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District School Superintendents

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Florida Association of District School Superintendents

February 21, 2012

Mr. Gerard Robinson, Commissioner
Office of the Commissioner of Education
Turlington Building, Suite 1514
325 West Gaines Street
Tallahassee, Florida 32399

Dear Commissioner Robinson:

Superintendents have supported the State Board of Education's push to prepare Florida's students for an increasingly competitive global economy where access to a world class public education is essential. This commitment has been embraced through our support of more rigorous standards, changes to cut scores that define proficiency in reading and mathematics, the introduction of End-of-Course (EOC) exams, and higher graduation requirements. We have supported these reforms even though they are likely to result in lower school grades and have a negative effect on perceptions of public education; however, some of the department's proposed changes to the school grading rule go too far and are not timely.

Below please find an analysis of each of the changes that warrant the greatest concern along with alternate recommendations that will keep Florida on the path of academic excellence.

Proficiency "F Trigger"

The points earned by students at a school towards their school grade should not be negated or manipulated by a reading proficiency standard that would generate an automatic "F". This proposal certainly appears to target schools that have historically served some of our state's most vulnerable students, namely lower socio-economic, demographically-diverse populations in the urban core. The "trigger" suggests that particular schools, based on a well-documented history, could never earn a school grade higher than an "F" despite improvements in other areas that contribute to a school grade. The proposal also appears to ensure that more schools in the urban core are labeled as "Intervene"; considering that the proposed changes to the Differentiated Accountability statute now identifies a school with its 1st "F" as an Intervene school.

The purpose of a school grade is to accumulate student performance in a number of areas including reading, mathematics, writing, and science proficiency; learning gains for reading and mathematics; and the performance of students in the lowest quartile in reading and mathematics. Two years ago, the school grade

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calculation for high school was adjusted to include other important factors such as graduation rate, participation and performance in accelerated courses, and college readiness in reading and mathematics, thus including the performance of 11th and 12th grade students that had been largely ignored. The “*F trigger*” proposal ignores the solid rationale that a school’s grade should be multi-dimensional. It should also be noted that the school-grade process already includes measures to ensure progress is made with struggling students through provisions linked to learning gains for the lowest quartile in reading and mathematics and the at-risk cohort for graduation rate. Those measures are sufficient to ensure school grades are not inflated in relation to low performance in other areas. Twenty-five percent may be an appropriate minimum threshold when viewed in a historical understanding that 60 percent or 70 percent is minimal passing on a 100 point scale. However, the State Board of Education recently passed cut scores that set minimal level 3 reading at the 53-56th percentile. Therefore, the 25 percent proficiency is roughly half the average for the State.

Alternative Proposal

Philosophically speaking, if the department wishes to emphasize reading proficiency then it should allocate a greater percentage of the school grade to that area, not introduce a “*trigger*” that ignores a school’s achievement in other areas. In the absence of increasing the weight for Reading, the department insists that reading proficiency must reach a particular threshold to generate a school grade higher than an “*F*” then we recommend that a 25 percent proficiency mark be required only for “*A*” and “*B*” schools. Additionally, if the proficiency target is not met but there is improvement from the prior year, then the criteria are met. If the “*A*” or “*B*” school does not meet either of these criteria, then the letter grade is reduced by one. School grades should not be reduced for “*C*” and “*D*” schools.

Learning Gains for Level 1 and 2 Students

The new learning gains calculation unfairly impacts urban schools that have moved students farther than any other school in the state. Due to a combination of developmental scale compression and the new requirement of proficiency plus 2 points for Level 1 students, fewer students will be counted as having “*gained*.” According to data from the department, this change has the largest impact in creating more “*F*” schools statewide than any other proposal, including the change in cut scores.

Alternative Proposal

For 2011-2012 count students as having gained a year if they reach the requirement without the added point requirement for Level 1 and 2 students. Review the impact data before making a determination for any changes in 2013-2014.

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Including Exceptional Student Education (ESE) and Second Year English Language Learners (ELL) Students in School Grade Calculations

We understand that the recommendations relating to ESE students may be revised. While we agree with the need to include students with disabilities and more ELL in the performance components for reading and mathematics, we are concerned that the proposed rule is contrary to researched-based evidence that demonstrates one year is insufficient for a child to acquire native language proficiency. The rule as currently written assumes that a student with two years or fewer of English language instruction is expected to test on par with a native language speaker. In fact, Stanford University concluded that it can take ELL students three to five years to develop oral proficiency in English and four to seven years to develop academic English proficiency. This challenge is particularly relevant to schools in the urban core, which are already considered lower-performing.

Alternative Proposal

Therefore, we suggest that the department continue to include ESE and third-year ELL students in the lowest 25 percent calculation for learning gains in reading and mathematics. We also support the inclusion of the alternative assessment in the school grade calculation, however, more work still needs to be done in determining appropriate proficiency levels for the most cognitively challenged and students with multiple handicaps before they are included. The fact that most ESE centers statewide become "F" graded schools under the proposed changes should send a loud signal that something is wrong with the proposal. For the next two years, provide bonus points for those ESE and ELL students who achieve proficiency and learning gains. In the third year, include ESE and ELL students in the learning gain calculation.

Linking Performance of ESE Centers and Alternative Schools to Students' Home Schools

We reject this proposal should it remain in the final rule recommendation. ESE centers and alternative schools are specifically designed to provide targeted and specific instruction and support to address the unique needs of students. The premise of this proposal is that students served by these schools belong in traditional schools. This is an inaccurate assumption that undermines the need to provide special services to select students. Most importantly, no school or educator should be held accountable for the performance of a student who is not educated by that school or educator. This notion is illogical and discredits accountability. We do not have an alternate proposal for this recommendation. We uniformly oppose it.

