



Thank you Chairman Cupp, and members of the Joint Education Oversight Committee, for giving me the opportunity to provide testimony today on the Ohio Department of Education's proposed ESSA plan.

My name is Chad Aldis, and I am the Vice President for Ohio Policy and Advocacy at the Thomas B. Fordham Institute. The Fordham Institute is an education-focused nonprofit that conducts research, analysis, and policy advocacy with offices in Columbus, Dayton, and Washington, D.C. Our Dayton office, through the affiliated Thomas B. Fordham Foundation, is also a charter school sponsor.

I'd like to first applaud the department for their hard work on this plan. ODE staff worked tirelessly to gather a massive amount of stakeholder feedback, and many of the recommendations that they heard throughout the state can be either seen as a part of this plan or are identified as areas meriting further study. I know you've listened to testimony from a number of people who felt that their voices weren't heard. As legislators, you know as well as anyone that it's extremely difficult to incorporate feedback that, while important and strongly valued, is diverse and many times contradictory.

The ESSA plan created by ODE is a thoughtful approach that strikes an important balance between meeting the federal requirements and protecting Ohio's autonomy. While the impact and role of the new federal education law has generated much discussion, the most important thing that ESSA does is return more authority over education to the state and local school districts—where it belongs.

Before I comment on the content of the plan itself, let me offer a suggestion regarding process. This plan should be as limited in scope as possible. That's because, once it is approved by the U.S. Department of Education, it is locked into place for many years to come. Revising it will be a hassle and require cooperation from officials in Washington. Thus we should resist the urge to put everything but the kitchen sink into the plan. We should stick to the plan requirements, and leave other important policy to be decided at the state level as necessary.

Worth noting, many of the changes being suggested have been lobbied for in front of this body in the past. Some of the most notable examples include the role of teacher evaluations, the quantity of tests administered, and the state's school grading system. A fair amount of the criticism is coming from people and entities that didn't like the decision reached by the General Assembly the first time around and have seen the ESSA engagement requirement as an opportunity to have a second bite at the apple. That's fine and to be expected. However, if we hijack the legislative process by creating policy through our ESSA proposal, Ohio could find itself right back in an NCLB environment where we were forced to carry out a plan that failed to take into account local contexts, needs, and solutions.

Shifting to the contents of the plan itself, here are some things that Ohio's ESSA plan should be commended for:

- 1. Improves the state's current school accountability system.** Over the years, Ohio has developed a robust, data-rich state report card system that has drawn critical acclaim. The amount of

information available for policy makers, communities, and, most importantly, parents is comprehensive. High quality information on school and district academic achievement is more important than ever with the growing amount of school choice that parents have available.

2. **Keeps A-F school ratings.** The A to F rating system is an intuitive, easily understood framework that represents a significant improvement from the previous labels Ohio used like “continuous improvement.”
3. **Recommends review of tests that aren’t required by ESSA.** Acknowledging the public comments regarding the need to reduce testing, the plan calls for re-examining any tests that aren’t required by federal law. While we are open to eliminating any of the non-required assessments, this review is important and should look at any potential impact of removing the assessment and consider its initially intended purpose. A review of these assessments should also include a comprehensive review of the testing impact of the Ohio teacher evaluation system including the use of vendor assessments and student learning objectives.
4. **Retains the performance index measure.** This is important because performance index incentivizes schools to improve student performance at every level of academic achievement rather than focusing only on students who score near the proficiency threshold.
5. **Preserves the prepared for success measure.** In an era where there’s plenty of rhetoric surrounding college and career readiness, Ohio has created a straightforward measure that examines whether students have demonstrated some of the academic and career-related indicators likely leading to success after high school.
6. **Adopts a smaller n size for calculating achievement gap measure.** The state’s adoption of an N-size of 15 (decreased from 30) is an important change. It means that information on many more students subgroups will be available and will make it easier to see if all students are getting the necessary attention to be successful.
7. **Increases focus on supporting excellent educators.** The plan recommends utilizing the 3 percent Title II set-aside to support principal and teacher leadership development. There are several programs that could accomplish this goal, including pilots that fund, implement, and evaluate teacher coaching, the creation of hybrid teacher roles, and an online network of open educational resources that Ohio teachers can access anytime, anywhere. It’s also important that the state take advantage of this opportunity to re-evaluate the efficiency and effectiveness of the existing Ohio Teacher Evaluation System in accordance with recommendations from the Educator Standards Board.
8. **Subsidizes fees paid by low-incomes students participating in Advanced Placement and International Baccalaureate courses.** All students deserve to access these advanced courses,

and this will remove some of the barriers. That being said, it's likely that many students in rural and urban schools will still not have sufficient access to high level course work.

