

WV ESSA PLAN COMMENTS

http://wvde.state.wv.us/essa/WV-ESSA-Plan_Public_Draft_FINAL.pdf

- **Page 8** Minimum N Size

- The Education Alliance and the business community support maximum transparency regarding student performance. Transparency, supported by the state's N size, is particularly important because of the significant achievement gaps between the state's largest subgroup (white) and other subgroups (Black/African American, Students with Disabilities etc.). In other words, by increasing the N size many of the subgroups in need of the most improvement may actually be provided with less public transparency regarding their achievement levels. While the Education Alliance is certain this was not the State's intent, the doubling of the N size may have the practical effect of masking the achievement gap at the local level. We also acknowledge there may be other factors, such as subgroups' Participation Rates, that may be negatively impacted by the current N size of 10. We suggest the state consider an additional level of subgroup gap analysis at the district level, particularly for districts/schools with small cell sizes, to underscore the education system's commitment to these subgroups and their communities to reduce the gaps in performance. In other words, what gets measured gets done.

- **PAGE 12** Long-term Goals

- The Education Alliance and the business community support rigorous long-term goals for our students. According to August 10, 2016 WVDE press release <https://wvde.state.wv.us/news/3306/>, WV English Language Arts (ELA) student achievement increased 2 percentage points from 45 to 47 percent and overall math proficiency increased 3 percentage points from 27 to 30 percent. However, Tables 4 and 5 (Page 12) state the "Baseline" (current starting point) for ELA is 64.63% and for Math 46.1%. It appears that the data used to calculate the WV starting points does not align with the state's assessment performance levels. The "Baseline" needs to accurately reflect the current achievement levels of our students in order for the State's long-term goals to be accurately measured and reported. Using the Smarter Balanced 4 level reporting system, students scoring Level 3 or higher have met the standard and are on grade level (i.e. "proficient").
https://wvde.state.wv.us/assessment/TOOLKITS/WV%20Assessment%20Report%20Results%20Educator%20Toolkit_Final.pdf Do the ESSA starting points also include students who have scored at Level 2 on Smarter Balanced? If so, how does that meet the ESSA requirement for "grade-level proficiency?" If the starting points are higher than the actual achievement results reported, then the 80% target would in fact, be much lower than the actual achievement goals towards which the State should strive for its students. West Virginia students need goals which are realistic, and which demonstrate sufficient rigor to make them globally competitive.

- **PAGE 14 -Graduation Rate**
 - Regarding the Graduation Rate goals, we support the addition of a 5 Year cohort to the accountability system in order to recognize that some students require additional support and time to graduate. We would like to see the separate GOALS for the 5 year rate and more information about how the 4 and 5 year cohorts will be combined to define graduation rate
- **PAGE 18 -Other Academic Indicator- elementary and middle schools**
 - The Education Alliance and the business community supports the state’s inclusion of multiple measures in the accountability system to fairly measure and judge all schools, including those with high rates of poverty. Specifically, we support the inclusion of “Academic Achievement Progress” (Growth) Indicator to reflect a multiple measure approach for accountability (not just achievement).
 - However, we are concerned regarding the validity and reliability of the proposed provision to measure student progress by allowing elementary and middle schools growth scores to be based on district administered benchmark assessments.
 - Validity concerns: if classroom teachers are administering benchmark assessments (in fall and spring) to determine student growth there may be an inherent incentive for their students to score low in the fall and higher in the spring and thus show high growth. What safeguards and protocols will ensure that a school’s “high growth” on Interim Assessments does not mask poor (or regressive) Academic achievement? What incentives at the school level ensure that schools care about both student proficiency and student growth over time?
 - Reliability concerns: Locally selected, administered, and locally scored assessments will result in different measures in each school that do not allow for accurate direct comparisons even with the lexiles/quantiles comparisons. If districts are selecting benchmark assessments to determine student growth, there may be an inherent incentive to select a less rigorous test to offset any deficiencies on the state’s standard assessment. This district to district variability may negatively impact the reliability of growth scores statewide.
- **Page 21 – other academic indicator – high schools**
 - The Education Alliance strongly supports the state’s academic achievement progress indicators for high school. Specifically, we agree with the proposed college and career measures including percentage of 12th grade students that acquire credentials such as AP/IB exams, college-credit-bearing coursework and completion of career technical education programs of study. These indicators are rigorous and provide valid and reliable measures.
- **PAGE 28- Annual Meaningful Differentiation -**
 - The Education Alliance is concerned regarding the proposed School Percentile Ranking. Is this an entirely normative ranking system based on below 25th, 50th, 75th percentile rankings? If so, this system would guarantee the same number of “distinguished schools” every year even if performance goes down. Likewise it also guarantees the same number

of “unsatisfactory schools” every year and makes it impossible for schools to know what they need to do to be distinguished. This type of norm ranking system may also have an unintended consequence of dissuading schools from sharing or helping each other improve. Finally, a normative ranking would clearly mask the poor performance of certain schools. If only 47% of West Virginia students are proficient in RLA and 30% proficient in math, how can 50% of West Virginia schools be Accomplished or Distinguished?

- The business community supports assigning annual ratings to schools that are clear and intuitive for parents, educators and the public. We are not advocating for a return to A-F system to accomplish this goal. However we believe any new rating system should not keep the public in the dark about school quality.
- ESSA requires that the weighting of each indicator in the aggregate provide “much greater weight for Academic Achievement than the School Quality indicators”. Although the state’s plan provides percentages (71%/29% and 67%/33%) that show the relative weight of the indicators, the color-coded visual report (that will be viewed by parents, educators and the public) gives each indicator the same visual space. Therefore, it may be difficult for the public to meaningfully differentiate schools that have low academic results (but acceptable school quality/student success) from those with high academic results but subpar school quality measures.
- The label “Emerging” (2nd from lowest) while appropriate to describe a new teacher’s performance as she emerges into a highly effective educator, does not provide a clear, transparent description of a school that may rank 26% in the ranking of all schools in the state. This label is neither meaningful nor understandable to the public, and in fact may mislead the public by fostering a belief that an “Emerging” school is one demonstrating measurable improvement and competency. A more accurate categorization for this grouping would be “Underachieving” or “Deficient.”