2-a and asks school personnel to respond to open-ended questions associated with each yes/no question. Figure 2 shows one example question taken from the current version of the IBAS data collection form.

Figure 2. Example Question from the Current IBAS Data Collection Form/Survey

1) Please indicate whether the school is in compliance with the regulation [Ed 306.29](#) relative to an English Language Arts and Reading program.*

- Yes
- No

Provide a narrative explanation that details how the school is complying with regulation [Ed 306.29](#). Make sure to include a description of the following:

-How you ensure a developmentally appropriate English Language Arts and Reading program that aligns with local competencies and curriculum pursuant to [Ed 306.21](#)

-Whether your program has competencies and curriculum that are aligned to "Common Core Standards for English Language Arts," 2010 edition, as referenced in Appendix II, or alternate state standards adopted by your local board; **and**

-Whether your school adheres to assessment practices consistent with [Ed 306.19](#).

A similar question is asked of all the educational programs in RSA 193-E:2-a listed below. All questions asked in the current IBAS data collection form are a subset of the Ed 306 minimum standards for school approval.

1. English/language arts and reading
2. Mathematics
3. Science
4. Social Studies, to include civics, government, economics, geography, history, and Holocaust and genocide education
5. Arts education, to include music and visual arts
6. World languages
7. Health and wellness education
8. Physical education
9. Engineering and technologies, including technology applications
10. Computer science and digital literacy
11. Personal finance literacy

Current: 3-Year Performance-Based Review and School Identifications

New Hampshire's federal system must identify, at least once every three years, the lowest-performing 5% of Title I schools and designate them as schools in need of Comprehensive Support and Improvement (CSI). In addition to the lowest performing 5% of Title I schools, all high schools with graduation rates below 67% are automatically designated as CSI schools. Identified schools are required to engage in school improvement processes specified under federal and state law, and receive federal funds to do so.

To identify schools, New Hampshire currently uses a profile method. This approach generally works well for identifying the bottom 5% of Title I schools, but the state can run into issues with the profile method when trying to move beyond simply identifying the very lowest-performing schools. It is beyond the scope of this report to detail the business rules NHED applies in such cases.

Schools are currently evaluated against the adequacy requirements in 193-E:2-a using the IBAS data collection form and designations provided by New Hampshire's federally approved accountability system, which serves as the current version of PBAS. Schools must meet either the IBAS or the PBAS requirements to be considered as providing the opportunity for an adequate education. In practice, essentially all schools meet the adequacy requirements through the IBAS system.

Recommendations for Redesigned State Accountability System

The Task Force recommends revising the state accountability system based on the [redesign principles](#) and [theory of action](#) (see Section IV, page 41), the desire to integrate the two systems in statute (IBAS/PBAS), and the grounding perspective that a redesigned state accountability system should not only identify schools but also support continuous improvement work in schools. Specifically, the Task Force proposed a system in which school identifications occur every three years under the PBAS. At the same time, the trend report and six-year comprehensive peer review process should support school-level continuous improvement efforts.

As shown in Table 1, the redesigned state accountability system has multiple components:

- The **State PBAS results** will be calculated and reported **annually**. This annual reporting includes a **trend report** for all schools that summarizes performance over the previous two to three years. Schools and districts can use these trend reports to monitor improvement efforts and provide an early signal to schools that are likely to be identified as not providing the opportunity for students to receive an adequate education. The Task Force also recommends that NHED provide opportunities for technical assistance to help interpret and use the information in the reports. The PBAS system includes the following indicators designed to provide an overall picture of school quality:
 - Academic achievement
 - Student longitudinal growth (elementary/middle schools only)
 - The progress of English learners towards English proficiency
 - The growth of the lowest achieving 25% of students (elementary/middle schools only)
 - Student attendance
 - Graduation and completion rates (high schools only)

- Postsecondary readiness (high schools only)
- A **streamlined IBAS data collection** will be required **every other year**. The current system asks school officials to complete between 11 and 14 yes/no questions, depending on the grade span, tied to the requirements of an adequate education as defined in RSA 193-E:2-a. Additionally, school leaders must provide a narrative response for each aspect of an adequate education biannually. The revised state system would only require completing the yes/no questions biannually and the narrative responses every six years. The narrative responses are part of the comprehensive peer review system detailed below.
- **Adequacy determinations** will be produced every **three years**. Adequacy determinations will be made by NHED using three years of the PBAS results. **Three years of state PBAS results** will provide a more stable estimate of each school's performance than a single-year determination.
- Each school will participate in a **comprehensive peer review** system once every **six years**. The peer review process will include (1) a self-study that includes state PBAS results as well as inputs and processes that lead to those outcomes, (2) review of the self-study, as well as IBAS and PBAS results, by a panel of peers, and (3) feedback from the peers and NHED that includes recommendations for continued improvement by the school.

Each component is discussed in more detail below. Note that the legislation requires the task force to review and potentially revise the PBAS. In doing so, the task force also addressed IBAS. Under the current legislation, these are two separate systems. Under the proposed new system, there are no longer two separate systems, divided between inputs and performance (i.e., outputs). Instead, the proposed system uses inputs and performance together within the six-year comprehensive peer review, as well as separately within the inputs survey, performance-based collection and reporting, and performance-based identification.

Table 1. Summary of Redesigned State System Components

	Definition	Frequency	Rationale
Performance-Based Data Collection & Trend Reporting	Annual reporting of performance indicators for the current year and the prior 2-3 years.	Annually	Provides all schools with targeted information for school improvement. Encourages all schools to monitor their performance and engage in continuous improvement activities.
IBAS Survey	A revised survey made up of the yes/no questions from the current IBAS Survey.	Every 2 years	Encourages self-reflection on whether the educational opportunities are being provided and helps inform the later peer review, while also reducing the reporting burden.
Performance-Based Identification	Three years of PBAS results will be used to identify schools that are not providing students with an opportunity for an adequate education.	Every 3 Years	Indicates that a school is in need of support to provide its students with an opportunity for an adequate education. NHED provides or organizes technical assistance and funds for school improvement.
Comprehensive Peer Review	Each school will complete a self-study that includes IBAS and PBAS results. This self-study will be reviewed by a panel of peers drawn from schools and districts in the state.	Every school participates once every 6 years	The self-study and high-quality feedback from trained peer reviewers will help support a continuous improvement process that strengthens local capacity and distributes responsibility among the school, district, and the state to guide improvement.

Table 2 (below) presents the elements of the proposed accountability system, along with a sample timeline indicating when each component would occur. The specific dates matter far less for this example than the intervals.

Table 2. Example Timeline of the Redesigned System

	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34
IBAS Survey		All Schools		All Schools		All Schools
Performance Based Identification			Identified Schools			Identified Schools
Performance Data Collection & Reporting	All Schools	All Schools	All School	All Schools	All Schools	All Schools
Comprehensive Peer Review	20% of schools	20% of schools	20% of schools	20% of schools	20% of schools	20% of schools

Note: Years are provided as examples only.

Redesigned: Annual Performance-Based Data Collection and Reporting

Performance-based results will be generated and reviewed annually under the state PBAS system. This annual reporting includes a **trend report** for all schools that summarizes performance to date. NHED already has a robust reporting structure, but additional resources will be required to implement an updated reporting system to support continuous improvement efforts. In addition, the trend report will signal to schools where they stand relative to the likelihood of being identified as not providing the opportunity for an adequate education. School and district leaders will need support to interpret these reports and act on the interpretations. Thus, NHED will need additional resources to provide professional learning opportunities for education leaders to ensure they can properly interpret and act on the trend and other reports.

As explained in the next section, the Task Force recommends that schools be identified, as defined in 193-E:2-a, as:

- Providing the opportunity for an adequate education, or
- Not providing the opportunity for an adequate education

Such identifications will be based on a 3-year cycle within the state PBAS system (see the section on [three-year PBAS identifications](#) for more details). The Task Force further recommends that schools be permitted to exit this status annually if they meet improvement targets. State PBAS results would also be used within the six-year comprehensive peer review

process. Table 3 describes the indicators recommended by the Task Force for the state PBAS system. New indicators or modifications to existing indicators in New Hampshire’s federal accountability system are noted in *italics*. Additional details about each indicator follow the table.

Table 3. State PBAS Indicators and Measures Recommended by the Task Force

State PBAS Indicators	Measures
Achievement (ELA, Math, & <i>Science</i>)	The state will continue using an index system that awards points based on the number of students in each achievement level, with more points for higher levels, in ELA, math, and <i>science</i> on the NH SAS, SAT, or DLM in grades 3-8 and third year of high school.
Student Growth	Student growth percentiles (SGPs) in ELA and math for grades 4-8 ¹
<i>Opportunity Measure</i>	The SGPs in ELA and math in grades 4-8 for the lowest scoring 25% of students from the prior year
EL Progress	The progress toward English fluency for multilingual learners based on their scores on the WIDA ACCESS 2.0
<i>Extended Graduation and Completion Rate</i>	Each school’s four- and <i>five-year</i> adjusted cohort high school graduation rate is based on a regular diploma, <i>HiSet</i> , <i>GED</i> , or <i>adult education diploma</i> , and <i>the proportion of eligible students who receive a certificate of completion by age 22</i>
<i>Postsecondary Readiness</i>	The percentage of high school seniors who have met two or more postsecondary (college/career/military) readiness measures during their high school years
<i>Student Attendance</i>	<i>The percentage of students who are not chronically absent (i.e., absent fewer than 18 days in the school year or the equivalent in instructional hours) or a decrease in the proportion of students who were chronically absent compared to previous years. There would be no differentiation based on absence type (e.g., excused vs. unexcused)</i>

¹The Task Force recommends that NHED and a subsequent accountability advisory committee continue to study potential growth models for use in the state PBAS.

- **Achievement:** The Task Force recommends that student performance in grades 3-8 and the third year of high school in ELA and math on the NH SAS, SAT, or alternate assessments continue to be used in the achievement indicator; however, the Task Force feels strongly that science should be added where tested in grades 5, 8, and the second year of high school. In addition, the federal accountability system currently uses an index value for the achievement indicator, but also reports the percentage of students proficient or above. The Task Force proposes continuing with this approach, but recommends that the NHED and the accountability advisory committee examine different options for assigning points to students at each achievement level. Task Force members like the idea of assigning more points for achieving Level 3 (proficiency), such as setting higher point values for moving from Level 2 to Level 3 than for moving from Level 3 to Level 4, but recognize the value of movement across all levels. Task Force members noted that clarity of communication to parents and the public should be a consideration in determining the scale and values. Community members should find the index value useful, and it should lead to the correct inferences about school performance.

