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WEA Response to OSPI's 2017 Consolidated Plan for the Every Student Succeeds Act

Since the initial state plan was released in November 2016, WEA recognizes the significant amount of work that the OSPI has devoted to processing public input, continuing consultation with ESSA workgroups and the state's education stakeholders, forming a Technical Advisory Committee to provide additional guidance, and completing significant updates to the state's plan. WEA supports OSPI's commitment to ongoing revision and updates to the plan in a collaborative and transparent way.

WEA strongly recommends that any plan the state submits to the Department of Education must address the following priorities:

- High expectations and accountability outcomes must be accompanied with ample funding – including the state's full compliance with the McCleary, et al. v. State of Washington Supreme Court orders.
- The focus of the plan must be to provide schools with additional resources and support. The number of identified schools should not exceed the state's capacity to support them. Identification of schools without providing additional support is not a plan – it is public shaming.
- The plan must only hold schools accountable for those factors within their control. When factors outside the school's control are measured, the state's plan must provide additional state investments in students instead of only measuring outcomes.
- The State must exercise its flexibility in the direction of less micro-managing of districts rather than more.
- The State must agree to only what is strictly required by the federal government, and not agree to maintain all current state laws in their current form – for example, the use of tests as a graduation requirement.

While meaningful updates and changes have been made, WEA continues to have concerns with some of the provisions in the state plan. WEA has outlined the plan's areas of strengths and concerns in this letter.

If you have any questions regarding these comments, please contact Sally McNair at smcnair@washingtonea.org.

A.4.ii.a: Minimum N-size:

WEA is supportive of the effort to select an appropriate N-size that both protects student privacy and works to ensure that sub-groups of students do not get hidden or lost in the data.

A.4.iii.a: Establishment of Long-Term Goals: Academic Achievement

The state plan sets a goal of a 90% proficiency rate, in 10 years, for all student subgroups on the state assessments.

- A 90% proficiency goal for all students places a heavier burden on schools and districts that have higher proportions of historically underserved students. The state's plan provides no guarantee of sufficient supports and resources to assist these students. While WEA does agree the state should establish high expectations for all student subgroups, the lowest achieving student subgroups will be required to make the greatest gains and the state plan must provide increased supports for these students and schools. Narrowing the achievement gap in the next 10 years should be a higher priority than achieving the same proficiency levels across all student subgroups.
- Setting the same long-term proficiency goal for our state's English learners is highly problematic. It is unreasonable to expect students who are not, by definition fluent in English, to achieve the same proficiency rates as native English speakers on the state assessment, a test primarily administered in English. For English learners, growth towards their English proficiency is a much more important measure than proficiency on the state assessment.
- Though not currently included in the state plan, OSPI intends to include the state science assessment in the state accountability system starting in 2021. Acting Assistant Secretary of Education Jason Botel made it clear, in a June 13, 2017 letter to the state of Delaware, science is not an allowed indicator at the high school level:

DDOE must ensure that each indicator only includes measures consistent with ESEA section 1111(c)(4)(B). Specifically, DDOE must:

** For the Academic Achievement indicator required under ESEA section 1111(c)(4)(B)(i)(I), only include proficiency on the annual assessments required under ESEA subsection (b)(2)(B)(v)(I) (i.e., reading/language arts and mathematics); a State may include performance on assessments other than those required under ESEA subsection (b)(2)(B)(v)(I) (e.g., science and social studies) in the indicator for public elementary and secondary schools that are not high schools as required under ESEA section 1111(c)(4)(B)(ii) (i.e., the Other Academic indicator) for elementary and secondary schools that are not high schools or in the School Quality or Student Success indicator for any schools, including high schools; and*

** For the indicator for public elementary and secondary schools that are not high schools required under ESEA section 1111(c)(4)(B)(ii) (i.e., the Other Academic indicator), only include measures for schools that are not high schools; if DDOE wants to include a measure of growth for high schools, it may do so as part of the Academic Achievement indicator.*

Including the science assessment as an indicator of School Quality and Student Success is not consistent with Congressional intent to focus on student or educator engagement school climate, opportunities for students, or postsecondary readiness. Science should not be used to displace other innovative indicators, such as measures of school quality, or to further add to the overall weight of standardized tests in the accountability system. Further discussion is warranted by education stakeholders before the state moves forward with including the science assessment, at any level, in the state's accountability system.

