

**Response to the Education Oversight Committee Proposed Accountability System  
South Carolina Department of Education & Superintendent Workgroup  
12-8-2016**

Current EOC Rec	Current Fiscal Impact	Concerns	Recommended Changes
1	<p>\$1.8 million KRA</p> <p>\$6-8 million in new Formative Assessment funding</p> <p>\$ Unknown</p>	<p>Disagree with some of the details</p> <p>Concern 1: Reporting results at 3<sup>rd</sup>, 5<sup>th</sup> and 8<sup>th</sup> grade does not reflect the total performance of Early Childhood, Elementary, and Middle. Exit grades are not a reflection of the three years prior. The design of the assessments used at those grades is a reflection of student performance at those grade levels only. Reporting results of just those grades may drive the wrong behavior (e.g. placing ineffective teachers at non-exit grades or using other avoidance strategies to circumvent the full picture of performance).</p> <p>Concern 2: Bullets 6-8 require the SCDE to report longitudinal data from IHEs and DEW. However, the department has little to no control over the agencies that must provide or validate the data for reporting. Additionally, K-12 schools have no direct impact on student performance after they exit Grade 12 because too many extenuating variables exist that may impact student outcomes. Reporting this information on the report card may lead to implications that the high school should have control over student results after graduation.</p>	<p>A. Report K-2 data for early childhood <u>but phase it in over the next three years</u> to give time for meaningful procurement of assessments and training for K-2 teachers.</p> <p>B. Report grades 3-5 combined metrics for elementary, grades 6-8 combined metrics for middle, and all EOCEPs high schools.</p> <p>C. SCDE, CHE, Technical College Board, RFA, and DEW will develop a timeline and an updated MOA for longitudinal data sharing. Legislation may be needed to ensure compliance and data quality. These data do not belong on school or district report cards but on a state longitudinal data page.</p>

		<p>Concern 3: The 5% per year growth toward CCR beginning with the class of 2020 on the transformation goal is not attainable. This target needs to be based on data patterns that document reasonable, realistic, and attainable annual targets. Additionally, it takes several years of students demonstrating Level 3 or higher on grade level assessments through elementary and middle school years to impact the CCR percentage. There is no historical basis for projecting this percentage growth.</p>	<p>D. Annual improvement targets should not be set until data history shows the improvement pattern.</p>
2	Reduction in funding costs associated with EOC studies of standards	<p>Disagree  Concern: The current process to revise standards is led by the SCDE but the work of standards revision is done primarily through collaboration of experts in the K-12 field, higher education, and business and industry. The EOC is already a part of the development of the standards; they are included in a public review and appraisal of the standards; and have ample opportunity to effect change with the standards. Two readings with the SBE and two readings with the EOC is duplicative and slows down the standards approval and implementation process.</p>	<p>E. EAA should give sole authority to the State Superintendent and State Board of Education to recommend and approve all standards and assessments.</p>
3	Reduction in assessment budget \$Unknown	<p>Disagree  Concern: The federal government does not require testing in social studies and only requires science in three grades. Additionally, language in the draft indicates an EOC assertion that the ELA and math assessments are not aligned to CCR. This statement is based solely on opinions stated from a very small high school stakeholder group consulted on a very surface level on state assessments. It was not based on a study of the methodology for alignment to CCR or psychometric parameters of the assessments.</p> <p>Note: <i>SC Ready is linked to CCR (ACT) through its equitable percentile cut scores in grade 8 to ACT Aspire. EOCEPs are also aligned to CCR (ACT) with an 80/B equitable percentile cut scores on each to predict a student earning the ACT benchmarks.</i></p>	<p>F. Reduce (not eliminate) testing in science to Grade 4, Grade 6, and Biology and reduce social studies to Grade 5, Grade 7, and US History.</p> <p><i>Superintendents request testing only in federally-required subjects &amp; grades and support moving immediately to develop formative use of performance tasks in science and social studies once the new standards are approved.</i></p>

