

CORAS Response to Ohio's Every Student Succeeds Draft Plan

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INTRODUCTION

In the fall of 2016, the Coalition of Rural and Appalachian Schools (CORAS) and its affiliated local education agencies worked collaboratively over multiple days to develop some recommendations that Ohio's policymakers should consider when developing the consolidated state plan under the Every Student Succeeds Act (ESSA). The initial recommendations put forth by CORAS were not exhaustive in addressing all the facets of ESSA, but rather targeted six different areas that have influence upon rural schools: teacher evaluation, evidence-based improvement, highly qualified teaching, assessment, accountability, and teacher and school leader academies. These categorical suggestions were shared with some legislators and state education officials in a policy brief, which is also being provided.

In January, the Ohio Department of Education (ODE) released a draft overview of Ohio's state plan for ESSA, entitled "Driving Education Excellence: Securing the Future for All Ohio Students." Then, on February 2, 2017, Ohio released its "State Template for the Consolidated State Plan under the Every Student Succeeds Act" for public comment. The draft summary and plan were reviewed by CORAS and its associated agencies to compare how their contents aligned to CORAS's initial recommendations and to offer additional feedback on the proposed state strategies. What follows is the CORAS response to Ohio's draft ESSA plan.

Evaluation:

Regarding teacher evaluation, CORAS does not change its original position on how to improve the Ohio Teacher Evaluation System as part of Ohio's ESSA plan. The Educator Standards Board (ESB) has been tasked with identifying how the current teacher evaluation system might be approved upon while still holding educators to high levels of accountability. CORAS again makes these recommendations in regard to teacher evaluation and hopes they will be shared with the ESB:

- Remove the Student Growth Measure (SGM) as a separate component of the evaluation (currently 50%) and incorporate SGM into the performance component of the evaluation with an appropriately created rubric.
- Require the trained evaluator to rate the teacher's performance on SGM based on evidence as described in the rubric. This mirrors what is done in all other areas of the performance component of the evaluation. At the beginning of the school year, the evaluator and teacher should mutually decide what assessments (evidence) will be used throughout the year to later rate the teacher's SGM performance on the performance rubric.
- The evidence collected for SGMs could include: Teacher level Value-Added data, building level Value-Added, vendor assessments, local created assessments, etc.
- ODE should create a state approved "Assessment Bank" for SGMs as an additional resource that teachers and administrators could use when collecting evidence to rate a teacher's SGM effectiveness.

High Qualified Teachers and Teacher Equity:

Ohio's draft ESSA plan addresses multiple avenues for supporting excellent educators, specifically ensuring that all Ohio students have access to effective teachers. According to the draft overview document, Ohio's ESSA plan "will be based on those elements currently in state law" (p. 19). Does this mean that extra requirements that have been put in place by the Ohio Department of Education for being deemed a highly qualified teacher (HQT) will be removed and that the standards outlined by the Ohio Revised Code (ORC) 3319.074 will be minimally followed as suggested by CORAS in its fall 2016 policy brief?

One example where the Ohio Department of Education appears to be going beyond the minimal requirements of highly qualified as defined by state law is the guidelines for intervention specialists. Special education core academic (resource room) classes in seventh through twelfth grade should not require subject area expertise. The law does not state that

intervention specialists who teach students eligible for the alternate assessment in grades seven through twelve are required to be subject area experts as defined on ODE's highly qualified teacher rubrics.

Concerning highly qualified teachers and teacher equity, CORAS also makes these same recommendations.

- Standards outlined by ORC 3319.074, ORC 3319.22, and Ohio Administrative Code 3301-51-01 should be the only requirements for High Qualified.
- Do not require subject area expertise for special education core academic classes.
- Lessen the burden to prove Local Equitable Access for Comprehensive Continuous Improvement Plan (CCIP) to ESSA minimum requirements, which includes differentiating the requirements placed on the HQT component of the CCIP for rural/small town, urban, and suburban districts and provide current data through the Collaboration Center to allow timely and effective data analysis and planning for improvement.

