

AKRON AREA SCHOOL SUPERINTENDENTS' ASSOCIATION

420 Washington Avenue, Cuyahoga Falls, Ohio 44221 (330)945-5600 FAX (330)920-1734
Walter Davis, President Phillip Herman, President Elect Joseph Iacano, Secretary/Treasurer

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We, the undersigned superintendents of the Akron Area School Superintendents' Association, want to be a part of the solution for positive education reform in the state of Ohio. We applaud the state for holding regional meetings and webinars that allowed educators, parents and community members to voice their opinions on how the new state education plan should look; however, we are alarmed that the feedback gathered during these stakeholder meetings does not appear to have been included in Ohio's plan.

Below are several recommendations we believe will enhance Ohio's education plan under the Every Student Succeeds Act:

- **Testing:** During the regional meetings, participants urged the state to reduce the amount of testing, which is allowable under ESSA; however, the proposed plan maintains the existing levels of testing exams with the nationally normed ACT or SAT, which are more relevant to our students and their As we understand the need to provide evidence of student progress in school, the state of Ohio should follow the requirements under ESSA, which outline that state testing should include grades 3-8 in reading and math, and grades 5 and 8 in science. This is also an opportunity to reduce testing at the high school and replace the end of course families. All state mandated testing should be consistently maintained for an extended period of time to allow for longitudinal data collection and analysis.
- **Accountability:** We recommend the elimination of the letter grade report card system. While ESSA does mandate an accountability measure, it does not require using a letter grade to rate school buildings or districts. The added layers of new data and the addition of non-academic measures render the final grade inaccurate. The repeated changes in the report card have also made it confusing and meaningless to parents and community members.
 - **Subgroups:** The state of Ohio's plan also looks to reduce the student subgroup size from 30 to 15. When a subgroup is this small, there is the potential for students to lose anonymity when data regarding subgroups is released to the public. Instead of using an arbitrary subgroup size, we recommend that accountable subgroups be set at the greater of 10% of a district's ADM or 30 students.
 - **Graduation Rate:** The state report card currently uses four and five-year graduation rates to determine a district's score; however, districts are penalized for keeping students on IEPs

beyond the four or five-year graduation mark. Many times, these students are receiving essential transition services and are better served remaining in the school district.

- **Testing Opt Outs:** The opt out solution that was implemented by the state did not solve the issue facing school districts. Students are still calculated in the participation rate and the AMO calculations. Districts are being penalized for decisions made by parents. When a parent determines that their child will not complete the state assessments, that child's score (calculated as a zero) should not be included in the participation rate and AMO calculations. A school district's data should only include results for students who were not opted out of the state assessments.
 - **K-3 Literacy Improvement:** The state of Ohio's plan must clarify the manner in which this accountability measure is calculated, aligned with the Third Grade Reading Guarantee, and described on the report card.
 - **School Quality or Student Success Description:** We acknowledge that strong student attendance in school leads to student success. However, the inclusion of excused absences in the calculation for the new non-academic indicator is problematic, especially when the report card does not differentiate between excused and unexcused absences.
- **Educator Effectiveness:** The performance rubric of the OTES/OPES evaluation system is a useful tool and influences educator quality. It has led to rich and valuable conversations that have helped districts enhance the quality of education. We believe the state should eliminate the student growth measures from teacher and principal evaluations. Instead, we recommend enhancing the rubric to include evidence regarding the manner in which the educator uses formative assessments to inform instruction which ultimately leads to academic achievement.
 - **Early Childhood Programming:** The purpose of early childhood programming is to support the development and well-being of young children and to foster their learning. The research clearly indicates that we need to capitalize on the brain growth that occurs in the early years of life as a strong foundation for further learning. We are concerned that Ohio has not made PreK programming enough of a priority. As a result, the state has not invested enough in early childhood (PreK) programming.
 - **Wrap-Around Services:** Ohio's plan does not include measures to support student mental and emotional well-being. We would like to see provisions for professionals to assist with the mental health and opiate issues affecting students and families throughout the state of Ohio.

ESSA presents a golden opportunity to return educational decisions to the state and local levels. As educators, we have the chance to create assessments and accountability measures that benefit students and truly reflect the needs of Ohio's children today and into the future. Again, we appreciate the efforts of the Ohio Department of Education in its draft document addressing Ohio's plan under the Every Student Succeeds Act. We are encouraged by the department's continued focus on educating Ohio's children however, we believe that the aforementioned areas must be addressed before the plan is submitted to the US Department of Education for approval.

Sincerely,

Mr. Tom Bratten, Stow-Munroe Falls City Schools
Mr. Russell Chaboudy, Coventry Local Schools
Dr. Joe Clark, Nordonia Hills City Schools
Mrs. Patricia Cleary, Barberton City Schools
Mr. Walter Davis, Woodridge Local Schools
Dr. Christina Dinklocker, Mogadore Local Schools
Mr. David Dunn, Norton City Schools
Mr. Jeffrey Ferguson, Tallmadge City Schools
Mr. David Heflinger, Field Local Schools
Mr. Phillip Herman, Hudson City Schools
Dr. Andrew Hill, Wadsworth City Schools
Mr. Joseph Iacano, Summit Educational Service Center
Mr. Jeffrey Miller, Green Local Schools
Mr. Matthew Montgomery, Revere Local Schools
Dr. Benjamin Moore, Portage Lakes Career Center
Dr. Todd Nichols, Cuyahoga Falls City Schools
Mr. Brian Poe, Copley-Fairlawn City Schools
Ms. Kathryn Powers, Twinsburg City Schools
Dr. Jim Robinson, Manchester Local Schools
Mr. Chuck Sincere, Springfield Local Schools
Ms. Mary Jane Stanchina, Six District Educational Compact