# Table of Contents

- Introduction ............................................. 1
- Pave the Way Forward ................................. 2
- Hold the Line ............................................. 4
- Protect the Promise ..................................... 9
- Conclusion .................................................. 11
- Resources ................................................... 12
- Appendix .................................................... 13
- Acknowledgments ......................................... 15
Introduction

States across the nation are turning their aspirations for college and career readiness for all students into action. They are moving beyond policy and practice centered on a floor — aiming for students to attain minimal proficiency on basic academic standards — to a new focus on ensuring that all students develop the capacity to demonstrate mastery of content and skills toward and beyond college and career readiness.

With this shift comes a new realization and greater urgency. The traditional system — in which students move ahead, year after year, regardless of whether they have reached a level of understanding that prepares them for what comes next — has perpetuated learning gaps for students that only grow over time. It has contributed to a system that restrains students — far too often, students of color, low-income students, English language learners (ELLs) and students with disabilities — from ever meeting the level of preparation they need for college and career.

In some states, leaders and educators have determined that to realize the promise of high expectations for all students that reflect a clear learning progression toward and beyond college and career readiness, students will need access to a far more personalized approach to learning. The traditional time-based system, they have concluded, has not served all students well — even when policy and practice were centered on a floor of minimal proficiency. The system holds little hope for helping all students reach, and have the opportunity to exceed, the level of preparation needed for college and career readiness. In these states, there is an increasing urgency to move away from the traditional system that has produced such inequitable results and toward a competency-based system in which students and their mastery of knowledge and skills — not time and the calendar — form the center.

Across states, what this competency-based system looks like, and how states transition to it, will vary based on state priorities and context — which only reinforces the value of state leadership to find the route that fits best. But one thing is true across all states — the journey to change from a traditional system to a competency-based system that succeeds in helping far more students be prepared for college and career will require strong and steady leadership. This work is complicated and challenging, but worthwhile. This paper is designed to provide guidance to state leaders in this journey across three major areas in which they should exercise strong leadership — all of which are important to ensure that their effort translates into the right actions in districts and schools and then into solid results for students:

1. **Pave the way forward:** Clarify the purpose and meaning of competency-based pathways.

2. **Hold the line:** Ensure that state graduation requirements, assessments and accountability systems promote determinations of competency that equate to college and career readiness.

3. **Protect the promise:** Identify and mitigate risks to equity.

These are only a subset of the issues that states will need to address and where leadership will be paramount. However, these priority areas have emerged throughout Achieve’s work with states in advancing policy and practice in graduation requirements, assessment and accountability and are important lessons for all states to consider.

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1 Achieve’s state policy framework, Advancing Competency-Based Pathways to College and Career Readiness, is designed to help state leaders navigate the most critical questions to find that best fit vision, as well as the policy and implementation questions they will encounter along the way in graduation requirements, assessments and accountability.
Pave the Way Forward

Clarify the purpose and meaning of competency-based pathways

A critical opportunity for state leadership is in creating a common understanding of what competency-based pathways (CBP) mean and what they are intended to accomplish, as well as how they relate to other critical reforms. This understanding should be shared across districts and schools, across teachers, and across students. It also should form the foundation for clear communication with parents, communities and policymakers. The path to create such common understanding will require a significant commitment of leaders’ time and focus to crystalize and share the vision, ensure broad buy-in, and open up opportunities for stakeholders to see concrete examples of what CBP is and is not. Without such common understanding, states will have difficulty moving ahead — misunderstandings and misconceptions will abound, there will be confusion about why the state is focusing on this effort in the midst of additional change, and the ability to take important steps in policy and practice will be hampered.

Defining CBP

Across states, a number of different terms — competency-based, proficiency-based, standards-based, performance-based, mastery-based and others — are used to describe a similar approach to learning.

To encourage systematic change within a state, it is important for states to work together with districts and stakeholders to settle on one term for CBP, define it clearly, and communicate it widely and consistently. Which term is chosen matters only in making it work in the state’s context; what matters most is that this one term is then used consistently. There is a strong risk that different terms may be used even within a state and that the meanings will not be clear, leading to significant misunderstandings.

A Starting Point for Defining CBP

The following description, adopted by Achieve’s Competency-Based Pathways Working Group, is based on the working definition of CBP:

- Students advance upon demonstrated mastery.
- Competencies include explicit, measurable, transferable learning objectives that empower students.
- Assessment is meaningful and a positive learning experience for students.
- Students receive rapid, differentiated support based on their individual learning needs.
- Learning outcomes emphasize competencies that include the application and creation of knowledge.
- The process of reaching learning outcomes encourages students to develop skills and dispositions important for success in college, careers and citizenship.

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2 Achieve’s Competency-Based Pathways Working Group met between August 2012 and November 2013 to develop the state policy framework. It comprised representatives from 11 states (Colorado, Hawaii, Kentucky, Louisiana, Maine, Michigan, Missouri, Ohio, Rhode Island, Washington and Wisconsin) and 11 national and state organizations (Advance Illinois, Alliance for Excellent Education, Business Education Compact, Council of Chief State School Officers, Data Quality Campaign, Digital Learning Now, INACOL, MetisNet, National Center for Time and Learning, National Governors Association and Western Governors University).

