

Following the recent release of the Ohio State Plan for the Every Student Succeeds Act (ESSA), The Cleveland Metropolitan School District (CMSD) respectfully provides the following recommendations.

Timeline

Early review of the Ohio plan finds too many similarities to NCLB that prevented urban districts from climbing out of the category of lowest performing school status. At a time when the federal government and new Secretary of Education is reviewing the regulations set in place by the previous Administration, CMSD recommends taking the **additional time** offered to consider more feedback. We would value more collaboration with those most impacted by this bill prior to releasing a plan that best supports scholars and districts that bear the most impact.

High Academic Standards

We applaud continued use of high learning standards. Ensuring rigorous standards for all students across the state provides needed stability and high expectations for all Ohio's children.

Assessments

We are encouraged that ODE is maintaining the current assessment system thus ensuring stability, while paring down the number of assessments, wherever possible. We believe that a strong reading foundation provides for future success which is why we are excited to find that there would be realignment for the Third Grade Reading Guarantee and the K – 3 Literacy Component. We recommend calculations be from Spring to Spring instead of Fall to Fall and the proficiency be the same for both calculations.

The draft plan signals that Ohio may be missing an opportunity to reevaluate and envision assessments for the 21st Century in light of the increased focus on innovative assessments in ESSA.

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 will be able to plan with in an integrated and cohesive manner. Our proposal is to continue the practice of local district control over all available Title I and Title II funds to customize services we provide for our students.

With regard to adding Foster Care students, CMSD would recommend utilizing formulas rather than competitive grants. In addition, CMSD proposes establishing a menu of services which LEAs could purchase through regional Education Service Centers.

CMSD implemented the ESSA requirement for Foster Care students on December 10. However, the lack of additional funding for staff and transportation, places the District in a difficult position. When transportation of foster care students cannot be placed on regular District Bus routes, alternative transportation must be used at a cost of \$100.00 per day. Since Foster care

students change placements frequently, the goal of keeping them in their School of Origin creates a large financial burden on our Title IA resources.

- We propose the state create a partnership with the county government to share costs at a rate that is equally shared.

CMSD has implemented the Homeless changes that are required based on ESSA. CMSD receives generous support from Title IA for providing services to our homeless students. Providing transportation to and from the School of Origin upon the request of the parent places a financial burden on our Title IA resources especially if homeless student cannot be placed on a regular bus route. When this happens, the student must be provided a cab or a van at the cost of \$100.00 per day.

- Our proposal would be to permit the LEA to make the determination of the school the homeless students should receive instruction in order to make the best choices based upon individual student circumstance and to support the student's academic and extracurricular opportunities that enhance our scholar's education.

Accountability

We appreciate the reconsideration of the Gap Closure, Value Add Measures and K-3 literacy metrics. Rolling the new English Language Learner measure into the Gap Closure metric provides more transparency and more efficient data collection. We do believe however that the calculations behind the Gap Closure measure must be reconsidered to encourage districts and schools to pursue aggressive but achievable goals.

While there must be a high bar for the long term proficiency goal, interim progress goals must be differentiated for each school. Instead of mandating an artificial percentage of the Gap to be closed every year, ODE should match schools to peers based on student characteristics. Then, use historical data to identify average performance and standard deviations in a subjects and subgroups for each group of schools to establish the target for each school. Such a measure allows all schools to succeed while maintaining high expectations and still demanding increased growth from schools that are exceptionally below average.

We approve of the inclusion of chronic absenteeism as an additional indicator of school quality. However, the current weight on this indicator is so small as to be meaningless. We believe this measure should have greater weight than as single indicator among many indicators that in total have a small weight on the Achievement Component. Philosophically, we believe it is important to include more than just student outcome measures in an evaluation of school quality. Attendance is an important leading indicator of success in a school that research has shown is connected to other student outcomes. We recognize that student outcomes, such as proficiency and growth, must be a significant part of any definition of school quality. But we must also recognize the success of schools that are making investments in foundational metrics like attendance, as part of a pathway to success in other metrics later on.

We applaud ODE for considering ways to adjust the N-size for subgroup reporting to ensure that schools and districts are held accountable for all students in their care. However, we are concerned 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 drastic punitive outcomes for not meeting the 95% participation rate, we support lowering the N-size for subgroup reporting and accountability.

We approve of the continued use of Value-Add as a measure of student growth. Emphasizing growth in conjunction with proficiency is incredibly important, as long as our measure of growth is transparent, easy to understand, and predictable.

