



TWINSBURG CITY SCHOOL DISTRICT
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We, the undersigned administrators of the Twinsburg City School District, want to be part of the solution for positive education reform in the state of Ohio. We appreciate that the state recently gathered feedback from stakeholders in K-12 public education. However, our administrative team has concerns regarding multiple items included in the ODE's draft plan to address the Every Student Succeeds Act (ESSA):

1. **Testing:** We recommend that Ohio's plan meet the minimum requirements of ESSA. Grade 4 and Grade 6 Social Studies, American History, American Government, 1 HS Math, 1 HS English are examples of additional tests that are not required by ESSA. Many stakeholder groups expressed concerns regarding the amount of testing for the students of Ohio; however, there are no reductions in required testing recommended in Ohio's draft plan.
2. **Graduation Rate:** The state report card currently uses four and five-year graduation rates to determine a district's score; however, districts are penalized for keeping students on IEPs beyond the four or five-year graduation mark. Many times, these students are receiving essential transition services and are better served remaining in the school district. School districts should not be penalized for doing what is best for the students.
3. **EL baseline:** It is disconcerting that baseline EL data is being calculated on only one year of student performance results regarding the new OELPA test format/platform.
4. **EL students:** Students with Disabilities (SWD) are no longer counted in the subgroup of SWD after the students are exited from the program. Consequently, EL students should not be counted in the subgroup for four years after exiting the program as being recommended in the draft plan.
5. **State Non-Academic Indicator:** The guidelines of ESSA require one State Non-Academic Indicator, therefore, only one measure should be included in Ohio's plan. We will meet the requirements with one reporting measure. School climate surveys are incredibly subjective and should not be investigated further.
6. **State Non-Academic Indicator - Chronic Absenteeism:** Students with ongoing medically related absences (e.g. asthma, cancer, diabetes, mental health illness, Crohn's, etc.) must not be included in the definition of chronic absenteeism. These are **medically excused** absences, and the parent and school district work together to assist in educating the student with medical needs. Furthermore, students attending internships, college visits or other school-related activities should not have their **excused absences** included in the calculation determining chronic absenteeism.
7. **Testing Opt Outs:** The opt out solution that was implemented by the state did not solve the issue facing school districts. Students are still calculated in the participation rate and the AMO calculations. Districts are being penalized for decisions made by parents. When a parent determines that their child will not complete the state assessments, that child's score (calculated as a zero) should not be included in the participation rate and AMO calculations. A school district's data should only include results for students who participate in state assessments.
8. **Gifted Indicator:** The Gifted Indicator is not required by ESSA. This measure and the yearly increases are unrealistic and need to align with ESSA mandates.
9. **K-3 Literacy:** "Any school or district that has less than five percent of their kindergartners reading below grade level will not receive a letter grade for this measure or component." Local control, while valued, in this instance is problematic as clear guidelines are not consistent from

district to district and should be monitored. Furthermore, alignment between K-3 Literacy and the Third Grade Reading Guarantee is imperative. The current system is confusing.

10. **Military dependents:** Currently school districts have no way of coding military dependents. Additionally this status is self-reported by families and not required upon enrollment into a school district. Given these factors, what is the intent of tracking military dependents?
11. **N Size:** The reduction in N size creates a smaller sample size and potentially compromises the confidentiality of the students, especially if students belong in multiple subgroups. We do not support the reduction of the N size to 15.
12. **Educator Effectiveness:** The performance rubric of the OTES/OPES evaluation system is a useful tool and influences educator quality. It has led to rich and valuable conversations that have helped districts enhance the quality of education. We believe the state should eliminate the student growth measures from teacher and principal evaluations. Instead, we recommend enhancing the rubric to include evidence regarding the manner in which the educator uses formative assessments to inform instruction, which ultimately leads to academic achievement.

Items that need clarification:

1. **Subgroups:** Please explain the reason/purpose behind the calculations being broken down into subgroups for the following measures: Performance Index, Chronic Absenteeism, Prepared for Success, and Value Added. This is especially troubling with the reduction in the N Size (see more above). It is noted that these are going to be reported categories only; however, is the intention they will be measured and published as part of districts' local report cards in the future?
2. **Value Added:** Is grade 3 now going to be included in Value Added calculations?
3. **Title IIA:** There are multiple references to Title II funds. Does this reduce district allocations or is this part of Ohio's allocations?
4. **HQT:** HQT is not referenced in the Technical Document; however, it is referenced in the overview. What is the status of HQT moving forward?

In closing, we noticed that many items included in the draft document indicate that studies will be completed to determine next steps. Since the US Department of Education does not require SEA's to submit their plans until September, we respectfully request that the Ohio Department of Education takes its time in its submission so that the plan is inclusive and accurately depicts the implementation of ESSA in our state.

Respectfully,

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