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Commissioner of Elementary & Secondary Education

Massachusetts Department of Elementary & Secondary Education

75 Pleasant Street

Malden, MA 02148

Dear Commissioner Chester:

I welcome the opportunity to offer comments on the draft Massachusetts Every Students Succeeds Act State Plan on behalf of MassINC. MassINC was founded in 1996 by leaders devoted to promoting informed dialogue on matters crucial to the advancement of economic opportunity in our Commonwealth. Our founders played pivotal roles shaping the 1993 education reform law, deeply embedding in the organization's DNA respect for the vital role of education accountability and a yearning to study and inform efforts to continuously improve the practice.<sup>i</sup>

The *Every Student Succeeds Act* is a pivotal moment in this two-and-a-half-decade journey. The federal government has shifted power back to the states to lead the way toward next generation accountability. In part, this represents broad recognition that we currently have limited understanding of how accountability should evolve to ensure that all students gain the full range of skills they will need to be successful in the future.

Recognizing that accountability is a powerful lever to ensure that all students in our Commonwealth have access to a high-quality education, Massachusetts has shown steady resolve to test new waters. We have been rewarded with the nation's highest achieving students on measures of core academic knowledge across all subgroups. This success should embolden us to continue to innovate as we seek to close academic achievement gaps and pursue gains for all students on nonacademic skills that are increasingly associated with college and career success.<sup>ii</sup>

To help foster fresh thinking on how we cultivate new models for education accountability, MassINC spent the past 12 months convening education policy experts, local educators, and community members. We focused primarily on Gateway Cities (these urban districts disproportionately educate the state's high-need students; as communities, they are most impacted by the direct and indirect effects of accountability policy). Staff at the Department of Elementary & Secondary Education (DESE) were excellent partners in this convening process.

Rob Curtin made enormous contributions to a learning community we hosted last summer and Matt Deninger travelled the state with us for a series of early morning community forums. We are grateful for their thoughtful contributions and devoted service.

The first lesson from this year-long outreach effort was that taking advantage of the opportunity ESSA presents to improve accountability will require a long implementation timeframe. As such, the comments below are not primarily a response to the immediate plan, but rather reflections on how Massachusetts uses this moment as an initial step toward more robust accountability policies and practices in the future. I describe three pivotal challenges as we see them and offer some suggestions for your consideration.

### **Challenge 1: Developing measures of college and career readiness and success.**

In our many conversations with education policy experts, local educators, and community members, there was widespread agreement that Massachusetts needs better measures of college and career readiness in the accountability system. Proficiency on the tenth grade MCAS is seen as too low a threshold. In part because proficiency is often interpreted as an indication that students are on track for success in college and career, though many who have reached this standard struggle to make these transitions successfully. Similarly, using the high school graduation rate as a heavily weighted indicator places strong emphasis on a finish line with increasingly limited labor market value.

While our conversations on potential college and career indicators were limited by lack of information on innovative options for measuring school performance in these domains, a new report from a taskforce convened by the Council of Chief State School Officers (CCSSO) sheds new light on this topic. The report cites a variety of enhanced indicators already in use.<sup>iii</sup> Kentucky is perhaps the leader with a number of advanced measures of college and career success. But many states currently incorporate vigorous measures of college and career readiness. For instance, 11 states currently include the percentage of graduates with industry certifications in their accountability system and four states include post-secondary enrollment. Ohio measures the percentage of students who complete an Honors Diploma, the state's most rigorous course of study.

The CSSO task force recommends states go one step further by adding measures of “successful transition to post-secondary education or the workforce within 12 months of graduation.” In the community forums we held, many leaders believed Massachusetts should make post-secondary enrollment and persistence a significant indicator of high school performance. But others raised concern, suggesting that this measure is influenced by too many factors beyond a high school's control.

We clearly require more robust assessment of college and career readiness, especially if we are hesitant to use actual transition outcomes as accountability measures. Because testing in high schools only occurs in tenth grade, there is both room and exigency to develop these measures at that level. The CSSO working group suggests states assess readiness in high schools with portfolios, performances, capstone projects, or other approaches that enable students to demonstrate communication, collaboration, and problem-solving skills that are central to success in both post-secondary education and the workforce.

