

# MEMORANDUM

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Michigan Association of Secondary School Principals

**To:** Michigan Department of Education

**From:** Michigan Association of Secondary School Principals

**Date:** March 15, 2017

**Re:** Public Comment on Proposed Consolidated ESSA Plan

Please accept this memorandum as formal feedback from the Michigan Association of Secondary School Principals (MASSP) on the draft of Michigan's Consolidated State Plan under the Every Student Succeeds Act (ESSA) circulated for public comment by the Michigan Department of Education (MDE).

Over the past year, MASSP has participated in several aspects of the stakeholder input process that MDE was required to conduct under ESSA. MASSP members and staff served on a myriad of committees and oversight bodies, having made a significant contribution of time and energy to ensure that the voices of Michigan's secondary principals were heard as MDE worked to develop this plan.

After reviewing the draft plan, we now find ourselves in the position of again addressing many of the same issues we raised during the work group process. In particular, MASSP and our members have concerns with significant elements of MDE's draft plan for Title I, Part A and Title II, Part A. The problems we have identified with these sections are significant enough that we must urge MDE to delay submission of at least these two portions of Michigan's ESSA plan. We would ask MDE to either delay submitting Michigan's entire ESSA plan until the September submission window or to consider a partial submission for April 3, and wait until September to submit plans for Title I, Part A and Title II, Part A.

We hope that MDE will consider both the delay and making significant changes to the state's Title I, Part A and Title II, Part A applications. We have enumerated our specific concerns and recommendations for changes below.

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## Title I, Part A

### Summative Grade

MDE's current proposal includes the statewide A-F grading of Michigan schools. The reduction of school performance to a single letter grade oversimplifies the many factors that go into student performance. Furthermore, it creates the fiction of comparability between schools without addressing the underlying differences in student population or available information. For example, the parent of an 8th grade student examining options for high school enrollment might be tempted to compare the performance of a 9<sup>th</sup> grade-only building to a traditional 9<sup>th</sup>-12<sup>th</sup> grade high school simply by looking at the summative grade. This is a false comparison since the 9<sup>th</sup> grade building's "grade" would not be based on ANY student proficiency, growth, or graduation rate data. Such a system would have a stigmatizing effect on schools that would further drive down enrollment, teacher retention, and neighboring performance.

**MASSP Recommendation:** We oppose assigning a summative grade to Michigan schools for the reasons outlined above. We are aware that MDE is currently working on alternatives to the proposed system, including a dashboard model that does not include misleading summative grades. We are also aware that the Michigan Legislature is in the process of debating this issue. Given the uncertain situation caused by the change in leadership at the U.S. Department of Education and the legislative debate in Michigan, combined with the problems inherent in the proposed system, MASSP would urge MDE to delay submission of this component of our state's ESSA plan and use the additional time to finish development of a dashboard model that does not include summative grades.

## Subgroup Weighting

MDE's draft accountability plan proposes that a school's summative score for each indicator be based on a straight, unweighted average of all student subgroups, regardless of their size or the percentage of the building population they represent. The practical result of this decision disproportionately inflates the impact of subgroups in determining school performance. Consider the example of a single group of 30 struggling students who are economically disadvantaged, English language learners, and members of a single ethnic subgroup – this situation is a reality in many Michigan communities who have taken in refugees. While these students may represent a small percentage of the overall population in a school building, they ensure that at least three subgroups of students will be averaged equally against the district's overall performance, even if the same 30 students make up each group. This fails to provide parents, community members, and other stakeholders with an accurate picture of how a school is serving the majority of students.

**MASSP Recommendation:** We recognize the importance of highlighting subgroup performance and achievement gaps as a component of Michigan's accountability system. However, we believe that in determining summative component scores, MDE should weight subgroups based on their percentage of the overall pupil population in a building. This creates a balance whereby subgroup performance is given additional weight in determining component scores, but without disproportionately impacting a building that is effectively educating the majority of students. Additionally, by including individual subgroup performance as part of a robust and detailed scorecard, stakeholders can still accurately determine how a particular building may be able to serve their individual student.