The Task Force also recommends that participation and opt-out rates be reported alongside achievement results to contextualize the findings and enable the public to interpret them appropriately. For example, the Task Force recommends that reports add asterisks to indicator results below certain thresholds (e.g., one asterisk if below 95% participation rate, two asterisks if below 80% participation rate, and gray out the achievement result if below a certain threshold). The ultimate decision will be based on input from the standing accountability advisory committee and the technical advisory committee.

- **Growth:** The current growth metric is SGPs. [Student growth percentiles](#) (SGPs) describe students' growth compared to other students with similar prior test scores (their academic peers). Although SGP calculations are complex, information can be presented in percentile terms familiar to most teachers and parents. The Task Force discussed using a different growth model that might be easier to explain to the public, such as value tables. The Task Force didn't express a clear preference for a growth model, but agreed that there is merit in continuing to explore growth models, including modeling with school data to determine the impact and ensuring attention to the criteria presented in the meeting (e.g., the model should correlate only weakly with school characteristics, demographics, and average prior achievement so that the growth metric is providing new information above and beyond the achievement indicator). The Task Force recommends that the NHED and the accountability advisory committee continue to study potential growth models for use in the state PBAS system.
- **Opportunity Measure (Performance of the Lowest 25%):** The Task Force recommends no changes to the current calculation of the equity measure in NH's federal accountability

system unless the growth metric is changed; if so, the Opportunity Measure will need to be revisited and built within the value table approach.

- **English Learner (EL) Progress:** The Task Force recommends no changes to the EL Progress metric.
- **Extended Graduation and Completion Rate:** The Task Force recommends that the state use the 4- and 5-year adjusted-cohort graduation rate as the measure of the extended graduation rate. Task Force members argued that the graduation rate should be extended to 5 years, rewarding schools for keeping students on a pathway to graduation, even if that takes an extra year. While the Task Force discussed extending the graduation rate beyond 5 years, concerns about potential loss of data quality for little gain in graduation rates led the Task Force to ultimately decide against moving beyond 5 years. There was a lot of discussion about which diplomas should count toward the graduation rate indicator. Ultimately, the Task Force agreed that regular diplomas, HiSet, GED, or adult education program diplomas should count toward the graduation rate, but reporting should disaggregate the graduation rate by diploma type. Including HiSet, GED, and adult education program diplomas fits with New Hampshire’s competency-based philosophy, where time should be variable, and achievement should be constant. Additionally, including multiple means of demonstrating high school completion allows the state accountability system to be designed in a way that can be applied to exceptional schools, such as alternative high schools, which was one of the design principles. The Task Force agreed that the proportion of eligible students who receive a special education certificate of completion by age 22 would also be counted in the redesigned extended graduation and completion rate indicator. A future accountability implementation advisory committee would work with NHED to determine the business rules for this indicator.
- **Postsecondary Readiness:** The Task Force agreed with the menu-of-options approach in the current College and Career Readiness (CCR) indicator because it provides different options for schools and students to demonstrate readiness for careers, college, and/or the military, and incentivizes the types of opportunities desirable for all students. The metric would be the percentage of high school seniors who meet two or more postsecondary readiness measures during their high school career.

That said, the Task Force recommended several changes. These changes are rooted in the redesign principles already established and additional considerations that emerged during the Task Force’s considerations, which include:

- Recognizing all pre-approved credentials
- Recognizing multiple types of readiness

- Strict comparability is not the goal, but having meaningful thresholds and expectations is important
- Any approach should be coupled with a means for collecting high-quality data

Specifically, the Task Force recommended adding to the menu of options, reorganizing it, and outlining the support needed to ensure the collection of postsecondary readiness data is of high quality.

First, the Task Force recommended pursuing additional options while emphasizing that all menu options should represent meaningful opportunities for students' futures. These additions could include important experiences such as graded Capstone/Senior Projects/Portfolios assessing local competencies identified in local Portraits of a Graduate and NH's work study practices, credit-bearing Extended Learning Opportunities (ELOs) or internships, and participation in military preparatory programs or enlistment in the military.

The Task Force further recommends that the subsequent implementation advisory committee develop an approved list of credentials and certifications with input from CTE directors, guidance counselors, and other relevant constituencies. These credentials should reflect rigorous expectations and lead to meaningful career pathways.

Second, the Task Force recommends that any revised menu of options be reorganized into categories that emphasize the nature of each accomplishment, rather than by traditional college, career, and military readiness options (see [Table 4](#), page 22).

Third, the Task Force identified weaknesses in the current data collection system and a lack of training on this indicator, both of which undermine the accuracy and credibility of data collection and reporting across New Hampshire schools. The Task Force members did not believe the current results accurately reflect the postsecondary readiness of high school graduates in New Hampshire. Adequately addressing issues with data collection requires targeting professional learning opportunities to those who collect these data in each school, district, or CTE center. Additionally, NHED must be supported in developing a data collection system to capture these data more consistently across schools and districts.

The Task Force discussed the [current menu of options](#) but could not agree on a final list. Rather, the Task Force recommended that the NHED and an accountability advisory committee review the revised list below and make final decisions about the menu of options using the high-level principles identified above.

Table 4. Suggested Menu of Options for Postsecondary Readiness Indicator in State Accountability System

Independent Learning & Coursework

- Completion of the NH Scholars program of study (or completion of a rigorous course of study equivalent to the NH Scholars program of study)
- Completing a credit- or grade-bearing Capstone Project (or equivalent) representing the culmination of academic programs and application of knowledge and skills to real-world problems with a grade of B/proficient or better
- Completion of the ACT National Career Readiness Certificate
- Completion of an approved credit-bearing Extended Learning Opportunity or internship

Achievement

- SAT scores meeting or exceeding the college and career-ready benchmark (480 in Evidence-Based Reading and Writing and 530 in Mathematics)
- ACT scores meeting or exceeding the college- and career-ready benchmark (18 in English, 22 in Mathematics, and 22 in Reading)
- Science achievement (ACT score of 23+ or Level 3+ on high school NHSAS Science)
- A score of 3, 4, or 5 on an AP exam
- A score of 4, 5, 6, or 7 on an IB exam
- Scoring at least Level III on components of the ASVAB that comprise the Armed Forces Qualification Test (AFQT)

Postsecondary Credit

- Credit from a dual or concurrent enrollment course
- Complete two credits of JROTC or Civil Air Patrol

Pathways

- Completion of a career pathway program of study
- Earning a seal of biliteracy
- Earning a CTE or other industry-recognized credential as part of a pathway
- Completion of an approved apprenticeship program per [NH RSA 278](#)
- Enlistment or acceptance of enlistment in the Armed Services
- Enrollment or acceptance in an accredited higher education institution

- **Student Attendance:** The Task Force agreed that at least 90% student attendance in schools is a critical precursor to learning. Students cannot learn if they are not in school. The Task Force recommended that the metric for this indicator include a threshold for student attendance and reward schools for making progress toward that threshold (i.e., decreasing rates of chronic absenteeism). Schools above the threshold (at least 90% student attendance) would receive full credit on the metric. The accountability implementation advisory

committee would make recommendations about how to assign points to schools below the threshold. Both excused and unexcused absences would be included in the student attendance indicator.

Redesigned: Biannual Abbreviated IBAS Survey Collection and Reporting

The Task Force recognized that the IBAS system should be modified to support a revised overall system. As mentioned previously, the current IBAS system requires school personnel to respond every other year to a series of questions affirming that they provide students with the opportunity for an adequate education, as defined by 193-E:2-a. The IBAS data collection form includes a series of yes/no questions about each component of 193-E:2-a and requires school personnel to respond to open-ended questions associated with each yes/no question.

Right now, completing the IBAS forms is viewed by Task Force members as a compliance exercise, and they discussed how to modify the system to better support the goal of providing meaningful, specific, and actionable feedback to schools and districts that can guide and direct school improvement efforts. The Task Force offered several suggestions for making the IBAS system more meaningful as an evaluation of adequacy and more useful for supporting school improvement. Most of those suggestions are incorporated into the six-year comprehensive peer review process.

The Task Force noted that the type of information collected by the IBAS survey does not necessarily change biannually, but it may still be important to collect responses to the yes/no questions every other year. The biannual abbreviated IBAS survey will largely serve as a basic level of assurance for legislative reporting. Therefore, the Task Force recommends that schools continue to participate in a biannual abbreviated IBAS survey that includes only the selected-response yes/no questions (no explanations or narratives until the school goes through peer review). Schools that check “no” for any of the questions would be automatically triggered for follow-up support and conversation with NHED.

Redesigned: 3-Year Performance Reviews and Adequacy Identifications

The Task Force recommended that the state PBAS system continue to identify schools every three years, but with different identification and reporting categories than those in New Hampshire’s federal accountability system. The Task Force indicated that they did not think many schools would be identified as not providing an opportunity for an adequate education. They also recommended that yearly exit opportunities from identification are important based on clearly delineated exit criteria (i.e., meeting targets set on state PBAS). Finally, the Task Force recommended that identifications happen as early as possible in the year, ideally in the summer, so that schools can plan for the upcoming year.

Aggregation Recommendations. The Task Force discussed different aggregation methods (e.g., compensatory, conjunctive, profile methods), and ultimately recommended a compensatory approach in which each indicator in the state PBAS system is assigned a weight and that weight is used to calculate a total composite (e.g., average) score that can be compared across schools in the same grade span. The Task Force thought this approach was more intuitive to understand and communicate, and that it made the policy values underlying the weights more transparent.

The weights illustrated in Table 5 are based on the Task Force’s guiding principles. There was some discussion of assigning different weights to the indicators for elementary and middle school, but the Task Force deferred that decision to a subsequent accountability advisory committee, as recommended in Section V of this report. Additionally, the Task Force recommends that an accountability advisory group make final decisions on aggregation weights after it reviews the impact analyses of those weights. Impact analyses ensure that the guiding principles have the intended effect when applied in practice.

