



The Education Trust–Midwest

March 14, 2017

TO: Michigan Department of Education

FROM: The Education Trust-Midwest

CC: State Superintendent of Public Instruction Brian Whiston

RE: The Education Trust-Midwest's Public Comments on Michigan's Every Student Succeeds Act Consolidated Draft Plan

As the Michigan Department of Education (MDE) finalizes its consolidated state plan for submission to the U.S. Department of Education regarding The Every Students Succeeds Act (ESSA), our organization would like to share our research-based perspective to inform the MDE's process. Once approved federally, the state's ESSA plan will guide much of Michigan's most important systemic improvement strategies for years, including performance standards for teaching and learning; honest and aligned assessments and public reporting systems that accurately depict how well our schools are performing; equitable access to high-quality educators for our most vulnerable; and a thoughtful school accountability system that focuses quality support efforts and uplifts models of excellence. Research from across the nation shows states with strong school accountability systems often have seen the largest progress for improving student achievement, especially for historically underserved groups of children such as African American, Latino and low-income students.¹ Getting this right is of utmost importance to Michigan students, who currently rank among the bottom ten states for key subjects, according to the national assessment.

As the MDE finalizes the state plan, our organization would like to bring to the forefront key considerations to ensure the plan aligns to the goal of making Michigan a top ten state for all groups of students. There are several positive aspects of this draft plan, which include:

- A single summative rating for public schools statewide, largely using academic measures toward college- and career-readiness.
- Ensuring that the outcomes for subgroups of students matter in a school's final rating.
- A much clearer and understandable methodology for calculating school ratings, marking a major improvement from the state's overly complex and confusing school accountability rankings, the top-to-bottom.

While we think these and others are positive steps forward and should be maintained in the final plan, there are areas that require extra attention. Below we outline our major concerns and recommendations:

Statewide Assessments

- **Promote high expectations by keeping the M-STEP state assessment:** Today's knowledge economy expects all students to be prepared for career and college when they graduate high school. Students are held responsible if they are unprepared through remedial course costs, lack of access to college admissions and other barriers to gainful employment. Michigan moved in the right direction when it adopted the M-STEP state assessment, the state's first truly honest

assessment of how our students are performing, including against their peers in other states. However, the current plans from MDE may replace the M-STEP in favor of a new—and potentially low-quality assessment not fully aligned to the breadth and depth of the state’s college- and career-ready standards. This change would create unnecessary uncertainty for parents, teachers and students, would create data inconsistency and force teachers to adapt to yet another new assessment.

If we want to become a top ten state, we must start with being honest, including an honest assessment. We recommend Michigan keep the M-STEP assessment, and that MDE is explicit that this is the intent.

School Accountability

- **Require a single summative rating to promote transparency in public reporting:** While MDE’s draft plan currently includes a single summative rating for schools, it has come to our attention that this may not be included in the final plan to the U.S. Department of Education.

A single summative rating sends a clear signal about whether schools are meeting expectations for all groups of students. Without a single summative rating, parents are left to cipher through pages of data with no guidance. Given the vast range of barriers that some parents face, including data literacy, reading levels, and English language comprehension, to name a few, this is not reasonable. ETM strongly recommends that MDE does not back away from having a single summative rating.

- **Student growth measures must show whether a child is on track to meet grade-level standards:** If students are not yet meeting grade-level academic standards, schools should be supporting that student’s growth and improvement. The current MDE plan incorporates student growth by measuring a student’s progress in comparison to their peers. This risks setting lower expectations for students of color and low-income students and does not incentivize schools to accelerate learning for historically underserved student groups. ETM recommends that MDE’s measure of student growth answers whether a student is making enough progress to meet or exceed grade-level expectations within a reasonable timeframe.
- **Require ambitious and well-defined goals for school improvement, aligned to becoming a top ten state:** Michigan’s educational decline over the last decade demonstrates that our state and students can no longer accept the status quo. In setting long-term state goals, Michigan must resist the temptation to set low goals that are easily achievable, which also deceives parents on the true quality of their schools.