## Subgroup Size (n-size)

The proposed plan would maintain Michigan's current minimum subgroup size (n-size) of 30 students and establish an even lower threshold of 10 students for reporting English learner progress. Much like equally weighting subgroups, having an n-size this small disproportionately inflates the impact of small cohorts of students in determining school performance. The effect is compounded when the same cohort of struggling students impact several different subgroups. For example, a school may have 30 students who are economically disadvantaged, African American and in special education – if these students are not proficient, they impact three different subgroups. When taken together with the requirement to ensure 95% participation for all subgroups, the 30 student n-size would mean that if more than a single student failed to participate in state exams, the school would fall short of this mark. This puts many schools with small subgroups in an untenable position while also potentially masking how a school is serving the majority of students.

**MASSP Recommendation:** We recognize the important role that subgroups play in highlighting performance and achievement gaps. Ensuring that schools are addressing the needs of all of their students is crucial. However,

for the purposes of high-stakes school accountability, we believe that a larger n-size of 50 students is a more appropriate threshold. This creates a balance whereby subgroup performance, which is already given additional weight in determining component scores, does not disproportionately impact a building unless that subgroup comprises a significant proportion of the building's population.

## **School Quality or Student Success**

The proposed metrics that collectively make up the Student Quality or Student Success portion of MDE's proposed accountability indicators present a number of problems as currently written. These are:

### ***Teacher and Administrator Longevity***

The use of teacher and, in particular, school administrator longevity in a building are poor substitutes for school district stability. Because student populations regularly fluctuate between grade levels within a community, it is not uncommon for a district to reassign teachers to other grades/buildings or reorganize the grade configurations of buildings within a district to respond to these changes. This reassignment allows a district to maintain staff stability in the face of demographic and enrollment fluctuations, but could be counted against a district under this metric. In the case of administrators, because the metric is based on a percentage, the movement of a single school administrator could have a significant negative impact on a building score, even if that administrator is promoted internally within the district or shifts roles. Additionally, this focus on longevity has the potential to incentivize a district to stifle career pathways and promotional opportunities for educators to progress in their careers.

**MASSP Recommendation:** We recommend that MDE abandon entirely the use of teacher and administrator longevity data as a metric. The data are not an accurate reflection of school stability, nor do they provide the context, in and of themselves, as to why there may be a certain amount of staff turnover. As such, they should not be included either as a graded metric or as a reporting point on a dashboard.

### ***Time Spent In Fine Arts, Music, and Physical Education***

The inclusion of time spent in fine arts, music, and physical education as a graded metric comes at a high cost to schools in terms of additional tracking and reporting, while providing only a partial picture of the non-core academic activities that are part of a school day, especially at the secondary level. This metric would require schools to establish new systems for tracking and reporting not only the course offerings available to students, but also their enrollment and level of participation in these activities. The scope of the courses included in this metric – fine arts, music, and physical education – are not clearly defined, which will create additional confusion for schools. Especially at the secondary level, the list also excludes many of the other non-core academic activities that students might pursue, including: foreign language, student government, debate, forensics, yearbook, and a myriad of other courses and co-curricular activities that directly correlate to student success. When combined with the focus on Grade 11-12 Advanced Coursework – another measure within this indicator – this metric also fails to account for students who choose to participate in technical skills courses rather than fine arts and music. Additionally, because students typically must choose between a variety of activities and cannot pursue every path, this effectively creates a situation where a school's success in one metric can directly lead to difficulties in the other. Finally, this metric focuses on student participation, something outside school control once students reach high school. Since this metric targets non-core courses, which are taken at the discretion of the student rather than as part of their core academic curriculum, the school is being held accountable for which electives students choose to study rather than whether those students are offered a variety of options to meet their needs.

