

A White Paper:

A Collective Response to Ohio's Every Student Succeeds Draft Plan

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Abstract

The Every Student Succeeds Act (ESSA) was signed into federal law on December 10, 2015. The ESSA replaced the No Child Left Behind Act (NCLB). The Federal version of ESSA shifts the broad federal oversight of primary and secondary education to greater flexibility and decision-making to the states. The Ohio Department of Education (ODE) underwent a comprehensive community engagement process that sought to gather feedback on Ohio's learning standards, assessments, school and district accountability, and special help for struggling schools. The ODE released its ESSA Draft Plan and is in the process of seeking feedback on it from February 2 through March 6 with the intention of submitting the full plan to the U.S. Department of Education in April of 2017. This report provides a detailed analysis of the major components of Ohio's plan and offers recommendations on: *Learning standards, Assessments, Accountability with Flexibility and Responsibility, Data Analysis to Improve Outcomes, Value-Added/Growth, School Quality, Ohio's Local Report Card System* and its *Prepared for Success* measures.

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The Every Student Succeeds Act (ESSA) was signed into federal law on December 10, 2015. The ESSA replaced the No Child Left Behind Act (NCLB) and at its core, was meant to ***shift broad federal oversight of primary and secondary education to greater flexibility and decision-making at the state and local levels***. The theme that resonates throughout the Federal Every Student Succeeds Act is restoring flexibility to states and local districts to create their own educational visions and incorporate new measures of quality and success into their respective accountability systems. At the Federal level the **ESSA**¹ requires states to develop and submit a plan to the Federal Government that addresses:

1. Academic content standards
2. Assessment of those standards
3. State, district and school accountability models
4. Supporting low-performing schools

The Ohio Department of Education underwent a comprehensive outreach campaign as a method to hear and gather input from a variety of stakeholders and according to reports, over 15,000 Ohioans provided descriptive feedback as to the strengths and opportunities that were present in the Ohio Accountability Model that local districts were bound to under **NCLB**². Over 11,000 Ohioans from all 88 counties provided feedback through a **survey**³ on a number of items. The majority of respondents were educators or education-related professionals (55.1%) followed by parents or family members of an Ohio student (22%). According to the respondents of the survey, Ohioans indicated the following:

¹<https://www2.ed.gov/policy/elsec/leg/essa/essafactsheet1127.pdf>

²http://education.ohio.gov/getattachment/Topics/Every-Student-Succeeds-Act-ESSA/ESSA_Framework_Report.pdf.aspx

³<http://education.ohio.gov/getattachment/Topics/Every-Student-Succeeds-Act-ESSA/ESSA-Online-Survey-Results.pdf.aspx>

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1. Preparing students for college, careers and life was most important to them;
2. School quality was overwhelmingly defined by the quality of the people providing or overseeing the provision of education in their schools (e.g. teachers and administrators);
3. Goal-based measures were the best measure to define student success (58%) followed by class grades (24%);
4. Student growth and progress was overwhelmingly considered the best measure of school success compared to other things like student scores on standardized tests;
5. More teaching and support personnel along with increased school funding needed to be done to ensure the success of students and/or schools and;
6. Overall growth of children was reported as key to evaluating the quality or effectiveness of a teacher.

After several webinars, regional meetings, surveys and presentations, Ohio finally had a chance to make some significant reductions to testing. Ohio's educators, parents, students and other constituents waited patiently for Ohio's interpretation and plans for implementing a more flexible and locally controlled accountability system that the ESSA permitted.

The Ohio Department of Education (ODE) released Ohio's Draft overview for ESSA and at its core, Ohio's plan literally turns its back to the flexibility that was provided through the shift from NCLB to ESSA. Beginning on February 2 through March 6, the Ohio Department of Education is asking for feedback on the draft plan. In April the ODE intends to submit the full draft plan to the United States Department of Education.

In the meantime, groups of Ohioans are meeting throughout the state to consider Ohio's plan. With the assistance of some of Ohio's educators, parents, students and members of our local communities will meet to discuss the contents of Ohio's ESSA draft plan and offer

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constructive feedback on Ohio's draft plan. The remaining pages of this document serve as a response to Ohio's ESSA Draft Plan.

