



MEMORANDUM

TO: MEMBERS OF THE OHIO HOUSE AND SENATE EDUCATION AND FINANCE COMMITTEES

FROM: THE OHIO 8 LEADERSHIP COUNCIL

DATE: AUGUST 21, 2012

RE: A-F ACCOUNTABILITY RECOMMENDATIONS- House Bill 555

We are writing today to outline The Ohio 8's recommendations, concerns, and critical unanswered questions regarding the development of Ohio's A-F accountability system to be considered within House Bill 555. As a strategic alliance composed of the superintendents and teacher union presidents from Ohio's eight urban school districts – Akron, Canton, Cincinnati, Cleveland, Columbus, Dayton, Toledo and Youngstown – we are pleased to continue this dialogue with you. The Ohio 8 would like to be a continued resource to you and your staff as you develop and shape education policy moving forward. Although we will be reaching out to schedule meetings, please do not hesitate to contact us in the interim via Scarlett Boudier or Lori McClung at 1-877-372-0166.

I. STATUS OF OHIO'S ACCOUNTABILITY SYSTEM AND TIMING FOR MODIFICATIONS

The purpose of building an accountability system is to help ensure K-12 students are college and career ready. Shifting from our existing accountability system to a new system requires consideration of pending policy discussions/decisions, preparation for transition and implementation, providing transparent methodologies, and securing appropriate data pools. Without consideration of all of these components, building a complete and comprehensive accountability system that works will not be possible. As a result, recommendations will be limited in nature and scope as with some components of Ohio's accountability system, we are being asked to provide suggestions on *how* to measure performance when in some very critical cases, the state has not defined *what* is being measured or what the measures being developed should be measuring. Another way of expressing our concern is that in some key areas, *we are developing policy prior to the science being available that should drive that policy*. The good thing is that in about another year or so we will have a majority of the needed science (common core, new assessments and report cards). The following provides the rationale behind our concerns:

a) Determination of whether a student is “college and career ready”: This question is the focus of work being done around the new Common Core standards, which Ohio and 40 states have adopted. Those higher standards are considered by many to represent college and career readiness. However, the *assessments* of student progress towards those standards are still being developed by two consortia. The Partnership for Assessment of Readiness for College and Careers (PARCC) of which Ohio is a member recently advised Ohio stakeholders that its assessments won’t be completed for another year, though preliminary drafts of elements of those assessments in English/Language Arts and math are developed for comment (See link here <http://www.parcconline.org/crd-pld-survey>) Thus, the development of the A to F rating system at this time cannot incorporate these higher standards of college and career readiness that will be implemented no later than the 2014-15 school year.

b) Assessments: Existing policy discussions suggest that Ohio plans on constructing an A-F reporting system on the current assessment for one year, then in the year following that, replacing the test/assessments thereby changing what the A-F reporting system is based upon. With any re-norming districts ratings are likely to significantly decline, which is normal, but two unnecessary re-norming processes within two school years will likely produce multiple downgrades in ratings for no other reason than the assessment has changed. So let’s have a one-time change in one year so districts experience only one re-norming of their rating..

c) Methodologies: When basic methodology isn’t defined, you are left to design a reporting system *before* you’ve made decisions about what that reporting system is intended to assess or measure. Right now, ODE has not provided transparent methodologies with regard to how districts progress/growth (value-added) is measured. In other words, presently we cannot predict where we will land so we can measure ourselves during the year. The decisions about what we want to know and report are driven by the ability of the assessments to do it. Without knowing what the new assessments are designed to measure, it is difficult to design a reporting system that will accurately report those measures. You can’t report what you do not know. As a result, we cannot make recommendations regarding how performance and growth (value-added) is measured because decisions around those measurements have not been yet made. For example, if the new assessments are designed to differentiate levels of performance (e.g., 0-20%=limited, 21-40%=basic, 41-60%=proficient, 61-80%=accelerated, 81-100%=advanced), then the state could choose to continue reporting Performance Index Scores for districts. However, if the new assessments focus solely on proficiency as opposed to levels of performance, (e.g., 0-80% and 90-100%=proficient) then the state cannot include a Performance Index measure. As this example shows, if the state does not yet know what the assessment is designed to measure (various levels of performance vs. a single measure of proficiency) then you cannot design a report about those measures.

d) Lack of data: The value added system Ohio uses depends upon a large data pool of past performance on state assessments. Since new assessments will be implemented in 2013-14 (and therefore there will not be an existing data pool of past performance on those assessments), it will be extremely difficult to include value added performance measures on the new report card. To put this differently, the current value added system compares the performance of today’s students to the performance of similar students on past assessments. If there are no data about past performance available, you cannot make a valid comparison. This is a perfect example of placing policy before the science.

e) Clarity between House Bill 555 and Federal Waiver: The language in House Bill 555 mandates the Ohio General Assembly to “revise the current academic performance rating system for school districts, individual buildings of districts, community schools, and STEM schools and to implement a rating system using

letter grades”. The Ohio Department of Education, however, submitted its No Child Left Behind waiver and established a fairly detailed structure and process to build an accountability system. A brief background paragraph regarding concerns around the waiver is provided at the close of this memo. It is safe to say, however, that the waiver and HB 555 do not coincide in approach and content related to Ohio’s accountability system.