4	\$ Unknown Increase in assessment budget for Performance Tasks	<p>Agree: SCDE will produce a timeline for performance task assessments.</p> <p>Concern: Implementation timeline is contingent upon reduction of testing in science and social studies because the dual focus on multiple choice summative testing and piloting performance tasks would be a hardship to teachers and students and would hinder the timeline for full implementation. <u>It is difficult for teachers to be trained in a new model while being held accountable in the old model of testing.</u> The development and adoption of new science and social studies standards supports this timeline.</p>	<p>G. Embed performance task assessments into science (grades 4 and 6) and social studies (grades 5 and 7) by 2019-20.</p> <p><i>Note: Performance tasks require time to develop, train, and pilot. In the interim, performance tasks assessments will be provided to districts for use at the local level. PTs will remain at the local level until such a time that they can be added to summative assessments by 2019-2020.</i></p>
5	Unknown at this time	<p>Agree</p> <p>Concern: The date for the next cyclical review is not clear. The SCDE should develop a timeline and RFP to secure social-emotional learning inventories</p>	<p>H. The SCDE will develop a timeline, budget request, and RFP to collect data on evidence of skills in the Profile of the SC Graduate.</p>
6	Unknown at this time	<p>Agree to no district ratings but district report elements are problematic.</p> <p>Concern 1: Reporting results at 3<sup>rd</sup>, 5<sup>th</sup> and 8<sup>th</sup> grade does not reflect the total performance of Early Childhood, Elementary, and Middle. Exit grades are not a reflection of the three years prior. The design of the assessments used at those grades is a reflection of student performance at those grade levels only. Reporting results of just those grades may drive the wrong behavior (e.g. placing ineffective teachers at non-exit grades or using other avoidance strategies to circumvent the full picture of performance).</p>	<p>I. Report K-2 data for early childhood <u>but phase it in over the next three years</u> to give time for meaningful procurement of assessments and training for K-2 teachers.</p> <p>J. Report grades 3-5 combined metrics for elementary, grades 6-8 combined metrics for middle, and all EOCEPs high schools.</p>

		<p>Concern 2: Bullets 6-8 require the SCDE to report longitudinal data from IHEs and DEW. However, the department has little to no control over the agencies that must provide or validate the data for reporting. Although these entities may have data by county, SCDE questions whether the data are currently kept by district. Additionally, K-12 schools have no direct impact on student performance before they enter school or after they exit Grade 12. Reporting this information on the report card may lead to implications that elementary schools are responsible for students' entering ready to learn and that the high school should have control over student results after graduation.</p>	<p>K. SCDE, CHE, Technical College Board, RFA, and DEW will develop a timeline and an updated MOA for longitudinal data sharing. Legislation may be needed to ensure compliance and data quality. These data do not belong on school or district report cards but on a state longitudinal data page.</p>
7		<p>Agree with a point system to measure performance in each leading indicator and determine a rating for each indicator. Disagree with the weighted point index to lead to ONE overall summative rating.</p> <p><u>Proposed Accountability System concerns in EOC draft:</u></p> <p>Concern #1: The n-size of 10 is problematic because the EOC draft is proposing to “count” four preferred sub-groups in the growth measure. One or two students in a subgroup size of 10 have a significant impact on that group’s performance which ultimately impacts two-thirds of the school’s growth points.</p> <p>Concern #2: Subgroup specification. Prioritizing some subgroups in the growth model over others may communicate a lack of concern for non-preferenced subgroups (problematic for USED); SC Ready assessments are grade level assessments by definition; therefore, growth for GT students may not be accurately reflected unless it is a computer-adaptive test. Students may hit the ceiling of the test.</p>	<p>L. Develop a reasonable summative point system for <u>each leading indicator</u> only.</p> <p>M. If n-size is “reported only,” then subgroups of 10 are acceptable. <u>Do not “count” subgroups in growth; only count ALL students in growth.</u></p> <p>Note for this concern: If n-size is going to “count” in the growth measure, use an n-size of 20. Reverse the weighting in the growth measure to reflect one-third of growth for subgroups and two-thirds of growth for ALL students. <i>Superintendent group agrees with this recommendation except the N-</i></p>