Report Cards

Ohio's State Report Card has many flaws. An intention of ESSA was to move away from No Child Left Behind type systems where schools were separated into winners and losers.

Maintaining the current report card is disappointing, not aligned with the intent of ESSA, and further perpetuates a stagnant way of thinking about this issue. We are concerned that the current mathematical method of creating summative report card grades is difficult to understand for practitioners and the public. Given that this summative grade is tied to high stakes state interventions, it is important that school staff can easily identify weak areas and the improvement they need to make in those areas, necessary step in changing course and improving instruction to benefit student outcomes.

We recommend that ODE consider alternative methods of meaningful differentiation of schools. One potential option would be a decision tree method.

- **Long Term Goals:** We are concerned that the proposed long term state goals look like a return to Annual Yearly Progress, which fails to account for significant progress students might have made, even if a school does not reach the threshold goal.
 - We recommend that as the state applies its long term goals to districts and schools via report card metrics, the measures take into account not just whether a school/district has met a threshold proficiency level, but better accounts for the size of the gains that have been made. Districts that have greatly improved in an area, but not necessarily met the goal, should be recognized.
- **Evidence of Interventions:** The proposed plan gives the state, rather than the LEA, the ability to determine what qualifies as evidence of a highly effective program. This arrangement will impede the ability of LEAs to tailor interventions to their local contexts and needs and understand how different interventions impact the students in their district.

- We would recommend providing support to districts by creating a repository of evidence-based interventions, but also explicitly allow LEAs that are capable of independently producing their own evidence of effective interventions (within the guidelines of the ESSA) to do so.
- **Direct Student Services:** We implore the state to reconsider this. The current plan is essentially re-instating Supplemental Education Services. This was a failed effort under NCLB.
 - We would suggest that District/LEA's use the funds for the school day or extended hours based on programs that have shown to increase student achievement for the population they are serving.
- **The District Continuum of Support for low performing schools:** We are concerned the current arrangement places any district with at least two priority schools into intensive support. This will guarantee that all of Ohio's urban districts will be stuck in Intensive Support with little hope of moving out of this category. Also troubling is the proposal to make Title 1 School Improvements competitive.
 - We recommend that ODE eliminate the threshold of two priority schools leading to intensive district support. The other criteria provide a sufficient differentiation for intensive versus moderate support.
- **The Exit Criteria for Schools in Comprehensive Support:** We are concerned that the current plan creates potential conditions where schools might have left the bottom 5%, in a particular year but not met the exit criteria. This 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.
 - We recommend the state rethink the exit criteria for comprehensive and targeted support. The state should consider allowing schools that have made significant gains in the areas of lowest 5%, graduation rates, or subgroup performance to exit from comprehensive support. Schools making significant progress will have the systems in place that are necessary to continue this momentum while intensive efforts can then be directed at other schools in need of support.
- **Priority of Goals through Weight of Measures:** ODE's proposal weights academic achievement (i.e. proficiency) equal to growth. Further, given the role that proficiency measures play in multiple graded components of the report card, proficiency will actually have a greater impact on a school's performance than growth. This will lead to yet another iteration of No Child Left Behind that does not encourage students and schools to grow, only comply. Favoring proficiency will result in schools focusing on middle performing students and pushing this group towards proficient while ignoring struggling and high performing students

- ODE should weight growth more heavily than proficiency in order to encourage all schools and students to improve.

Educator Effectiveness Measure for ensuring Educator Equity

- Educator effectiveness and equity must focus on the impact of effective teachers on student outcomes in a more significant way. We cannot perpetually accept the contrast between consistently high evaluation scores for teachers while having significant variance in teachers' ability to raise student achievement. ODE's proposal is based on a theory of action that preparation and licensure are the key indicators of educator effectiveness, rather than outcomes students achieve as a result of excellent educators. In Cleveland, there is no correlation between the Workforce Strength Index created by ODE and school performance index.
 - CMSD recommends that ODE strengthen the rigor of the existing OTES process and rubric to better identify actual teacher performance, as well as reorient definition of equity to focus more on student outcomes.
 - The state should also consider revising the definition of effective to a weighted formula that favors outcome measures like OTES over input measures like years of experience or licensure.

Thank you for considering our opinions and proposals on this plan. We look forward to continuing collaborating with ODE, Ohio legislators and all other stakeholders to support quality educational choices in every neighborhood.