



TO: Jack Jacobson, Pres., DC State Board of Education
FR: Ruth Wattenberg, Chr., ESSA Committee
DA: November 3
RE: DCSBOE's response to OSSE's initial ESSA Strawman draft

We appreciate that the Office of The State Superintendent of Education prepared and discussed with us a Strawman draft of its proposal for revising how DC evaluates school quality. This memo, having been reviewed and discussed by State Board members on November 2, 2016, constitutes the State Board of Education's response to the draft. We look forward to working with OSSE to incorporate these recommendations into the next iteration of the draft.

Introduction

Since the No Child Left Behind law was adopted in the early 2000's, DC, along with every other state, has been required to test all students, grades 3-8 and once in high schools, in reading and math, and to then rate the quality of each of our schools based on little else than how many students in each school earned a proficient or advanced score on these tests. High schools were also judged based on their graduation rates.

In response to growing public dissatisfaction with the narrowness of these evaluation criteria last year, Congress passed and the president signed a new law, the "Every Student Succeeds Act." The new law replaces No Child Left Behind, and it gives every state the opportunity and obligation to rethink how it evaluates the schools in its jurisdiction and what it includes in its state report card.

On school evaluation—that is, the basis on which states can hold schools and districts accountable—the new law gives states greater--though far from complete--flexibility for determining how they will evaluate school quality. While much of the evaluation still must be based on test scores, at least half of it can be based on other indicators of quality. And, unlike in the past, schools can be evaluated based substantially on test score growth; in the past, the emphasis was almost completely on the proportion of students who met a certain defined level of proficiency, no matter how much students in the school had progressed. In addition, ESSA encourages states to expand how they report about schools, through expanded report cards, which provides another opportunity.

Under DC law, the new ESSA plan must be proposed to the State Board of Education and get the SBOE's approval before it can be submitted to the federal Education Department. The proposal can be submitted to the ED in March or in July.

In preparation for this, the State Board of Education held community meetings in each ward last spring and conducted an online survey. A detailed summary of these findings were shared with the Office of the State Superintendent of Education in the summer.

Since last winter, the Board has been hearing from multiple experts on many aspects of ESSA. Since the spring, Board members have discussed ESSA issues with constituents, educators, parents, and others in numerous conversations and at numerous



State Board of Education of the District of Columbia

441 4th Street, NW ~ Suites 530S & 723N ~ Washington, DC 20001 ~ (202) 741-0888
www.sboe.dc.gov ~ sboe@dc.gov ~ facebook.com/dcstateboard ~ @DCSBOE



meetings. Board members have learned as well from our colleagues and experts in other states through our involvement with the national Association of State Boards of Education.

Overwhelmingly, what we heard echoes the sentiments that led Congress to change the law. Much of what we heard were examples of well intended goals (for greater student achievement) leading to unhealthy responses from schools and school districts. I think everyone on the SBOE believes that finding ways to ease and undo these unintended consequences is a big part of what we hope to address in the new rules. We understand that it's important to hold schools accountable and that one important, and required, way to do so is with reading and math scores. We also understand that it's a question of balance. Specifically,

What we learned:

- That, while the importance of reading and math is unquestioned, the focus on almost entirely reading and math scores had led many schools to focus so narrowly and completely on these two subjects that instruction in science, social studies, civics, and the arts had been squeezed out or greatly reduced.
- That the focus on tests as the main indicator of quality had, in many cases, led to rules that required, pressured, or encouraged teachers to spend inordinate time on test prep instead of the learning that kids most needed and that parents most wanted.
- That parents want schools that are safe, nurturing, and academically engaging. That the overwhelming focus on test scores as a measure of quality, has sometimes led schools to neglect larger academic and social needs—sacrificing some of the nurturing that schools traditionally have offered; sacrificing PE and recess; and deemphasizing their attention to learning activities that engage critical and creative thinking and the soft skills that are crucial to adult success.
- That at the high school level, the focus on 4 year grad rates—a worthy goal for many students--has sometimes led to rushing kids through, passing them in classes that they barely if at all understood. We've heard that this is a special issue for special education students and English Language Learners.
- That all of these problems tend to be worse in the highest poverty schools, because their scores tend to be lower and their climb to proficient scores is therefore steeper. The pressure to raise scores in some of these schools can be excruciating and, counterproductively, can lead to practices that, as noted above, aren't in the interest of kids or their learning.
- That crediting schools almost completely based on the proportion of students who score at a given level and not on how much progress the students have made ---means that schools that enroll lower-scoring students (mainly high



State Board of Education of the District of Columbia

441 4th Street, NW ~ Suites 530S & 723N ~ Washington, DC 20001 ~ (202) 741-0888
www.sboe.dc.gov ~ sboe@dc.gov ~ facebook.com/dcstateboard ~ @DCSBOE



poverty schools) have been many times more effective than their counterparts to earn an equivalent rating. That, as a result, schools that are models of effective education can get overlooked—and even led to dismantle effective programs and practices. ---has led schools to focus disproportionately on the students who are at the cusp of reaching that threshold instead of on other students. --- may discourage schools from encouraging the enrollment of lower scoring students.

