

ESSA Response

Thank you to the members of the Joint Education Oversight Committee for this opportunity to present testimony on behalf of the leadership team of Westerville City Schools. We look forward to seeing how the recommendations of stakeholders from local school districts are incorporated into Ohio's ESSA proposal.

Our general response to the draft document is that it takes advantage of some of the allowances provided under ESSA for greater state and local school district control over education. However, there is still a significant gap between proposed changes and the concerns of stakeholders at the local level. The following are recommendations for your consideration.

A. Challenging State Academic Standards and Academic Assessments

Challenging Academic Standards

- We support the continued effort to have challenging academic standards that reflect college and career readiness. Please continue to engage educators and other stakeholders in the development and review of these standards.
- Career Technical Education remains an underutilized graduation pathway. Recent efforts to change standards and requirements will not increase enrollment in these programs. In fact, they are more of a deterrent. Local CTE superintendents and principals, along with business and industry leaders, should have a greater voice in determining which assessments and performance levels should be used for the industry credential standards. The authority for those determinations should not rest solely with ODE.

Aligned Academic Assessments

- Ohio's proposal does not adequately address the issue of time spent on state assessments. To quote from page 7 of the Draft Overview, "stakeholders expressed an interest in continuing to explore a further reduction in testing."
 - Ohio should start by reducing state tests to the minimum required by ESSA. From that position we can make better shared decisions about the need for additional state assessments to support the state's policy goals.
 - Decisions regarding local assessments should be left to local boards of education and their communities, rather than the state imposing limitations.
 - Ohio must fully examine the impact of online assessments on student performance. We must account for any variables associated with moving to online assessments and their impact on student performance.

B. An Aligned System of Accountability, Support and Improvement

Accountability System and Report Card

- There is a clear disconnect between ODE's statement that the current report card system is "nationally heralded for its comprehensive, innovative and easy to understand structure." (p.8) and public sentiment. While there are elements of Ohio's School and District Report Card that are informative, there are also elements that are meaningless and confusing.
 - The overall **A-F grading system** is a poor choice for communicating performance. We recommend, as others have, that Ohio move towards using Exceeds, Meets, Fails to Meet as descriptors of performance level with some additional component that indicates progress over time.
 - **Indicators Met and Gap Closure** are good measures. However, frequent changes to assessments, performance standards and the number of indicators have made these measures less valuable as a long range planning tool. Avoid making frequent changes that impact these accountability measures. We would also recommend reconsidering the decision to grade schools based on an N size of 15. The data is helpful, but we question the need for and fairness of issuing a grade in this area.
 - **Progress (Growth)** is an important measure of performance. However, confidence in the current measurement continues to diminish. The state relies on this metric as a means of measuring district, school, and teacher performance. It would be prudent to have a qualified, independent third party review this measure for its appropriateness, reliability and validity. Let's be assured that Ohio is using the best measurement of progress if we are going to attach high stakes to its application as an accountability tool.
 - **K-3 Literacy** is a measure that needs significant improvement as noted in the ESSA summary. In its current form it is useless.
 - **Prepared for Success** has some merit, as well as some flaws related to calculations and grades.
 - The opportunity presented in ESSA to add a "**School Quality**" measure needs significant consideration. Ohio's plan measures school quality in terms of student engagement, but measuring engagement with attendance and discipline data does not offer a direct reflection of student engagement. School attendance and discipline are a function of larger community elements that include, but are not exclusive to, school engagement and quality. The idea of a statewide school climate survey as

a measure of school quality is also problematic in that it requires time from instruction just like state assessments.

An Aligned and Evidence-Based Improvement System

Ohio Improvement Process (OIP)

- Ohio's OIP Framework is grounded in evidence-based research on the effectiveness of formative instruction and the use of district, building, and teacher teams. The model is very strong, but the compliance issues render its implementation and application difficult and burdensome.

Supporting Excellent Educators

- We strongly encourage Ohio to implement, as soon as possible, all 6 recommendations made by the Education Standards Board in regard to teacher and principal evaluation. The current system is burdensome and lacks fairness.

We are confident that the recommendations our team is making reflect those of many stakeholders. We need to push harder on our ESSA proposal to ensure that it truly reflects the input of the many local community leaders who are engaged in the process. In its current form, Ohio's ESSA proposal does not seem fully representative of the concerns and recommendations being made by many leaders at the local level. My colleagues at Westerville City Schools thank you for your time and consideration of our testimony.