Ohio's Draft Plan on Academic Content Standards

We believe...

- Ohio has used learning standards for quite some time and, in general, educators see the utility of a clearly stated set of learning expectations.. School Districts welcome rigorous, academic standards that are flexible. The standards serve as a the core objectives and teachers bring these standards to life through their instruction. Much like a local school district would do, the state should have a transparent review process that ensures the input from teachers, parents, community partners and higher education.

Please consider...

- Ohio's Learning Standards should be reviewed and vetted by those that will be using them the most--Ohio's Teachers. It is critical that local educators are involved with the revision process. Any changes to the standards require adjustments to classroom instruction in order to ensure instructional alignment to Ohio's learning objectives.
- We are concerned that any potential changes to standards would lead to immediate changes in the assessments that students take. We urge the Ohio Department of Education (ODE) to clearly indicate the length of time between the introduction of a substantively new topic and when this new topic would appear in the student assessments.

We recommend

1. Revise Ohio's Learning Standards on a routine basis.
2. Involve Ohio's educators and citizens more thoroughly and thoughtfully in the revision of Ohio's Learning Standards.

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Ohio's Draft Plan on Aligned Academic Assessments

We believe...

- That exploring the use of an adaptive testing format would allow students to show what they know in a more efficient manner. An adaptive testing format makes continual adjustments in the delivery of the assessment items that the students answer. It is a more precise way to assess student learning.

Please consider...

- Despite the overwhelming response to reduce the amount of assessments that Ohio's children take and a golden opportunity provided by the Federal Government to reduce the number of tests, Ohio's Draft ESSA plan does not take advantage of this reduction.
- Under Federal ESSA requirements Ohio must administer the following number of assessments in these areas:

	Number of Assessments Required Under ESSA		
<i>Grade Level</i>	<i>English-Language Arts</i>	<i>Mathematics</i>	<i>Science</i>
3	1	1	1
4	1	1	
5	1	1	
6	1	1	1
7	1	1	
8	1	1	
High School	1	1	1
Sub Total	7	7	3
	Grand Total		17

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- Under Ohio's ESSA draft plan it has proposed the following:

Number of Assessments Proposed Under Ohio's ESSA Draft Plan				
<i>Grade Level</i>	<i>English-Language Arts</i>	<i>Mathematics</i>	<i>Science</i>	<i>Soc. Studies</i>
3	2	1	1	0
4	1	1	0	1
5	1	1	0	0
6	1	1	1	1
7	1	1	0	0
8	1	1	0	0
High School	2	2	1	2
Subtotal	9	8	3	4
Grand Total				24

- Ohio has proposed adding 7 additional assessments that are not required or necessary. Each assessment takes approximately three (3) hours of testing time which equates to a loss of 2 days of learning during the school calendar year.
- The number of assessments and the time to administer them during a school day is an incredible burden and it has a negative impact on teaching and learning.
- Feedback from multiple formats from several of Ohioans (parents, students, educators, community members, etc.) as reported by the Ohio Department of Education, overwhelmingly indicated Ohioans believe too much time is spent on state driven standardized testing.
- The ODE should not confuse the desire to “stabilize the system” with keeping the status quo.

We recommend

1. Reduce the number of standardized tests administered to Ohio's students to the Federal requirements listed in ESSA and allow the local districts to submit a plan as to how they

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will evaluate the content areas that Ohio's draft plan recommended. Ohio should provide local control to assessment areas that the Federal ESSA does not require.

2. Summative assessments, like those recommended through Ohio's Assessment Model, can be used for formative purposes. Ohio can and should make the assessment results more meaningful and helpful to teachers. We recommend providing the same kind of item analysis data that was once given to educators under the Ohio Achievement Test and the Ohio Graduation Test. This assessment data was critical to analyzing the strengths and needs of students so that intervention and remediation could be provided. Require assessment providers to include a detailed item analysis on every assessment that Ohioans pay for so that Ohio's educators can intervene with students during the school year and more effectively.
3. The Federal ESSA requirements do not address the Opt Out Movement (e.g. parents requesting that students not be administered the State tests) that occurred in many districts. We recommend that the students, schools and districts be held harmless for parents choosing to Opt Out. The ACT pathway creates another opportunity for parents to exercise freedom from testing for their children and this could negatively impact district results if provisions are not made.
4. The current "remediation free" score on the ACT is higher than Ohio's mean score. The ODE should more clearly define "remediation free" and what the assessment defines IS indeed remediation free.