A.4.iii.b: Graduation Rate:

WEA has similar concerns as outlined above for setting the same 90% graduation rate in 10 years for all student subgroups. Districts and schools supporting the students with the greatest need will warrant additional supports and resources to meet the academic and non-academic needs of their students to ensure high graduation rates.

In sum, the state plan must assure that extra supports are provided to districts and schools to ensure low-performing subgroups who are required by federal regulations to improve faster than subgroups who are higher achieving, are not punished for having a larger gap to overcome.

A.4.iv.b: Indicator for Public Elementary and Secondary Schools that are Not High Schools:

The use of student growth percentiles (SGPs) in the state's accountability system continues to be based on students' performance on the Smarter Balanced Assessment (SBA), an overreliance on a single measure to define student success. The SBA, a grade-level test, does not capture actual growth for any students significantly above or below grade level and is therefore not an accurate measure of actual student growth. A grade-level test cannot determine if "adequate growth" is being made for those students significantly above or below grade level.

A.4.iv.c: Graduation Rate

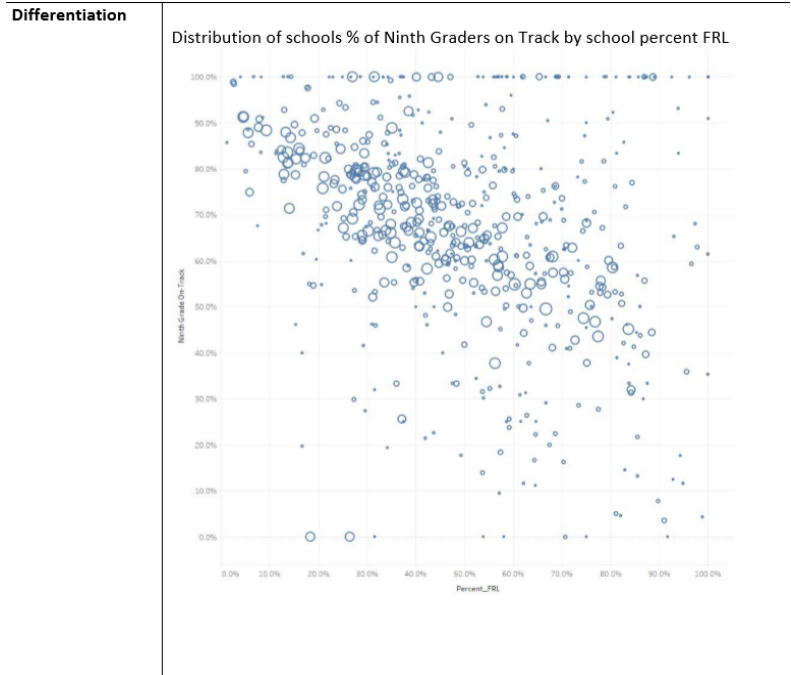
WEA supports the use of extended graduation rates for the graduation indicator, recognizing that not all students' circumstances are compatible with a four-year graduation period.