Evidence-Based School Improvement:

In its original policy brief concerning Ohio's ESSA plan, CORAS made two basic recommendations:

- Develop a data dashboard that provides districts, schools, and classrooms the necessary information for conducting item analysis.
- Provide support for wrap-around services so that schools; facilitate collaboration between schools and outside agencies that support students/families and provide funds to place these on-site services.

CORAS is pleased to see that Ohio's draft ESSA plan recognizes the need for non-academic supports for our lowest-performing schools. However, the draft plan overview document mentions that the Title I School Improvement 7 percent set aside will be a "competitive" process and "additional incentive will be available to support a resource coordinator to serve as a site leader to coordinate student and family services (health, mental health, integrated student supports, etc.)" (p. 16). Any school that has been identified by state parameters as needing moderate to high levels of supports for school improvement should not be forced into a competitive process for funding and such wrap-around services. These services, which are integral to evidence-based school improvement, should readily be available and state-funded at all identified schools.

A second concern in regards to Ohio's released draft ESSA plan is the notion that wrap-around services might be well-suited for the Decision-Framework (p. 15 of the overview document and p. 57 of the actual state template of the plan). How can supports for mental health services be adequately addressed within the Decision-Framework? It appears as if there is high value placed on the effectiveness of the Decision Framework because it is referenced multiple times in the draft plan, but a survey of stakeholders who actually are required to use the Decision Framework would likely yield a different perspective. Rather than list resources within a Decision Framework, the actual "resources" themselves should be provided by the state to our struggling schools.

Finally, it is suggested in the draft ESSA plan that educational service centers (ESCs) will provide more targeted intervention (p. 63 of the state template of the ESSA plan), but the current proposed state budget includes a 25.8% cut in funding for ESCs. So how will ESCs provide additional services to these schools in need of improvement? Will already struggling schools be forced to pay for these needed services?

Assessment:

Currently, Ohio is not approving a process for using the ACT and/or ACT to replace end-of-course (EOC) exams in high school. This suggestion was included in the fall 2016 policy brief submitted by CORAS, and our organization appreciates that this feedback was incorporated into the draft plan. CORAS still has the following concerns relating to how Ohio plans to address assessments under the ESSA plan:

- The state did not lower the remediation free/passing scores for the (EOC) exams or ACT. CORAS had suggested using the average college acceptance score. The current remediation free score on the ACT is higher than the

mean score in Ohio. As suggested by other superintendents across the state, Ohio needs to more clearly articulate what is meant by remediation free and that what the assessment defines is, in fact, remediation free.

- The draft plan indicates that there will be further adjusting of Ohio's testing schedule (p. 8 of overview). CORAS again urges the state to hold its testing later in the school year to maximize instructional time before accountability assessments. Conducting state standardized testing in May should not influence the prompt availability of assessment results because one of the main rationales for transitioning to online testing was the quick turnaround of testing results.
- Based on a review of Ohio's draft ESSA plan, it appears that the state realizes test results must be more readily available to students, families, and schools. These assessments cannot inform instruction and be used appropriately to plan student programming if user-friendly item analyses are not provided for each subject area assessment and results are not available before the start of the following school year. Schools should have student scores and item analysis within a few weeks of the test administration.
- The state's draft ESSA plan does not reinstitute the waiver for exceeding the 1% cap on alternative assessment. CORAS again recommends that alternative assessments be determined on an individual student basis with justification through an approved waiver process.
- CORAS advocates for maintaining adaptive testing, but Ohio's intentions for adaptive testing are not specific in the draft plan. More clarity is needed in the state's ESSA plan regarding adaptive testing.
- Ohio claims to have significantly reduced the amount of hours spent on standardized testing. The baseline for this claim is using the 2014-2015 testing year when the state historically increased the amount of student time spent testing by requiring mid and end-of-the-year testing. In comparison to years prior to 2014-2015, the state really has not significantly reduced all of its testing. Further, Ohio's plan includes more testing than is required by state law. If we are including additional testing to fulfill the state's high school graduation requirements, then perhaps those requirements need revised.

Accountability/Report Card:

CORAS proposed several ideas concerning the state's accountability system. After a thorough review of the state's ESSA plan, CORAS would like to revisit several of its recommendations.

