



June 15, 2017

Dr. Lisa Long
55 Hansen Place
Suite 400
Brooklyn, New York 11211

Dear Dr. Long,

On behalf of the members of the New York State School Administrators Consortium (NYSSAC), comprised of members of the School Administrators Association of New York State (SAANYS) and members of the New York State Federation of School Administrators (NYSFSA), we thank you for the opportunity to provide comment on the Draft ESSA State Plan. The extensive stakeholder engagement, number of regional and public hearings, and process for developing the draft was inclusive and embraced the expertise of parents, students, educators, community members, and professional organizations from our very diverse state. We appreciate the many opportunities to exchange ideas and the responsiveness to those discussions.

Our comments on the Draft ESSA State Plan will summarize both strengths and challenges from the perspective of school leaders. Our goal in submitting these issues is to support the development of a strong plan for moving forward to meet the unique and rapidly changing educational needs of all of our students and schools. We have all learned valuable lessons from prior education reform initiatives that were introduced too quickly and without sufficient consideration to implementation at regional and local levels. Our challenge for this next version of educational change is to ensure that a balance is achieved between immediate action and sustainable progress.

ESSA State Plan Strengths

Overall, the Draft ESSA State Plan recognizes unique district characteristics through an expanded and flexible approach to the proposed accountability system. This is evident in the following features of the draft state plan:

- ***Flexible Inclusion of Four to Six-Year Graduation Rate at the Secondary Level.*** This proposal recognizes the diverse needs of students and the multiple pathways toward meeting rigorous graduation requirements. The recommendation recognizes the ability of districts to provide programs that encourage completion, rather than a race toward completion.

Additionally, this approach will increase opportunities for ensuring that students attain the required skills and competencies needed to meet graduation requirements.

- ***Multiple Measures and Performance Levels.*** As indicated in our April 2017 letter to members of the Board of Regents, we supported and continue to support the use of multiple measures and the use of levels of performance for identifying schools. The inclusion of these components indicates an acknowledgment of the wide range of indicators that can be used to evaluate district and school performance.
- ***Performance Index and a College, Career, and Civic Readiness Index (CCCR).*** The Performance Index, as designed in the draft plan, will acknowledge and grant partial credit for students performing at all levels on statewide assessments. This is a balanced approach that accounts for the wide range of district resource capacities and student demographics in New York. Likewise, the CCCR creates an index that accounts for student successes in TASC, night schools, CTE programs, and Advanced Placement courses. This approach provides a balance between accountability measures and a wide range of program options.
- ***Use of End and Long Range Goals.*** The proposed use of end and long range goals for all subgroups is a viable methodology for ensuring that students are progressing toward reasonable academic targets. This methodology also allows districts the ability to set internal interim goals for monitoring progress throughout the academic year. However, careful consideration must be given to setting reasonable academic targets. Schools with larger academic gaps should not be held to unachievable targets.

The above processes provide an integrated way to monitor student progress and acknowledge student attainment of graduation goals through a variety of paths. Furthermore, it recognizes the provision of a wide range of program and instructional paths offered by school districts in New York.

ESSA State Plan Challenges

We feel that the Draft ESSA State Plan would better meet the needs of students and schools by addressing the following concerns:

- The draft plan continues to include wording regarding school leaders that we opposed and on which we provided comment via a letter to members of the Board of Regents in April 2017. Specifically, current wording in the draft plan continues to require diagnosing the capacity of principals. Throughout the plan, the principal is the only role singled out for specific interventions. One of the first occurrences of this bias is noted in the section entitled “Year 3 Improvement Steps Required by Comprehensive Supports and Improvement Schools,” which states that districts are required to submit a “principal needs assessment” (p 57). Additionally, in the section pertaining to oversight for schools not making progress (p. 71) a “complete assessment of the principal’s capacity by using a tool such as the Interstate School Leaders Licensure Consortium...” We understand the importance of leadership in schools; however, this singular targeting of principals is unsound and seemingly punitive. Rigorous principal evaluations are already in place and should not be usurped. Over the past six years, New York

has taken an aggressive, and sometimes antagonistic, approach toward principals and teachers. We cannot afford to continue this trend.

Chronic absenteeism and attendance as indicators in an accountability system are suspect, as they assume that the results of interventions and remedies are within the full control of instructional, administrative, or supervisory staff. Should the use of chronic absenteeism be included as a performance indicator in the final State Plan, we would strongly suggest that clear and fair definitions and clarifications be provided. The definition must take into account the full range of possible scenarios inherent in the use of this indicator and consider mitigating circumstances. For example, a student who is absent 2-4 days due to the flu would be considered chronically absent if enrolled in the district for only one month. Careful application of this volatile indicator is needed.

- The narrative addressing the 95 percent participation rate should clarify that districts will be able to use the calculation resulting in the highest participation rate for accountability purposes. Additionally, the proposed actions exceed ESSA requirements and should be deleted. The revised USDOE template states, “Describe how the state factors the requirement for 95 percent student participation in statewide mathematics and reading/language arts into the assessments into the statewide accountability system.” The proposed actions in the Draft ESSA State Plan would be more appropriately addressed through guidance to the field outside the scope of the plan. Most school leaders have taken as many interceding remedies as possible to ensure that the maximum number of students participate in the statewide assessment program. Factors that continue to result in students “opting out” of state assessments are not within the span of control of our schools. The root causes of this situation are currently in the hands of the NYSED or legislature. Neither schools nor supervisory school leaders should be penalized by opt-out decisions made by parents.
- Programs or strategies that focus on early education are minimally addressed. The sections of the draft plan related to transitions provide an example of this lack of focus. The most challenging institutional barriers in the P-12 continuum are at the prekindergarten – grade 2 level. This lack of continuity contributes to gaps in growth and achievement from the very start of a student’s academic career. We would recommend that the draft plan include strategies for supporting complete statewide provisions of prekindergarten programs, mandated full-day kindergarten, and funding structures that provide greater linkages between pre-school special education and prekindergarten programs. While New York’s state plan under No Child Left Behind focused on the upper end of the P-12 continuum, it is imperative that ESSA signal an expanded focus on the early grades.

Additional Specific Recommended Revisions

- Further clarification regarding the Graduation Rate Index calculation is needed. The Draft State Plan indicates that each graduation cohort will be weighted. It is our suggestion that every student that graduates within six years be counted equally.
- Specific wording regarding professional development for principals in the draft should be revised and worded as “supervisory school leaders.” The term “principal” is very narrow and there are multiple titles that school districts use for persons in leadership positions at the building and program levels.
- The Draft State Plan refers frequently to “plans.” These plans include TSI plans, DTSE plans, CSI plans, transition plans, CTLE plans, PD plans and Corrective action plans, and there are many more that districts are required to develop. We would recommend consolidation and elimination of plans wherever possible, or at a minimum specification of the plans being referred to.

Thank you for the opportunity to be involved in the development of the draft ESSA State Plan and public comment period. We would be happy to discuss any of the above items further should additional information be helpful.

Sincerely,



Kevin Casey
Executive Director, SAANYS



Peter McNally
Executive Director, NYSFSA

Cc: MaryEllen Elia, Commissioner of Education
The Honorable Members of the Board of Regents