Table 5. Example Aggregation Weights for Future Decision-Making

Indicator	Elementary/ Middle School	High School
Achievement	25%	35%
Growth	40%	NA
Opportunity	20%	NA
EL Progress	5%	5%
Student Attendance	10%	10%
Graduation Rate	NA	35%
Postsecondary Readiness	NA	15%
	100%	100%

Aggregation Weight Guiding Principles:

- **Achievement** should be weighted more heavily in high schools than in elementary schools, because students should be proficient before graduating from high school. For example, achievement could be weighted at about 25% in elementary school to 35% in high school. Because science is administered only once per grade span, it should be included in the calculation in proportion to the number of students participating in the test.

- **Growth** should be weighted more heavily for younger students than for older students because early growth offers greater opportunities for students to continue making progress toward proficiency throughout their educational experience. For example, growth could be weighted about 40% in elementary/middle school. Growth cannot be calculated in high school since there is no annual testing.
- The **opportunity measure** is another measure of growth, so it should follow the same principles identified above. Growth should be weighted more heavily for younger students than for older students. For example, the Opportunity Measure could be weighted at about 20% in elementary/middle school.
- The **progress of English learners towards proficiency** is an important indicator of school system quality; however, currently, only 20% of schools in the state have enough students designated as English Learners to calculate this indicator. As such, the Task Force recommended weighting it at 5% for each grade span. For schools that do not meet the minimum-n for EL students, the 5% of points should be distributed among the remaining indicators.
- **Student attendance** is a prerequisite for learning. As such, the Task Force recommended this be included as about 10% weight for each grade span.
- The Task Force recommended a substantial weight for high school **graduation rate**, given its central importance to postsecondary outcomes (e.g., about 35%).
- Ensuring all students are ready for postsecondary success (college, career, and/or military) is a key function of high schools. The Task Force recommended that the **postsecondary readiness** indicator be weighted at about 15%.

Reporting Category and Identification Recommendations. The Task Force noted the importance of labels and words and preferred simple labels:

- “**Meets**” to indicate that the school is providing an opportunity for an adequate education
- “**Does Not Meet**” indicates the school is not providing an opportunity for an adequate education.

In general, the group did not want to divide the “meets” category into additional categories (such as schools of commendation) because it could lead to ranking schools. Further, the Task Force did not think that the relatively low level of state education funding warranted categorizing schools beyond a simple meets/does not meet.

There was discussion about whether it would be helpful to break the “not meets” category into two groups, so that schools that are urgently in need of support are identified separately from

those that may have only one subgroup or issue leading to their identification. However, the Task Force noted its charge was to redesign the state PBAS system based on RSA 193-E:2-a, and subgroup identifications and reporting categories are not part of that legislation. As such, the Task Force recommended only two reporting categories—meets and does not meet—and that determination would be based on three years of state PBAS data, not on any one subgroup, though subgroup performance should be reported and considered as part of the comprehensive peer review process.

Overall, there was consensus that reports should not just identify schools as “meets the adequacy requirements of 193-E:2-a” or “does not meet the adequacy requirements of 193-E:2-a” but should also include specific feedback to all schools (whether high or low performing) about their areas of strength and their needs to support continuous improvement efforts, and the idea that all schools have room for improvement.

The Task Force did not anticipate that a large percentage of New Hampshire schools would “not meet” expectations. In contrast to federal accountability requirements, the Task Force strongly agreed that there shouldn’t be a minimum number or percentage of schools identified. However, the group also agreed that any school identified as “not meeting” should receive support and resources from the state to address the weaknesses identified through the accountability system. Creating the composite index and subsequent cut scores for identification is beyond the scope of the Task Force, given the available data, and should be considered within the first years of implementation, as detailed within Section II. Policy and Implementation Recommendations.

Post-Identification Recommendations. The Task Force reviewed and discussed [RSA 193-H](#), which details what happens after a school is identified as not meeting the adequacy requirements in [RSA 193-E:2-a](#). The Task Force recommended a similar but modified process to what is detailed in [RSA 193-H:4](#):

- After notification, NHED must support schools to improve. For example, NHED should provide technical assistance to scaffold the school through a comprehensive needs assessment and an initial improvement plan within a reasonable timeframe. This will require additional funding from the state legislature to hire additional staff at NHED. (See the fiscal note in Appendix B.)
- The school’s local board of education should be notified of this improvement plan. The plan may follow the same template as the state's current school improvement plan for schools identified under the federal system.
- After receiving the improvement plan, the state department of education will have a defined period of time to review it and either approve it, leading to implementation, or disapprove it, leading to an amendment.

- NHED will provide ongoing technical assistance and funding support until a school exits identification based on state PBAS results. This will require additional funding from the state legislature. (See the fiscal note in Appendix B.)

To support these school improvement processes, the Task Force recommended that identified schools receive three years of level funding, roughly equivalent to what is provided to schools identified for Comprehensive Support and Improvement under the federal system.

New: Six-Year Comprehensive Peer Review

The Task Force offered several suggestions for making the entire accountability system more meaningful as an evaluation of adequacy and more useful for supporting school improvement. This includes meaningfully integrating the input- and performance-based components into a comprehensive peer review process led by the NHED. Each school in the state will be reviewed once every six years, as is typical in an accreditation process. The six-year cycle aligns with continuous improvement work and is manageable for schools, districts, and NHED, provided appropriate funds are appropriated. (see Appendix B for a fiscal note on the peer review system.) The Task Force was clear that the peer review system cannot become an unfunded mandate. If the peer review system is not funded by the legislature, the peer review component would be eliminated, and the system would revert to the current biannual IBAS survey.

Even with funding, however, Task Force members recognized that NHED does not currently have the capacity to provide detailed feedback to all schools, even if the system evaluated only 15-20% of the schools each year. The peer review system helps build local capacity and provide experience-based feedback to participating schools. The Task Force designed the peer review to enact reciprocal accountability, in which each level of the system—the state, district, and school—is both responsible and accountable to the others to support student learning. More importantly, the peer review component could be structured to facilitate reflective conversations among local educators and leaders to support school improvement efforts. Task Force members noted that any additional effort required to participate in a comprehensive peer review process would need to be balanced with meaningful feedback that school personnel can use to improve their practices.

Self-Study Domains. The peer review system will be structured as a self-study for the participating schools, with peer review, similar to an accreditation protocol. Schools and districts will have to provide evidence for each domain listed in Table 6. This evidence will document how they provide students with a meaningful opportunity to learn each required aspect of 193-E:2-a. Schools accredited by a state-approved accrediting body (e.g., NEASC) will not have to submit any evidence relative to the domains listed in Table 6. In other words, schools will not

complete the state’s self-study or peer review process if they currently have full accreditation from the New England Association of Schools and Colleges (NEASC) and they can provide evidence of active engagement in that process. The indicators in Table 6 will be considered for the school's overall student population and for subgroups such as students with disabilities and economically disadvantaged students.

Table 6. Six-Year Comprehensive Peer Review Indicators and Measures

Indicators	Measures
Performance-Based Outcomes	
Performance Review	Review of the last 3 years of state PBAS data at the school level (achievement, growth, opportunity measure, EL progress, extended graduation and completion rate, student attendance, postsecondary readiness)
Input-Based Activities, Resources & Processes	
<i>Well-Rounded: Access to Well-Rounded Education</i>	
IBAS Survey (Narratives)	Narrative descriptions of academic programs in the IBAS biannual survey
<i>Access: Access to High-Quality Instruction & Educators</i>	
Access to Credentialed Teachers	Percentage of teachers who have a credential and are teaching in their area of certification Narrative explaining why some teachers are teaching outside their area of certification (e.g., our high school science teacher is credentialed in physics, but also teaches chemistry, biology) and what, if anything, the school/district is going to do to improve student access to teachers who are teaching in their area of certification
Access to High-Quality Instructional Materials	Percentage of teachers who have access to high-quality instructional materials provided by the school/district in the four core content areas (English language arts, mathematics, science, and social studies)

Indicators	Measures
Access to High-Quality Instruction	Narrative description of the teacher supervision process that ensures student access to high-quality instruction, as well as professional development opportunities provided to teachers related to implementing the provided high-quality instructional materials
<i>At-Risk: Supports for Special Populations & Young Learners</i>	
Access to High-Quality Academic Support	Narrative descriptions of English learners, special education, MTSS programs, and other academic supports offered to all students and subgroups of students, including academic counseling Explanation of how students are identified for additional supports or interventions
Access to Grade 1-2 Early Literacy/ Numeracy Screening & Support	The percentage of students who participated in a grade 1 or 2 literacy and numeracy screener at least once early in the academic year Narrative description of how the school/district ensures the development of early literacy and numeracy skills (e.g., teacher training; selection/adoption of HQIM; how they identify students who need additional support or intervention; what they do programmatically with those students who are identified)
<i>School Culture: School Climate, Engagement, and Well-Being</i>	
Reflection on Student & Educator School Climate Survey Results	A submitted reflection on what the school/district learned and school improvement plans in place from the findings associated with administering a school climate type survey to Gr 3-12 students and educators. Districts/schools can select their own school climate survey from a list of vetted, high-quality surveys reviewed by the state. The state will provide guidance on selecting a survey tool. The survey does not need to be given annually, although it can be.

Indicators	Measures
<i>Program Alignment: Resource Allocation</i>	
Resource Allocation Reports	Explanation of the funding streams available to the school/district from local, state, and federal sources and how the school/district is allocating those funds, and why

Well-Rounded: Access to Well-Rounded Education

- **IBAS Survey (Narratives):** The Task Force recommends that the narrative component of the current IBAS data collection serve as the foundation of the six-year peer review process. This would provide peer reviewers with a better understanding of the school’s operations, program quality, students’ access to a well-rounded education, and performance-based results in context.

Access: Access to High-Quality Instruction & Educators

- **Access to Credentialed Teachers:** The Task Force agreed that access to credentialed teachers is an important and foundational aspect to ensure that all students have the opportunity to receive an adequate education, as defined in RSA 193-E:2-a. Yet the Task Force also recognized that some of the current regulations in New Hampshire about what it means to be teaching in an area of certification may need to be expanded so that some schools (especially small, rural schools) are not penalized for not being able to attract or retain specialized science teachers, for example. Task Force members explained that currently, high school science teachers must have a certification in physics, chemistry, biology, etc., and teach only the aligned course, or they are counted as teaching outside of their certification. But the same stringency is not applied to high school English language arts, social studies, or math teachers. This is why the Task Force recommends requiring the narrative so the school/district can explain why some teachers are teaching outside their area of certification and what, if anything, the school/district will do to improve student access to teachers who are teaching in their area of certification.
- **Access to High-Quality Instructional Materials:** High-quality instructional materials are comprehensive, research-based, and standards-aligned resources that ensure all students have access to rigorous, grade-appropriate instruction. These materials are

intended to be used throughout the school year, allowing teachers to build students' knowledge in coherent ways over time. This domain will provide insight into the percentage of teachers who have access to high-quality instructional materials provided by the school/district in the four core content areas (English language arts, mathematics, science, and social studies).

