

Comments of Citizens for Effective Schools on OSSE’s January 30th Draft State Plan on Accountability and Proposed Submission Date

I. Functions of School Accountability Systems

When Congress recently replaced the No Child Left Behind Act (NCLB) with the Every Student Succeeds Act (ESSA), it intended to change the national conversation on accountability. It required States to move beyond NCLB’s holding schools accountable just for test scores and graduation rates to also hold them accountable for at least one indicator of “school quality or student success.” By specifying that the new indicator could be “school quality,” ESSA was encouraging States to look not only at students’ academic outcomes but what was going on inside schools that constituted their “quality.”

State school accountability systems can serve at least three major functions. First, they can literally hold schools “accountable,” i.e., measure and publicly report school performance and subject low-achieving schools to interventions. Second, because “what gets measured, gets done,” by selecting which factors to measure, a State will greatly influence what schools concentrate on. To the extent that an accountability system measures factors that contribute to good school quality — e.g. teacher emotional supportiveness for students, engaging students in critical thinking — it will incentivize schools to focus on improving those factors and thereby improve student learning. And third, if the system measures important learning conditions in each school, it will greatly help parents in selecting which schools would be most appropriate for their children.

II. Role of School Climate Surveys in ESSA Accountability

In giving examples of indicators that could qualify as accountability indicators of “school quality or student success,” ESSA explicitly lists measures of “school climate and safety.” School climate surveys have two major advantages for use as accountability indicators under ESSA.

Initially, school climate surveys of students are analogous to student standardized tests; since they are taken by individual students, it’s possible to correlate the demographic background of each student with the answers on the indicator. Thus, student climate surveys would satisfy ESSA’s requirement that, to qualify as an accountability indicator, the measure’s results must be disaggregable by student subgroup: low income, racial/ethnic, disability or English language learner. (By contrast, it may be impossible to disaggregate by student subgroups climate indicators collected from administrative data, such as teacher attendance and teacher turnover. Because teachers are concurrently teaching a mix of students from different subgroups, there appears to be no way to differentiate teacher attendance and turnover as to each subgroup.)

Further, there are robust school climate surveys that report valuable information about what is happening in each school on multiple components. These include, for example, student relationships, learning environment, discipline, attitudes, parent and community relationships and the school’s physical condition. Information on such learning conditions can be invaluable to schools in focusing on how to improve and to parents in selecting schools best suited for their children.

III. National Compendium of School Climate Surveys

The U.S. Department of Education (DOE) has approved a specific list of school climate surveys as “valid and reliable ... that can assist educators in their efforts to identify and assess their conditions for learning.” “School Climate Survey Compendium,” National Center for Safe Supportive Learning Environments, <http://safesupportivelearning.ed.gov/resources/school-climate-survey-compendium> These surveys are for students, teachers, parents and others.

IV. Need for Deferring Submission Date

According to OSSE’s January 30th draft plan, it is planning to conduct a pilot school climate survey for possible use for accountability at some time in the future. But the draft plan is extremely vague. It says only: “Because we are committed to the importance of school climate work and to exploring this measure, OSSE also plans to begin an opt-program with LEAs and schools who are interested in piloting a school survey for possible use in the accountability framework.” “District of Columbia Consolidated State Plan under the Every Student Succeeds Act,” Draft, January 30, 2017, p. 39.

The draft plan says nothing about completing the “pilot” in time to administer a climate survey for accountability by the spring of 2018 so its results could be reported for meaningful differentiation and identifying schools for intervention before the beginning of the 2018-19 school year as required by DOE. This failure to provide for administering both the pilot and the climate indicator for accountability during 2017-18 frustrates the purpose of DOE’s extension of the time for reporting accountability ratings from before the 2017-18 school year to before the 2018-19 school year.

As the DOE favorably described commenters on its proposed accountability rule, extension was needed to “allow States to meaningfully establish systems including taking the time to design new indicators to satisfy the requirements of the Student Success or School Quality indicator – and collect information in new indicators that had not previously been part of the accountability system.” “Elementary and Secondary Education Act of 1965, as Amended by the Every Student Succeeds Act – Accountability and State Plans, A Rule by the Education Department on 11/29/2016 (DOE Rule), p. 124.

That is, OSSE is supposed to use the 2017-18 period to do whatever it needs to do to finalize any school climate indicator and administer it by the end of the 2017-18 school year. That’s necessary so that it can report accountability results to the public before the beginning of the 2018-19 school year.

Under ESSA, OSSE must develop its State plan “with *timely and meaningful consultation* with the ... State board of education ... local educational agencies ... teachers, principals, other school leaders, charter school leaders ... specialized instructional support personnel, paraprofessionals, administrators, other staff and parents.” (Emphasis added) Elementary and Secondary Education Act, Sect. 1111(a)(1)(A)

Including a robust school climate measure in D.C.’s state plan is essential to redirect the huge emphasis on accountability to raise test scores toward focusing on the factors that help schools improve, to guide that school improvement, and to enhance the basis for parents to make informed school choices.

OSSE should establish a stakeholder advisory task force of key organizations related to DCPS and charter schools – each organization selecting its own representatives – to: review the school climate surveys endorsed by DOE in the above Compendium; determine which would be best for D.C.; and make its recommendation to OSSE by August 2017 for which school climate survey should be piloted. The “pilot”

should be conducted in the fall 2017, thereafter reviewed and revised as necessary, and administered for accountability in the spring 2018. That would enable OSSE to report the results to the public before the start of the 2018-19 school year – in keeping with DOE’s schedule.

The date for the submission of the state plan should be deferred from April 3rd to September 18th to allow for the task force to do its work and report to OSSE. That would give OSSE time to decide which school climate indicator to pilot and include that in the formal state plan it would submit to DOE by September 18th.

Respectfully submitted,

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