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Ohio's Aligned System of Accountability, Support and Improvement

We believe...

- Students need to attain a level of academic proficiency in order to prepare them for their next step in life.
- Student readiness for college or career is too narrowly defined in its current form and in Ohio's ESSA Draft. While business and industry certainly need employees that are academically ready, a Global Economy also requires people who are able to collaborate, communicate, think creatively and engage in critical thinking. A narrowly defined accountability system that puts an overemphasis on multiple choice and short answer, standardized tests that cannot accurately depict the deeper learning that is taking place in our classrooms.
- Ohio's school districts should be held accountable and we recognize the need for an accountability system. Such a system should be developed so that constituent groups and community members can easily understand the progress of the district.
- The public does not value the current accountability and report card system that is in place. It is too complex and not easily understood as evidenced by the 32-page companion guide to explain what it in fact is showing constituents. More information does not necessarily mean "better information."
- Creating a summative rating system that is valid and reliable will be a very difficult undertaking. The scales and variables included in such a system are not currently aligned nor are they equally important.
- Ohio's current graduation system that is set to go into effect for the Class of 2018 will have a profound and devastating impact on Ohio's Graduation rate and the 93% graduation rate goal that Ohio's ESSA draft plan aspires to.
- Kindergarten through 3rd grade literacy skills are critical to a student's future success, however the current K-3 Literacy metric is not a reliable measure across Ohio.
- The new School Quality indicator is not related to the quality of the school or district. It focuses on chronic absenteeism and student discipline which are more strongly correlated to socio-economic status and factors outside of the control of the school.

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Please consider...

- While local communities can understand and relate to an “A - F” system due to their own prior experience in school, the current “A - F” system is not descriptive nor is it accurate. People have preconceived notions as to what a “C” represents. While a “C” in Ohio’s accountability model may be considered acceptable, for many parents and community members a “C” represents a lack of effort.
- Creating an accountability model that is more balanced and one that does not put an overemphasis on standardized test scores.
- Clearly defining the Prepared for Success report card metric.
- The growth model that Ohio uses is a student’s NCE position compared to the student’s previous NCE position relative to the other students in his or her testing cohort. This model standardizes the growth model and limits the number of students able to demonstrate *more than expected, expected* and *less than expected growth*. The Sanders’ growth model is a calculation of “actual growth” based on their “predicted growth.” Ohio should consider using the growth model calculation and method as it was originally intended to be used by its founder.

We recommend

1. Revise Ohio’s current report card system and do not use an “A - F” reporting approach for every area that currently has a letter grade associated with it. Many school districts are engaged in standards-based grading practices that focus on progress being made rather than calculations not easily understood by users. We recommend a less complex model that is more user friendly to parents, community, teachers and administrators. We would encourage the ODE and Ohio Legislators to consider a more descriptive system that could include: *Accomplished, Proficient, Developing*.

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2. We recommend that a summative rating system not be used until Ohio's accountability system is a more descriptive system that clearly and accurately communicates to Ohioans the achievement and progress of students.
3. We recommend the consideration of an Ohio Graduation System that is not exclusively reliant upon a student's standardized test performance.
4. We recommend the use of a predicted growth model for the Gap Closing metric that includes the rating of *Exceeds the Standard*, *Meets the Standard* and *Does Not Meet the Standard*.
5. We recommend that the Prepared for Success report card metric include more than test scores. Students in many of Ohio's schools are engaged in College Credit Plus courses and schools have aggressively pursued this option for students. Accumulation of college credit while in high school prepares students to be successful in postsecondary education.
6. Revise the new School Quality indicator to include data that actually reports on the quality of the school as opposed to factors outside of the control of the school. While *chronic absenteeism* and *student discipline* have an impact on the student, they are not related to school quality measures. Based on years of research and the ODE's own ESSA Online survey results, the greatest indicator of school quality is qualified teachers and administrators. The focus should be on capturing these variables and using them as THE indicator of School Quality because the ones currently identified are more correlated to the zip code of the school district.

