

Every Student Succeeds Act Ohio Implementation Plan

Ohio 8 Coalition Detailed Recommendations

Timeline

While the state is currently focused on an April submission date for the plan, the federal government also affords states the opportunity to submit in September. Taking advantage of this later opportunity will ensure that Ohio's efforts under ESSA include meaningful changes to Ohio's K-12 system to best support the needs of all students.

Funding

Ohio Department of Education is proposing to take the maximum allowable set-asides from Title I and Title II. This will decrease the level of resources LEAs and their schools' abilities to plan within an integrated and cohesive manner. It is the Ohio 8 Coalition's recommendation that Ohio continue the practice of local district control over available Title I and Title II funds so that school districts can effectively customize the services and supports we provide for our unique student populations.

Sub-group N-Size

The Ohio 8 Coalition is encouraged by ODE's efforts to consider opportunities to adjust the N-size for subgroup reporting to ensure that schools and districts are held accountable for all students they serve. We are concerned, however, that an N-size under 20 could present problems and lead to unforeseen consequences when coupled with the required 95% participation rate. This creates a potential situation where one student that is part of a subgroup of 15 could take a school below the subgroup participation requirement if they do not test. While we are concerned about potential complications resulting from a lower N-size and stringent consequences from not meeting the 95% participation rate, if ODE is willing to report, but not impose punitive outcomes for not meeting the 95% participation rate, we support lowering the N-size for subgroup reporting and accountability.

Growth

The Ohio 8 Coalition believes that Ohio's current value-added measurement is broken and the measurement and the application of value added is completely inadequate. As a result, there must be a meaningful and comprehensive statewide conversation around a measure that accurately reflects student growth and performance. The measure cannot rely on the K-12 system to resolve all issues related to the non-academic needs of students, many of which directly affect student achievement. Value added has failed as a measurement due to the following:

- Value added is no longer used for its original intention, which was to measure the growth of a student in one academic year.
- The measure can and should directly control for demographics, but it is not being used in that way.
- Value added is supposed to yield consistent results, but due to the inconsistent application, the results at district and school levels are inconsistent.

Additionally, The Ohio 8 Coalition Teacher Union Presidents believe that value added is now being used to evaluate and measure teacher performance even though it was not built to address that issue. The Ohio 8 Coalition Teacher Union Presidents strongly believe that value added, should not be used to evaluate teachers.

School Improvement

Unlike in the past, local schools and districts have the opportunity under ESSA to develop customized improvement plans that support the challenges faced by their students and community. The effectiveness of this opportunity is contingent upon the state establishing a meaningful, accurate, and transparent method by which to identify the lowest-performing 5% of schools in the state. The Ohio 8 Coalition is concerned that the state's proposed approach maintains an identification method that prevents educators, parents, community members, and schools from understanding where they need to focus improvement efforts to improve outcomes for students. Further, the exit criteria ensure that once a school is targeted for improvement, they will likely never be removed from that status.

School Improvement: the lowest-performing 5%

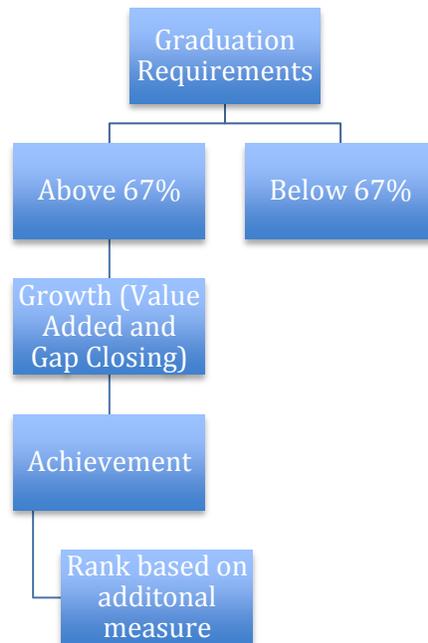
ESSA requires state's to identify the lowest-performing 5% of schools in the state and requires those schools to develop local improvement plans. The Ohio 8 Coalition believes that the criteria used to identify these schools should be:

- Student Focused;
- Transparent;
- Accurate;
- Stable over time;
- Simple and straightforward;
- Fair (equitable); and
- Include timely communication when changes are being considered and vetted in a meaningful way among stakeholders.

ODE's reliance on complex report card measures is in conflict with the principles outlined above, particularly related to transparency and the goal of being simple and straightforward. In order for schools to develop improvement plans that will move the needle, they must be able to clearly identify areas needing improvement in order to exit out of the improvement category. The Ohio 8 Coalition is further concerned that the state's approach to school improvement does not align entrance and exit criteria, which could lead to more and more schools entering comprehensive support without guarantees of schools exiting. The more schools identified for support, the more difficulty both the state and local districts will have in supporting these schools.

Entrance Criteria

The Ohio 8 Coalition recommends the state consider the following decision tree approach to identify the lowest-performing 5% of schools, which is student focused; transparent; accurate; stable over time; simple and straightforward; and fair (equitable).



Exit Criteria

The Ohio 8 Coalition recommends the following exit criteria for schools in the lowest-performing 5%. This criteria is aligned with the entrance criteria, the goals of the state, and are rigorous but attainable.

- The school’s ranking is higher than the lowest 5% of schools as determined by the decision tree framework for two consecutive years; and
- The school earns a four-year graduation rate of better than 67% for two consecutive school years; and
- The school has shown improvement among the student subgroups, or for those that have not seen improvement, the school has either met the state’s AMO benchmark or shown no decline in performance for two consecutive years.

District Continuum of Support

ODE's plan outlines a "District Continuum of Support," which the Ohio 8 Coalition is deeply concerned about. While The Ohio 8 Coalition is not opposed to the concept of district supports we believe that ODE's proposal will over-identify school districts and make it nearly impossible for them to exit out of the classification. Further ODE has proposed that all Title I School Improvement dollars be distributed on a competitive basis making it even harder for school districts to overcome the challenges their students face.

The following chart outlines ODE’s proposed approach.

Academic Distress Commission	Intensive Supports	Moderate Supports	Independent
Districts that are under the Supervision of an Academic Distress Commission	Overall "F" on district Report Card or At least two Priority Schools or A four year graduation rate of less than 67% or An "F" on Gap Closing for two consecutive years.	Overall "D" on district Report Card or "D" or "F" on Gap Closing for the two most recent years or At least one Priority, Focus or Watch School	All other districts

Because the state has a robust process of intervention and support of individual school districts the Ohio 8 Coalition recommends that the state consider the following framework for school district intervention that ensures that only the districts facing significant and comprehensive challenges are identified and supported. The Ohio 8 Coalition’s recommended approach is based on student enrollment in schools struggling with performance and ensures a transparent process for exiting each category of support. Additional dialogue among stakeholders will be required to determine the most effective student enrollment percentage.

Intensive Support Criteria	Academic Distress Commission
School districts serving more than X% of students that are enrolled in schools receiving comprehensive support for more than three consecutive years should receive intensive support from the state.	School districts serving more than X% of students that are enrolled in schools receiving comprehensive support for more than six consecutive years should be subject to academic distress commissions.