3 In an effort to reach a shared understanding across the nation, Susan Patrick, president of INACOL, and Chris Sturgis, principal of MetisNet, developed a working definition of CBP.
In Maine, the state and districts have worked together to develop a glossary of terms to support shared understanding of the state’s movement toward proficiency-based learning. The glossary differentiates between proficiency-based (or standards-based) approaches, in which “student progress in demonstrating proficiency of standards is measured and used to determine advancement to higher learning levels,” and a standards-referenced system, in which “students generally advance in age-based cohorts (grade levels) and may advance without demonstration of proficiency on specific standards.” In addition, the state and some districts have been building a shared understanding of student learning through the use of a common taxonomy to describe levels of learning — 1 as the lowest level (retrieval), 2 (comprehension), 3 (analysis) and 4 as the highest level (knowledge utilization).

**Clarifying the Rationale**

To build and maintain support for the challenging work of changing policy and practice to support a shift to CBP, states also should go beyond defining what CBP is — they should clarify and communicate about what it is intended to accomplish. Shifting from a time-based system to a competency-based system is not easy. It requires significant shifts in how teachers help students engage with content, assess student work and support students who have yet to master standards. It also can put pressure on time-honored systems, such as school schedules, traditional grade levels and grading systems, to change. To rally support and buy-in and maintain momentum during the most challenging moments, a compelling and shared rationale for why the work is necessary will prove invaluable. States should take care to work with stakeholders in crystallizing this rationale and then should always refer back to it in presentations and publications for educators, policymakers and the public. See “How Can CBP Help More Students Achieve College and Career Readiness?” for common themes for how states have addressed the rationale.

**Connecting CBP to Other Reforms**

The state has a critical role in defining the meaning of and rationale for CBP as well as its connection to other reform efforts, such as the implementation of college- and career-ready standards. Individual states also have great flexibility in how they define and prioritize this relationship. State leaders should be proactive in convening district and school leaders and other stakeholders to arrive at a common understanding of the state’s goals and strategies for reaching the goals — and to lay a foundation for clear and effective communication across the state; from the state, district and school levels; and with parents, community, and business and higher education leaders.

**How Can CBP Help More Students Achieve College and Career Readiness?**

It is essential that states have a clear and broadly shared understanding of how CBP could help them meet their college- and career-ready goals and aspirations for students. As such, state leaders should engage stakeholders in answering this question and communicate the answer often.

Although each state may answer this question differently, three primary themes often rise to the top in such conversations:

1. By focusing on **mastery** of all critical knowledge and skills throughout a student’s learning experience, competency-based education prevents learning gaps from developing and growing over time. As a result, this approach keeps students on the path toward preparation for college and career.

2. Through more **transparent** competency-based courses of study and grading and reporting systems, it is harder for students to fall through the cracks. It is clear what students need to know and be able to do to stay on track to college and career, and if they are not where they need to be, it is clear exactly where they need additional support.

3. By expecting students to have **ownership** of their learning and **flexibility** in how they demonstrate their learning, rather than promoting a one-size-fits-all approach, competency-based education reinforces student engagement and better prepares students for success after high school.
Hold the Line

*Ensure that state graduation requirements, assessments and accountability systems promote determinations of competency that equate to college and career readiness*

While a great deal of the innovation in CBP across the nation has been in schools and districts, states have a significant role to play in encouraging schools and districts to pursue CBP as a mechanism to help more students reach college and career readiness by graduation. A major part of that role is ensuring that competencies (or standards, learning targets, etc.) are aligned to college- and career-ready expectations and that determinations of mastery/proficiency of these competencies are at a level of rigor correlated to college and career readiness. In particular, states can accomplish this aim through advancements in state policy and practice to support competency-based approaches to graduation requirements (or credit accumulation/advancement), summative assessments and accountability indicators.

Paving the Way Forward: Engaging Stakeholders and Addressing Stumbling Blocks

As they work to advance CBP, states need to exercise strong, ongoing engagement of key stakeholders, including students, parents, teachers, administrators, policymakers, postsecondary leaders and the business community. Moving from a time-based to a competency-based system is challenging work for districts and schools, and helping them build and maintain momentum to move forward even through tough moments is essential. States should have their own communications and stakeholder engagement plans to support their competency work, and they should provide support to districts and schools to build and embed ongoing engagement and communications in their own journeys. This effort also should be part of a broader communications strategy about the state’s goals for students and the education system, including how CBP contributes to the state meeting its overall goals. Finally, this communications and engagement plan should include precise and ongoing feedback loops to ensure that stakeholders understand how their feedback is used.

