



Richard Woods, Georgia's School Superintendent
"Educating Georgia's Future"

Thursday, September 14, 2017

The Honorable Governor Nathan Deal,

First and foremost, I appreciate your strong leadership in assuring that Georgia's communities and schools have the support and resources needed during this hurricane season. Though traumatic, these challenges have brought the compassion and resilience of Georgians to the fore. I am also grateful for the numerous schools whose leaders have opened their doors to serve as shelters for fellow Georgians in need.

I wish to personally thank you for your input on Georgia's draft of the Every Student Succeeds Act (ESSA). It is an honor to have our highest elected official directly join the many Georgians who have participated in the development and feedback opportunities that produced our state's draft ESSA plan.

Georgia's ESSA process has been one in which all of Georgia, including students, parents, educators, education advocacy groups, business and industry representatives, and other stakeholders have come together to craft a plan that best meets the needs of our children, communities, and state. Thousands of Georgians have committed thousands of hours to the betterment of our state's education system. This is a plan that extends flexibility to districts and schools and opportunities to students. It not only reflects the operational shift of the Georgia Department of Education (GaDOE) away from compliance and consequence to service and support; it also cements the paradigm shift to a broader, more balanced education system for our nearly 1.8 million public school students.

I wish to assure you that your voice and positions have been present throughout the process. As part of the ESSA plan development process, two State Board of Education members served on the State ESSA Advisory Committee, in addition to your Education Policy Advisor and the Executive Director of the Governor's Office of Student Achievement (GOSA). Leadership from GOSA served on and regularly attended meetings for the Accountability and Federal Programs to Support School Improvement working committees. The State Board of Education received several ESSA state plan updates from each of the working committees via the Committee of the Whole and Rules Committee public meetings. I deeply appreciate these representatives' active participation throughout the process, as part of the level of engagement and transparency we provided to Georgians.

In early June, at the request of the Chair of the State Board of Education, senior GaDOE staff met with the State Board Chair and the Executive Director of GOSA to discuss the contents of Georgia's State ESSA Plan.

At the time, only three recommended changes were expressed by the Chair and Executive Director:

1. Removal of the career planning CCRPI indicator
2. Removal of weighted points given in the Closing Gaps CCRPI indicator for schools meeting ambitious performance targets for Economically Disadvantaged, Students with Disabilities, and English Learners subgroups
3. Adoption of GOSA's new criteria for turnaround-eligible schools

Senior GaDOE staff asked and confirmed that no additional recommended changes remained. These concerns, as well as those expressed by Georgians during the public comment period, were shared and discussed by Georgia's

ESSA working groups as part of an open and transparent process. Following receipt of your letter, I met with GOSA's Executive Director and your Education Policy Advisor to discuss your recommendations in more depth.

In response to your feedback and following consultation with the working groups, we will:

1. Remove the career planning indicator as requested
2. Remove weighted points given in the Closing Gaps CCRPI indicator for schools meeting ambitious performance targets for Economically Disadvantaged, Students with Disabilities, and English Learners subgroups. I will state that I have reservations about this, given support expressed during the public comment period and my desire to recognize schools with challenging student populations meeting ambitious performance targets.
3. Align with GOSA's new criteria for turnaround-eligible schools. I have concerns that this detracts from our efforts to provide schools with clear and attainable entrance and exit criteria; however, I also do not want to subject schools to two competing measures.

Additionally, we will respond to your recommendations with the following changes:

- **Assessment Innovation & Flexibility.** As an outspoken advocate for both flexibility and innovation, I wish to reaffirm both my personal commitment and that of the Georgia Department of Education to aggressively apply for the Innovative Assessment Demonstration Pilot and to develop and implement statewide cumulative interim assessments in all tested grades as an option for districts. Changes will be made to the plan to better convey that intent. My Department has already engaged with Gwinnett and Henry counties, and has had conversations with Putnam County. I assure you that they will be represented on the Assessment Task force. A team from the GaDOE has visited Henry County and has held regular meetings with their staff to support personalized learning efforts. I am excited about the innovation that is occurring in our districts and will add additional language to Georgia's ESSA Plan to articulate even more strongly our state's commitment to flexibility in this area.
- **CNA/DIP.** In recent discussions with various school districts, we reviewed recommended changes to address concerns regarding the Comprehensive Needs Assessment (CNA) and District Improvement Plan (DIP). Use of both CNA and DIP templates will be optional for school districts. This will be clearly stated within the ESSA draft. This flexibility has already been communicated to school districts.
- **Literacy.** The CCRPI Literacy (Lexile) indicators will be updated to utilize the midpoint of the College and Career Ready Stretch Band as the target, as opposed to the lower bound as currently written in the draft ESSA plan. While the lower bound is utilized for the on-grade-level reading indicator for Georgia Milestones, it does represent a minimum reading target. Utilizing the midpoint of the stretch band will provide for a more ambitious reading target, ensuring students are well-prepared for the next grade level, course, college, and career.

