



2800 University Ave SE | Suite 200
Minneapolis, MN 55414

Testimony on Minnesota's Every Student Succeeds Act Draft Plan

July 19, 2017

Chair Pratt, Chair Erickson, and members of the Senate E-12 Policy and House Education Innovation Policy Committees

Cc: Commissioner Brenda Cassellius

The Every Student Succeeds Act is a milestone for education policy, and offers states like Minnesota the chance to develop systems for accountability and school support that are tailored to the needs of local communities. We thank the staff at the Minnesota Department of Education for their diligent work to craft a thoughtful state plan based on the input of diverse stakeholders. We have been involved in almost a year's worth of committee meetings to guide the Department's work on accountability and educator quality, and have appreciated the opportunity to be at the table advocating for equity, accountability, and transparency.

We support certain elements of MDE's plan, such as the inclusion of teacher evaluations in the definition of teacher effectiveness and the decision to equally weight all student groups when calculating accountability indicators—a positive step toward ensuring that underrepresented groups are not hidden within averages.

We also see a number of areas for improvement to ensure our state plan conveys a sense of urgency, clarity of expectations, and a focus on transparency for families. Our biggest concerns are with loopholes we see in the school identification process and the lack of detail around how information will be shared with the public.

SCHOOL IDENTIFICATION

MDE is planning to use a decision tree process, or funnel, to identify schools for support. We have concerns with this approach, both conceptually and in practice:

- **Lack of Clarity on Performance for All Schools:** MDE's funnel system identifies schools for support, but unlike the current Multiple Measurement Rating and Focus Rating systems, it provides no information about the performance of schools that are not identified. Rather than developing scores based on multiple factors, the funnel is binary—either you are above or below the cut-off. The

concept of a holistic rating that factors all indicators into an overall score is implicit in ESSA, which requires that academic measures be “weighted” most heavily. The funnel system does not have true weightings, as most people understand the term. As a result, the current plan for designations serves only a compliance function, providing limited information on school performance to communities.

- **Lack of Clear Expectations:** MDE’s plan sets statewide goals, but does not use these goals to inform the school identification process. Schools will only be identified if they are performing worse than their peers. MDE could increase clarity for schools and communities about when and why a school will be flagged for improvement by creating absolute thresholds for identification so that schools know what to aim for upfront.
- **Role of the School Quality Indicator:** We have concerns with the use of a non-academic indicator as the tie-breaker in the funnel system. Schools with the worst performance in the state on both proficiency and growth could theoretically avoid being identified by keeping up student attendance. A more traditional scoring system avoids this loophole by giving weightings to different factors. Moreover, it is unclear how new indicators would be added to this stage of the funnel in a way that is meaningful.
- **Low Bar for School Identification:** All together, the choice to identify exactly the bottom five percent of schools for comprehensive support, a three-year identification cycle, and the fact that public reporting and transparency are put off into the future create an overall lack of urgency within the plan. We need to ensure that students in low-performing schools are not put on the back burner.
 - For comprehensive support, MDE could improve the plan by setting absolute thresholds for identification to ensure that students in struggling schools get the support they need before it is too late.
 - MDE plans to determine whether a sub-group is performing similar to the bottom five percent of schools based on whether they fall below the average performance of those schools. This sets very low expectations. MDE could instead look at the *cut-off* point for the bottom five percent—a slightly higher bar than the average.
 - To determine whether a school is consistently underperforming, MDE requires low performance across *all* categories of indicators. This means that a school doing poorly overall can avoid being identified by moving just above its peers on one factor. MDE could set a higher bar by exploring alternatives, for example, requiring that a school be below the threshold on four of six indicators.
- **Lack of Alignment Between School Recognition and Identification for Support:** MDE plans to recognize schools for success, but has yet to determine or share how. Ideally, Minnesota would use the same core measures to identify schools for improvement as we would to evaluate success. This is another downside of using a funnel system rather than a more traditional weighted calculation.
- **Exit Criteria:** We have concerns with the criteria for exiting schools from the comprehensive support group, which are based only on whether a school would be identified in the next cycle. Hypothetically, a school could actually decrease in terms of proficiency and growth, but increase its consistent attendance and be exited from the system. Alternately, a school could see no improvement, but have peers who fare worse, and as a result be exited. MDE should apply more objective measures to determine whether a school escalates within or exits the system.

PUBLIC REPORTING AND TRANSPARENCY

MDE's draft plan includes little detail on public reporting. Given the lack of detail, and the fact that the proposed school identification system does not create clear public ratings, we are concerned that Minnesota will take a step back, not forward, on public transparency under ESSA. Minnesota's new Northstar system should not be just a compliance tool; it should be designed to help the public understand outcomes, empowering parents as decision-makers and advocates for their children.

The current Minnesota Report Card has a lot of strengths, hosting a wealth of data on district, school, and statewide performance. At the same time, we have heard from parents and community members that the Report Card is challenging to navigate and, at times, difficult to understand. In addition to being more user-friendly, a new dashboard under ESSA should be accompanied by a clear summary to help families understand school performance at-a-glance. Doing so would make the data more accessible, and give the public a better understanding of how students are doing. MDE mentions this priority in the plan, but provides little detail on what it might look like in practice.

We will be watching the development of a public reporting system closely, both in terms of content and process. The parents, students, and community members with the most at stake in school performance should have the largest voice in the decision-making process. To date, we have not seen in-depth stakeholder engagement on the question of public reporting. We are eager to see MDE focus on this in the coming year, and hope that the final draft plan will include more detail on the role of parents and individuals from traditionally underserved communities, along with more specificity around how the dashboard will incorporate at-a-glance snapshots to promote transparency and accessibility.

NEXT STEPS

There are areas for significant improvement in MDE's ESSA plan. We hope that MDE will make meaningful revisions in the coming weeks to present an even stronger plan for public comment. We also hope that the Legislature will continue to play an oversight role as the plan is finalized and implemented.

One important area for legislative consideration is alignment with World's Best Workforce. The draft ESSA plan highlights a number of areas where MDE will align metrics and actions required under WBWF with those required under ESSA, and vice versa. In an ideal world, these systems would feel seamless to schools and districts; Minnesota would truly have one accountability system. We are eager to work with the Legislature and MDE to continue exploring ways to create a single system that supports student success.

Sincerely,
Andrea Roethke
Managing Director
EdAllies