States also can have significant effects on district and school success by helping to “pave the way forward” by addressing potential stumbling blocks. For example, one of the most visible concerns about CBP among parents is that it will diminish their child’s eligibility and competitiveness in applying for colleges. In response, states in the New England Secondary Schools Consortium have made an intentional, and very successful, effort to persuade higher education systems and institutions to sign on to an endorsement to not only accept competency-based high school transcripts but also to favor them.

Graduation Requirements

Currently, more than 30 states have policies that allow CBP (see Appendix page 13), although these policies do not always translate into broad use by districts and schools, where traditional definitions of credit as seat time prevail in local policy and practice. Many states, in fact, do not have seat-time requirements built into their state policy but rather define “credit” as proficiency on standards (e.g., Indiana and Washington), successful demonstration of a unit of study (Maryland) or mastery of the applicable subject matter (Minnesota). Some states also explicitly permit the use of competency-based methods to award credit or diplomas at the local level, either upon notification to the state education agency (Missouri) or upon approval from the agency (South Carolina). Other states leave all decisions up to local school districts. In most cases, these approaches to providing flexibility have led only to pockets of innovation and use of CBP for credit and graduation. States need to consider if and how they can go further to incentivize innovation and use.

For CBP to advance, states may need to do more than just allow districts and schools to use competency-based approaches for graduation and credit accumulation/advancement. Many states have learned that simply offering flexibility does not necessarily catalyze action and that they need to take actions that range from encouraging or supporting districts to strongly incentivizing use. States may need to take action to define competency-based graduation requirements or competency-based methods of awarding course credit — and to do so with an eye toward ensuring that determinations that students have completed required standards or otherwise reached competency reflect rigor and comparability across districts. States also can take more intermediate steps through policy or practice.
The most far-reaching approaches for states to take are to define competency-based graduation requirements statewide or require local districts to do so. Colorado has taken the first approach. In May 2013, the Colorado State Board of Education adopted initial statewide guidelines for districts in setting competency-based graduation requirements, effective for the graduating class of 2021. The guidelines tie graduation to student performance on a menu of assessment options, including end-of-course assessments from the Partnership for Assessment of Readiness for College and Careers (PARCC), the ACT or SAT, Advanced Placement/International Baccalaureate, the Armed Services Vocational Aptitude Battery (ASVAB), a senior capstone, and other options. One of the most critical elements of the Colorado guidelines is defining the threshold for competency across these assessments and options.

Maine, New Hampshire and Vermont have taken the second approach. In 2012, Maine's legislature passed LD1422, which requires local districts to adopt proficiency-based graduation requirements by January 2018. The Maine Department of Education is supporting districts in implementing this requirement through various means, including an online technical assistance plan. New Hampshire has eliminated the Carnegie unit that defines units of “seat time” from all state regulations and now requires local districts to make graduation decisions based on student attainment of competencies. It also has taken a strong stance on encouraging students to meet competencies outside of the classroom. New Hampshire, importantly, is putting in place a moderation process to ensure rigor and comparability of competency determinations across its system. Finally, in December 2013, the Vermont Board of Education voted to require all school districts to develop proficiency-based graduation requirements for the graduating class of 2020. These regulations went into effect in April 2014 following the administrative rulemaking process.

States also can take smaller steps forward to advance competency-based graduation and credit attainment. Several other states, such as Alabama and Florida, have taken a more limited approach to defining competency-based methods of awarding credit by offering credit advancement (or credit enhancement or acceleration) policies that allow students to receive credit for performance on a specified assessment without completing seat time requirements. In these states, defining the rigor needed for determinations of credit is often a responsibility shared between the state and local districts. For example, Alabama’s credit advancement policy allows eligible students to attain credit by achieving a statewide mastery score on an end-of-course assessment or by demonstrating proficiency through independent and teacher-led study or online opportunities. These smaller steps can be beneficial for states in beginning a conversation about the level of performance needed for credit or advancement, as well as broadening the pool of students and teachers who understand the value that such policies offer for students. These steps, however, could have an unintended effect of promoting a misconception that CBP is about assisting only “high-performing” students and not an approach that can help all students succeed.

Another, more limited approach in states that have seat time requirements is to offer seat time waivers to districts or other authorities to allow students to earn credit through competency-based methods. States that have taken this approach include Kentucky, Louisiana, Michigan and West Virginia. In some cases, these waivers are primarily focused on supporting students who are undercredited to accelerate their credit accumulation through meaningful methods. Again, seat time waivers can be a good entry point for states to advance CBP — and after they have had several years to be tested, the waiver policy can lead to more systemic efforts that affect more students.