Graduation Rate of Students with Disabilities

The rule includes a five-year graduation rate. This is a positive step in that it acknowledges that many students may need an additional year to graduate from high school with a standard diploma. The rate includes students with disabilities who earn a special diploma. One concern is whether

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students with disabilities who take more than five years to earn a special diploma will be included in the five-year graduation rate. Students with disabilities may be served by school districts until they are 22 years of age. The rule should be clarified to ensure that students with disabilities are counted when a special diploma is earned regardless of whether it takes five years or longer. Also, the school grade should not be negatively impacted for those students with disabilities who take longer than five years to earn the special diploma

Middle School Proposal for Acceleration

The department's proposal to include a new component to school grades for middle schools related to acceleration is premature. Beyond the untimeliness of the reform, the proposal includes a denominator for Algebra that would include all seventh graders who earned an FCAT Mathematics Level 3 or higher. Districts and schools were not aware of these criteria and therefore were not afforded the opportunity to change district policy on accelerating middle school students into Algebra. Any school grade calculation changes that have the potential to negatively impact school grades should never be implemented mid-year. Districts and schools have not placed all of these students in Algebra for a number of reasons. Relying only on a student's score on one test should not be the sole determinate of whether the student is prepared for Algebra. It should be noted that as of yet, there has not been any data analysis produced by the department to demonstrate a solid relationship between the FCAT Mathematics assessment and the EOC assessments.

Alternate Proposal

A suggested alternative for the 2011-2012 school grade would be to award bonus points to middle schools whose students take and pass the Algebra test. For the 2012-2013 school year, a denominator could be created that would include only eighth graders who were proficient in mathematics on the sixth and seventh grade FCAT. Students who do not meet this criterion but pass Algebra in 8th grade should generate bonus points for the school.

Change in Growth/Decline Points Formula

The new proposal for the reduction of bonus points ignores the fact that already approved changes to components of High School Accountability, such as a broader denominator for college readiness, and the proposed use of a federal rate for graduation calculation, will reduce high school grades. The proposal reduces the maximum number of bonus points from twenty to ten for each component of the "Second 800 Points," and the points are no longer awarded on a one to one basis.

Alternate Proposal

We support the reduction in the total number of points from twenty to ten considering that this is the third year of the new high school grading criteria; however, given other changes to the "Second 800

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Points,” we believe that bonus points should be rewarded on a one to one basis. Schools should receive one additional point for each increase in growth in all areas up to a maximum of ten per area.

Learning Gains Methodology/Additional Weight for Levels 4 and 5

The methodology for including learning gains has always been used to compare growth on the FCAT assessments. With the inclusion of EOC assessments that measure content very differently from that of the comprehensive FCAT, comparison of an FCAT assessment to an EOC assessment or comparison of an Algebra EOC assessment to a Geometry EOC assessment to measure growth does not make sense. We support the three current methods proposed to demonstrate learning gains with some additional options.

Alternate Proposal

We recommend that the department maintain the three methods to measure learning gains and include a fourth method for EOC assessments. The fourth method would award a learning gain to any student who scores proficient on an EOC assessment, regardless of the prior test score. We support the additional weight given to students who move to Levels 4 or 5. We additionally propose that if a student moves from Level 1 to Level 3 (a two level increase), that student should also be rewarded with an additional .1 weight. Additionally, we recommend that a review of the minimum vertical scale score points required to make learning gains within Levels 1 and 2 be completed after the release of the 2012 FCAT results. These cut scores were set in the absence of two years of FCAT 2.0 results; therefore, adjustments to these required scores may be necessary.

Using Last Year’s Science Proficiency Performance for a High School’s School Grade

Why would the department use the performance of students from the year before to determine the academic health of a school in the current year? The proposal mocks the notion of accountability and the school grade process by randomly applying points to a school that does not represent the work of educators and students during the current school year.

Alternative Proposal

Simply remove 100 points from the high school grade denominator this year as Biology is field tested. Next year, include the 100 points once again.

In conclusion, we have supported more challenging standards and aggressive cut scores because we recognize the value in continuing to push for even higher levels of achievement in our public schools. We are troubled, however, by the pace and methods of implementation set out in the proposed rule. We are subject to the legislation on the adjustment of the school grading scale (75 percent of schools receiving A or B triggers increase of scale) even though we believe that districts should not be

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penalized for striving to have more schools earn A and B. As superintendents of Florida's public school districts, we are looking to the department to implement fair and consistent reforms that support our public school educators, students, and parents. The implementation of the proposed rule as currently drafted is unacceptable and would prove disastrous for districts and schools; particularly those schools that are demographically and economically diverse.

As superintendents, we strongly support the use of accountability measures to inform and improve education practice. We also support a rational increase of those measures in a manner that will not undermine reform. The purpose of this letter is to provide you with the collective recommendations of superintendents from small, medium and large school districts. We have attempted to strike a clear balance between critique and solution, and we are hopeful that the department will reconsider its position and allow for a period of transition to these new standards rather than risk forcing hundreds of schools across the state into needless failure. Such an action will certainly undo the progress made in recent years, particularly in our most fragile schools where students and the surrounding communities have rallied in support of educational improvement.

Sincerely,



Ronald Blocker
President

c: Florida District School Superintendents
William J. Montford, Chief Executive Officer