A.4.iv.d: Progress in Achieving English Language Proficiency Indicator

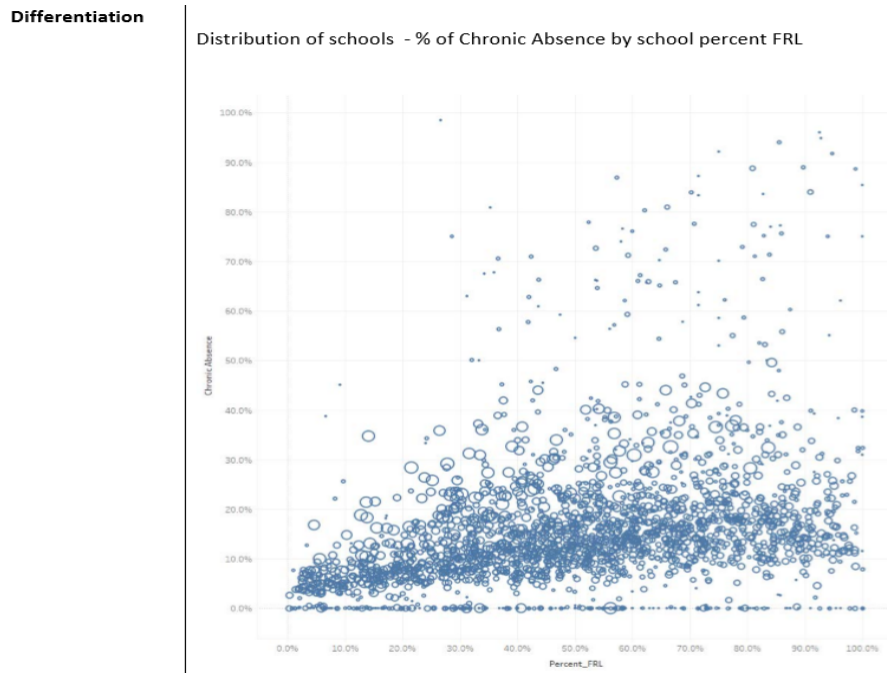
WEA supports a flexible approach to measuring the progress of English learners to transition out of services, based on the unique needs and starting point of each student.

A.4.iv.e: School Quality or Student Success Indicator(s)

The state's chosen SQSS indicators primarily measure student outcomes as opposed to investments the state and districts make into opportunities and supports for students. It comes as no surprise then that two of the three indicators, chronic absenteeism and 9th grade on track are largely proxies for poverty, and only identify additional challenges high poverty schools must address. WEA is concerned that the use of these factors will not be used to target investments in schools and communities to address the underlying causes of chronic absenteeism and 9th grade success.



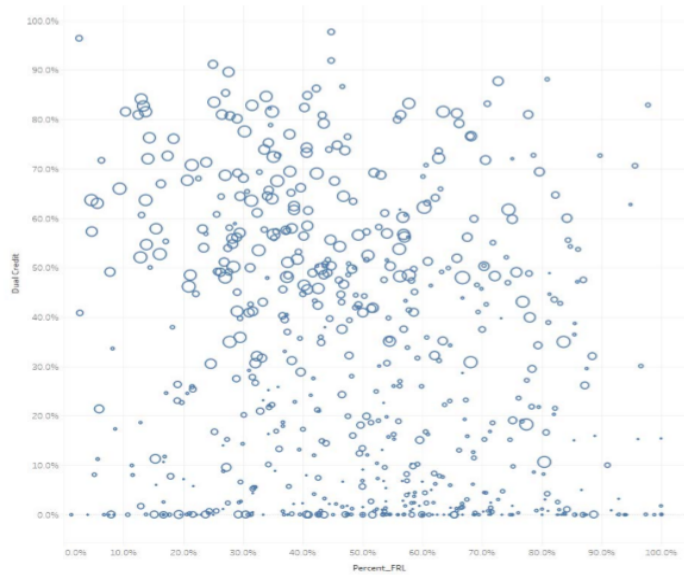
Number of students on track to graduate decreases as poverty increases.



Chronic absenteeism increases slightly as poverty levels increase.

Differentiation

Distribution of schools % of students participating in Dual Credit by school percent FRL



No obvious correlation between dual credit participation and percent FRL.

WEA supports the use of SQSS indicators, such as dual credit participation, that highlight investments made in students and don't simply measure outcomes. Where indicators such as chronic absenteeism are utilized, meaningful state investments must be made in students, families, and communities to address the underlying issue.

A.4.v.a: Annual Meaningful Differentiation

WEA finds the state's plan for annual meaningful differentiation to be an innovative way for schools to measure their achievement and growth overtime. In particular, the use of the decile system with fixed cut scores for each decile will better allow schools to see their growth over time by eliminating a moving target set in motion by the relative performance of other schools.