Using Data To “Hold the Line” on CBP Implementation Across Graduation Requirements, Assessment and Accountability

As states manage transitions to CBP, it is imperative that they have a thorough plan in place to use data to inform progress and course adjustments along the way. On the front end, it will be beneficial for states to identify indicators that are associated with early implementation of CBP and illuminate how well students are performing according to these indicators in schools and districts in early stages of implementation. Indicators such as attendance, discipline and dropout rates — which are often leading indicators of strong CBP implementation with attendance rising and discipline and dropout rates falling — can be valuable to use to identify schools and districts that may need extra support. As implementation progresses, particularly in high school, indicators of college and career readiness, and of postsecondary education and training matriculation and success, can be valuable data points for the state, districts and schools to examine to suggest course adjustments. Regardless of the stage of implementation, however, the state should take care to examine data broken down by student race/ethnicity, income, ELL and students with disabilities status to find out if there are particular equity issues that need to be addressed.
States also can move beyond broad flexibility by **encouraging innovation** and **providing support and technical assistance**. Some states have sought to spark innovation among districts and schools by hosting statewide summits on competency-based education, such as in Iowa and Kentucky. Other approaches include seeding innovation through district-specific or regional “innovation zones” where statutes and regulations can be waived. Kentucky’s Districts of Innovation program is one prominent example. States also work to spark innovation by highlighting examples of effective practice, providing technical assistance, or providing grant funds to seed early adopter districts and schools. Iowa, for example, has issued guidelines to districts in using competency-based approaches.

**Holding the Line on Graduation Requirements**

State leaders should make careful decisions about what approach they will take for allowing, encouraging, incentivizing or requiring competency-based methods for students to advance toward high school graduation — and how they might sequence in several phases to give the system time to learn and adjust before CBP is applied statewide.

Regardless of the approach, states will need to take a strong leadership role to ensure that state policy and implementation across districts and schools translates into graduation requirements that include the full set of the state’s college- and career-ready standards. They also must take steps to ensure that across districts and schools, educators have the support they need to make determinations of student competency/proficiency/mastery according to a shared understanding about the level of performance that is necessary to advance toward high school graduation.

**Summative Assessment**

In a competency-based system, summative assessments play a critical role in validating determinations of student proficiency/mastery of standards for graduation and credit but also for advancing students through the standards throughout their K–12 course of study. The assessments will be an important piece of the state’s strategy for establishing comparability or moderating results across districts, schools and educators to ensure consistency of high expectations for all students. In this time of rapid transition and opportunity in the policy landscape of state summative assessments, primarily focused on a move to assessments that encourage deeper demonstration of knowledge and skills, states should think carefully about how they can best leverage summative assessments to support CBP. They should do so, however, with a critical eye toward ensuring that the full assessment system is aligned, coherent and streamlined. Students should not be taking assessments that do not provide meaningful learning experiences in their own right; do not provide valuable information to them, their families and their educators; or in any way contribute to an environment of “overtesting.”

One step that states can take is to work with districts to build meaningful, authentic demonstrations of student learning that are specifically designed around a competency-based system, such as a high school senior capstone experience or other “gateway” performance assessments. States also should work with districts to ensure thoughtful policy and protocols around any stakes they may apply to these assessments.

**What Are States Doing Now To Encourage Performance-Based Assessments?**

A number of states are working together and with districts to develop or pilot performance-based assessments. For example, several states in the Council of Chief State School Officers’ Innovation Lab Network are developing performance-based assessments through the Innovation Lab Network Performance Assessment Project, and states in New England are working to support greater personalization of the high school experience through strong moderation processes for performance assessments through the Center for Secondary School Redesign’s NETWORK program. In Ohio, the state is leveraging Race to the Top funds to build the capacity to offer performance-based assessments through its Ohio Performance Assessment Pilot Project.

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4 For additional guidance, please see Achieve’s Student Assessment Inventory for School Districts at http://www.achieve.org/publications/student-assessment-inventory-school-districts)
In addition, states should help districts and schools develop an infrastructure for summative assessments that can be administered more frequently to validate determinations of student competency or mastery. States may help facilitate development of cross-district or fully statewide assessments that can be administered at a student’s point of readiness and are designed specifically to validate determinations of mastery. States will have several models from higher education and local K–12 systems from which to learn.

For example, Western Governors University (WGU) has developed a model in which students take a standardized assessment at any time during a course and then take a performance assessment that ultimately determines mastery and determination of course credit. One of the key aspects of the WGU model is differentiation of educator roles — students have a strong ongoing relationship with an adviser, courses are facilitated by other educators who are focused on locating and sharing resources for students to master the competencies, and then performance assessments are scored by other educators without a relationship with the student.

On the K–12 side, Adams County School District 50 in Colorado pioneered a Measurement Topic Assessment designed to be administered at students’ point of readiness to validate teachers’ determinations of student proficiency, although there is a significant need for additional technical infrastructure to support such flexible, systematic administration in districts. Overall, the need for more effective, aligned technology solutions in the field is critical.

**Holding the Line on Summative Assessments**

State leaders will need to decide what steps the state will take to support districts and schools in validating educators’ determinations of student competency/proficiency/mastery. Regardless of their preferred approach, states will need to take a strong leadership role in providing guidance and criteria, facilitating work across districts and schools, or developing other steps to ensure consistency and alignment of assessments and scoring to college- and career-ready expectations.