- That many parents, educators, and experts believe that by adopting broader measures of school quality—and tracking indicators that may signal emerging problems--the new ESSA plan can encourage schools to adopt better practices and discourage them from engaging in the worst practices.

Our recommendations:

OSSE has released an initial strawman draft that sets forth its preliminary ideas for what should be included in a new ESSA plan. Based on what we've learned and what we think, we offer the following initial list of recommendations that build on this draft. We are looking forward to working with OSSE to take full advantage of the new law's flexibility to find better ways to judge our schools—ways that encourage good practices and push back on the destructive consequences of overly narrow criteria--and to identify those that most need real help. We will continue to refine these recommendations, adding and subtracting from them, and vetting them, as we continue to work and talk with people in the schools and experts in the field.

I. There should be a broader set of metrics for determining quality

ESSA is considered a step forward in how states hold schools accountable in part because it allows for broadening what counts as quality beyond test scores, attendance, and high school graduation rates. This initial draft adds to the legally required metrics (mainly test scores, growth in English language proficiency, and graduation rates): reenrollment rates at all grades, attendance, and, in high school, the percentage of students meeting college-ready mark, as measured by some mix of participation in/achievement in SAT, AP, IB, and dual enrollment; and whether 9th graders have taken a set of courses defined as “on-track to graduate.”

1. Other metrics that we think are critical:

- a) **Evidence of a school culture/climate that promotes learning.** The metrics we use should be based in and ratified by research and should minimally include metrics that i. capture (probably through a survey) whether students feel challenged, nurtured, safe, comfortable, appreciate their teachers, etc. ii. capture whether teachers feel that they have opportunities to improve, including through collaboration with each other, have relational trust, and get the support they need to be successful. Probably obtained through a combination of a teacher survey, teacher retention data. (The teacher retention metric shouldn't aim for 0% retention, as some turnover is to be expected and may be necessary. Our goal is a metric that discourages the very high turnover that is currently present in many of our highest poverty schools, which can't help but be very unhealthy for students, both educationally and emotionally.)**potentially, though it's complicated, we could make use of 3rd



State Board of Education of the District of Columbia

441 4th Street, NW ~ Suites 530S & 723N ~ Washington, DC 20001 ~ (202) 741-0888
www.sboe.dc.gov ~ sboe@dc.gov ~ facebook.com/dcstateboard ~ @DCSBOE



- party inspections/accreditations from such groups as IB, PCSB, OSSE, etc.iii. capture, probably through a survey, family views.
- b) At high school, beyond evidence of college readiness, **evidence of career preparation/readiness**. Possible metrics: portion of students receiving industry certifications or certain kinds of badges [for example??], evidence of robust career counseling or participation in high quality internships
 - c) Something that measures **quality of special education (possibly including issues of timeliness in providing services)**.
 - d) Possibly **make it possible for each LEA and/or school the opportunity to set one goal of their own** (e.g. improving their music program; increasing their integration of field trips and the curriculum)
 - e) **Evidence of a broad, rich curriculum in social studies, science, literature, and the arts. How to do this—what are the pro's and cons of/alternatives to** **High school and middle: points for students who are enrolled in all four core subjects and at least one elective. **Elementary: points for spending at least a minimum number of minutes in social studies, science and arts, with an audit to back it up.
 - f) **Reenrollment rate. Potentially this could produce an unfair and inaccurate rating** of schools with very transient students. Yet we want to incentivize retention of students. It may be a more appropriate metric for charters but not DCPS. How to balance?

Question: Are there other metrics that should be included? What are the pro's and con's of the metrics proposed above and by OSSE.

II. Greater weight should be given for student progress

The straw man draft gives equal weight to proficiency and growth. We believe that this is unfair in principle and unhelpful in practice. Schools that enroll lower scoring students—on average, students who are poorer, don't speak English, and are in special education—have to be many times more effective than their counterparts to earn an equivalent rating.