WEA strongly opposes the use of a single summative score for schools as it masks the complexity of schools and their students. Strengths and weaknesses of student subgroups can be hidden in a summative rating. It unfairly reduces schools to a number that does little to help understand the needs of the particular school and its community.

A.4.vi.d: Frequency of Identification

WEA supports the transition from annual identification of Priority schools under NCLB, to identifying Comprehensive Support Schools under ESSA only once every three years. This three-year cycle will create stability and time for planning and allow the state to more intentionally support school improvement in these identified schools.

A.4.vi.e: Targeted Support and Improvement

WEA understands that the number of schools identified for Targeted Support and Improvement is uncertain at this point in time but is concerned that if the state identifies too many schools for Targeted Support and Improvement, it will lose its ability to meaningfully support school improvement in these buildings.

A.4.vi.g: Additional Statewide Categories of Schools

WEA agrees that an additional category of targeted support schools for consistently low-performing English Learner Progress is beneficial, but has concerns the state plan will identify more schools for intervention than it has capacity to support. In addition, the state plan states several times there is no guarantee of financial support for targeted support schools. If there is no guarantee of resource allocation, then all we are doing is labeling schools. Identifying schools should be in conjunction with resource support and allocation.

A.4.vii: Annual Measurement of Achievement

Despite direction from the Achievement and Accountability workgroup that actions for schools who do not meet the 95 percent participation rate should be non-punitive supports and not affect the rating or funding of schools, the state plan ignores this guidance by instituting a punitive consequence that affects a school's rating. Since students who do not take the state assessment will already be calculated as not meeting standard, a system that lowers a school's accountability system in essence lowers the schools accountability rating twice, regardless of the actual student proficiency rates.

A.4.vii.d: Resource Allocation Review

WEA is alarmed to see no guarantee of financial support or resources for schools identified for targeted support and improvement. Any school that has additional requirements placed upon them by the state plan must be granted allotments of sufficient size to enable the school to effectively implement selected strategies included in their school improvement plan. Further, the plan should recognize that the State is under a court order due to its systemic underfunding of basic education. The plan should require the State to have complied with all state legal requirements in terms of basic education funding prior to being targeted for school improvement or other mandated interventions.

A.4.vii.e: Technical Assistance

Overall, WEA is pleased to see the state plan embrace a flexible approach to school improvement driven by local need. WEA encourages OSPI to ensure that non-academic needs play an equal role as academic measures in the building needs assessment. Low performing schools must ensure students, staff and the community have strong relationships built on trust before academic interventions can achieve their full potential.

Resource and Advisory Committee: WEA looks forward to partnering with OSPI and other stakeholders on the Resource and Advisory Committee. The commitment to ensure a strong and diverse representation of educators with successful first-hand experience working in school improvement is critical. Those doing this difficult work have benefitted most by learning from others that share their experiences. It is important that this steering committee, in recommending evidence-based interventions, does not stifle local control and innovation. Additionally, interventions must be broad enough that they have the flexibility to address both academic and non-academic needs of students that support the end goal of student learning.

System of Performance Management: WEA agrees that it will be beneficial for OSPI to offer differentiated support for districts with large proportions of schools identified for comprehensive or targeted support.

Collection and Use of Data: OSPI should not exceed the requirements of ESSA by requiring elementary school teams to utilize WAKids as one of their data measures used for a school's needs assessment. OSPI takes flexibility away from LEAs and individual school buildings in prioritizing indicators on which the state agency would like to focus on. Doing so removes the ability for districts and school buildings to make appropriate decisions for their school community.

A.4.vii.f: Additional Optional Action

The state plan references the process outlined in Washington state law (RCW 28A.657.020) to address schools that are consistently identified for comprehensive support and improvement who are not meeting exit criteria. Not mentioned in the state's plan is the statutory requirement from RCW 28A.657.060 for adequate funding: "If federal or state funds for school improvement are not available, the plan is not required to be implemented until such funding becomes available."

If OSPI includes the RAD process as a part of our state's consolidated ESSA plan, they must be able to guarantee sufficient funding to support any identified schools, including full funding in accordance with McCleary, et al. v. State of Washington Supreme Court orders.