No matter what any of us believe or think is the best approach or methodology, without answering these questions, a comprehensive accountability system cannot be constructed. In addition, alignment among all changes coming within the next 18 months (common core, new assessments, funding formula, federal waiver, etc), present a significant list of items to communicate to public to understand and for the state to have assurances that districts have goals that are transparent and achievable. As a result, at this point in time, The Ohio 8 can only make recommendations on components of an accountability system that have been clearly defined by the state or that are not contingent upon future policy discussions/program implementation. We believe as the work around the new Common Core standards is completed and implemented, assessments are developed, and new report cards then The Ohio 8 can more accurately suggest solutions to some of the toughest questions posed in this testimony.

II. KEY ACCOUNTABILITY SYSTEM COMPONENTS

Graduation Rates

This is a clear measure of achievement and growth (value-added). It sets a goal line and a clear expectation for not only students but parents and the community regarding where a district stands in its effort to ensure students have the ability to be college and career ready. Ohio’s Accountability System must prioritize graduation rates as its own separate indicator. The graduation rate should not be embedded or diluted among other indicators. Establishing the graduation rate as an indicator on equal footing with the other indicators demonstrates the most transparent measure of a district’s success and encourages districts to ensure that no student exits the school system prematurely.

Achievement measures vs. Growth (value-added) measures

This is a recommendation that cannot be reasonably fleshed out in detail until common core and new assessments are completed as described above. The Ohio 8 will state, however, that any proposals should weigh “achievement” and “growth (value-added)” evenly. If a student makes more than a year’s worth of academic gain (or more) yet does not meet an established indicator, absolutely credit should be provided to the district for that growth (value-added). Districts, parents and communities must be able to clearly understand the growth (value-added) made by students and school districts to meet that indicator and must receive credit for that growth (value-added). We suggest a 2:2 ratio for performance versus progress with additional weight given to value-added and student growth (value-added) measures throughout an accountability system. Again, this component of an accountability system cannot be completed until the common core standards, assessments, and report cards are developed.

Timing & Communication

We suggest a phase in of a new ranking system beginning in 2013 with full and exclusive implementation of the new accountability system during the 2015-2016 school year. This would allow for enough time to conduct outreach to the community and to coordinate alignment with the implementation of the common core, new assessments and new report cards. In addition, we strongly recommend that no new accountability system be implemented mid school year. The proper training of staff and outreach to the public takes time and must be coordinated based on the school year schedule not a legislative schedule (many legislative decisions are made effective July 1st when students and teachers are gone and families are more difficult to engage). Our suggested schedule is as follows:

2012-2013: communicate upcoming changes

2013-2014 school year: continue to communicate change/differences to the public.

2014-2015 school year: post and utilize both old and new accountability systems and integrate changes to common core standards.

2015-2016 school year: implement new accountability system exclusively

Counting At Risk Students

For accountability purposes, the current measures (as described in the Ohio Department of Education No Child Left Behind waiver and the as introduced version Senate Bill 316) biases the impact of a single student's test score either favorably or unfavorably depending upon the size and diversity of the school district that child happens to attend. The Ohio 8 suggests for accountability purposes, each student's test score should be counted in the "All Students" category and counted a second time in the appropriate ethnicity disaggregation, ensuring that attention remains focused on the performance expectations for all children regardless of their ethnicity, yet limiting the bias inherent in the current measurement. In order to assure appropriate attention to the additional learning needs of students, The Ohio 8 would recommend that each category then be further disaggregated within category to report the impact of economically disadvantaged and student learning needs on that particular group (as outlined in the charts below). We believe that, in doing so, Ohio's school districts will remain accountable for addressing the specific learning needs of our children, including English Language Learner needs, the needs of Students with Disabilities, and the academic, social and emotional needs of Economically Disadvantaged students specifically so that each subgroup's aggregate score can meet the appropriate Annual Measurable Objective.