### **Suggestions for Consideration:**

- The Department could identify as a research need an examination of post-secondary transition data to identify variance in student outcomes after high school that can be attributed to high school practices. If such a statistical connection exists between high schools and post-secondary outcomes, there would be a strong rationale for adding these measures to accountability in the future. This kind of analysis might also identify and draw attention to high schools that have developed effective practices to improve post-secondary transitions.
- The Department could work with partners, such as the Massachusetts Consortium for Innovative Assessment, to pilot portfolios, capstone projects and other next generation performance task approaches to capture non-academic skill gains at the high school level.
- While the state works toward next generation college and career measures, it should consider the effects of proposed new high schools measures in terms of advancing post-secondary success in the near-term: Chronic absenteeism and ninth grade course passing rates are essentially leading graduation rate measures. In weighting these measures, the Department should take care that the system does not create incentive for schools to overly focus on the few students who are at risk of not graduating over the much larger number of students who are at risk of graduating, but struggling to transition successfully to college or career. Similarly, the design of the proposed arts learning and breadth of the curriculum measures could create incentive for schools to provide strong service learning and work-based learning experiences. Alternatively, these additional measures could create incentives to favor allocating resources to courses, such as the arts and foreign languages, over advising and experiential learning opportunities that are critical to successful post-secondary transitions for economically disadvantaged students.

### **Challenge 2: Effectively communicating accountability and school performance data.**

For the past four years, MassINC has been working with Gateway City leaders on an “education vision.” This vision calls for leveraging unique urban assets to create exceptional learning environments that make these communities more attractive place for families to live and more productive places for employers to locate. To achieve the vision, Massachusetts must have an accountability system that can identify and effectively communicate how much inclusive urban schools are contributing to student learning.

Gateway City schools serve large numbers of English Language Learners and children with learning disabilities. They also educate thousands of students who are unstably housed, moving between foster families, or fleeing crisis in their country of origin. These students will invariably face more difficulties on standardized tests. Our system is not designed to fully control for these factors so that apples-to-apples comparisons can be made when ranking schools statewide.

This is by design and entirely appropriate. Using all value-added measures that distill a school's contribution to learning would likely lead to directing attention and scarce resources to schools with relatively higher performing students. But it is possible to allocate support and resources to schools serving students with the greatest need without painting those schools as the “lowest performing”—a label that is objectively inaccurate and counterproductive.

Labeling urban schools as failing largely on the basis of student status measures can penalize communities for being inclusive, weaken fragile real estate markets, and further concentrate poverty.<sup>iv</sup> Indeed, since the passage of education reform in 1993, there has been a dramatic concentration of economically disadvantaged students in Gateway City schools. While education policy is certainly not the only force behind this trend, we cannot ignore this reality and the consequences it has for student learning. Rather than support economic integration, there is a strong likelihood that the communication of current accountability data has reinforced the growing segregation of economically disadvantaged students.

In recent surveys and focus groups of Massachusetts voters conducted by MassINC, respondents clearly felt publicly reported data largely provide an indicator of the socioeconomic backgrounds of students rather than school quality. More than half of voters surveyed reported that they lack reliable information to understand the performance of their local schools; an overwhelming majority say they would like clear information to make their own determinations rather than a single state assigned grade or level.<sup>v</sup>

### **Suggestions for Consideration:**

- Describe the school and district levels as “levels of assistance” rather than performance levels, clearly communicate with the media that these are not accurately described as indicators of “failing” or “low-performing” schools, but rather schools that require targeted support in order to ensure that all students reach proficiency and graduate prepared for college and career success. It is also important to emphasize that these levels are primarily determined for the administrative purpose of delivering assistance.
- Develop school report cards that provide parents with clear indicators of school performance across multiple domains. Avoid featuring and using complicated indexes. Instead, disaggregate data into meaningful information providing as much subgroup detail as possible. Include post-secondary persistence rates by grade point average for the most recent cohort of graduates to give an indicator of whether the grades a student is earning—the best measure we currently have of post-secondary readiness—place them on track for a college degree.
- Design school report cards so that they become a catalyst for local school improvement efforts. Currently, very few residents are aware of school report cards and the data they provide. A richer school report card can provide a tool for other parents and stakeholders to hold their school accountable. In addition to designing a more accessible report card and promoting its use, DESE can further stimulate the use of school report cards for local school improvement by including space for local option measures. State accountability will always be limited. Communities should

identify local priorities and provide stakeholders with data to ensure that initiatives to drive improvement in these areas are successful. Build school reports cards that allow schools and districts to present locally-generated data, such as percentage of students who are kindergarten ready or the percentage of students who participate in summer learning.<sup>vi</sup>

### **Challenge 3: Engaging local educators in developing and continuously improving assessment and accountability.**

Without a doubt, accountability has propelled Massachusetts forward; next generation accountability has the potential to help our educators make another great leap, but success will require buy-in from the field. In our conversations, it was clear that educators appreciate the value of high standards and standardized tests, but they also see a need for careful reflection on how we use limited assessment resources and utilize the data generated by assessment to improve instruction in communities with many needs and limited capacity.