Michigan’s proposed plan is to have 75 percent of schools and 75 percent of student subgroups meet the 2016-17 state assessment proficiency, growth, graduation, and English learner progress rates for the 75th percentile of schools by 2024-25. We don’t believe these goals are ambitious enough, certainly not enough to make Michigan a top ten education state. For instance, the state’s goal in math would only require a school to have about half of its students be proficient. Additionally, long-term goals should apply to everyone, not ignore 25 percent of schools and student subgroups.

We also recommend that MDE be explicit about the goals for performance on all of the indicators within the accountability system, so that schools know where to improve.

- **Reward schools for progress against the state’s long-term goals:** In the proposed accountability system, a school’s rating is dependent on whether they are meeting the state’s long-term goals. While we appreciate that final ratings are dependent on long-term goals, there is another place for enhancement. Namely, we recommend that when a school is making sufficient progress against the state’s long-term goals, that these schools receive credit for this progress. This is especially important for schools that are currently low-performing, yet showing sustained strides forward.
- **Provide greater information on MDE plans for identifying and supporting struggling schools:** Michigan’s current draft plan is missing critical information for supporting struggling schools. We know that when schools in Michigan are underperforming, these schools need support to improve. This sometimes involves difficult decisions around staffing or policies for schools—decisions that can’t be taken lightly. MDE is not planning to release to the public its methodology for identifying these low-performing schools, citing more time necessary to get the methodology right. While we appreciate taking the time to get this right, ETM urges the MDE to develop and publish its methodology for identifying low-performing schools prior to plan submission, including for schools where a group of students is struggling. Given the importance of identification, these decisions should be made in a transparent manner, in consultation with stakeholders and with opportunity for public comment. Along with identification, MDE should also provide clearer guidance to districts and schools on how to improve. This should include guidance on timelines for school improvement planning, root cause analysis of needs, community engagement strategies and selection of evidence-based solutions, funding and progress monitoring. At the end of the day, these schools should be put on a long-term pathway for success.
- **In addition to school accountability ratings, require accountability ratings for districts:** Districts serve a critical role in improving and supporting their lower performing schools. Districts set policies, procedures and practices that often go well beyond school-level decision-making in matters like recruitment and retention of staff, budgeting or educator professional development. The state should hold districts accountable for the performance of their students and for improvement in schools that are struggling, either overall or for any student group. Assigning accountability ratings to districts will send a clear message that districts are responsible for how their schools are serving all groups of students.

Teaching Quality & Equity

- **Promote equitable access of high-quality educators for our most vulnerable students, and support the implementation of the state’s educator evaluation system:** Research is clear, the number one in-school factor for raising student achievement is quality teaching. At the same time, we know that our most vulnerable students often do not have access to top educators. While the MDE’s current plan identifies strategies for improving teaching quality, we recommend that these strategies are foremost focused on high-needs communities.

MDE is also missing a major lever in the plan for improving teaching quality as well: meaningful implementation of the state’s educator evaluation system. MDE should provide thoughtful support to local districts on how to implement these systems with fidelity, so that local educators get the feedback they need to improve.

To aid such efforts, ETM recommends that the MDE create a common definition for teaching quality, one that combines both student academic growth and observations of instructional practice. Doing so would elevate the profession and set clear expectations for quality teaching.

And while strong educator evaluation systems and other strategies are important for improving teaching quality, they don't inherently address the issue of equitable access of top educators for the most vulnerable students. We recommend MDE create incentives and consequences to district leadership around the decisions they make on strategic staffing and placement decisions. The importance of these decisions further emphasizes the need for a strong district accountability system.

In short, we appreciate MDE's progress on several parts of the state ESSA plan, especially the proposed school accountability and rating system, as written in the draft plan. At the same time, we recommend MDE take steps to promote greater transparency and honesty in the system, in particular by keeping the M-STEP assessment and being much more ambitious with the state's long-term goals. We are also concerned about proposals to utilize a transparency dashboard only, in place of a clear and meaningful school accountability and rating system. Lastly, educator quality is vital for student learning, and we recommend the MDE take more proactive steps to both strengthen instruction and promote greater access to top educators for our most vulnerable students.

ⁱ Chad Aldeman, "Grading Schools: How States Should Define 'School Quality' Under the Every Student Succeeds Act," Bellwether Education Partners (2016). <https://goo.gl/H0LsEL>