**Accountability**

Along with graduation requirements and assessment, state accountability for districts and schools is a key leverage point for states in emphasizing a level of proficiency (or mastery or competency) that equates to college and career readiness. States should consider how they can use accountability systems to drive student progress toward and beyond this level in a way that is supportive and aligned to CBP. In shifting to a competency-based system, the purpose, student goals, indicators and use of indicators in accountability likely will shift a great deal. For the many states in which adoption and implementation of CBP will be focused on certain districts and schools rather than statewide, shifting to a more competency-aligned accountability system also will require the states to differentiate their system to the degree necessary to account for this variation. For instance, a state may have a consistent accountability formula in use across the state but have a specific system of public reporting or a recognition program for districts/schools using CBP.

**Purpose**

State accountability systems, which include public reporting, statewide performance goals, incentive programs and accountability determinations, serve a number of key purposes: They help focus education leaders on critical areas to improve performance; allow the state to differentiate the performance of districts and schools to identify needs for support and intervention; raise the sense of urgency to improve student opportunities, particularly for disadvantaged students; provide critical data to policymakers and the public; bolster confidence in the education system and return on investment; and support transparency of student outcomes. They also can be used along with performance management routines to identify course adjustments, benchmark performance and evaluate the effectiveness of programs. In a competency-based system, accountability can serve these purposes, as well as provide signals to ensure quality; improve the rates of students mastering standards; and most important, reduce disparities in mastery of standards among students by race/ethnicity, income, special education and ELL status.
Goals

With CBP, states will need to ensure that accountability systems are based on clear goals for student and systemwide outcomes. Is the goal to allow students to advance to higher levels of content than they could in a time-bound system and therefore graduate students with more and/or deeper content knowledge? Is it to ensure that all students stay on pace to graduate on time and at a college- and career-ready level and that those off pace make more rapid progress? Or is the goal focused on equity and student support — to ensure that students who are not mastering standards get the support they need to reach the mastery level before they are moved on rather than going through the system falling further behind each year?

If states have all of these goals, they will need to grapple with trade-offs — considering the effects of rewarding schools where students move more rapidly in attaining mastery versus schools where students go through the curriculum at an average pace but attain levels above mastery. In addition, states should be clear about how the goals relate to the state’s approach to advancing CBP — if the approach is limited to a subset of students, the goals should be aligned to that group of students versus broader goals for more systemic CBP reform efforts.

Indicators

States likely will adopt several different indicators to illuminate and drive student progress in a competency-based system. These indicators will include measures of students’ current mastery/proficiency of standards (which may differentiate between learning at sufficient college- and career-ready levels and deeper levels exceeding college and career readiness), the extent to which they are learning at a sufficient pace (which can be defined in several ways), students’ rate of mastering standards (which is a function of how many standards they master in a particular time period) and how students’ rate of mastering standards has changed in a time period.

For each of these indicators, states will need to grapple with several key issues:

- **Grain size:** Where will the indicators fall on a spectrum from a single standard to a small cluster to a unit to a full course/grade level of standards?

- **Defining indicators as percentages:** Many accountability indicators have traditionally been defined as percentages of students meeting a certain threshold or average performance across students in a school or district. While indicators of average performance of a school/district are probably not applicable in a competency-based environment, states likely will seek to define indicators as percentages of students reaching mastery, the percentage on/off pace, the percentage at different rates of learning and the percentage at different rates of change in learning. In this case, states will need to take great care in selecting the appropriate denominator to use — all students in a school, students in a certain range of prior performance, students in a grade level (if applicable), etc.

- **Clarity:** Just as states have worked over the last decade or more to inform parents and stakeholders about student performance according to performance levels on state assessments and growth scores, states will need to invest time and thought into educating parents and stakeholders about the CBP indicators and ensuring that results are displayed in such a way as to aid in understanding and use of the results.

Use of Indicators

Under a competency-based approach, accountability and assessment can both be freed from the bounds of time and become a far more frequently deployed tool to drive performance. Competency-based education thought leaders anticipate that accountability will be a continuous rather than discrete activity, more of a performance management system than an annual judgment. For example, the indicators in use could be as simple as the percentage of students in a cohort that have achieved mastery at a certain level of content, and the results could be reported each grading period, each month or each week. Schools and districts where students are taking longer to reach mastery would be identified for support and intervention, just as students who take longer to reach mastery would need to be identified for extra support and intervention.
**Holding the Line through Accountability**

State leaders will need to decide how they will use accountability mechanisms to drive results toward and beyond college and career readiness in a competency-based system. Their decisions will depend in large part on how implementation of CBP is taking root across the state and their own context in terms of the mechanisms with the greatest impact in their state. Regardless of the decision, however, states will need to exercise strong leadership through selecting indicators that reinforce college- and career-ready expectations.

**Protect the Promise**

*Identify and mitigate risks to equity*

States must address many additional questions in policymaking and implementation to make sure that the promise of CBP is realized for all students. Without attention paid to risks to equity, CBP could have negligible effects on persistent disparities in performance among students by race/ethnicity, income, special education and ELL status. Far worse, it also could open up new achievement gaps — ones not based on different levels of performance but on the time it takes to reach standards, if different groups are moving at disproportionally slower paces through the content.