	<p>\$1.4 million annually for VAM</p> <p>Decile value-table has no cost</p>	<p>Disagree with the growth model</p> <p>Concern #3: Value Added Measures (VAM) as a growth model has several limitations. Many states are moving away from VAM because it lacks transparency, is difficult to use in school improvement planning, and is meaningless to students and parents. Additionally, <u>IHEs do not need student growth data as a part of CAEP accreditation</u>. The SCDE recently learned that the performance rubric on NIET is all that is needed for CAEP. Student Learning Objectives (SLOs) are required student growth artifacts for all teachers; therefore, VAM data received through Roster Verification (RV) is duplicative for tested grade and subject teachers. Roster verification to get teacher level data is also time-consuming, expensive, difficult to streamline across the state, and not reliable with small class sizes (e.g. elementary teachers). If state collects teacher level VAM through RV then there may be an attempt to use it inappropriately. The fiscal and time costs for completing RV without confidence in its accuracy (with new standards, new tests, and human error) make this growth model unappealing. Second, VAM data are more reliable at grades 7 and 8 where there are several years of prior tests to predict student growth. Grades 4 and 5 are the least reliable data sets using a VAM growth data. The EOC draft proposes to use VAM creatively at the elementary level where those data are much less reliable. VAM calculations do not work as well on tests with a vertical scale. Third, the SCDE must significantly clean RV data that comes in from districts. For example, of the 46 districts who did RV in 2016, there were 2500 teacher certification numbers that had to be looked up and added to the files before sending them to the vendor. Further, the vendor requires a minimum of 6-8 weeks to produce the growth spreadsheets. The SCDE gets the data file</p>	<p><i>size should be 30 or 5% whichever is larger.</i></p> <p>N. Use the Decile Value Table as the growth model</p>
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	<p data-bbox="319 743 491 912">\$Unknown Positive Learning Environment Survey</p> <p data-bbox="319 1058 491 1416">\$300,000 annually for Lexile and Quantile results on the SC Ready assessment in Elementary</p>	<p data-bbox="508 198 1373 490">from DRC at the end of August (because of the last district testing date of June 12). If all running smoothly, VAM would be back to the SCDE by October. However, VAM vendor takes additional weeks beyond 8 weeks to run analyses and populate their portal with growth information. This is very late data for districts and schools to act upon. Finally, VAM costs \$1.4 million per year and if it is named in proviso, costs could increase. Other growth models used in the state are free.</p> <p data-bbox="508 522 1331 597">Concern #4: The EOC draft uses an ELP metric that reflects an old proposal from the SCDE.</p> <p data-bbox="508 743 1365 1003">Concern #5: Chronic Absenteeism is not easily controlled by the school. Further, it will require minute level calculations to determine “present for the day” at the all levels. Additionally, chronic absenteeism metrics disproportionately hurt schools with high poverty and high transiency where absences are more significant. We do not need another measure in the accountability model that highlights poverty.</p> <p data-bbox="508 1036 1365 1409">Concern #6: The IHE proposed College and Career Readiness (CCR) cut scores to take a credit bearing course across two-year and four-year institutions are not valid. They are above the ACT cut scores predictive of scoring a “B” or better in corresponding college courses in a two-year college transfer or four-year college program. Using these cut scores with the 2016 ACT 11<sup>th</sup> grade South Carolina data would mean 59.6% of students would need remediation in English and 70% of students would need remediation in math. These percentages far exceed the number of students currently being remediated and would put a huge FTE</p>	<p data-bbox="1390 522 1854 701">O. Use the new proficient level scoring methodology for the ELP assessment which requires a composite score of 5 with no individual domain score below</p> <p data-bbox="1390 743 1854 928">P. Do not “count” chronic absenteeism; report these data as ESSA requires. Move points to the <u>Positive Learning Environment survey</u>.</p> <p data-bbox="1390 1036 1854 1367">Q. Collect the data from 16 technical colleges on Compass and ACT scores for remediation. Do a crosswalk between Compass and ACT if necessary (using ACT research). Use this information to set a composite score to take a credit-bearing course.</p>