- **Access to High-Quality Instruction:** Instruction is one of the main ingredients to improving student learning at scale. Schools/districts will provide a narrative description of the teacher supervision process that ensures student access to high-quality instruction, as well as the professional development opportunities provided to teachers for implementing high-quality instructional materials.

At-Risk: Supports for Special Populations & Young Learners

- **Access to High-Quality Academic Support:** The Task Force recognized that the performance of English language learners and students with disabilities is an important consideration, but there are a number of schools with fewer than 11 students in these subgroups, such that disaggregated results on the performance-based indicators will not be calculated. Therefore, the Task Force recommended that SAUs provide narrative descriptions of their English learner, special education, and Multi-Tiered System of Support (MTSS) programs offered to all students and student subgroups, regardless of whether they meet the threshold of 11 students. This contextualized information can provide peer reviewers with insight into the quality and nature of the academic support, enabling them to provide specific, meaningful, and actionable feedback as part of the peer review process.
- **Access to Grades 1-2 Early Literacy/Numeracy Screening & Support:** The Task Force was persuaded by the language in 193-E:2-a, which focuses in part on early learning experiences, and by the fact that annual performance-based data collection and reporting lacks an indicator for K-2. Given that kindergarten is not compulsory in New Hampshire, the Task Force recommended that a redesigned state accountability system collect information for grades 1-2 that focuses on important indicators of students' future academic achievement. As such, the Task Force recommended that the participation rate of screening grade 1-2 students in early literacy and numeracy be included as a measure of schools providing the opportunity for an adequate education. The Task Force members were clear: they do not want schools to have to administer a screener a set number of times each year or to report to the state on students' screener performance. Rather, the measure would be the participation rate—the percentage of students in grades 1-2 who

took an early literacy and numeracy screener at least once in each grade (e.g., an average by grade for both early literacy and numeracy). The Task Force recommended that the state provide a list of screening tools schools could use to guide Tier 1-2 instruction and support for the youngest learners. The Task Force also recommended that the peer review process include a narrative description of how the school/district ensures the development of early literacy and numeracy skills (e.g., teacher training; selection/adoption of HQIM, how they identify students who need additional support or intervention, and what they do programmatically with those students who are identified).

School Culture: School Climate, Engagement, and Well-Being

- **Reflection on Student and Educator School Climate Survey Results:** The Task Force strongly agreed that school culture and climate can influence student engagement, student and educator well-being, educator effectiveness, and ultimately student achievement outcomes. However, the Task Force did not think it was appropriate to collect school culture and climate survey results at the state level. Rather, the Task Force wants to encourage local reflection and school improvement planning by asking districts/schools to submit a reflection on student and educator school climate survey results as part of the peer review process. In other words, what did the district/school learn, and what district/school improvement plans were put in place from the results of a school climate survey? The Task Force recommended local control and decision-making in selecting the school climate survey instrument from a list of vetted, high-quality surveys reviewed by the state. The state would also provide guidance to SAUs on selecting and using a survey tool, including a cost-free option. The Task Force did not want to require the survey to be administered annually, but at least once every three years to track progress and monitor culture and climate improvement efforts. Also, the Task Force strongly recommended that the state deem this school climate survey as an academic survey and therefore exempt it under [RSA 186:11](#).

Program Alignment: Resource Allocation

- **Resource Allocation:** Funding for education in New Hampshire is complicated. The state's districts and schools have differing funding levels to support education in their locales. The Task Force recommended including, as part of peer review, a section in which the district/school explains its funding streams from local, state, and federal

sources, how it is allocating those funds, and why. This would provide the peer reviewers with an opportunity to better understand the local funding and resource allocation context and to situate their recommendations and feedback accordingly.

Goal Setting. In an effort to promote continuous improvement processes, schools and districts will be required to identify three school improvement goals as part of the self-study, preferably tied to the domains listed in 193-E:2-a. Schools may identify other goals, but at least three should be tied to determinations of adequacy. Schools and districts will be required to:

- Identify the goal as specifically as possible (e.g., in three years, an average of 10% more students will score at levels 3 and 4 on the state writing assessment across grades).
- Describe the root cause analysis that led to identifying this goal and explain why this goal emerged as an important focal area.
- Describe the educational interventions that will be used to support the goal, and explain why these interventions have been selected. This would be an opportunity to describe the research base supporting the proposed intervention.
- Describe the proximal and intermediate indicators that will be used to monitor and adjust the long-term goals.
- Finally, describe the assessments or other sources of data that will be used to evaluate whether the goal was reached.

School Selection. Rather than randomly selecting schools or districts for peer review each year, school administrative unions (SAUs) will be the first units selected to encourage collaboration and communication among all schools in a district and with the district office. This can pave the way for a reciprocal accountability system. The Task Force anticipates that 15-20% of SAUs will be required to participate each year and may decide to select SAUs to create peer networks that undergo the peer review process simultaneously. These peer networks could be regional (e.g., all North Country SAUs or based on similar districts). In addition, the selection of schools should be coordinated with other processes. For example, schools completing a needs assessment under the federal accountability system may also be included to avoid duplicating work and to help concentrate resources.

Process. The school/district submissions will be peer reviewed by educators and leaders from other schools and districts in the state. The process will be designed and overseen by NHED with support from outside experts as necessary. The Task Force had some initial ideas about how peer reviewers could be selected (e.g., the schools/districts under review in any given year are reviewers for other schools/districts in that year or in a subsequent year), but final decisions will need to be made by the NHED with input from New Hampshire school administrators and

external consultants. One consideration is whether there is enough local capacity and willingness to participate in such peer reviews. In addition, the Task Force recommended that context be considered in selecting peers to ensure peers with experience in the schools' contexts (e.g., peers with experience in rural education review rural schools). To be clear, a diversity of experiences is also important, but at least some overlap in context is desirable. NHED should be provided with a budget to support this process, including funding to organize two-day summer institutes, pay peer reviewers' stipends, and other expenses required to train and host peer reviewers, produce materials, and other resources. For example, NHED will need to create rubrics and other scoring tools (e.g., examples/non-examples) to ensure that reviews are as consistent as possible across various reviewers. NHED will also create training protocols to ensure that reviewers understand how to evaluate and score the evidence. Reviewers will also be taught how to provide constructive feedback to participating schools and districts. As stated earlier, if the peer review system is not funded by the legislature, the peer review component would be eliminated, and the system would revert to a biannual IBAS survey.

Feedback & Follow-Up. Evaluators will be trained to consider both the qualitative and quantitative information gathered from the self-study information. They will provide both descriptive and evaluative feedback that accounts for both performance-based and input-based results, written within the state-provided templates. For example, if the peers find that the school's evidence and goal-setting are lacking, they could recommend annual updates from the reviewed schools to NHED until the school/district meets the key criteria, or biannual/quarterly updates to local school boards with progress towards goals and/or how the district/school has addressed the peer reviewers' feedback.

Section II. Policy & Implementation Recommendations

Policy Recommendations

Accountability systems are policy instruments designed to represent the values of state policymakers and key constituencies. These systems instantiate policy by signaling and incentivizing key behaviors among school personnel. Additionally, the consequences and supports associated with accountability decisions have noticeable policy impacts. The New Hampshire Legislature is ultimately responsible for determining the consequences for schools identified as not providing an opportunity for an adequate education. With full recognition of the legislature's role in creating the policies associated with the accountability system determinations, the Task Force offered the following recommendations for New Hampshire policy and education leaders.

1. Schools identified as not providing their students with an opportunity for an adequate education should be supported in improving through legislatively funded technical support facilitated by NHED. After an NHED needs assessment, identified schools may be eligible for increased adequacy funding.
2. The legislature should provide sustained financial support to NHED to:
 - a. Hire additional personnel to manage and support the proposed peer review system. The NHED staff would be responsible for leading the peer review system and providing professional learning to help schools/districts with ongoing continuous improvement and program evaluation efforts related to the peer review process.
 - b. Support an ongoing implementation advisory committee. The Task Force recommends that the redesigned state accountability system detailed in this report undergo a piloting and verification process for two to three years, depending on the extent to which new data collections are required, prior to implementation. This on-ramp would provide NHED, along with external consultants and a smaller group of Task Force members, the chance to verify the integrity and adequacy of the system, conduct accountability standard-setting procedures, refine the indicators and measures based on impact analyses, and operationalize all aspects of the system so that it could go into effect after two to three years. This advisory committee should meet at least quarterly to provide NHED with guidance on key implementation issues. After the accountability system is operational, the advisory committee, at NHED's discretion, could shift to a twice-yearly meeting schedule.

- c. Convene a group of interest holders representing unique schools (e.g., alternative high schools; schools with extremely small enrollments) and others to help define a potential exceptional school accountability system built on the framework of the proposed redesigned state accountability system.
 - d. Provide state support for improved data collection, including staff training, clearer local data-collection responsibilities, a system for capturing data, and partnerships with relevant organizations.
3. Substantially rework the proposed accountability system, including eliminating the six-year comprehensive peer review, if funding is not appropriated.
4. Create a coherent policy structure to support the implementation of the PBAS. For example, allowing parents to opt their children out of any statewide assessment runs counter to the notion of a PBAS that is supposed to produce comparable results for schools and districts across the state.

Section III. Background

NHED staff solicited applications from members of the New Hampshire educational community to apply for membership on the Task Force. Ultimately, 14 New Hampshire leaders and educators were selected to serve on the New Hampshire State Accountability System Task Force, pursuant to the composition specified in RSA 193-E:3-c. The Task Force elected Robert Malay, Superintendent of SAU 29, as the chairperson.

The National Center for the Improvement of Educational Assessment, Inc. (Center for Assessment) and RMC Research Corporation, both New Hampshire-based firms, were selected through a competitive bid process to support the Task Force and provided expertise throughout the process. The Center for Assessment’s team consisted of Scott Marion, Carla Evans, and Nathan Dadey. In addition, RMC Research Corporation provided feedback and input on meeting agendas and content, meeting coordination, public noticing, and note-taking support. RMC’s team consisted of Carol Keirstead and Chris Dwyer. Ongoing oversight and project planning were supported throughout by NHED staff, including Nathaniel Greene, Kyu-Ryung Hwang, and David Harrison.