States should be vigilant in policy adoption and implementation to ensure that a shift to CBP promotes equity in opportunity and outcomes. Certainly, states and districts across the nation have often pursued CBP due to its promise of addressing disparities. In Adams County School District 50 in Colorado, where the majority of students are economically disadvantaged, the district’s Competency-Based System is designed to “systematically and systemically” close learning gaps for all students throughout their schooling. The goal of these systems is to ensure that all students demonstrate mastery in each standard or competency to reach the promise of, in the phrase of districts in the Maine Cohort for Customized Learning, “every student, every standard.” CBP can specifically promote equity in several ways, including:

- Shifting to a system in which all students must demonstrate mastery on standards or competencies before moving ahead, eliminating the possibility that learning gaps endure and grow for students throughout their schooling;
- Focusing the system on real-time, embedded supports for all students who struggle to master standards and providing more time for students who need it;
- Providing appropriate flexibility in how students demonstrate mastery, giving them more “voice and choice” in their education;
- Encouraging instructional environments in which students collaborate, which is a particular benefit for ELLs; and
- Heightening the level of transparency for students about what is expected from them to demonstrate mastery — giving them access to and ownership of their own data, learning goals and rubrics/taxonomies to clarify what reaching mastery means.

There are risks, however, that shifting to this approach could fail to further equity aims, worsen current disparities or create new ones. To mitigate these risks, states should take actions through whatever means are most appropriate for their context to address seven major risks (see sidebar). Some of these considerations are specifically related to CBP (such as pacing), while others also are critical in a traditional system. These issues are highly interrelated and should be considered as a whole. For example, standards, performance expectations and accountability have many common threads and interdependencies, as do learning, pacing, support and intervention, and effective instruction.
One of the most significant risks to equity emerges from use of performance-based assessments/tasks, where there is a risk of variation across teachers in how proficiency or mastery is defined, with a serious risk that teachers of traditionally underperforming students employ the lower bar. Variation in the quality and alignment of the assessment/task itself also is a substantial risk. Mitigation strategies for this risk could include having teachers collaboratively set proficiency/mastery definitions with norming across as many teachers as possible, as well as approaches in which states facilitate teachers in developing tasks according to common rubrics and protocols to ensure alignment and quality. This also is an opportunity for states to support schools and districts in ensuring that teachers have opportunities within professional learning communities to look at student work as part of good reflective practice and feedback loops/routines. In addition, teachers can create protocols to monitor and adjust expectations based on external review and feedback. Instructional roles can be separated

**Major Risks for States To Address To Ensure Equity in a Competency-Based System**

1. **Student access to the standards:** How can the state ensure that all students, including ELLs and students with disabilities, are exposed to the full range of the state’s college- and career-ready standards?

2. **Learning environment:** What can the state do to support flexibility in student demonstrations of mastery — both in how the student demonstrates mastery (e.g., projects) and in where and when (e.g., prior learning, out of school)?

3. **Performance expectations:** How can the state ensure that assessments promote consistency of high expectations across students statewide? What can the state do to invest in the development, use and refinement of taxonomies and rubrics of student work to ensure consistency of high expectations across students, schools and districts? How can the state ensure that processes are in place to maintain high expectations for students, particularly at transition points (e.g., elementary to middle, middle to high school and high school graduation)?

4. **Appropriate student pacing through standards:** What state actions can support districts and schools in providing all students clarity around the expected pace through the standards (e.g., teacher pace or faster)? How can the state help in monitoring students’ rate and level of learning through standards?

5. **Effective support and intervention for students:** How can the state help districts, schools and teachers implement systematic, tiered approaches to support and intervention (including just-in-time support) for all students struggling with standards? What can the state do to promote personalized support for all students? How can the state provide tools for teachers and schools to build school cultures in which all students, including students with disabilities and ELLs, feel empowered to ask for help in learning and demonstrating mastery?

6. **Robust accountability and reporting:** How can the state ensure that student accountability for making progress on the standards is backed up with robust teacher, school and district accountability for student progress? How can the state support reporting of school- and district-level metrics on student pacing — disaggregated by student race/ethnicity, economically disadvantaged, ELL and students with disabilities status — and use these data to inform teacher professional development and other uses?

7. **Ensuring student access to effective instruction:** What actions can the state take to ensure that students have access to educators with the capacity and tools to effectively use data and technology? How can the state encourage use of team-teaching and flexible grouping across teachers to help ensure that students have exposure to the most effective teachers and mitigate exposure to less effective teachers? How can the state ensure that instructional leaders have supports in considering key issues such as student assignment to teachers?
so only external content experts grade/evaluate performance-based tasks. States also can leverage accountability and public reporting, incorporating additional measures that do not depend on teacher definition of expectations to identify disparities and make outcomes transparent (e.g., postsecondary enrollment and success rates).