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Final Remarks

While the Federal version of the Every Student Succeeds Act is not perfect, it represents a National bipartisan effort and is more realistic compared to its predecessor--No Child Left Behind. It provides a degree of flexibility for states and offers an opportunity for each state to listen to its constituents and enact a more localized accountability system. The Ohio Department of Education took a considerable amount of time to seek the feedback from those thoughtful Ohioans willing to invest the effort and energy to provide feedback on Ohio's current system of accountability. As indicated in Ohio's ESSA Draft Plan, over 15,000 people took part to "develop the draft." Clearly, Ohioans care about the public school systems throughout the state and they have passionate opinions as to what Ohio should do more of, and less of.

In summary, we recommend:

1. Learning Standards: Revising Ohio's Learning Standards on a routine basis and involve others more thoroughly and thoughtfully.
2. Assessments: Take full advantage of the Federal ESSA structure and reduce the number of standardized tests that are administered to Ohio students.
3. Accountability with Flexibility and Responsibility: Providing flexible accountability to the local districts will increase responsibility. While we recognize Ohio need a uniform accountability system, recognize that our state is diverse and those at the local level report to a local community that has needs and expectations of the district.
4. Data Analysis to Improve Outcomes: Require the testing vendors to provide the kind of assessment data through a detailed and thorough item analysis that will allow Ohio's educators to meet the learning needs and gaps that students demonstrate. We had this more detailed level of analysis on the previous assessments.
5. Value-Added/Growth: The growth model developed by Dr. Bill Sanders was meant to provide feedback on the academic growth of a student, not the value of a teacher. A predicted growth model measures a student's progress against his/her previous test performances and indicates whether the student made more than expected, expected

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or less than expected progress. Ohio's current model does a complicated mathematical conversation and puts a student's performance on the normal statistical bell curve and compares him/her to other students. Keep it simple so that students, parents and educators can understand.

6. Real School Quality: Recognize that we all want School Quality and that while the School Quality metrics proposed by the Ohio Department of Education may be correlated to measures of quality, they are directly related to poverty, socio-economic status and more in control of parents than educators. Education is social service and it is delivered by people. Measures of School Quality ought be related and within the control of those providing the learning opportunity to students. Quality school measures should be directly related to the culture and climate of the school.
7. Local Report Card System: If more is better than Ohio's current report card wins. What currently exists is a statewide DRIP phenomenon--Data Rich, Information Poor. Ohio's Report Card is currently bloated with too many measures that the general public cannot easily use to determine a local district's progress. Further, the "A - F" reporting system is not descriptive nor accurate. It disenfranchises educators and leaves them with little hope. ESSA requires a three-tier system and Ohio should abandon the grading system to one that is more descriptive. We recommend: *Accomplished, Proficient* and *Developing* for the reasons outlined in this paper.
8. Prepared for Success: Being prepared for success is more than scoring high on a standardized test. It should be a robust measure that could incorporate the number of College Credit Plus courses provided to students and how many take advantage of them; internship and externship opportunities; partnerships with business and industry and the acquisition of the soft-skill/non-cognitive skills that business leaders indicate they are looking for in high school and college graduates. Ohio's "test and score" focus has displaced the value of these important components of a student's development.

While there are several items that we would like the ODE, Ohio School Board, Ohio Legislators and the Governor of Ohio to consider, the common thread is less testing and more

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involvement from those who are most familiar with implementing educational policy. Those that have been tasked with writing the policy of Ohio's ESSA model do not have the practical experience of implementing educational policy. This is all the more reason why those charged with the writing should not only hear and gather input from those that have done this at the local level, but must more thoroughly incorporate the recommendations obtained during that discourse.

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