The Task Force convened for 10 in-person full-day meetings at the NHED offices between June 2025 and May 2026. The last meeting on June 3, 2026, was a three-hour virtual meeting. The meetings were structured to guide the Task Force through an intentional design process that began with foundations (theory of action and design principles), then progressed to accountability design recommendations (indicators, measures, and system design characteristics and features), and finally to policy and implementation recommendations. This process is reflected in the sequence of topics across the Task Force meetings (see Table 7). All meeting agendas were [posted publicly](#) by RMC.

Table 7. Task Force Meeting Dates & Focal Topics

DATE	FOCAL TOPICS
June 16, 2025	<ul style="list-style-type: none"> • Roles of NHED, Center for Assessment, RMC • Role of Task Force chair • Task Force charge, purpose, process, trajectory, norms, and scope • History of accountability in New Hampshire • Purposes and goals of accountability • New Hampshire accountability system evaluation findings • Successes and challenges in state’s current accountability system

DATE	FOCAL TOPICS
September 22, 2025	<ul style="list-style-type: none"> ● Reciprocal and balanced accountability ● Accountability design principles ● NHED’s existing data and performance indicators ● Education Commission of the States virtual presentation on the national landscape of federal accountability systems
October 20, 2025	<ul style="list-style-type: none"> ● Reporting categories/school identifications ● Treating all schools the same vs. designing for exceptional schools ● NHED Office of Charter Schools presentation on charter school accountability indicators and model ● Alternative high schools and K-2 schools considerations ● Postsecondary readiness considerations
November 17, 2025	<ul style="list-style-type: none"> ● Surveying the field ● Graduation rate considerations ● Access to and enrollment in rigorous coursework, performance in coursework, and curricular breadth considerations ● Engagement in schools, including chronic absenteeism considerations ● K-2 indicator considerations
December 15, 2025	<ul style="list-style-type: none"> ● Draft theory of action review and discussion about other potential indicators ● Returning to K-2 indicator considerations ● Returning to engagement in schooling and extending to school climate indicator considerations
February 5, 2026	<ul style="list-style-type: none"> ● ExcelinEd virtual presentation on accountability systems ● Returning to the Design Principles based on feedback from the field ● Putting the model together: Overall landscape of the indicators and system
February 17, 2026	<ul style="list-style-type: none"> ● Overview of IBAS and PBAS systems ● Reporting categories (determinations) for IBAS and PBAS ● Combining indicators and aggregation methods for IBAS and PBAS
March 23, 2026	<ul style="list-style-type: none"> ● Feedback on first draft of final report ● Aggregation weights for PBAS

DATE	FOCAL TOPICS
	<ul style="list-style-type: none"> ● NHED School Improvement Manager's explanation of key considerations for connecting accountability and school improvement
April 20, 2026	<ul style="list-style-type: none"> ● Feedback on the second draft of the final report ● Options for achievement and growth metrics ● Peer review self-study indicators and the relationship with adequacy identifications ● Necessary revisions to 193-H
May 18, 2026	<ul style="list-style-type: none"> ● Feedback on the third draft of the final report
June 3, 2026	<ul style="list-style-type: none"> ● Review and finalize the report (virtual)

The Task Force operated under the specific legislative charge (RSA 193-E:3-c) and established meeting norms. The Task Force was asked to create a credible state accountability system, consistent with and supportive of the state’s educational vision and values, as reflected in RSA 193-E:2-a (the state has a separate accountability system for federal compliance). The Task Force's charge was to create a state accountability system that best reflects New Hampshire’s educational context, which can be used to evaluate students’ educational opportunities. Additionally, while the Task Force's charge was to recommend changes to the design of PBAS, the deliberations also included the IBAS. The Task Force felt strongly that the input and performance-based systems must reflect a coherent state accountability system. Recommendations for the design and implementation of both the PBAS and IBAS systems are included in this report, along with suggested interactions between the two.

This report presents recommendations reflecting areas of agreement among the Task Force members. The few non-consensus recommendations are noted in this report, along with descriptions of the nature and rationale for alternative viewpoints.

Section IV. Theory of Action & Design Principles

The Task Force emphasized that the proposed system must be rooted in continuous school improvement, rather than merely identifying schools for accountability purposes. This grounding perspective guided the high-level principles articulated here and the design specifics in the remaining sections. As a function of this, the Task Force further emphasized that accountability systems are most effective when they (1) provide information about inputs, processes, and outcomes that are highly valued and under a school system’s control; (2) integrate with improvement systems that specify the conditions, resources, and supports that can help promote improved actions and outcomes; and (3) reflect a reciprocal and balanced accountability approach² in which the state, districts, and schools are each responsible for actions (e.g., funding, capacity-building, purchasing high-quality instructional materials) that lead to improved student achievement outcomes.

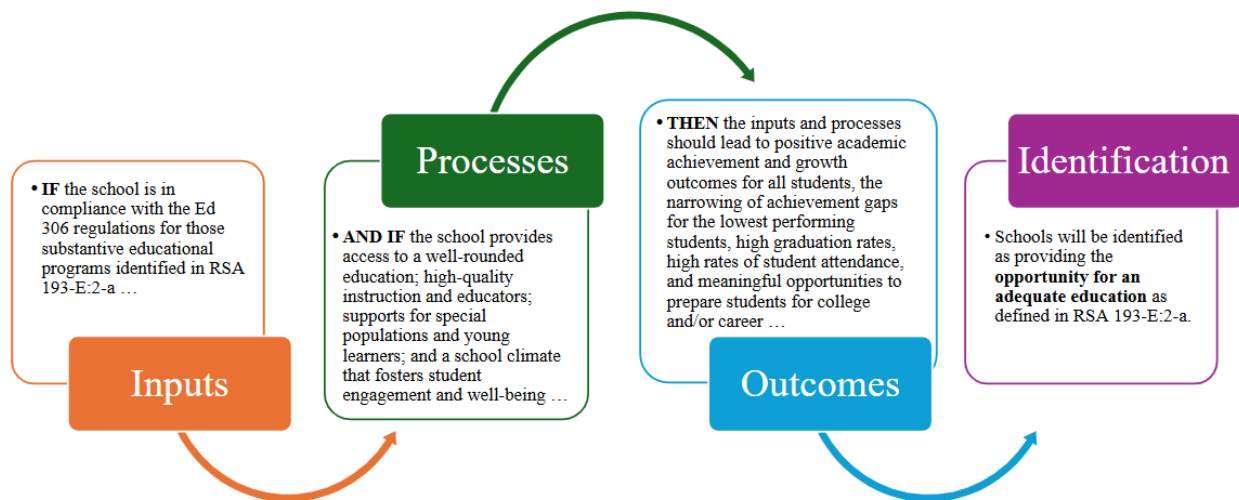
Accordingly, the Task Force discussed the promise of revised state accountability as a system that signals what inputs and performance outcomes are valued, provides information about school performance on those inputs and outcomes, and identifies schools that may need interventions and additional support or resources to improve.

Theory of Action

A theory of action is useful for clarifying the key conditions and actions thought to promote the goals of the state accountability system, namely, identifying which schools are providing students with the opportunity for an adequate education. Figure 3 provides a high-level illustration of the prominent components in the Task Force’s theory of action. The figure illustrates how the input-based accountability system connects to the performance-based accountability system through a chain of reasoning that ultimately informs whether a school is providing its students with the opportunity for an adequate education, as defined in RSA 193-E:2-a.

² See this [brief](#) on reciprocal and balanced accountability for a definition of terms and more background on the topic.

Figure 3. Theory of Action for New Hampshire’s State Accountability System



The two boxes on the left side of the figure list a sample of the inputs, conditions, and processes necessary to support the priority outcomes shown in the third box. For example:

- **If** the school is in compliance with the minimum standards for school approval identified in RSA 193-E:2-a;
- **And if** the school provides access to a well-rounded education, high-quality instruction and educators, support for special populations and young learners, and a school climate that fosters student engagement and well-being;
- **Then** we would expect to see positive academic achievement and growth outcomes for all students, the narrowing of achievement gaps for the lowest performing students, high graduation rates, high rates of student attendance, and meaningful opportunities to prepare students for college and/or career.

The theory of action is based on principles of reciprocity and assumes that NHED, districts, and schools are each responsible for creating the conditions and acting in ways that promote the goals of the state accountability system in accordance with RSA 193-E:2-a. Those specific conditions and actions are listed below by system level: state, district, and school.

New Hampshire's State Accountability System Theory of Action assumes that...

The State

- Provides adequate funding so that school districts offer all students the opportunity for an adequate education.
- Creates effective policies and strategies to promote excellence and opportunity to learn.
- Provides additional resources and/or more proactive intervention, as needed, to support low-performing schools.
- Ensures that laws and regulations support efforts to provide adequate educational opportunities and minimize those that hinder them.
- Provides high-quality standards and competencies to outline the features of quality educational programs.
- Uses an inclusive process to design and administer high-quality state assessments, aligned to state standards and competencies.
- Compiles school and district data and constructs reports that are useful to district and school personnel for improving programs and student performance, ensuring data quality for continuous improvement and planning.
- Provides timely, responsive technical support, and other guidance to support accurate reporting and effective data use.
- Fosters community support for all public schools.
- Provides high-quality professional learning opportunities around common areas of identified need (e.g., reading and math instruction and intervention).

The District

- Is adequately funded by its local community.
- Provides schools with programs, materials, funding, and other resources to ensure that all students have opportunities for an adequate education.
- Hires and retains credentialed and qualified personnel to support schools and students.
- Creates policies and procedures that promote excellence and opportunity to learn.
- Collects, analyzes, and reports school and student data to support continuous improvement and planning.
- Communicates about the performance and progress of schools to ensure maximum transparency and build community support.
- Evaluates and continuously improves programs to ensure that schools are providing meaningful experiences for all students to grow and develop across grade levels and content areas.
- Adopts, with input from school-level staff, a meaningful, high-quality curriculum that prepares students to learn the content and skills described in the state content standards and competencies.

- Provides funding and support for implementing new curricula with integrity and establishes structures for ongoing implementation support.
- Creates opportunities and structures for high-quality professional learning for educators to improve learning for all students.