As I stated previously, an unprecedented number of Georgia stakeholders participated in public hearings, provided comments, and/or served on the ESSA Advisory Committee and ESSA Working Committees. This is the first time such a wide range of education stakeholders have come together to draft such a comprehensive education plan for our state, an accomplishment that should be recognized and respected. Together, these stakeholders recommended that the state's ESSA plan include key elements:

Grades K-2: Assessment and Accountability

Our work together on Senate Bill 364 produced a great opportunity regarding formative numeracy and literacy assessments in grades one and two. The legislation requires districts to utilize formative numeracy and literacy assessments of their choice, but given the *option* of using state-adopted assessments. Mandating that districts utilize the state's literacy and numeracy assessments severely restricts flexibility and runs counter to the spirit and intent of SB 364. The dialogue and details surrounding SB 364 were clear: these would be formative assessments. No doubt adding these tests as part of the CCRPI measurement for primary schools would lead to the unintended consequence of these assessments becoming high-stakes. I have been very clear that I am not in favor of expanding high-stakes testing, especially for first- and second-graders (six- and seven-year-old children). I believe

our state’s educators and parents have been clear in expressing this desire as well. If it is your will and that of the General Assembly to expand high-stakes testing into the early grades and include these results in CCRPI, then that decision should be codified in state law, as it goes beyond the minimum federal assessment requirements and is not appropriate to include in Georgia’s ESSA plan.

Furthermore, a feedback meeting with 23 districts from across the state was held and a solution for grades one and two literacy and numeracy assessments discussed. It was decided unanimously by these districts that GaDOE would pursue the current solution, Keenville. Already, more than 50 districts have volunteered to pilot this innovative approach to assessments, with more coming forward to participate each week. I have received tremendous positive feedback from parents, teachers, and assessment and curriculum leaders, and Georgia is already receiving national recognition for this innovative approach to formative assessments. Recurring costs to the state to maintain this solution will be minimal. This solution will also provide a tight alignment between the Georgia Kindergarten Inventory of Developing Skills (GKIDS) literacy and numeracy components and the third-grade Milestones, which have not been created by for-profit vendors, while providing nationally benchmarked results by utilizing Lexiles to measure literacy and Quantiles to measure numeracy. Keenville is a developmentally appropriate and engaging game-based assessment that will provide a truly personalized, competency-based experience.

Accountability

Throughout the several feedback sessions that were held across the state, online surveys which included the participation of thousands of Georgians, and feedback received from the largest school districts in our state, deep concerns were expressed regarding the weight of high-stakes testing in the state accountability measure, the College and Career Ready Performance Index (CCRPI). A third-party evaluation of the CCRPI conducted last fall concluded that Georgia’s accountability model was more harsh and stringent than those of other southern states and the highest-performing NAEP states. Stripping out the indicators that are listed in your recommendations will have the unintended consequence of placing even more weight on high-stakes testing, reducing opportunities for students, and establishing overly harsh barriers to success for our schools. The major consequences of No Child Left Behind (NCLB) and the Adequate Yearly Progress (AYP) ratings were impossible expectations for schools, narrowing of opportunities for students, and disproportionate focus on testing. I do not want to see Georgia return to this culture of “measure, pressure, and punish” in our schools.

With the creation of CCRPI, Georgia sought to establish a broader view of school performance, and received praise nationally and recognition at the state level for taking a step in the right direction. The additional refinements to CCRPI in Georgia’s ESSA plan better align to the requests of Georgians to provide a broader view of performance beyond only test scores, while streamlining the overall metric.

The development process for the redesigned CCRPI was stakeholder-driven, thoughtful, and informed by data. The Accountability Committee considered the intended and unintended outcomes associated with all indicators and recommended a CCRPI system that is responsive to stakeholder feedback, includes multiple measures, emphasizes growth and improvement, preserves local flexibility, and values multiple outcomes – including educating the whole child. It is a fairer system than what Georgia has previously implemented and affords all schools an opportunity to demonstrate their success.

- **Student Attendance.** Employability skills are a key issue that I continue to hear when engaging with business and industry. Of those skills, attendance is regularly identified as most important. This indicator has been included in Georgia’s accountability model since the creation of CCRPI, but the new definition, focused on chronic absenteeism, is more realistic, in line with national research, and provides additional flexibility to districts. States across the nation including Colorado, Delaware, and Connecticut see the need to include an attendance indicator as evidenced by submitted state plans. Removing this indicator will place an even greater emphasis on high-stakes testing; this is a broad concern that continues to be raised by Georgians.