We favor an accountability system in which schools that are equally effective in raising achievement are judged equally by the accountability formula. For this reason, we favor a system that heavily favors growth, possibly using the 3:1 weighting system being considered by Colorado. Measuring growth is complicated, and we don't want to commit ourselves here to a specific formula. We do not believe such a system in any way takes the pressure off of schools to bring every child to proficiency. Under the system we envision, the more progress its students make, the greater the school's score—giving every school the maximum incentive to bring every child to the highest level possible. But under this system, where students begin their year at a low score, the school isn't penalized for not raising the child multiple grade levels. Further,

- a. It's critical to make sure that growth scores are based solely on students who have been in the school. (To assure that students who aren't enrolled for a full year are attended to, perhaps the school should be credited for any growth/loss the student makes divided by the portion of the year the student is there.)
- b. While we don't considerate it adequate, we may be favorable to the OSSE proposal (also noted below)to provide extra points to schools for moving students out of the two bottom performance categories.
- c. We favor a weighting system that reflects the typically greater challenge of increasing the achievement of our lowest-scoring, lowest-income, special education and ELL students.



State Board of Education of the District of Columbia

441 4th Street, NW ~ Suites 530S & 723N ~ Washington, DC 20001 ~ (202) 741-0888
www.sboe.dc.gov ~ sboe@dc.gov ~ facebook.com/dcstateboard ~ @DCSBOE



- d. We do not favor a system in which schools are credited for the shift in scores between, e.g., the scores of one year's 3rd graders and another year's 3rd grades, as that can simply reflect—and reward/punish—schools based on changes in their population and demographics. We favor a system that measures, evaluates and reports achievement growth based on the growth of actual students from one grade to the next (longitudinal/cohort).
- e. We know that there are many issues around choosing which growth measure is used. We plan to bring in an expert to work with us.

III. A counterweight to the high school graduation metric such that high schools are not incentivized to push students through in order to meet high graduation rates *without simultaneously providing the students with a reasonable high-school level education.* We hear many stories about students being pushed through—and passed through--courses despite not having learned the material, just because the schools are eager to increase their grad rate. Emerging research suggests that around the country, credit recovery courses and other gimmicks may be contributing to this. We want our grad rate to grow, but we want it to be meaningful. How to do this?

Possibly something along the lines of transparency around credit recovery, e.g. number who graduate through them; maybe credit recovery students must pass a test?; or, an index based on the ratio of graduates to PARCC or competency scores

For the same reason, **we want to give maximum support to schools that want to give students a 5-year experience, provided the 5-year experience is strong.**

IV. Metrics that incentivize paying attention to students with the lowest achievement. Perhaps extra points for moving students up from the bottom categories. For this reason, there may be support for the straw man provision that would give points for reducing the proportion of students in levels 1 and 2.

We have a concern here that needs to be figured out: Can PARCC--which is not computer adaptive, and which is aimed at measuring grade level standards—provide reasonable measurements of growth at the bottom level? And, if not, how do we get this? Perhaps we need to push PARCC to create an adaptive test?

V. Incentivize (or at least don't disincentivize) student diversity and the enrollment of lower-achieving students. Our current formula makes it in the interest of schools that seek high scores to enroll the highest achieving students possible. Part of this bias will be addressed by disproportionately weighting progress over proficiency. But, we would like to consider metrics that could encourage schools to enroll lower-scoring students.

Further, the current system penalizes schools with diverse populations in at least two ways: a) the more subgroups that attend a school, the more chances that a school has of earning a low score due to the low score of any given subgroup (and some of the low score may be due to measurement error, given that the subgroups may be small) and b) by measuring the achievement gap between subgroups within a school, as we now do, schools that enroll students from high and low-scoring subgroups are most likely to show achievement gaps and be penalized for them, though these gaps are not the fault of the school and were present long before the students attended the given school.



We want to correct this, though it's unclear what the law requires/allows. Some experts have proposed measuring growth/reduction in achievement gaps by reference to the citywide average achievement of subgroups.

VI. Clarify which schools are doing well with our poorest students, with better disaggregation. Currently OSSE disaggregates scores based on whether students are enrolled in the Free and Reduced meals (FARMS) program. Originally, FARMS was a credible indicator of student poverty, but for various reasons, it no longer is--meaning that we don't have credible data about how schools are faring with our poorest students.

What to do: Because DC schools get extra monies for their at-risk students, DC schools already must identify students who fall into these categories (homeless, foster, TANF, SNAP), but scores are not disaggregated based on these categories. ESSA already requires disaggregation of homeless and foster children. **We propose to disaggregate as well by TANF (which identifies the poorest students) and SNAP**, which shouldn't pose any significant extra burden since the information is already collected.

VII. How to address high schools: This poses a special problem. Federal law requires testing once in high school. Since DC only tests in one year (typically 10th), it's not possible to use a growth measure. One possibility is to test in 9th and tie it to the students' 8th grade score.

VIII. Additional issues to address: rolling test averages, chronic absenteeism, whether PARCC can capture growth at lower and higher achievement levels, requirements around supplement not supplant to further transparency around the school budgets, issue of course based exams, what to include in school report cards, reporting of scores, research on testing load....