The School

- Is adequately funded by its district.
- Engages in an honest and self-reflective continuous improvement process to identify what is working well, what needs adjustment, and what should be abandoned.
- Strives for and communicates high expectations and sets the conditions for a positive and inclusive learning culture and climate for all members of the school community.
- Engages meaningfully with families and the community throughout the year.
- Ensures that educators are full partners in selecting/designing, and implementing high-quality instructional models and materials.
- Designs and implements a high-quality local assessment system that supports rich learning environments.
- Provides educators with relevant and job-embedded professional development opportunities.
- Provides regular time for educators to collaborate about student work and learning.
- Creates, implements, and monitors school improvement plans based on identified needs, using a solid research base and best practices.
- Supports a distributed leadership system to foster shared ownership and responsibility for school function and student growth.
- Provides a system of supports, interventions, and enrichments to meet the needs of all students.
- Collects, analyzes, and reports school and student data to support continuous improvement, planning, and decision-making.
- Actively participates in data review and validation processes to ensure the accuracy and integrity of assessment and accountability reporting.

The conditions and actions listed above represent strong expectations for the adults at various levels of the system that they must meet for students to succeed.

Redesign Principles

The Accountability Task Force identified a set of principles to guide the redesign work. The Task Force discussed the desired characteristics and features of a revised system, including how to address trade-offs among competing design tensions and priorities. [Appendix C](#) presents eight design tensions commonly encountered in the design of accountability systems.

1. Change vs. comparing over time
2. Flexibility vs. standardization
3. Simplicity vs. comprehensiveness
4. Reporting new information vs. minimizing burden
5. Treating all schools the same vs. designing for exceptionality
6. Focus on outcomes vs. both outcomes and opportunities
7. Longer-term implementation vs. near-term implementation
8. Single system vs. hybrid system vs. multiple systems

The continua presented in [Appendix C](#) were provided to the Task Force to spur discussion about the tensions and to elicit common perspectives among the Task Force members. The Task Force's perspective on the accountability design principles guided its recommendations on indicators, measures, and system design features, summarized below.

1. The current approach to state accountability is not sufficient, and **change is necessary**, even though this might make it difficult to meaningfully compare federal and state accountability results after the transition.

The redesigned state system:

2. Should be **mostly standardized**, where all schools are measured using the same indicators and measures, **but there are some key areas where flexibility will be important** (e.g., alternative high schools; postsecondary readiness indicator).
3. Should be **comprehensive** with attention to the audience, but it shouldn't be so complex that the public can't understand the system. It should be guided by the desire to add more meaningful data beyond what the system is now.
4. Can **report new information as long as it's meaningful and relevant**. In other words, the burden of new data collection should not be a barrier, but it must be important information.
5. Should be **designed as a flexible system that could be meaningfully applied to all schools**, regardless of exceptionality, such as unusual grade configurations or unique missions and populations served.

6. Should **balance opportunity and outcome indicators**, selecting indicators that are under the school's control.
7. **Could take longer to implement** because the data must be reviewed and accurate at all levels. The Task Force recommends that it is vital to “go slow in order to go fast.” **However, if the system's technical quality is assured, there is no reason to delay implementation.**
8. Should be a **hybrid system** with overlap of indicators between the federal and state accountability systems, but the federal system and requirements should not drive the state system and requirements.

Section V. Public Input

Feedback from the Field (Leader Survey)

The Task Force sought feedback from the field to better understand how a broader group of district and school leaders in the state view a selection of these design tensions, along with the Task Force's perspective on Redesign Principles #2-5, because these were determined to be the highest priority principles for public input. A Google survey was shared at regional meetings of superintendents, principals, and leaders in curriculum and instruction, special education, and CTE in November and December 2025. The survey and detailed results are available upon request.

Seventy-nine educational leaders across New Hampshire shared their perspectives on the accountability design principles. The largest groups of participants were superintendents (n = 33) and principals (n = 25), accounting for over 73% of the total feedback. The findings from this convenience sample are not generalizable. Rather, they represent the views and perspectives of those who completed the survey.

That said, respondents tended to agree with the Task Force's perspectives on the trade-offs related to the accountability design principles presented in the survey (i.e., a 70:30 or 80:20 agree-to-disagree ratio). District and school leaders who completed the survey tended to favor:

- Allowing flexibility where appropriate (e.g., postsecondary readiness) rather than creating a standardized/ comparable accountability system [Redesign Principle #2].
- Comprehensiveness over simplicity [Redesign Principle #3].
- Reporting new information rather than minimizing data-collection burdens [Redesign Principle #4].
- Designing for differences across schools (e.g., alternative high schools) rather than treating all schools the same [Redesign Principle #5].

However, respondents raised some concerns in their open-ended comments. For example, leaders raised concerns about local capacity to collect comprehensive accountability data without any additional funding or state support. The Task Force discussed the survey results during its February 5, 2026, meeting.

Public Listening Sessions

The Task Force sought feedback from the field on the proposed features of the New Hampshire state accountability system in April 2026 through four in-person presentations/discussions (two sessions were also live-streamed) and a feedback survey. Sessions were held in Concord, Derry, Berlin, and Keene. Each session included background about the Task Force charge, the theory of action, and elements of the proposed system. Participants asked clarifying questions, provided public comments, and were also invited to complete a short survey.

Forty-two members of the public attended sessions, either in person or remotely, and 23 completed surveys. Participants included administrators, teachers, parents, and school board members. Results from comments and surveys are combined below to describe what participants liked about the proposed system, where they had suggestions and concerns, and the areas where they needed more clarification. The latter points were largely related to decisions the Task Force had not yet made at the time of the listening sessions.

Respondents responded favorably to the comprehensiveness of the approach, including the types of indicators included, the peer review process, and the school improvement orientation. They particularly called out the inclusion of science achievement and indicators related to student attendance, educator certification, and school climate. Several commented on the benefits of a broader definition of high school graduation. Appreciation was expressed for the Task Force's efforts to create a system that is more meaningful for schools than the current one.

Common questions and concerns were also raised. Some asked if all schools, including non-public, virtual, and charter schools, would be held accountable by this system. Several participants spoke about the importance of assessing performance in the early grades. There were questions about how growth will be measured and if high school assessments will remain the same. A few also asked for clarification on the opportunity indicator. Several raised concerns that it might be difficult to secure and fund an adequate number of peer reviewers and wanted assurance that the peer review would align with other review processes (e.g., NEASC approval). Respondents were sensitive to any approach that might create inequities for low-resourced schools. Finally, increasing public participation and awareness was identified as a recommendation.

Participants identified the need for clarification in several areas for which, at the time of the

listening sessions, the Task Force had yet to complete deliberations, including the calculation and weighting of growth; the relationship between graduation and completion; more details about post-secondary metrics; and the mechanics of determining adequacy. They also wanted more information about the plan for identified schools, as well as the method by which schools can exit identification.

The Task Force members incorporated feedback from the listening sessions where appropriate, but they recognized that relatively few people participated in the sessions or otherwise provided input.

Appendix A: Selected New Hampshire Legislation

193-E:2-a Substantive Educational Content of an Adequate Education.

I. (a) Beginning in the school year 2008-2009, and for each year thereafter, the specific criteria and substantive educational program that deliver the opportunity for an adequate education shall be defined and identified as the school approval standards in the following learning areas:

- (1) English/language arts and reading.
- (2) Mathematics.
- (3) Science.
- (4) Social studies, including civics, government, economics, geography, history, and Holocaust and genocide education.
- (5) Arts education, including music and visual arts.
- (6) World languages.
- (7) Health and wellness education, including a policy for violations of RSA 126-K:8, I(a).
- (8) Physical education.
- (9) Engineering and technologies including technology applications.
- (10) Personal finance literacy.
- (11) Computer science.

(b) Teachers shall use academic and applied instruction to teach the learning areas under subparagraph (a). The following skills shall be integrated into the learning areas:

- (1) Computer use and digital literacy.
- (2) Logic and rhetoric.

II. The standards shall cover kindergarten through twelfth grade and shall clearly set forth the opportunities to acquire the communication, analytical and research skills and competencies, as well as the substantive knowledge expected to be possessed by students at the various grade levels, including the credit requirement necessary to earn a high school diploma.

II-a. Instruction in support of kindergarten standards shall be engaging and shall foster children's development and learning in all domains including physical, social, cognitive, and language. Educators shall create a learning environment that facilitates high quality, child-directed experiences based upon early childhood best teaching practices and play-based learning that comprise movement, creative expression, exploration, socialization, and music. Educators shall develop literacy through guided reading and shall provide unstructured time for the discovery of each child's individual talents, abilities, and needs.

III. Public schools and public academies shall adhere to the standards identified in paragraph I.

IV. (a) The minimum standards for public school approval for the areas identified in paragraph I shall constitute the opportunity for the delivery of an adequate education. The general court shall periodically, but not less frequently than every 10 years, review, revise, and update, as necessary, the minimum standards identified in paragraph I and shall ensure that the high quality of the minimum standards for public school approval in each area of education identified in paragraph I

is maintained. Changes made by the board of education to the school approval standards through rulemaking after the effective date of this section shall not be included within the standards that constitute the opportunity for the delivery of an adequate education without prior adoption by the general court. The board of education shall provide written notice to the speaker of the house of representatives, the president of the senate, and the chairs of the house and senate education committees of any changes to the school approval standards adopted pursuant to RSA 541-A.

(b) Neither the department of education nor the state board of education shall by statute or rule require that the common core standards developed jointly by the National Governors Association and the Council of Chief State School Officers be implemented in any school or school district in this state. If the local school board elects not to implement the common core standards or the common core state standards adopted by the state board pursuant to RSA 541-A, the local school board shall determine, approve, and implement alternative academic standards.

(c) The state board shall not amend any existing academic standards and shall not approve any new academic standards without the prior review and recommendation of the legislative oversight committee established in RSA 193-C:8-a.

(d) In this paragraph, "academic standards" shall have the same meaning as in RSA 193-E:2-a, VI(b).

V. (a) The general court requires the state board of education and the department of education to institute procedures for maintaining, updating, improving, and refining the minimum standards for public school approval for each area of education identified in paragraph I. Each school district shall be responsible for maintaining, updating, improving, and refining curriculum. The curriculum shall present educational goals, broad pedagogical approaches and strategies for assisting students in the development of the skills, competencies, and knowledge called for by the minimum standards for public school approval for each area of education identified in paragraph I. It is the responsibility of local teachers, administrators, and school boards to identify and implement approaches best suited for the students in their communities to acquire the skills and knowledge included in the curriculum, to determine the scope, organization, and sequence of course offerings, and to choose the methods of instruction, the activities, and the materials to be used.