Another significant concern frequently cited is about how the unique needs of students with disabilities and ELLs will be addressed in a competency-based system. States should take great care to set policies and practices for their competency-based systems (or support districts and schools in doing so) with these students’ unique needs in mind, from instructional strategies such as direct instruction or small-group projects, to flexibility in demonstrating mastery, to specific supports needed in the classroom, to accommodations and modifications and other considerations such as pathways to graduation.

States should be clear that students with disabilities have diverse characteristics and that instructional strategies and supports should be designed to meet each individual's needs. The National Center for Learning Disabilities has issued policy recommendations regarding competency-based education for students with learning or attention issues. States should have a clear sense of how they will encourage teachers to balance direct instruction with project-based learning for students with disabilities and ELLs, encourage learning groups that provide opportunities for ELLs to work with English-proficient students, and promote inclusion of special education students. States should be able to say how the system will allow students, particularly students with disabilities, to make progress even when they struggle on one or more standards. States should help schools and districts support teachers through robust and ongoing professional development, particularly in techniques to assist ELLs and students with disabilities with demonstrating mastery of standards. It also is critical for states to consider the complex relationships among federal, state and district policy and practice and the law, regulations, guidance and funding streams for which each is responsible.

**Conclusion**

The advancement of CBP holds great promise in meeting the central aims of the standards-based reform movement, to ensure that all students meet or exceed specific outcomes by high school graduation and that students have equitable access and exposure to rich instruction and strong support to learn and demonstrate their learning. This is the time for state leaders to act. It presents an opportunity for bold leadership among state leaders, who will be called upon to clearly communicate the aims of CBP and its importance for students and for their states. While opening the door to more personalized approaches to learning and flexibility in how students demonstrate mastery, states will need to take care to hold the line on rigor throughout graduation requirements, assessment and accountability policies and implementation.

States are taking a variety of avenues to advance CBP in their states and in many cases will need to take significant steps forward in policy and implementation to provide a strong impetus for districts and schools to further CBP and ensure that determinations of mastery/proficiency are rigorous and aligned to college and career readiness. As states advance CBP, they must do so with a thoughtful eye toward ensuring that it results in significant reductions in disparities in educational outcomes among students and mitigate risks that the work could exacerbate gaps or create new ones. States that are pursuing CBP, from those just beginning the journey to those that have been at the helm for many years, need strong leadership that not only can offer and communicate the shared vision and ongoing information needed to pave the way toward authentic change but also can at all necessary points take the actions necessary to build a system that has the capacity to drive toward far higher outcomes for a far greater number of students.
Resources

- Achieve’s state policy framework: Advancing Competency-Based Pathways to College and Career Readiness
- Maine Center for Best Practices, including case studies and videos illustrating how proficiency-based learning serves students in Maine
- Adams County School District 50 Competency-Based System, which includes a number of tools and resources on competency-based learning
- CompetencyWorks, the primary site for up-to-date information, webinars and resources for CBP
- CompetencyWorks’ brief on state policy and CBP: Necessary for Success
- Policy brief from Digital Learning Now: The Shift from Cohorts to Competency
# Appendix

## States with Policies Allowing, Encouraging, or Requiring Competency-Based Graduation Requirements, Advancement or Credit