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	<p>&amp; Middle</p> <p>\$Unknown FTE English and math teacher impact on Grade 12</p>	<p>burden on the high schools to do remediation in the senior year. Additionally, many students who do not score a 19-English and 22-mathematics will not only get into both two-year and four-year colleges with scores lower than these benchmarks, but will also NOT be required to take remedial courses because two-year and four-year colleges look at multiple metrics for placement into credit-bearing courses, with the primary metric being a GPA of 3.0 or higher in college preparatory curriculum and the type of program the student is seeking to enter. Therefore, the cut scores on ACT in the current accountability draft will be applied punitively to high schools with a result of arbitrarily lowering the high schools' CCR ratings and not accurately reflect the TRUE number of students who graduate without the need for remediation. Kentucky has tracked the data for students after the freshman year of college at two year and four year universities to determine the ACT score needed for success in entry-level college courses (18-English, 20-Reading, 20-Mathematics). South Carolina's two-year and four-year colleges have these data and should share these statistics with the SCDE and EOC before CCR cut scores are set in the accountability model. North Carolina also tracked its data to determine a composite cut score (17) needed for entry into courses above developmental level. South Carolina should produce its data to validate an ACT composite that corresponds with success in the English and mathematics courses for Associate Degree and/or Certification programs or at least align its cut scores with surrounding states (e.g. North Carolina). High schools want to own remediation in the senior year; however, it is not valid or cost effective to <u>remediate students based on the ACT cuts scores that predict a "B" or better in college transfer or four-year college courses.</u> Also, Accuplacer and SAT cut scores are not provided in the current accountability draft and will also be needed by 2017-18.</p>	<p>Suggestion 1: use an ACT composite of 19 (the average of Kentucky's cut points of 18 English, 20 Reading, 20 Math) until Technical College System provides the data for SC.</p> <p>Suggestion 2: In 2017-18, common cut scores on SAT and Accuplacer to take a credit-bearing course may be based on a similar state's cut scores (e.g. NC – which has a longer history of using Accuplacer) until such a time as the SC Technical College System has a pattern of data to determine the appropriate SC cut scores on these assessments.</p>
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8		<p>Disagree with final summative ratings; disagree with A-F labels; disagree with the bell curve distribution</p> <p>Concern 1: Final summative ratings attempt to pull all of the complex and disparate metrics across all leading indicators into one overall score. This method is not transparent to highlight performance on individual indicators and could mask where a school needs to make specific improvement efforts. Additionally, business and industry understand the logic of analyzing and</p>	<p>U. Use a rating system for EACH leading indicator (achievement, growth, graduation, ELP, student engagement, prepared for success) and do not use an overall summative rating</p>

	<p>Budget request increase for 2017 is \$16.8M to</p>	<p>reporting key performance metrics separately as this method is more aligned to a business model. Likewise, parents understand a child’s summative performance on a student report card across the different subjects he/she takes in school. A student, for example, does not earn one combined “grade” across all the different subjects he/she is taking; rather, there is a separate rating for each class.</p> <p>Concern 2: A-F ratings are used in 16 states; however, something other than A-F is used in 34 states. Some of the most progressive and impressive states have communicated school performance without using A-F ratings. Grades have different connotations to different people; therefore, they do not provide a unified, clear definition of school performance. They are only as clear as the perception of each unique individual who views them. Further, SC has used A-F ratings since 2012. Contrary to stated aspirations, these ratings did not inspire businesses to identify and provide additional support for “F” schools; they did not trigger more funding and support for schools; they did not inspire greater improvement for schools and districts. Rather, the opposite was true. According the SCDE research study conducted by the American Institute of Research (AIR) in 2016, several members of the business community felt that A-F ratings were perceived to have a “negative impact on economic development” in the regions where schools had “F” ratings. Principals reported “greater problems recruiting and retaining teachers” in schools where “F” ratings were used.