(b) The state board of education shall adopt rules, pursuant to RSA 541-A, relative to the approval of alternative programs for granting credit leading to graduation.

VI. In this section:

(a) "Minimum standards for public school approval" mean the applicable criteria that public schools and public academies shall meet in order to be an approved school, as adopted by the state board of education through administrative rules.

(b) "Academic standards" means what a student should know and be able to do in a course or at each grade level.

(c) "Curriculum" means the lessons and academic content taught in school or in a specific course or program.

(d) "Applied learning" means an educational approach whereby students have the opportunity to directly engage in learning activities using knowledge and skills.

(e) "Logic" means a reasoning skill that better enables a student to analyze problems in learning areas such as mathematics and to develop problem solutions; to better understand the principle of cause and effect; and to develop critical thinking skills to better identify fact from unverified information or data.

(f) "Rhetoric" means the skill of speaking and writing as a means of communication or persuasion.

193-E:3-c Development, Implementation, and Review of the Performance-Based Accountability System

I. There is hereby established a Task Force to develop and review the performance-based accountability system (PBAS) that will serve to demonstrate that a school is providing the opportunity for an adequate education as defined in RSA 193-E:2-a.

II. The Task Force shall be composed of no fewer than 10 and no more than 15 members and shall consist of:

(a) Six or more individuals who hold a current New Hampshire certification of superintendent, assistant superintendent, or curriculum administrator. There shall be at least one representative of each of the 5 New Hampshire School Administrators Association administrative regions and one statewide at-large representative.

(b) Two individuals who hold a current New Hampshire certification of principal.

(c) Two individuals who hold a current New Hampshire experienced educator license as classroom teachers, one elementary and one secondary, who are familiar with performance-based accountability and work in the role of classroom teacher in a school.

(d) Other educational experts whose understanding of performance-based accountability and expertise will be of benefit to the Task Force's duties.

III. The Department of Education shall:

(a) Appoint Task Force members after consultation with professional education organizations and stakeholder groups with relevant assessment and accountability expertise.

(b) Advise, facilitate, and provide technical support to the Task Force as needed.

(c) Set the schedule and call meetings of the Task Force as needed to meet the deliverables of this section.

(d) Support the chairperson in posting notices and minutes of Task Force meetings as needed to meet the deliverables of this section.

(e) Solicit public comment and host listening sessions relative to State PBAS proposals in collaboration with the Task Force.

IV. The Task Force shall have the following duties:

- (a) Elect a chairperson.
- (b) Define the performance-based accountability system to be used by schools that will ensure that the opportunity for an adequate education as defined in RSA 193-E:2-a is provided.
- (c) Identify performance criteria and measurements.
- (d) Establish performance goals and the relative weights assigned to those goals.
- (e) Ensure that State PBAS performance criteria are aligned with academic standards and with the scope and sequence of skill and knowledge development at various learning levels.
- (f) Develop a process of continuous review and improvement to the State PBAS.
- (g) Review and make recommendations of the applicability and application of the State PBAS for chartered public schools established pursuant to RSA 194-B and alternative schools.
- (h) Advise the department on the initial and ongoing implementation of State PBAS, including developing deadlines and data collection and reporting methodologies.

V. The department may provide stipends, mileage, and expense reimbursement to members of the Task Force established in this section, as well as make expenditures of other costs associated with administration of the Task Force as determined to be appropriate by the department.

VI. Any unexpended funds for the biennium ending June 30, 2025, and each biennium thereafter in accounts 06-56-560040-3043-612 and 06-56-567010-7064-612, shall not lapse and shall be made available to the department of education for the purpose of providing reimbursements of expenses related to this section.

VII. The Task Force shall develop a performance-based scoring system, which shall be based on data and indicators which are already provided to the department and/or performance measures that schools are already required to provide the department under other state or federal laws. In establishing the performance-based system, the Task Force may consider one or more of the following data and indicators:

- (a) Performance on state assessments pursuant to RSA 193-C.
- (b) Indicators identified in RSA 193-E:3, I.
- (c) College and career readiness indicators aligned to the New Hampshire consolidated state plan, as required by the Elementary and Secondary Education Act, 20 U.S.C. section 6301 et seq. as amended.
- (d) Other metrics as determined by the Task Force.

VIII. The Task Force shall provide a report of its findings and make recommendations for future legislation for the performance-based accountability system to the state board of education and the legislative oversight committee established in RSA 193-C:8-a no later than June 30, 2026.

Section 193-E:3-d - Performance-Based School Accountability System; Verification Process

Prior to the submission of the final report pursuant to RSA 193-E:3-c, VIII, the department shall undertake a process to verify and test the integrity, accuracy, and validity of the performance-based accountability system utilizing the best available data from one school from each of the counties in the state. The commissioner shall ensure, to the greatest extent possible, that the verification process utilizes the best available data from a balance of elementary and secondary schools representing diverse socioeconomic conditions throughout the state. The commissioner shall work with school officials and faculty from the selected schools to implement the performance-based school accountability program and to develop a data collection system which will allow schools to easily report results to the department for analysis and reporting. The commissioner shall review and make recommendations regarding the performance-based accountability system to ensure that the system adequately measures the goals and indicators associated with student academic achievement and growth.

193-H-School Performance and Accountability

193-H:1 Definitions. –

In this chapter:

- I. "Commissioner" means the commissioner of the department of education.
- II. "Competencies" means student learning targets that represent a level of mastery of key content-specific concepts, skills, and knowledge applied within or across content domains. Specific and required types of competencies include district competencies at grade level and course or program competencies required for graduation and graduation competencies.
- III. (a) "Comprehensive support and improvement school" means:
 - (1) Any school that accepts federal funds from Title I, Part A of ESSA and is among the 5 percent lowest performing Title I schools in the state as defined by the New Hampshire consolidated state plan required for ESSA.
 - (2) Any school that is among the lowest performing 5 percent of all schools in the state based on the same methodology used in subparagraph (1) regardless of Title I status.
 - (3) Any high school with a graduation rate of less than 67 percent.
- (b) The department shall produce initial determinations of comprehensive support and improvement schools in the fall of 2018, using data from the 2017-2018 school year. Subsequent determinations shall be made based upon a schedule set forth in the New Hampshire consolidated state plan. The purpose of the consolidated state plan is to provide parents with quality, transparent information about how the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), will be implemented in New Hampshire as submitted by the state and approved by the federal Department of Education.

(c) Those schools identified as comprehensive support and improvement schools, that also receive Title I, Part A funds through ESSA, may also receive federal Title I school improvement funds, if available, to assist in improvement activities.

(d) Any school that demonstrates and meets criteria established as a comprehensive support and improvement school pursuant to subparagraph (a) shall be identified as a school in need of corrective and technical assistance and subject to RSA 193-E:3-e.

IV. "Department" means the department of education.

V. "ESSA" means the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act.

VI. "Statewide assessment" means the New Hampshire education improvement and assessment program as established under RSA 193-C.

VII. "Targeted support and improvement schools" means:

(a)(1) Any school with at least one consistently low performing subgroup as defined by the state's methodology documented in the New Hampshire consolidated state plan required for ESSA. Additional targeted support and improvement schools are those schools with subgroups of students that, on their own, would fall below the thresholds used to identify all schools for comprehensive support and improvement. The department shall produce initial determinations of targeted support and improvement schools using data from the 2017-2018 school year.

Subsequent determinations shall be made based upon a schedule set forth in the New Hampshire consolidated state plan.

(2) Any school that demonstrates and meets criteria established as a targeted support and improvement school pursuant to subparagraph (a) shall be identified as a school in need of corrective and technical assistance and subject to RSA 193-E:3-e.

(b) Those schools identified for targeted support and improvement schools, that also receive Title I, Part A funds through ESSA, may also receive federal Title I school improvement funds, if available, to assist in improvement activities.

VIII. "Work-study practices" means those behaviors that enhance learning achievement and promote a positive work ethic such as, but not limited to, listening and following directions, accepting responsibility, staying on task, completing work accurately, managing time wisely, showing initiative, and being cooperative, and work-study skills that contribute to success in college, career, and life that include communication, creativity, collaboration, and self-direction.

Source. 2003, 314:6. 2013, 263:2, eff. Sept. 22, 2013. 2018, 185:1, eff. Aug. 7, 2018. 2024, 350:6, 7, eff. Oct. 1, 2024.

193-H:1-a Purpose. –

I. The purpose of this chapter is to create an accountability model that will best support schools and educators as they work to enable all students to progress toward college and career readiness with clearly defined learning outcomes.

II. New Hampshire's student assessment system should promote and measure knowledge and skills that lead students to graduate from high schools ready for college and career.

III. Students best learn at their own pace as they master content and skills, allowing them to advance when they demonstrate the desired level of mastery rather than progressing based on a predetermined amount of seat time in a classroom will assure that students will reach college and career readiness.

IV. New Hampshire's system of educator support should promote the capacity of educators to deeply engage students in learning rigorous and meaningful knowledge, skills, and work-study practices for success in college, career, and citizenship.

V. Competency-based strategies provide flexibility in the way that credit can be earned and awarded and provide students with personalized learning, including those that are offered through on-line, blended, and community based opportunities.

193-H:2 Statewide Performance Targets. –

I. Schools shall meet performance based indicators under this chapter, and statewide performance targets as approved by the legislative oversight committee established in RSA 193-C and thereafter, as established in rules adopted by the state board of education pursuant to RSA 541-A.

II. Notwithstanding RSA 541-A, the state board of education shall receive approval from the legislative oversight committee established in RSA 193-C prior to the submission of any rules to the joint legislative committee on administrative rules relative to statewide performance targets and performance based indicators required under this section.

193-H:3 Identification and Public Disclosure of Targeted Support and Improvement Schools and Comprehensive Support and Improvement Schools. –

I. The commissioner shall annually compile and disseminate to the governor and council, the president of the senate, the speaker of the house of representatives, local school boards, superintendents of schools, and the public, and shall make available on the department website, a list of targeted support and improvement schools and comprehensive support and improvement schools.

II. A school or school district designated by the commissioner as a targeted support and improvement school or a comprehensive support and improvement school shall have 30 days from the date of the report to appeal such designation to the state board of education.