<table>
<thead>
<tr>
<th>State</th>
<th>Policy Description</th>
<th>Citation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>State has policy for credit advancement based on scores on assessments.</td>
<td>Credit Advancement Policy on AL Department of Education website</td>
</tr>
<tr>
<td>Alaska</td>
<td>Credit is set by local board policy.</td>
<td>4 AAC 06.075 (e)</td>
</tr>
<tr>
<td>Arizona</td>
<td>Districts may offer competency-based credit through Move On When Ready.</td>
<td>Administrative Code AAC R7-2-315.01</td>
</tr>
<tr>
<td>Colorado</td>
<td>State has issued graduation guidelines to districts that require students to meet competency through various means for high school graduation.</td>
<td>Colorado High School Graduation Guidelines issued May 2013</td>
</tr>
<tr>
<td>Connecticut</td>
<td>State law allows districts to offer mastery-based credits.</td>
<td>HB 6358, signed by Governor in June 2013</td>
</tr>
<tr>
<td>Delaware</td>
<td>Competency-based credit applicable to community service, work experience.</td>
<td>14 DE Admin Code 505, Section 8</td>
</tr>
<tr>
<td>Florida</td>
<td>Credit enhancement students can earn course credit by passing (Level 3) end-of-course exams even if they did not take course.</td>
<td>Title 48 Section 1003.4295</td>
</tr>
<tr>
<td>Idaho</td>
<td>Districts have flexibility to issue credit based on mastery of content standards.</td>
<td>Idaho Administrative Code 08.02.03 Section 105</td>
</tr>
<tr>
<td>Indiana</td>
<td>State regulation defines credit as proficiency with the academic standards.</td>
<td>511 IAC 6-7-1</td>
</tr>
<tr>
<td>Iowa</td>
<td>State has issued guidelines to districts and held statewide forum.</td>
<td>SF2284 signed by governor in May 2012</td>
</tr>
<tr>
<td>Kansas</td>
<td>State regulation defines credit as demonstration of content knowledge of the course regardless of time spent in course. State provides an incentive in funding formula for using CBP.</td>
<td>KSBE 91-31-31</td>
</tr>
<tr>
<td>Kentucky</td>
<td>Local board policy to allow &quot;standards-based, performance-based credit.&quot; State offers seat-time waivers to districts. Districts of Innovation encouraged to use CBP.</td>
<td>704 KAR 3:305</td>
</tr>
<tr>
<td>Louisiana</td>
<td>State permits districts to give middle and high school students Carnegie unit credit through demonstration of proficiency.</td>
<td>Title 28 Bulletin 741 §2314</td>
</tr>
<tr>
<td>Maine</td>
<td>State statute requires proficiency-based graduation requirements beginning January 2018 (with extension options); state provides technical assistance.</td>
<td>LD 1422 signed by governor in May 2012</td>
</tr>
<tr>
<td>Maryland</td>
<td>State regulation defines credit as successful demonstration of a unit of study and is not tied to hours.</td>
<td>COMAR 13A.03.02.02</td>
</tr>
<tr>
<td>Michigan</td>
<td>Credit is based on proficiency of expectations, not seat time.</td>
<td>Michigan Merit Curriculum Chapter 380 Section 1278a</td>
</tr>
<tr>
<td>Minnesota</td>
<td>State regulation defines credit as completing an academic year of study or mastery of the applicable subject matter, as determined locally.</td>
<td>Statute 120B.024</td>
</tr>
<tr>
<td>Missouri</td>
<td>Districts may award competency-based credit upon application to the state Department of Elementary and Secondary Education.</td>
<td>Graduation Handbook</td>
</tr>
<tr>
<td>State</td>
<td>Policy Description</td>
<td>Citation</td>
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<tr>
<td>Nevada</td>
<td>State requires districts to allow students to obtain credit toward graduation in lieu of attending a course.</td>
<td>NAC 389.670</td>
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<tr>
<td>New Hampshire</td>
<td>Minimum Standards for Public School Approval require students to attain credit through competencies for high school graduation.</td>
<td>Regulations Chapter ED 306</td>
</tr>
<tr>
<td>New York</td>
<td>State allows students to earn credit by attaining a minimum score on the Regents exam and completing a project.</td>
<td>Regulations 100.5</td>
</tr>
<tr>
<td>Ohio</td>
<td>State requires districts to offer students credit flexibility through educational options determined by the State Board of Education.</td>
<td>Chapter 3301-05.01</td>
</tr>
<tr>
<td>Oklahoma</td>
<td>Graduation requirements include completion of credits or &quot;sets of competencies.&quot;</td>
<td>Oklahoma Statutes - Title 70 O.S. § 11-103.6</td>
</tr>
<tr>
<td>Oregon</td>
<td>State requires districts to allow students to obtain credit through classroom or equivalent work, such as project-based learning.</td>
<td>Administrative Rules 581-022-1131</td>
</tr>
<tr>
<td>Pennsylvania</td>
<td>Districts are permitted to issue credit based on demonstration of proficiency.</td>
<td>PA Code § 4.24</td>
</tr>
<tr>
<td>Rhode Island</td>
<td>State regulation defines courses as recognized and demonstrated set of knowledge and skills.</td>
<td>Board of Regents Regulations Title L.6.3.0</td>
</tr>
<tr>
<td>South Carolina</td>
<td>Districts may issue competency-based credit with state approval.</td>
<td>Regulation 43-234</td>
</tr>
<tr>
<td>South Dakota</td>
<td>State regulation allows credit to be earned by demonstration of competency through examination, alternative assessments of knowledge or 146 hours.</td>
<td>Administrative Rules 24:43:01:01</td>
</tr>
<tr>
<td>Texas</td>
<td>State requires districts to allow students to obtain credit by examination.</td>
<td>State Rules Chapter 74.24</td>
</tr>
<tr>
<td>Utah</td>
<td>State requires districts to adopt a policy for competency-based credit.</td>
<td>R277-705-3</td>
</tr>
<tr>
<td>Vermont</td>
<td>Districts are required to develop proficiency-based graduation requirements.</td>
<td>State Board Rule 2120.7</td>
</tr>
<tr>
<td>Washington</td>
<td>State regulation defines credit as proficiency with the academic standards.</td>
<td>WAC 180-51-050</td>
</tr>
<tr>
<td>West Virginia</td>
<td>State offers districts seat time waivers.</td>
<td>State Board Policy 2510</td>
</tr>
<tr>
<td>Wyoming</td>
<td>State allows credit through competency-based equivalency exams based on local requirements. State monitors locally developed course competencies and exams.</td>
<td>State Department of Education Rules Chapter 31 Section 9</td>
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</table>
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Michael Cohen
President
Achieve