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EdAllies Public Comment on the Minnesota Every Student Succeeds Act Draft Plan

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At EdAllies, we believe that every Minnesota student deserves a rigorous and engaging education, and that we can't let barriers stand in the way. One tool for identifying and removing barriers—particularly systematic barriers—are statewide accountability systems that effectively assess whether our schools are on track, and that provide clear interventions when they are falling short. We have been monitoring the development of Minnesota's ESSA plan, and while we are pleased with certain elements that advance equity, we also have recommendations for strengthening the plan's provisions around transparency and accountability.

TITLE I, PART A: ACCOUNTABILITY

We believe that certain elements of the accountability plan will help advance equity. For example, we support the Minnesota Department of Education's decision to identify schools for improvement if they have specific student groups with low graduation rates, not just a low graduation rate overall.

We also think it is the right choice to include all students in the denominator for accountability purposes. This will encourage meaningful participation in statewide assessments, and ensure that the state does not overlook schools with low participation when identifying schools in need of support.

Finally, we are pleased that all student groups are weighted equally when calculating a school's overall performance, ensuring that smaller groups are not hidden within averages. We recommend that MDE keep this provision, and strengthen it by ensuring there are not unintended consequences for schools that are made up predominantly of students of color or students from low-income families. MDE should ensure that the system never undercounts historically underserved students.

SCHOOL IDENTIFICATION

The proposed funnel system is a major weakness of the plan. It does not provide a sense of overall performance of all schools, misses an opportunity to identify high-performers, and distorts the weight of specific indicators. Moreover, the use of a non-academic indicator as the tie-breaker could mean that very low-proficiency/low-growth schools are not identified for comprehensive support.

We recommend that MDE replace the funnel with a composite rating system, which would provide meaningful information on the performance of all schools, rather than exclusively identifying those at the bottom. It would also provide a more well-rounded picture of a school by providing weights to multiple indicators, and increase transparency by creating an accessible summative metric.

If MDE maintains the funnel, certain changes could both raise the bar and avoid unintended consequences. First, we recommend that MDE set absolute thresholds for identification, rather than relative thresholds. One strength of the plan is that it sets ambitious goals, however, it does not tie accountability metrics to these goals. Rather than setting relative thresholds, MDE could use data about current school performance relative to state goals to create these absolute thresholds, potentially updating them over time as we see improvement as a state. This would increase clarity for schools and communities about when and why MDE will flag a school for improvement. It would also mirror the process for identifying schools with low graduation rates. Finally, doing so would support schools in setting specific academic achievement goals, which is an important component of a school's success.

Second, when identifying schools with low student group performance for additional targeted support, we recommend that MDE include schools with performance worse than **any** school in the bottom five percent. The current proposal relies on average metrics for the bottom five percent—a needlessly low threshold.

Finally, when identifying consistently underperforming schools for targeted support, we recommend that MDE include schools that are performing poorly on **most indicators** rather than **all stages**. Under the current model, a school will not be identified for support if they reach the 26th percentile or above for consistent attendance. This significantly distorts the real-world weight of this metric. We recommend that MDE instead identify schools as consistently underperforming if they demonstrate low performance across four of the six accountability indicators.

SCHOOL SUPPORT EXIT CRITERIA

The current plan lacks meaningful criteria for determining whether a school identified for improvement should be exited from support. We are pleased to hear, per comments from Commissioner Cassellius in recent public meetings, that MDE is considering applying more objective criteria to ensure a school is moving in the right direction and more effectively serving students before being exited. Under the current draft, a school could actually decrease its proficiency and growth, but increase consistent attendance and be exited. As MDE explores alternatives, we support options that both ensure improvement on core academic measures, and that the progress is significant enough to be meaningful for students.

PUBLIC REPORTING

Another major concern is the lack of detail on how MDE will share key accountability metrics with the public. We appreciate that MDE plans to spend time to build a meaningful dashboard system in the coming year, but recommend that MDE also make a clear upfront commitment to transparency and accessibility by

including language in the draft plan ensuring a holistic rating to accompany the dashboard. We recommend that MDE provide at-a-glance ratings for each category of indicators (proficiency, growth, English Learner outcomes, graduation, and school quality/student success), along with an overall composite rating, alongside the more in-depth data.

We also recommend that MDE specify within the plan that parents, students, and community members—particularly those from low-income communities and communities of color—will drive the development of the data dashboard.

ACCOUNTABILITY INDICATORS

The indicators that MDE selects for accountability will influence school behavior. It is important to select meaningful indicators and define them in a way that incentivizes what we hope to see in schools. We support the future addition of a college and career readiness indicator, and recommend that MDE use college enrollment and remediation rates—measuring outcomes rather than inputs.

We also recommend that MDE include classroom absences due to discipline as missed instructional days for the purposes of defining consistent attendance. MDE should require schools to count as absent students who educators send out of the classroom or to in-school suspension.

TITLE I, PART A: SCHOOL SUPPORT AND IMPROVEMENT

What happens during the school improvement process—not on paper, but in practice—ultimately determines whether our state plan impacts students. We hope that the plan’s focus on evidence-based interventions will help drive meaningful improvement. We recommend that MDE rigorously evaluate the impact of interventions used in different school settings, and work to elevate and share best practices with schools across the state, whether they have been identified for improvement or not. We also support efforts to rigorously evaluate the impact of the support infrastructure MDE provides through the Regional Centers of Excellence. Finally, we support escalating interventions for schools that fail to improve, with an eye to ensuring that we meet the needs of current students in real time. To determine what a specific school setting needs, parents of the school’s most underserved students should be at the table in the needs assessment and decision-making process.

TITLE I, PART A: ACCESS TO EDUCATORS, SCHOOL CONDITIONS AND SCHOOL TRANSITIONS

We support the plan’s use of the teacher evaluation system to measure teacher effectiveness. To be meaningful, this definition must be tied to job performance, and should not be based solely on licensure status, as MDE considers the role of the state’s new tiered system. We are also pleased to see that the definition of an inexperienced teacher values the work teachers have performed out-of-state.