193-H:4 Local Education Improvement Plan; Strategic Responses. –

I. (a) A school shall have one year from the date that a school has been designated as a targeted support and improvement school or a comprehensive support and improvement school pursuant to RSA 193-H:3 to take action to remedy identified problems at the local level. The school shall create an initial plan that identifies actions that it intends implement to correct the areas of concern. The plan shall be submitted to the state board within 90 days of the date that the school or school district was designated as a targeted support and improvement school or a comprehensive support and improvement school. If the plan does not sufficiently address the

areas of concern, the state board shall disapprove the plan within 30 days. If the state board disapproves the plan, the state board's designee shall work with the school district where the school is located to amend the plan so that it meets state board approval. One year following the designation, if the school or school district is not making satisfactory progress in implementing its plan, the commissioner shall issue a notice to the school district and shall initiate a process for providing assistance pursuant to this section.

(b) If a school has been designated as a targeted support and improvement school or a comprehensive support and improvement school, the school district, on behalf of the school, may request assistance from the department. The department shall, if resources allow, provide technical assistance to those schools that request assistance under this section.

(c) No later than one year after designation as a targeted support and improvement school or a comprehensive support and improvement school, the commissioner shall designate a progress review team to evaluate the implementation of the improvement plans and the progress toward state performance targets. The progress review team shall deliver a report to the state board. The report shall include evidence of satisfactory implementation and progress towards state performance targets or lack thereof and recommendations regarding future actions.

II. [Repealed.]

III. At a minimum, the corrective action plan filed by the commissioner shall:

(a) Identify the area in which the school needs to meet the annual statewide performance targets established under RSA 193-H:2.

(b) Identify and describe the strategy the school intends to implement to improve its performance.

(c) Establish and explain a strategy designed to promote family and community involvement.

(d) Detail how the school district budget reflects the goals of the local education improvement plan.

IV. In addition to the provisions of paragraph III, each plan filed by the commissioner may include the following elements:

(a) The school's curriculum including curricular priorities and instructional materials.

(b) Instructional models that incorporate research-based practices that have been proven to be effective in improving student achievement.

(c) Formal and informal opportunities to assess and monitor each child's progress.

(d) Evidence of data-based decisions.

(e) Structural reform strategies that may include schedule, organization, support mechanisms, and resources.

(f) Shared leadership structure to support school improvement.

(g) Professional development that is aligned with school improvement goals.

(h) External support and resources based on their effectiveness and alignment with the school improvement plan.

(i) Extended learning activities for students.

Appendix B: Fiscal Note

Proposed Budget for New Hampshire Accountability System

Assumptions:

1. This is an annual budget based on the assumption that 83 of the almost 500 schools (one-sixth) are reviewed each year.
2. Each school review will require each of the three reviewers to spend approximately eight hours reviewing and writing notes and summaries for each review.
3. We further assume that reviewers will review all of the schools in a given district.
4. For the purposes of this analysis, we assume that each reviewer will review six schools each year or spend a total of three days per year.
5. Thus, we assume that we will need approximately 14 teams of three reviewers each year, or a total of 42 reviewers each year.

Given these assumptions, we anticipate the following costs each year:

Reviewer stipends = \$147,000. This is based on paying each of 42 reviewers \$500/day for a total of seven days (six days of reviewing plus one day of training).

Technical support and leadership = \$75,000.

Facilities and food = \$10,000.

Hotels and mileage = \$25,000 (for reviewers who need to stay overnight and pay mileage).

NHED personnel = At least one FTE to manage and support the process.

Total cost = \$257,000/year

School Improvement Funds - Direct Grants to LEAs

Each school identified for not providing an opportunity for students to receive an adequate education will require funding to support its improvement efforts. The exact amount of funding will depend on the number of schools identified and the intensity of the support required. Based

on NHED's experience with Comprehensive Support and Improvement schools, we estimate that approximately \$50,000/year will be required for each identified school.

NH Department of Education Administration, Support, and Technical Assistance

Managing the operational lifecycle of the accountability system demands a tiered staffing structure that combines high-level regulatory administration with specialized technical execution. NHED has identified the following minimum staffing requirements:

A. State Administrator (1.0 FTE)

- **Estimated Position Cost:** \$180,000 (inclusive of salary, benefits, equipment, etc.)
- **Role Summary:** The State Administrator will serve as the program's executive director, carrying ultimate responsibility for the system's compliance, strategic alignment, and overall administration.
- **Key Responsibilities:**
 - **Program Administration & Oversight:** Directing the execution of the state accountability model, ensuring alignment with state statutes and federal guidelines.
 - **Public Transparency Reporting:** Overseeing the design, verification, and dissemination of public accountability metrics and fulfilling state transparency requirements.
 - **Stakeholder Liaison:** Serving as the primary point of contact for superintendents, school boards, and legislative committees regarding performance benchmarks and evaluation methods.
 - **Policy Alignment:** Reviewing and adjusting accountability parameters in response to educational outcomes and statutory modifications.

B. Program Staff (2.0 FTE)

- **Estimated Position Cost:** \$130,000 per position (\$260,000 combined total)
- **Role Summary:** The two support positions provide the operational and technical foundation required to execute the administrator's directives and interface directly with school districts. Their roles are divided into two primary focus areas:
- **Key Responsibilities:**
 - **Technical Assistance & Training Coordination:** Serving as the frontline support for schools; developing and executing training for local administrators regarding compliance standards, reporting deadlines, and state accountability indicators.

- **Data Collection & Material Development:** Creating, refining, and distributing standardized templates, compliance forms, and data collection materials; ensuring school districts possess clear instructions to submit accurate information.
- **Systems Administration Support:** Assisting in the maintenance of data pipelines, performing initial quality assurance checks on submitted school metrics, and troubleshooting user-end operational issues.

Operational Core Requirements

Staffing alone is insufficient to support the proposed accountability system. Accompanying operational funding is required to satisfy specific mandates within the program's scope:

- **Technical Assistance & Support to Schools:** Funding for regional workshops, consultative site visits, and localized support mechanisms to assist underperforming schools in interpreting data and implementing improvement strategies.
- **Data Collection Infrastructure & Material Development:** Development of secure, integrated data collection instruments, software interfaces, or modifications to existing databases to accommodate the new system's indicators.
- **Form Creation and Dissemination:** Graphic and digital development of standardized compliance templates, explanatory circulars, and instructional guidelines distributed statewide.
- **Public Transparency Reporting Systems:** Designing and deploying an accessible, web-based public reporting interface or dashboard to display school accountability outcomes transparently for parents, educators, and lawmakers.

Operational funding for a new state accountability system would likely be front-loaded within the first one to two years, with an expected cost of about \$200,000 to build and maintain the systems and business rules necessary to develop, collect, and report on the accountability system. Maintenance of the systems would significantly decrease in the following years, with an anticipated annual maintenance cost of approximately \$50,000.

Appendix C: Accountability Design Tensions

#	Accountability Design Tension	Continuum of Perspectives	
1	Change vs. Comparing Over Time	<p>Change: If the current system does not serve its intended purposes well, then modifications are needed. This may involve adding or removing indicators, modifying indicators, and/or changing the “rules” for how indicators are combined, and school ratings are produced (if at all).</p>	<p>Comparability Over Time: Making substantive changes to the system will inhibit our ability to meaningfully compare accountability results in future years with those from previous years.</p>
2	Flexibility vs. Standardization	<p>Flexibility: Flexibility could include the (1) use of local measures in accountability, (2) choice over which indicators are relevant for a school, or (3) choice over what data or evidence can be used for an indicator.</p>	<p>Standardization/Comparability: All schools are measured using the same indicators and methods.</p>
3	Simplicity vs. Comprehensiveness	<p>Simplicity: The accountability system should be straightforward and uncomplicated. For example, the number of indicators should be minimized, and each measure should be easy to understand and compute locally.</p>	<p>Comprehensiveness: The accountability system should be comprehensive and use the most technically defensible set of indicators and measures, even if there are many indicators or some measures are difficult to understand or compute locally.</p>
4	Reporting New Information vs. Minimizing Burden	<p>Reporting New Information: Collecting new types of data or qualitative information that is not currently collected, but can provide new or local context.</p>	<p>Minimizing New Data Collection Burden: Using only existing data collected by NHED in the accountability system, even if there are improvements made to how the data is collected.</p>

#	Accountability Design Tension	Continuum of Perspectives	
5	Treating all schools the same vs. designing for exceptionalty	Treating All Schools the Same: Every school is held accountable for the same set of indicators or expectations regardless of its unique student populations, missions, or grade configurations.	Designing for Exceptionality: There could be either (1) separate accountability systems for exceptional schools (e.g., alternative high schools, K-2 schools), or (2) the same accountability system, but it is designed broadly and flexibly enough to apply to all schools regardless of their unique student populations, missions, or grade configurations.
6	Focus on outcomes vs. both outcomes and opportunities	Mostly Outcomes: Most accountability systems designed to meet federal requirements focus on outcomes (e.g., academic achievement, growth, graduation rate, chronic absenteeism). Outcomes-based indicators/ measures are typically lagging indicators of school quality.	Balance of Outcomes & Opportunities: Accountability systems can also include a broad set of indicators that measure both student educational opportunities and outcomes. Opportunities can be thought of as inputs into the system, such as school climate, curriculum quality, and opportunities for advanced coursework. These research-based inputs may support the desired outcomes.
7	Longer-Term Implementation vs. Near-Term Implementation	Longer-term Implementation: A more deliberate implementation approach allows for time to study the impact of potential changes and can result in greater confidence that the new system is working as intended.	Near-term Implementation: A quicker implementation allows for a potentially faster realization of the goals, purposes, and uses of the changes. However, it may require changes in subsequent years if the model is found not to be working as intended.

#	Accountability Design Tension	Continuum of Perspectives	
8	Single System vs. Multiple Systems (vs. Hybrid System)	<p>Single System: A single system is one in which the federal and state accountability systems are addressed.</p> <p>Hybrid System: A hybrid system means that part of the system meets federal requirements, while other components are designed to meet state-specific needs. Such a system requires decision-making about how tightly to couple the state and federal parts.</p>	<p>Multiple Systems: Some federal requirements may be seen as a constraint. For example, ESSA requirements limit School Quality and Student Success (SQSS) indicators to those that are standardized and comparable. Allowing multiple systems means the state can pursue state-specific priorities outside of the constraints of the federal system.</p>