Further, this section under "School Improvement Plan" states the LEA must select and implement a NCLB-era school improvement model (Closure, Restart, Transformation or Turnaround), despite this requirement being removed from Washington state statute which has been updated to say simply:

"Implementation of an approved school improvement model required for the receipt of federal or state funds for school improvement for those persistently lowest-achieving schools that the district will be focusing on for required action. The approved school improvement model selected must address the concerns raised in the academic performance audit and be intended to improve student performance to allow a school district to be removed from the list of districts designated as a required action district by the state board of education within three years of implementation of the plan." [RCW 28A.657.050]

The U.S. Department of Education's own studies have provided evidence that the federal turnaround models under NCLB provided no benefit. A January 2017 report from the U.S. Department of Education (School Improvement Grants: Implementation and Effectiveness Executive Summary, <https://ies.ed.gov/ncee/pubs/20174013/pdf/20174012.pdf>) reports: "Overall, across all grades, we found that implementing any SIG-funded model had no significant impacts on math or reading test scores, high school graduation, or college enrollment." WEA strongly encourages reference to the failed NCLB-era turnaround models be struck from the state's plan and that current statutory language be followed.

A.5.B: Public Reporting

The state plan makes multiple references to the state's Equity Plan. A review of that plan raises additional areas that deserve comment.

WEA encourages OSPI to more clearly define how stakeholder groups will be included in future efforts to update the Washington State Equity Plan. In the spirit of ESSA, this coordination should be timely and meaningful consultation with teachers, paraprofessionals and SISPs. We encourage OSPI to expand

their inclusion of Community Based Organizations and Civil Rights Organizations beyond the current state commissions to include civil rights organizations independent of state government.

A.5.C: Root Cause Analysis

Strategy 2 (Prepare) references cooperation with pre-service programs at colleges of education and refers to recruitment, hiring and retention of teachers with content area expertise to focus on serving students with disabilities or students who are English learners. WEA strongly opposes any state policy that would require an individual to obtain certification or an endorsement area outside of their interest area and capacity.

Under Strategy 3 (Develop), WEA applauds support for expansion of teacher mentoring but encourages OSPI to exercise caution in developing a statewide induction and mentoring program. While state support is welcome, any system put in place must be locally driven to reflect the local needs and interests of new teachers in each district in the state.

The Washington State Equity plan also defines the term “excellent educator” which was created by OSPI’s Equity Plan Leadership Team, a workgroup solely comprised of OSPI staff. WEA seeks clarity on the purpose of an additional definition of “excellent educator” not required by ESSA and encourages OSPI to ensure that any workgroup responsible for recommendations and reports required under ESSA include appropriate stakeholder representation, as ESSA requires.

Other:

Charter Schools: We encourage OSPI to ensure that Charter Schools are required to be held to the same high standards, and meet all the same basic education legal requirements as public schools in order to meet ESSA requirements. While the state Legislature provided additional flexibility to charter schools, WEA can think of no reason why charter schools would get preferential treatment from federal rules or the application of federal plans or interventions regarding ESSA. Please consider an additional review of the plan to ensure that all schools receiving basic education funds are held to the same accountability standards – as a prerequisite for funding under ESSA.

Academic Assessments in Mathematics, ELA and Science

ESSA requires that the Smarter Balanced test be used only for purposes for which it was designed and validated. Based on the Smarter Balanced Assessment Consortium’s commissioned research, **“Making Good Use of New Assessments: Interpreting and Using Scores From the Smarter Balanced Assessment Consortium”** which confirms that SBA was not designed for and should not be used for any individual student high-stakes purposes including grade promotion or graduation, we believe that compliance with this section requires a change in our current state policy.

Alternate Assessments

There was significant public comment about the lack of appropriateness of the state’s alternative assessment, the Washington Access to Instruction and Measurement (WA-AIM), none of which is acknowledged or addressed in this state plan.

Appropriate Accommodations

WEA has collected for the last two years data from educators who have administered the Smarter Balanced Assessment to students eligible for accommodations. Hundreds have reported problems with ensuring students receive the proper accommodations for which they are entitled.