- 9. Improves ODE support for struggling schools.** Some positive aspects of Ohio's school improvement plans include: the creation of an online evidence-based clearinghouse to provide resources to schools and districts as they go about selecting improvement plans; the department's plans to "build its research capacity" and conduct performance monitoring in addition to compliance monitoring; the creation of a peer-to-peer network for districts to engage directly with one another; and incentives for districts to participate in random control trials and other research.

Of course, no plan is perfect and this one is no exception. The provisions below should either be removed from the plan or, where appropriate, the legislature should consider amending current law (these recommendations are underscored) to address the underlying issue.

- 1. Change the summative grade rating calculation.** The current summative grade calculation, which the ESSA plan doesn't appear to recommend changing, is likely to result in the overwhelming majority of high poverty schools and districts—regardless of their effectiveness—getting a D or an F. This is happening because current law weighs grade components that tend to correlate with poverty at about 80 percent of the overall grade. Growth, a factor that doesn't correlate with poverty, accounts for only 20 percent of a school district's grade. Serious consideration should be given to increasing the impact of student growth on the overall school grade.
- 2. Explore calculating the graduation cohort in a different way.** While graduation rate is a standard, generally accepted measure, Ohio should explore calculating the cohort in another manner. By removing students from a high school's ninth grade cohort, even if the student transfers in the twelfth grade, the graduation rate for traditional high schools is being overstated at the expense of dropout recovery and some online schools. The net result is that school districts, whether they utilize it or not, have a direct incentive to encourage credit deficient upperclassmen to transfer to other high schools.
- 3. Eliminate the category of "watch" schools.** The definition of what places a school in the watch category is ambiguous and unclear—the plan mentions schools that struggle to meet the needs of one or more student subgroups in accordance with state, but the details about what this means and how it specifically fits into the new school identification system are fuzzy. The state should remove the "watch" category from its proposal, and instead focus on identifying and supporting the federally mandated categories of priority and focus schools.
- 4. Alter the district continuum of support so that it's not as broad and inclusive.** Ohio's overall report card calculation relies disproportionately on factors that correlate with demographics and relatively little on student growth. Because of this calculation, it's likely that most high-

poverty districts will find themselves in “intensive support status” under the state’s proposed continuum of support. Although some of these districts will undoubtedly deserve to be there, there is also the possibility that undeserving districts will end up there too. Adding districts with at least one watch school to the moderate support status category will exacerbate the problem. In summary, there’s a very real chance that a large number of school districts will be forced to adopt improvement plans intended only for the lowest-performing schools. The sheer amount of time and manpower it will take the department just to monitor the data of that many districts—let alone actually support them—is staggering. It will dilute energy and resources, all without yielding any benefits for most schools. New compliances processes and burdensome paperwork will also create extra work for everyone involved. We recommend altering the continuum of support to include *only* the lowest-performing districts and schools. This can be accomplished by removing “watch” status from the list of things that can place a district into intensive or moderate support status and ensuring the newly recommended methodology for calculating “gap closing” doesn’t over identify schools and districts. The current measure results in the overwhelming majority of districts receiving a D or F in gap closing.

5. **Use great caution when spending education dollars on school turnaround efforts.** Studies from across the nation suggest that funding school turnarounds hasn’t gone well. In Ohio, hundreds of millions in school improvement grant dollars were spent with little to show for it. We are concerned that Ohio’s ESSA plan contains many of the same elements as these school improvement plans of the past. While the turnaround strategies listed in the plan aren’t bad in and of themselves, they will fail to result in systemic, long-term positive change if they are applied at random. It would be wise for the state to invest heavily in districts and schools that choose strategies that have been proven to work and should consider including high-quality tutoring and public school choice options.
6. **Protect the autonomy of CTE programs.** The plan identifies the need to ensure alignment of CTE standards with Ohio’s learning standards more broadly. While generally supportive, care should be taken to ensure that it doesn’t result in the loss of program level autonomy/independence that’s likely to be important in the long-term success of CTE programs. In other words, a light touch should be used in pushing for standards alignment.

While I agree with many who have testified and suggested that Ohio’s ESSA plan can be improved, I disagree with those suggesting that Ohio delay its application until September. If you believe that as a matter of sound public policy Ohio should promise to do only that which federal law requires thereby preserving its autonomy in other areas, the best course of action is to submit our state plan for federal approval as soon as possible. This plan largely does that.

Moreover, this plan is effective for the 2017-18 school year and local school districts deserve a certain degree of certainty when a school year begins. Waiting until September to submit this application could force districts to operate for months without knowing for sure what the rules of the game are—

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especially if the federal government pushes back on any of our template submitted elements. This should be avoided.

Thank you again for the opportunity to speak with you today. I am happy to answer any questions that you may have.