

Testimony of Mark Simon on OSSE's January 30 Draft Plan on Accountability Under ESSA and the SBOE Committee Recommendations for the Improvement of the ESSA Proposal – March 15, 2017

I previously testified on November 16 and February 15, and will not repeat that testimony here. Today I would like to supplement my previous testimony by responding to the SBOE ESSA Committee's Recommendations for Improvements to the OSSE Draft ESSA Proposal.

First I want to thank the entire SBOE ESSA committee for hammering out a consensus set of recommendations that are responsive to the sentiment and expertise you heard in hearings. You conducted a lot of hearings, you listened carefully, and you have diligently read the research and followed the debates nationally. While I would have wanted the SBOE to go further in several areas, and there is at least one measure of school accountability that you have not included that I think would be important, I recognize that the Board is attempting to speak with one voice here in trying to get OSSE to move away from its orthodoxy and toward a richer set of measures. That has involved compromise leading, hopefully, to resoluteness.

OSSE's past narrow focus on a single data point and the resulting school focus on the PARCC test has led to a distortion in what schools do and inaccurate measures of school, teacher and principal quality. It has rendered inexplicable our failure to lower the achievement gaps based on race and socio-economic background. We have been focused on an inadequate set of data points and therefore have no idea why the bar hasn't moved for low income, low achieving students. It's time to focus as well on what a well-rounded education looks like, on whether the learning climate in schools is improving, and to incentivize a switch to a focus on richer accountability measures.

Your ESSA Committee has come up with a well-reasoned and reasonable set of recommendations for broadening the criteria and better monitoring the ways our indicators might themselves be skewing the data. As you said, we need to be studying the effects of our accountability measures on the culture of schooling as an ongoing process under the auspices of the SBOE. This point needs to be made to the DC Council as an expanded role for the SBOE.

Hopefully, OSSE will take your recommendations seriously, treating the SBOE as a partner with a legitimate perspective representing the public that elected you, and they will incorporate your recommendations into their new draft to be released on March 14. If they decide not to treat your recommendations seriously, then I hope you, collectively, have the conviction to vote their plan down. We parents, community activists, teachers, principals, and education policy analysts are counting on you to be strong enough to do that. Otherwise, there is no point in having an independent, elected, state board of education.

Response to Recommendations:

1. Elevate "school climate" and "well-rounded education" factors to balance the over-emphasis on the standardized test. The committee recommends that in the second year, non-test factors could account for 35% or more of the accountability rating. I hope that you are open to the possibility that it should be considerably more than 35%. Once a work group has an opportunity

to flesh out what other indicators of the quality of the learning climate in a school might be, I think that you will see that those rich indicators could account for considerably more than 35% of a school's accountability.

2. Hopefully, OSSE will come back with a plan that shifts the emphasis to growth over proficiency. If not, schools (and the educators who work in those schools) with chronically low proficiency due to high poverty, high mobility, etc. will continue to suffer a disadvantage, as you have eloquently argued in your recommendations to OSSE. I hope they don't ignore you.
3. I urge you, when you talk about climate surveys, to include not just surveys of students and parents, but also educators. The teaching staff in charter schools have no collective voice and in DCPS the voice of educators has been de-legitimized. And yet, caring professional educators may be the most important set of eyes and ears about the learning climate in each school. In business, 360 degree evaluations have been used successfully as a tool for management feedback in the best run companies. There is no reason that well-constructed climate surveys of the teaching staff wouldn't also be one of the most useful tools in school accountability. If teachers say something is wrong, or that something is working and making a difference in the achievement of students, it needs to get our attention just as much as if parents or students do.
4. Teachers, principals and students have been voting with their feet for years and nobody has bothered to count or to notice. Staff turnover rates and student mobility rates may be one of the best indicators of the quality of the learning environment. Churn in the teaching staff or the student body diminishes the stability and the learning culture of a school. The sense of community in a school and the sense of team among the faculty requires that people stick around. If a school is evaluated to some small degree on its ability to retain both staff and students, efforts will be made to incentivize retention, and thereby improve the culture of the school. Turnover data is an objective measure. No judgement interferes with the facts. It is easily available. In fact, the only reason that a school or LEA might not want to make the data available publicly is a desire to cover up revealing information. Measuring year-after-year churn may be the most revealing set of data about the quality of the school learning climate. Only OSSE and the SBOE, representing the broad public, have an interest in holding schools and LEAs accountable for the effects of their policies on teacher, principal, or student retention. I hope you can reconsider recommending this as a potential measure. It was not included in your recommendations. Perhaps it can be considered by a multi-stakeholder task force.
5. Lastly, although the State Board said nothing in your recommendations about the proposed five-star system for grading schools, I would urge you to recommend against such a system. When the accountability methodology is imprecise and nuanced, encouraging the public to accept that it can be boiled down into a five-star rating is misleading.

Thank you for your hard work on this issue. The statutory role of the SBOE in authorizing the accountability plan under ESSA is the most important role you have. I urge you to remain resolute in defending the public's interest in this arena.

Note[For those who may not remember from my previous testimony, Mark Simon has been a long time parent activist in DCPS from Ward 1, a lifelong career educator, and a national education policy analyst affiliated with the Economic Policy Institute. I have testified frequently before the DC Council on the school system budget, and on teacher evaluation, teacher quality and education reform. Most recently I have been an advocate for better independent research on how DC schools are doing.]

Addendum: *The following is the testimony actually delivered on March 15th in light of the revisions put out the day before by OSS to their January 30 Plan.*

Members of the State Board, My name is Mark Simon, Ward 1 parent, public education advocate, and education policy analyst affiliated with the Economic Policy Institute.

You have my written comments focused on your excellent consensus recommendations. I made some suggestions for improvements and would be happy to respond if you have questions. But with just 3 minutes, I'd like to focus here on OSSE's response yesterday and whether it treats your recommendations as seriously as the DC community needs it to.

What I appreciated most about your recommendations is that – although they are a compromise from what I and most of the dozens of parent, community, and educator representatives wanted, your recommendations still would have brought a shift in emphasis from a single, education culture distorting, test driven metric being the entire focus. Rather, you recognized that the learning climate needs to be captured with other significant measures.

1. While OSSE lowered the weight of the test from 80% to 70%, that reduction will not change one iota the test-prep emphasis in schools. It will not accomplish what you and we wanted.
2. The slight shift, a good one, toward the growth metric in elementary schools was inexplicably rejected for high schools.
3. While OSSE heard you about the need for a beefed up “school climate and well-rounded education” component, they renamed it “access and opportunities” and reduced the weight from 10% to 5%. That leaves the lion's share of School Environment to be measured primarily by attendance and re-enrollment. Attendance hardly captures anything about the quality of the learning culture in a school.

4. While I felt that your recommendation of a climate survey needed to be expanded to include a survey of educators in each school, OSSE has not committed to the concept of using a climate survey at all. But only to exploring the idea for two full years. Once you give your approval to their plan now, they are not even committing to allowing you to vote on whether it must be included at all in year three.
5. OSSE's plan revisions seem to have rejected your notion that time on science, social studies and other subjects not tested on PARCC should be measured at all.

In summary, your attempt to get at the richness of the learning culture in each school has been rejected. They seem to have heard you, but in failing to commit to having any factors other than the PARCC test and attendance count significantly, they have rejected your underlying logic.

I urge you not to rush to endorse OSSE's plan but rather to insist that in order to get your vote of approval, at the very least they need to take a little more time and consider more seriously your, and through you, our perspectives.