</p> <p>Concern 3: Using the EOC proposed distribution to determine final ratings (10% A, 20% B, 40% C, 20% D, 10% F) means:  1) There will always be a group of schools who are “Fs” no matter how much they improve; 2) There will be 120 schools in the “F” range that must receive technical assistance which is a tremendous</p>	<p>through a weighted point index.</p> <p>V. Use the following labels <u>applied to each leading indicator rather than an overall summative rating</u>:</p> <p>Exceeds Expectations,  Meets Expectations,  Below Expectations  Fails to Meet Expectations</p> <p>These levels should be clearly defined on the report card in relation to the goal statements so stakeholders fully understand them. The “<i>fails to meet expectations</i>” category should reflect the bottom 5% used for comprehensive support &amp; intervention)</p> <p>W. Establish a criterion reference system to measure performance on EACH indicator. The “<i>fails to meet expectations</i>” category should reflect the bottom 5%.</p>
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	serve 56 schools; we will need \$35M to serve up to 120 schools	cost increase in priority funding; 3) 70% of schools will be “C and below” in the state. A forced bell curve distribution is contrary to the entire theory of standards-based learning and improvement. If we truly believe all students can succeed, we likewise necessarily must believe that all schools can meet expectations.	Schools scoring in the “fails to meet expectations” category in a majority of the leading indicators could be identified for comprehensive support and intervention.
9		Agree	
10		Agree with caveats Concern: There is significant overlap between the functions and roles of the SCDE and EOC. Statutory authority provides the mission of the EOC is to oversee the accountability system only. Improvement initiatives are relegated to the SCDE.	X. The SCDE should identify programs and policies that significantly improve student achievement and close the gap. Innovation grants to schools should be consolidated under the SCDE Office of School Transformation.
11		Agree with caveats.  Concern: 2017-18 is too soon to allow pilots of innovative assessments. Under current state law, the new accountability model must be fully implemented in 2017-18, and <b>under the ESSA regulations parts of federal accountability can occur in 2018-19.</b> Additionally, there are no funds awarded to the SCDE to assist districts in innovation efforts. The SCDE has an Office of School Transformation, which has both improvement (priority and focus schools) and innovation (school choice, personalized learning, and charter). This Office could manage grant applications for innovative pilots and coordinate requests with other offices where applicable including Office of Standards and Learning, Office of Early Learners, Office of Research and Data Analysis, Office of Assessment, and Office of School Leadership.	Y. Innovation should be encouraged and supported beginning in 2018-19 with state innovation funds awarded to the SCDE.
12		Agree	
13		Agree	
14		Agree	

15		Agree	
16		Agree	
17		Agree to dashboard; disagree with summative rating	Z. Report on the front page of the report card a dashboard with all leading indicators and a summative rating for each indicator
18		Concern: The SCDE does not need a report on the data system to identify the problem areas that impede a report card portal. The SCDE has identified its problems and has begun to address the data structure to create a web-based report card.	AA. Work with the SCDE to determine specific needs related to the development of a web-based report card.
19 SCDE added rec.		Concern: Items in the “other data elements section” at the back of the EOC draft are extensive and will require a burden of time, effort, and resources at the school and state level to collect, analyze, and report.	BB. The SCDE and EOC should carefully review each of the proposed data points to align and prioritize them with ESSA requirements and with what is MOST important to drive continuous improvement. Eliminate data elements that are not required and do not drive SC to its transformational goals.