While Massachusetts faces immediate pressure to comply with ESSA's quick implementation timeframe, in the future there will be opportunity to reflect on leeway the law provides for more significant change. This is an opening to actively seek the engagement of local educators and build their capacity to partner with the state to improve assessment and accountability. New Hampshire offers a strong model for such an approach.

During the 2014-2015 school year, New Hampshire piloted the Performance Assessment of Competency Education (PACE) program. PACE is a locally developed and administered testing program integrated into students' everyday learning experiences. Students in the PACE system take both the standard state tests and locally administered performance assessments. These assessments were co-developed with local educators in a participatory process initiated by the state education agency. In addition to face-to-face workshops, the state has used online tools to engage educators and provide personalized professional development to build their capacity to design and evaluate performance-based assessments and instructional strategies to help students build the higher-order skills these assessments can detect. An early evaluation of PACE found that that this collaboration has led to the development of high-quality assessments and improvements in instruction.<sup>vii</sup>

#### **Suggestions for Consideration:**

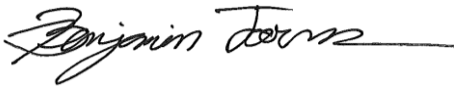
- Develop and clearly communicate objectives for next generation assessment. Work collaboratively with school leaders through efforts like the Five District Partnership and the Massachusetts Consortium for Innovative Educational Assessment to test new approaches in these areas.
- Engage educators and community stakeholders in the process of developing schools report cards. At all of our community meetings, there was keen interest among principals and teachers in

working together with the state to share capacity to generate and clearly communicate more meaningful data on school performance.

- Integrate inspection teams into the process of accountability. Gauging school effectiveness along multiple dimensions will require embedding a level of professional judgement into the process. Peer educators from urban districts who are close to the day-to-day work of teachers can offer perspective and generate buy-in from schools. At the same time, the experience of observing and evaluating schools can provide valuable professional development, teacher leadership opportunities, and information exchange.

Over the course of the past year, I gained a deep appreciation for the complexity of accountability policy and the difficult questions you face in implementing this new law. I hope that these thoughts and the enclosed research reports provide value. Thank you for your leadership on these complex issues and your unwavering commitment to advancing educational excellence in our Commonwealth.

Sincerely,



Benjamin Forman  
Research Director, MassINC

Cc: Paul Sagan, James Morton, Katherine Craven, Ed Doherty, Roland Fryer, Margaret McKenna, Nathan Moore, Michael Moriarty, Penny Noyce, James Peyser, Mary Ann Stewart

Enclosures: Next Generation Education Accountability: Design Ideas from New England's Small-to-Midsized Urban School Districts; We've got a prime opportunity to advance the Gateway Cities Vision; The Public's Take on Education Accountability: Results from a Survey of Massachusetts Voters.

## NOTES

<sup>i</sup> For examples of prior MassINC research on the topic, see: Tom Downes and others. “Incomplete Grade: Education Reform at 15” (Boston, MA: MassINC, 2009); Andrew Churchill and others. “Reaching Capacity: A Blueprint for the State Role in Improving Low Performing Schools and Districts” (Boston, MA: Rennie Center for Education Research & Policy at MassINC, 2005); “Examining State Intervention Capacity How Can the State Better Support Low Performing Schools and Districts?” (Boston, MA: Rennie Center for Education Research & Policy at MassINC, 2004).

<sup>ii</sup> For a summary of this research, see Robert Larocca and Sara Bartolino Krachman. “Expanding the Definition of Student Success Under ESSA Opportunities to Advance Social-Emotional Mindsets, Skills, and Habits for Today’s Students” (Boston, MA: Transforming Education, 2016).

<sup>iii</sup> “Destination Known: Designing State Systems to Measure and Value College and Career Readiness” (Washington, DC: Council of Chief State School Officers, 2017).

<sup>iv</sup> There is a large body of research on these issues. For examples, see: Alexander Bogin and Phuong Nguyen-Hoang. “Property Left Behind: An Unintended Consequence of a No Child Left Behind ‘Failing’ School Designation” *Journal of Regional Science* 54.5 (2014); and Scott Imberman and Michael Lovenheim. “Does the Market Value Value-Added? Evidence from Housing Prices After a Public Release of School and Teacher Value-Added” *Journal of Urban Economics* 91 (2016).

<sup>v</sup> Steve Koczela and others. “The Public’s Take on Education Accountability: Results from a Survey of Massachusetts Voters” (Boston, MA: MassINC, 2017).

<sup>vi</sup> “Draft Recommendations for the Next Generation Kentucky Accountability System” (Frankfort, KY: Kentucky Department of Education, November 2016).

<sup>vii</sup> Chris Sturgis. “Reaching the Tipping Point: Insights on Advancing Competency Education in New England.” (Vienna, VA: iNACOL, 2016).