**MASSP Recommendation:** We recommend that this metric be limited to grades K-5 or K-8 where student participation in these courses is determined, to a greater or lesser extent, by the school rather than the student. Since many other metrics within the proposed accountability system are specific to high schools – such as graduation rate and participation in advanced coursework – there is no reason other metrics cannot be limited to non-high school grades as appropriate. Alternatively, the metric could be changed to measure access to rather than participation in these courses, which would be far more appropriate at the high school level. However, we caution MDE against creating additional reporting requirements, especially at the high school level, since many of the metrics already being used are specific to high schools and thus place a greater reporting burden on these buildings.

### **Weighting of Factors**

The proposed ESSA plan does not specify how these five factors would be weighted within the School Quality or Student Success indicator. This makes giving comprehensive feedback challenging and is especially problematic given that this indicator contains several areas concern for secondary principals.

**MASSP Recommendation:** We ask that MDE redraft this portion of the proposed plan with specific information on how each of the included factors would be weighted. In order to provide stakeholders with an opportunity to review and provide informed comment on this portion of MDE’s plan, we also urge a delayed submission of this portion of Michigan’s ESSA draft plan to accommodate this review process.

### **Capacity**

MDE’s proposed plan of identifying all schools receiving an “F” grade as “comprehensive support schools” means that 383 schools – or 14 percent of all the schools in the state – will be identified for department intervention. This is roughly three times the 5 percent threshold set in federal guidelines. In its ESSA application, MDE states that “the amount [of Title I dollars] needed to fully fund these schools...will be almost twice the amount that is annually available from Michigan’s anticipated required 7% reservation.” In other words, MDE’s proposed plan spreads already limited resources over a larger number of districts than it can support. The clear and predictable result of this will be that those schools requiring the most support will receive less funding than they need.

**MASSP Recommendation:** We urge MDE to revise its methodology to focus on those schools most in need of support so that the limited available resources can have the greatest impact where it is most needed. We believe the weighting of subgroups based on their relative size, as recommended above, will help differentiate between schools that need significant supports and those that may need to refocus their efforts on subgroup performance. We recognize that additional changes may be necessary to fully address this concern, which is why we again urge a delayed submission of this portion of Michigan’s current ESSA draft plan so that these issues can be resolved.

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## **Title II, Part A**

This section of the ESSA plan provided MDE with an opportunity to conduct an environmental analysis to assess where gaps exist in terms of current student achievement, educator preparation, and the needs of students. While MDE collected plenty of anecdotal feedback, an analysis that accurately reflects the actual needs of the field was never conducted. Instead of supporting educators so that they are better equipped to support students, the plan for Title II, Part A effectively diverts \$6.9 million away from local districts and allocates it to a handful of

new projects that will have a limited scope, short duration, and minimal impact on student achievement and, ultimately, educator quality.

There are three distinct groups of educators to consider in Title II, Part A: pre-service teachers in our teacher preparation institutions, current teachers and current administrators. Each of these groups of educators could benefit tremendously from systemic, on-going, and targeted professional development. Over the last six years, MASSP has provided extensive training directly to thousands of teachers and administrators statewide. This work has allowed us to gain valuable insights into the needs of the field K-12.

MDE's plan for the \$6.9 million of available Title II funds for state level activities would limit the impact of those dollars severely. The programs that would be initiated would affect a very limited number of educators – and thus a very limited number of students – and only in those districts with an “F” rating that were identified for participation in these pilot programs. Indeed, MDE points out several times in its plan that their proposals “may support only a small proportion” (p 54) of teachers. These programs would likely be unsustainable without ongoing state investment. Lastly, MDE's plan does not take a systemic approach, nor does it outline a plan for replication or scalability.

