

Dear Senator/Representative [                    ]

On behalf of the Washington State Board of Education, it is my pleasure to offer our position on reauthorization of the Elementary and Secondary Education Act (ESEA).

The Board affirms that the federal government has an important role in protecting the rights and interests of our most vulnerable student populations. Accordingly, the Board welcomes federal involvement in public education policy that is appropriate to its mission and commensurate with the financial investment it makes in schools.

Our first recommendation is to move forward this year with reauthorization of the Elementary and Secondary Education Act. Congress needs to act now to correct the very real deficiencies of the No Child Left Behind Act and restore the consistency and predictability to federal education policy that our state and all others so urgently need.

In Washington the absence of an ESEA flexibility waiver has forced us to label nearly all of our schools “failing” under the 100% NCLB proficiency target for the 2014 year. Many of these schools had received well-earned “exemplary” ratings under the state’s Achievement Index only months before. Enabling a strong but realistic, state-driven framework for goal-setting will ensure that no state has to go through this harmful and demoralizing exercise again.

At the same time as we insist on the need to fix NCLB without delay, we recognize the benefits it has had for children since enactment in 2002. In its focus on improved achievement for all students and its requirements for annual assessments, transparency of results and identification of achievement gaps, NCLB was a major step forward. A reauthorized ESEA should not retreat from the progress made under NCLB; it should build on it.

Specific recommendations of the State Board of Education for ESEA reauthorization include:

**Data collection and reporting.** Continue to require rigorous and easily accessible reporting of assessment data and other indicators of academic achievement, such as attendance, graduation rates and school evaluations. Maintain requirements for disaggregation of data by student subgroups. Provide support through research and grants for efforts by states to develop and report data on such non-academic indicators as student engagement, discipline, teacher and principal quality, and access to advanced courses.

**Annual assessments.** Retain requirements for statewide annual assessments in reading/language arts and math in each of grades 3-8 and once in the high school grades, and in science in each of three grade spans. Annual assessments are fundamental to any meaningful system of school accountability and to ensuring equity in opportunity for disadvantaged students. Annual, state-selected assessments enable us to measure and compare school performance in an effective state system of accountability. They enable the use of growth measures, without which performance cannot be evaluated in a fair and valid way. They provide the ability to identify and provide supports for low-performing schools and student

subgroups, and inform research on the most effective ways to improve performance. They are integral to the success of the state's emerging charter sector.

For these reasons the Board strongly opposes any proposal that would replace annual testing with some variant of grade-span testing, whether as practice or for purposes of accountability.

The SBE also opposes proposals that would give states the option to use locally-chosen assessments in place of statewide assessments for federal accountability. The use of local options means a loss of comparability in assessments across a state, with consequences that ripple through a state accountability system. It also invites the lowering of standards for children most in need of higher standards.

We do share the concern of many Washington parents and educators about the amounts of school time spent for testing, much of it locally rather than state or federally-driven. We support the use of Title funds for audits to identify low-quality or duplicative tests for possible elimination.

**Career and college-ready standards.** Require each state to set career- and college-ready standards for its public schools. Each state would define career- and college-ready for itself, in what continues to be a dynamic area of study. State definitions should be reported to USED, where they would provide valuable information for policy-makers and researchers, but they should not require validation by USED.

**Strong accountability with greater state flexibility.** The SBE supports a federal framework for accountability in which states must set specific performance targets for all schools, but would have the freedom to design and implement ways of meeting them that best fit their needs. ESEA could, for example, require states to designate schools in need of improvement, while leaving to the states how those designations are made. The law could require states to set explicit achievement targets for districts, schools and subgroups, including for growth, and to measure progress against those goals, while leaving to the states the goals, measures and supports they judge most likely to be effective. An approach to school improvement that is appropriately "tight on ends, loose on means" would enable states to design their own, research-based systems of consequences and interventions for their schools. As a condition of federal funds, state accountability systems should expect progress in closing achievement gaps so that all students have the opportunity to graduate ready for college and career.

**English Language Learners.** In Washington the English Language Learners group is the fastest-growing of all ESEA subgroups. The SBE supports formula grants to help states ensure that all students are meeting rigorous academic standards. A reauthorized ESEA should require all states to establish rigorous and achievable targets in English language proficiency and other content areas. The standards developed by each SEA should predict success on grade level English language arts assessments, while still addressing the different proficiency levels of English learners.

**Equitable distribution of teachers and principals.** Too often the children most in need of the best instruction are the least likely to receive it. The SBE supports a strong federal role in helping assure that low-income and minority children in Title 1 schools are served by effective

teachers and school leaders. State applications for grants under Title II (High Quality Teachers and Principals) should describe how the state will assure that low-income and minority students are not taught at higher rates than are other students by teachers rated in the lowest of the state's evaluation categories, and not assigned at a higher rate to schools administered by principals in the lowest evaluation categories.

**Early childhood education.** The Board recognizes that early childhood education can be a foundation for success in school, particularly for children with social and economic disadvantages. The Board supports inclusion in ESEA of supports for equitable access to early childhood education.

The Board's concerns are by no means limited to those summarized above. We are also paying close attention to such issues for reauthorization as maintenance of effort, Title I portability, children with disabilities, charter schools and others before the Congress in this legislation. Board members will be happy to share their views on these and other issues at your convenience.

Thank you for your consideration, and for your commitment to improving educational outcomes for all of the children of Washington.

Very truly yours,

Isabel Muñoz-Colón  
Chair