

February 7, 2017

Dear State Superintendent Kang, Ward 1 SBOE Representative Wilson Phelan, and other members of the SBOE,

My name is Mark Simon, Ward 1 resident, former active DCPS parent, lifetime educator, and currently an education policy associate at the Economic Policy Institute. I have followed DC education reform efforts, have testified frequently on school system budgets and on education reform, teaching improvement and teacher evaluation reform in the District of Columbia.

On November 16th, the State Board of Education held an important hearing on School Evaluation Measures under the “Every Student Succeeds Act.” I testified along with 25 other researchers, educators, parent and community representatives. The sentiment at that hearing was overwhelming and almost unanimous that OSSE and the State Board need to move away from the test-based proficiency rate as the sole criteria measuring school, teacher, and principal quality. You have an opportunity now to base school accountability on the qualitative goals parents, educators, students and the broad public have for public education in this country, and even more so, in this city. The broad spectrum of witnesses who testified at the November 16th hearing urged the SBOE to reject OSSE’s draft recommendations.

Since the November 16 hearing, OSSE has revised slightly its draft recommendations. The new draft maintains the 80% of accountability focused on a single measure – standardized test scores on a single test. However, the new draft suggests that half of that 80% should look at a convoluted version of “growth” that still doesn’t sufficiently reward schools for student progress among those not close to proficiency. In effect, by maintaining the 80%, OSSE has remained locked into an approach that has been roundly criticized by parents, community representatives, researchers and public education advocates in this town.

I would like to make five points about the new draft from OSSE in the hope that the SBOE will either exert its authority independently, rejecting this new draft, or work with OSSE to make further changes and bring about the mid-course corrections we need.

1. The new draft talks about “multiple measures” in its draft accountability system. In fact, it maintains the single measure that eclipses all else- the result on the PARCC test (and where that score is not available, the SAT/ACT scores). A system that allocates 80% out of 95% of a school’s evaluation to a single test has not developed “multiple measures.” It has rather maintained a steadfast and irrational commitment to a single, standardized test outcome as a proxy for the quality of education.
2. **Reduce the weight of standardized test scores** to the least amount allowable under the US Department of Education’s regulations – 50%. It’s a slap in the face, given the recommendations from most education testing experts about the problems with attaching too high stakes to any single indicator, not to mention the broad concern expressed by parents and the public in the District of Columbia. The percentage of students who score “proficient” on a single

standardized test is only an inaccurate proxy for school quality -- affected by many things other than school quality, most of which exist outside the school. In a high stakes environment, when a single measure counts for 80% of a school's accountability, shortcuts will be taken. The breadth of what students need will get short shrift. Cheating will occur. What students and good teachers hate most about education, the standardized test itself, necessarily becomes the priority. Most importantly, the true quality of the learning environment of a school, will not be measured, and charter schools and neighborhood schools that may be doing a good job with low achieving students will be labeled as failures. We've had a decade in which the lowest achieving students have made little or no progress overall. Under this draft from OSSE it will likely continue.

3. **Shift from a proficiency rate snapshot of a school's standardized test scores to a growth model that measures and weights the scale score increase at each decile of achievement equally.** The new draft does use a version of "growth" and not just the percentage of students who achieve proficiency. This is an improvement. But the way it approaches growth counts students closer to being "proficient" more than students much further away from it. Why? Every school needs to be rewarded for working with all their students. The progress, or lack thereof, of students at each decile of attainment is equally important. Currently, the lowest scoring students don't count, and in the draft being recommended by OSSE, they will still count less. This is wrong. The accountability system needs to record and measure the growth of students at every decile of proficiency from the lowest scoring to the highest scoring. The progress of students at each decile of achievement needs to count in a school's rating – not just those students closest to the bubble of proficiency. The incentive to recruit higher scoring students rather than working well with the students each school has needs to end. No principal should be scheming how to impact that bottom line snapshot proficiency rate number or the progress of those closest to it rather than providing what all students need. The school's accomplishment in moving all students from wherever they are to better achievement needs to count more than the percentage of students above an arbitrary proficiency line. Schools need to be accountable for things within their control, not accountable for achievement that is affected more by the socioeconomic background of the students they recruit. Educators and students themselves must be motivated to achieve what is within reach, not demoralized by false assumptions and arbitrary goalposts.
4. **Adopt a high-quality school climate indicator instrument** and make it count so that we will have a qualitative measure of the actual teaching/learning environment from the perspective of students, parents, and the educators in each school. Gary Ratner recommended DC use the School Climate Assessment Instrument used in California, for validity and because it correlates so well with student achievement, but there are other good instruments provided by the US Department of Education and on the website of the American Institutes of Research. The survey is needed in part to balance the excessive weight of the standardized test, but also so that schools will have a roadmap for improvement of the teaching and learning environment. The current DCPS climate survey is a relatively useless feel-good instrument, designed more to obfuscate any measure of the quality of the learning environment of a school.

The excuse that schools may not want a new instrument imposed on them amounts to avoidance of accountability. Every school needs to be accountable to those most impacted by the learning climate – students, parents, teachers, and other staff working with students. It cannot be a choice of school leadership who may have an incentive to avoid accountability. If the SBOE or OSSE need more information about the different instruments that could be used, then the SBOE should establish a task force to gather information so that an informed choice can be made by the end of the current school year. The decision should be made now, however, to factor in a uniform and proven survey of each school’s learning climate as a significant part – at least 25% -- of a school’s accountability score.

5. **Measure the long-term staff and student turnover rates** of each school and use turnover rates as an indicator of teachers and students voting with their feet. Staff or student turnover in one year may not be a negative factor, but if a school cannot hang onto good teachers or principals, year after year, or if student churn is impacting the stability of the school community as an ongoing feature of normal life in a school, it may be the most important indicator of the quality of the learning environment. Likewise, truancy, suspension rates, discipline infractions, and the rate of voluntary or involuntary student departures from a school midyear are often indicators of instability that impacts the learning environment. If one school routinely exits a significant percentage of low scoring students, midyear, this needs to be known.

The latest draft from OSSE takes a baby step in this direction by weighing “reenrollment.” But this factor needs to be enlarged to include not just reenrollment and attendance, but staff turnover as well. Truancy and disciplinary infractions can also be counted as indicators of student morale. A well-constructed student and staff turnover and participation measure could count for as much as 25% of a school’s evaluation.

When parents look at a prospective school for their child, they want to know what the learning environment is like. The accountability measures must drive the improvements that parents seek. Higher proficiency scores alone tell parents more about the socio-economic background of the students in a school, than about the quality of the job the teaching staff is doing with the students they have. Parents want to know whether a wide range of students’ needs are being met. They want to know what parents, students and the teaching staff think of the school, and they want to know what kinds of behaviors the school motivates in the students it has. The only meaningful way to provide “multiple measures” is to move away from the single proxy for quality in a single standardized test, and toward qualitative measures of the learning environment.

Congress gave states the power to set their own accountability measures because the narrow test-driven single indicator was doing damage, nationwide. Education testing experts have warned against the approach that had been taken for years. If OSSE and the State Board of Education squander the opportunity you have now to develop a broader set of criteria and specifically to move to a growth model that values the progress of all students at every decile of achievement, replacing the proficiency rate snapshot, you will be acting against the will of the people of DC and against the recommendations of experts. You will be stuck in a status quo that needs a mid-course correction.