- **Beyond the Core.** At each of the stakeholder feedback sessions, concerns were expressed by Georgians about the narrowing of opportunities at the detriment of the arts, physical education, career and technical education, and world languages, especially in elementary and middle schools. I am fully committed to providing our students with a well-rounded education, and that means we must have a well-rounded accountability measure for our schools. Georgians have been extremely vocal about their approval of this indicator, which will allow schools to utilize federal funds to support expanded opportunities for our students. As you know, the Great Recession led to many of these enrichment courses being cut by districts, and NCLB and AYP led to non-tested subjects being scaled back or eliminated altogether. This indicator not only restores, but will expand these opportunities, while giving districts broad flexibility to offer courses that make sense for their students. States across the nation including Michigan and Tennessee see the need for inclusion of the arts or P.E. in their accountability systems. Again, removing this indicator will place even greater emphasis on high-stakes testing, a broad concern that continues to be raised by Georgians.
- **Accelerated Enrollment in AP/IB.** Georgia is recognized nationally for its success in AP and IB. Students who are enrolled in just one AP course have a 97% graduation rate, a direct linkage between the enrollment in these courses and higher graduation rates. The additional benefits of AP and IB can be found in the experience of more rigorous coursework, earning of college credit, or both. Excluding indicators that reflect both components would severely limit opportunities for our students. Furthermore, if the state is not going to cover the costs of AP/IB assessments for all students then it is unfair to hold schools accountable specifically for offering those assessments. States across the nation including Massachusetts and the District of Columbia see the need to include indicators for AP courses, as evidenced by submitted state plans. Removing this indicator will place even greater emphasis on high-stakes testing, a broad concern that continues to be raised by Georgians.
- **Pathway Completion.** Our work in this area has seen Georgia recognized as one of the leading states for Career, Technical, and Agricultural Education (CTAE). Due to the strength of this program and with the staunch support of our business community, students are able to match their interests and passions with hundreds of pathways, including specific pathways developed by local school districts and businesses to meet the needs of local communities. The adoption of the Cyber Security pathway, which originated in the Columbia County area, is just one example of this responsiveness to business and industry. Students who complete these pathways have a 95% graduation rate. The recent PDK poll of the public's attitudes toward public schools found that "Georgians support a greater focus on job and career training in schools especially strongly. Nearly nine in 10 say public high schools should offer such classes even if it means those students spend less time on academics, exceeding the also high level of support among Americans overall (82%)." Eliminating this indicator would send an adverse message to the business community, greatly diminish opportunities for our students, not be reflective of CCRPI intent to capture career opportunities, and place even greater emphasis on high-stakes testing. Most recently, Arizona's State ESSA Plan was praised by the U.S. Department of Education for its inclusion of career pathways in their state accountability model.

Your requested changes to the CCRPI model – which was developed by a widely representative committee of Georgians and vetted by national experts – would remove or adjust all indicators that do not incorporate test scores. This would lead to a CCRPI measure based nearly 100% on test scores, which is essentially no different than AYP. The AYP system failed to result in meaningful improvement in student outcomes. The state should be extremely cautious about adopting an accountability system that returns to a disproportionate emphasis on test scores and the unintended consequences associated with such a system – this would be a huge step backward for our state.

Conclusion

As an educator and school leader who has worked under the compliance models of both No Child Left Behind and Race to the Top, I would caution that the unintended consequences of adopting some of your requested changes

would take us back to the days of impossible expectations for schools, narrowing of opportunities for students, declining/stagnating performance, and overemphasis on testing.

Georgia is experiencing remarkable success, a testament to the work and dedication of educators as well as our commitment to pursue a path of flexibility, opportunity, innovation, and improvement. Georgia's ESSA plan supports our continued efforts down that path.

The efforts of the thousands of stakeholders who gave feedback on this state plan reflect the key truth that Georgians are demanding more from their education system. They are demanding a holistic approach that supports the whole child. They are demanding a system that produces students who are not only college and career ready, but also ready for life. They are demanding more than can be measured by a high-stakes test. The same PDK poll of the public's attitudes toward public schools, referenced earlier in the section on career education, bears this out. "Public school parents in the state, moreover, don't think standardized tests measure what's important in their child's learning — one of the key tools used by the state to identifying failing schools," reads the report. It goes on to provide more detail: "Fifty-seven percent of [Georgia] public school parents say these tests do a good job measuring learning — fewer than might be expected — and just 44% say they measure important aspects of their child's education. Only 16% and 17% strongly hold these views."

I deeply believe this plan meets those demands. All of Georgia should be proud of the plan we will submit to the United States Department of Education, as it is a plan that has been crafted by Georgians, for Georgians.

I look forward to our continued ~~committed~~ work together as we continue to provide the children of Georgia with a balanced education that best prepares them for life and continues our state down a path of prosperity.

Respectfully,

A handwritten signature in cursive script that reads "Richard Woods".

Richard Woods
Georgia's School Superintendent