- The state is suggesting an N-size of 15 in the draft plan. CORAS continues to argue that the N-size is more appropriately set at 25. When the denominator is reduced in this accountability measure, a single family can have a significant impact on a school's subgroup performance. The argument for reducing the N-size to 15 is that it allows for better representation of diverse student groups, but ALL of Ohio's students are counted in multiple places throughout a school's report card. Ohio should not continue to add additional subgroups that are not required by federal law. Districts and schools do not need more sub-groups to be measured to "force them" to work with individual students to ensure success because performing well on these assessments is essential to graduating. If Ohio is compelled to decrease the N-size to 15, then state-provided wrap-around services are even more critically necessary.
- In its Fall 2016 policy brief, CORAS recommended that passing rates for retesting should be reported but not factored into the indicators met rating. CORAS still believes that first attempts at EOC exams are the only "attempts" that should count on the state report card; therefore, CORAS does not support the state's idea that a separate academic indicator for students who "re-take" EOC exams should be added to the indicators met. Schools are already "accountable" for these students because they must earn enough points via EOC exams to graduate. The state report card is already complicated without continuing to add indicators.
- The proposed nonacademic indicator measuring chronic absenteeism and discipline is supported by CORAS. We are pleased that the criterion of success includes meeting a benchmark or a percent of increase each year. However, CORAS wishes to clarify that this measure should not include legally excused absences. While CORAS supports the proposed measure, our members are interested in reviewing the feedback from districts that are piloting other measures of student engagement in the next few years.

- Concerning the Prepared for Success indicator, Ohio intends to “consider how access to advanced coursework may be incorporated further into the report card as an additional indicator” (p. 12 overview document). CORAS does not advocate for additional indicators to continue to be added to the state report card unless we are reducing others. Further, CORAS restates its original position on how the Prepared for Success indicator is calculated. Earning 9 credit hours via College Credit Plus (CCP) should be calculated as a full point in the base formula rather than CCP course completion being a 0.3 add-on. The new, more stringent requirements for accessing CCP courses are evidence as to why CCP courses merit this point value in the base formula. Moreover, earning a passing score on ASVAB and earning an associate degree should each equate to 0.3 points in this formula.
- Finally, CORAS recommends that the state redesign its A-F report card rating system. The accompanying guide for understanding the Ohio school/district report card is over 30 pages, which is not user-friendly to our own educator staff, and especially students, families, and communities. We concur with some of our fellow educators who have recommended a much less complicated system that might include: Exceeds the Indicator, Meets the Indicator, Approaching the Indicator, and Does Not Meet the Indicator.

Teacher and School Leader Academies:

Ohio’s draft ESSA plan does not specifically explain how teacher and school leader academies will be addressed. CORAS and the Patton College of Education is firmly opposed to development and the implementation of Teacher and School Leader Academies if they do not closely follow the same standards and requirements that current licensing requirements contain. In addition to the initial recommendations pertaining to these entities we reiterate these following points.

- All licensure programs must meet high standards for preparation of educational professionals as outlined in Ohio and national standards.
- States must be extremely careful about authorizing preparation academics. These academies must be a partnership between universities and communities.
- The state must not provide funding streams /policies to privilege independent programs without evidence.
- The Department of Education must monitor provisions in state and federal policies to prevent further stratification.

CLOSING

CORAS appreciates the opportunity to provide stakeholder feedback in regard to Ohio’s draft ESSA plan. ODE has made multiple attempts to solicit input, and CORAS hopes the suggestions provided here will be given the highest consideration. CORAS is particularly excited to see that Ohio’s draft ESSA plan specifically identifies the need to support rural schools because we feel rural schools in Southeastern Ohio have historically been under-represented in major decision-making. In describing the supports for rural schools, the draft overview document refers to “leveraging” federal funds. CORAS is adamant that the state should not place any additional restrictions on the use of federal funds earmarked for rural school improvement.

ESSA is a major legislative piece for American schools, and will require a great deal of time and funding for successful implementation. CORAS believes it is in the best interest of Ohio’s schools to thoroughly develop the ESSA plan, and, therefore, urges the Ohio Department of Education to delay its formal federal submission until September 18 rather than hurriedly meeting the April 3, 2017, deadline. Additional time is warranted to work through such significant decision-making.