



Dear State Board of Education Members:

Thank you for the opportunity to address the Board regarding our Association's perspective about the accountability provisions of the state's new ESSA consolidated plan. Before commenting on the specific questions, I was asked to address, I'll share the fairness criteria that guided my decisions when considering new accountability indicators as a member of two workgroups in that ESSA planning process:

1. Context
Do all schools regardless of context (size, rural-urban, wealthy-poor, etc.) have an equal opportunity to perform well on the indicator?
2. Control
Do all schools have control of the significant factors that lead to success with the indicator?
3. Costs
Are the costs of both success on the indicator, and reporting about it, fully funded by the state?

After applying those fairness criteria, I voted in support of 9th grade course completion rates and against the use of chronic absenteeism and dual credit. After those discussions, new information from the ESSA Technical Advisory Committee (TAC), and a research article by Dr. Pete Bylsma, have caused me to change my thinking regarding 9th grade course completion.

With that background, I will comment on the questions that panel members were asked to address.

1. *What potential policy benefits and drawbacks do the proposed new Achievement Index indicators (e.g., 9th grade course completion rates, chronic absenteeism, career and industry certifications— as combined with "dual credit, and English language learner progress) pose from your perspective?*

A clear benefit of these indicators is that they are all correlated with student academic success. But that correlation could be due to a shared connection with poverty since according to the TAC briefing paper, all the indicators except dual credit are also highly correlated with poverty.

In the conclusion to his recent research article about the SBE's current Achievement Index, Dr. Bylsma stated:

The validity of a tool (e.g., evaluation, assessment, test) refers to how well the tool measures the constructs it claims to measure ... A norm-referenced system that assigns scores and labels based on how the school performs compared to other schools without taking into consideration their demographic context yields labels that do not have validity ... As currently constructed, the Index essentially gives recognition to schools based largely on the wealth of the community and students' families, not how effective they are— the median FRL rate for schools rated Exemplary was under 10% in 2016, much lower than the state average (44%). (WEJ, May 2017, pg. 87)

While the TAC found that most of the proposed indicators were highly correlated with poverty, it didn't provide an analysis of the multiplier effect when using multiple indicators that all correlated with poverty. That layering of poverty-sensitive factors was a concern voiced by

school district members of the ESSA Accountability System Workgroup. My fear, and what Bylsma's research seems to support, is that with few exceptions, the resulting index identifies high poverty schools. On its face, that creates an unfair system that penalizes based on school zip code rather than staff effort.

2. *How do you believe that changes to the Achievement Index can support SPI's school improvement efforts, and local school improvement efforts overall? Do you have concerns about the Index interface, the scoring, or the tier label structure relative to these efforts?*

If the Achievement Index is transparent and the elements are well understood by school leaders, it can be a valuable tool for local school improvement efforts. If the index continues to evolve or the elements behind the index are not well understood, its value for guiding improvement is greatly diminished. In its current form, and with addition of the new indicators, the Achievement Index is most useful as a tool for identifying the schools most in need of additional state support.

3. *What are the one or two things about the draft ESSA plan that make you optimistic for the future, and suggest to you that the performance of schools will improve? Alternatively, what are your one or two primary concerns about the draft ESSA plan?*

The best things about the changes created by ESSA are a return of authority to the states, and the elimination of non-sensical provisions, such as all students will be successful at some randomly chosen future date. My biggest concern about the new plan is that the NCLB approach to blame and shame will continue, but with a state rather than federal design.

4. *What are your organization's views on the manner in which equity can be advanced in our current and future accountability landscape?*

Closing the opportunity/achievement gap has become a high priority for school systems and their leaders across the state. Rather than focusing blame on schools that haven't learned how to overcome the opportunity gaps, with which many students enter our schools, we should learn from the schools that have been successful, and then support other schools in implementing the strategies that appear to work.

That can help close gaps that exist within our schools, but rather than intervening where significant gaps already exist, a more effective strategy would address gaps before the students enter our schools. According to the US News analysis, Washington ranked 16th overall in the quality of our Pre-K-12 systems, yet we were 35th in overall preschool enrollment. According to the data compiled by the Education Counts Research Center, Washington ranks 46th in the preschool enrollment of low-income students as compared to non-low-income students. If equity is important to Washington, our legislators need to be held accountable for making early education a much higher priority.

Sincerely,



Dr. Bill Keim
Executive Director