Taken individually, each proposed investment in MDE's Title II, Part A draft plan is concerning:

### **Clinical and Residency-Based Element to Teacher Preparation**

These concepts could be integrated into the requirements that teacher preparation institutions must meet for program approval. There is no need for MDE to spend time or money as part of the state's ESSA plan to implement programming in this area. If, as MDE state's in its ESSA plan, “Michigan's own schools districts [tell educator preparation programs] that their graduates are not ready for the realities of the classrooms, schools, and other education settings” (p 43) then why would the state allocate its limited resources to these same institutions? Schools could much more effectively provide instructional rounds training directly at a much lower cost and in a more effective manner. An investment in providing scalable instructional rounds training would benefit all districts and establish a sustainable model for this work to be ongoing – well beyond the life of the available funding.

### **Induction and Mentoring**

ISDs and districts across the state already have induction and mentoring programs in place without state intervention. MDE suggests making clinical and residency-based preparation part of this process. Districts are already equipped to provide this type of support – the issue is funding. If MDE were to invest in this type of programming for only low performing schools it would be a drop in the bucket – impacting very few teachers without any ability for the school to continue this work once the funding is gone. Rather, MDE should invest its time in identifying and highlighting sustainable, successful exemplar models that other districts can model.

### **Professional Learning**

Improving student achievement by growing the practice of Michigan's current and future educators should be the primary target of MDE's focus – both in terms of investment and scope of work. To accomplish this, the department should expand high-quality, universally available professional development in face-to-face, online and blended models, while adding new programs such as micro-credentialing to incentivize educators to participate in these development opportunities.

Instead, MDE has proposed a very limited scope for this investment with a focus on early literacy. Michigan would do well to look to a successful state, such as Tennessee, which partnered with Battelle for Kids to provide much needed expertise and capacity to create a repository of online and blended learning professional development opportunities for all the state's educators. Since the need for this type of professional development goes well beyond the few educators who would be impacted by MDE's proposed plan, this change in focus would serve to raise the performance of educators and students across the state, including those in the "comprehensive support schools" that are currently being targeted in a limited way by this proposal.

### **Additional Elements with Minimal Impact**

Additional elements of the plan with minimal impact include researching career advancement opportunities for teachers, exploration of distributed leadership models, and the development of teacher and principal leadership networks. While these are not without some merit, MDE's ability to significantly impact any one of these areas in a way that is meaningful, scalable, and sustainable is limited at best. Especially given the scope of financial resources available for investment, the significant need to improve classroom instructional practice, and the potential to mirror a successful model from another state far outweighs the limited benefit that investment in these additional plan elements would generate.

**MASSP Recommendation:** We would advocate for a complete revision of MDE's proposed plan under Title II, Part A. Our recommendations and focus are based on first-hand observations and interactions with K-12 teachers and administrators across the state. They also build on models that have shown success in other states, such as the partnership between the non-profit company Battelle for Kids and the Department of Education in Tennessee.

First, we recommend wide-scale professional development in face-to-face, online, and blended formats in targeted areas based on the needs of the students and educators in each district. This approach would have an impact on educator quality statewide with a scalable and sustainable approach that has already proven to be effective with initiatives such as the Formative Assessment for Michigan Educators (FAME) program and the work on modeling inquiry-based science instruction provided through Michigan's existing Math & Science Centers Networks. This format and approach has been well received by teachers who often elect to attend this training on their own time, as it is actionable and improves their instructional practice. We further suggest that MDE strongly consider partnering with the non-profit organization Battelle for Kids, as MDE does not have the capacity nor the expertise to scale professional development of this size.

In addition, Michigan has made a significant investment in improving educator quality through research-based evaluation practices. MDE's Title II, Part A recommendations do not dedicate any funding to support educators or provide next steps in evaluation training. The implementation of Michigan's educator evaluation law has highlighted a clear need for professional development in areas such as student growth measures and, most especially, coaching and feedback – the most essential part of the process in terms of growing educator effectiveness. The approximately \$2.6 million of funding that is targeted to administrator growth should be spent on these types of educator training.

If these proposals were combined with programs such as micro-credentialing to incentivize educators to participate in these development opportunities, the collective impact on education across the state and especially in Michigan's comprehensive support schools would be powerful.

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