The Ohio 8 believes in the importance of an achievement gap measure that fairly and accurately measures all students evenly. Under the current *Adequate Yearly Progress* measure, the test scores of some students are counted only one time while the test scores of other students are counted as frequently as five times on the same measure. For clarity's sake, consider the example of a Hispanic student who is economically disadvantaged, speaks English as a second language, and is on an IEP. In a rural Ohio school district that serves very few Hispanic students, this child's reading score would count once in the "all students" category of our current *Adequate Yearly Progress* measure as shown below. In an urban Ohio school district that serves a much more diverse population, this same child's

reading test score would count in the “All Students”, “Hispanic”, “Economically Disadvantaged”, “Students with Disabilities”, and “Limited English Proficient” categories, again as shown below.

Rural District Example: *Hispanic student who is Economically Disadvantaged, Limited English Proficient, and is identified as a Student with a Disability, however the Rural District serves a very small population of these students and therefore the student only counts in the “All Students” category*

Adequate Yearly Progress Grades 3-8 and 10 Reading and Mathematics		All Students	Economically Disadvantaged	Asian/Pacific Islander	Black, non-Hispanic	American Indian/Alaska Native	Hispanic	Multi-Racial	White, non-Hispanic	Students with Disabilities	Limited English Proficient	AYP Determination by Indicator
Proficient	Reading	X	NC				NC		NC	NC	NC	

Urban District Example: *Hispanic student who is Economically Disadvantaged, Limited English Proficient, and is identified as a Student with a Disability and the Urban District serves a large population of these students, therefore the student counts in five categories*

Adequate Yearly Progress Grades 3-8 and 10 Reading and Mathematics		All Students	Economically Disadvantaged	Asian/Pacific Islander	Black, non-Hispanic	American Indian/Alaska Native	Hispanic	Multi-Racial	White, non-Hispanic	Students with Disabilities	Limited English Proficient	AYP Determination by Indicator
Proficient	Reading	X	X				X		X	X	X	

Rural District Example: *Hispanic student who is Economically Disadvantaged, Limited English Proficient, and is identified as a Student with a Disability, however the Rural District serves a very small population of these students and therefore the student only counts in the “All Students” category. This category is disaggregated to show the impact of Limited English Proficient students, Students with Disabilities, and Economically Disadvantaged students on the All Students measure.*

	<i>All Students</i>	<i>Asian/Pacific Islander</i>	<i>Black, non-Hispanic</i>	<i>American Indian/Alaska Native</i>	<i>Hispanic</i>	<i>Multi-racial</i>	<i>White, non-Hispanic</i>
READING	X				NC		
Limited English Proficient	X				NC		
Students with Disabilities	X				NC		
Economically Disadvantaged	X				NC		

Urban District Example: *Hispanic student who is Economically Disadvantaged, Limited English Proficient, and is identified as a Student with a Disability and the Urban District serves a large population of these students, therefore the student counts in two categories. These categories are disaggregated to show the impact of Limited English Proficient students, Students with Disabilities, and Economically Disadvantaged students on each measure.*

	<i>All Students</i>	<i>Asian/Pacific Islander</i>	<i>Black, non-Hispanic</i>	<i>American Indian/Alaska Native</i>	<i>Hispanic</i>	<i>Multi-racial</i>	<i>White, non-Hispanic</i>
READING	X				X		
Limited English Proficient	X				X		
Students with Disabilities	X				X		
Economically Disadvantaged	X				X		

Finally, The Ohio Eight also advocates that the points awarded to the meeting of Value-Added within the Annual Measurable Objective be equivalent to the points awarded for the Safe Harbor measure, demonstrating the importance of balancing absolute academic performance and student growth (value-added) in all of Ohio's schools. We believe this balanced measurement strategy will also more appropriately capture and track progress made on the achievement gap between groups of Ohio's children, when measured by comparing individual school district performance to the state benchmark, as is proposed in Ohio's Race to the Top waiver.

III. BACKGROUND RECONCILIATION OF HB 555 WITH ODE'S FEDERAL NCLB WAIVER

The May 2012 No Child Left Behind waiver submitted by ODE (and approved by the U.S. Dept. of Education) was modified by ODE during the legislative session. It has not, however, had public input and ODE has not yet shared the rationale behind the differences among the proposals. Our concerns about ODE's May waiver submission are below:

1. Multiple and major changes to the waiver, without proper time for public hearings on those changes for sufficient review and analysis.
2. The way the achievement gap is measured remains punitive to districts with large populations of minority students, English as a Second Language students, special needs students, and economically disadvantaged students.
3. The system is even less influenced by student growth (value-added) measures than the accountability system proposed in April waiver and SB 316. The pairing of value added with graduation measures causes new and perhaps unintended consequences.
4. The calculation of the overall letter grade is different than originally proposed in the April waiver and SB 316. In those versions, the policy averaged the grades from the areas being measured and then assigned a grade based upon a grade-point average. The May ODE waiver submission includes a process that averages *percentages* and then assigns a letter grade, so that any measurement with a poor percentage will dramatically drag down a district's overall letter grade. There does not seem to be a rationale for averaging percentages.