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Nathan Deal  
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Superintendent Woods:

As Governor, I am proud of the progress that Georgia has made in encouraging and providing opportunities for innovation in K-12 education, including allowing school districts much greater flexibility from state law and state board rules in exchange for clear accountability. Innovations such as the expanded dual enrollment and apprenticeship programs have provided greater opportunities for many Georgia students and have offered schools and districts new opportunities to meet the needs of their local communities. However, challenges remain, perhaps most important of which are the number of Georgia students unable to read on grade level by the end of third grade and the number of students in our state assigned to attend clearly underperforming schools. There are many efforts underway to increase the likelihood that third graders will be reading on level at the end of the school year, including the work of your department through the Striving Readers program, the RESA Growing Readers coaching program, the Governor's Office of Student Achievement's (GOSA's) Reading Mentor program, and the work of the Get Georgia Reading Campaign. In addition, the 2017 First Priority Act (HB 338) offers a new and expanded approach to ensure strong supports for the improvement of our lowest performing schools and, as a core element of that improvement, implementing strategies to more effectively support the achievement of the third grade reading goal.

Those are positive steps to ensure the economic future of our citizens and our state. With those steps and our remaining needs in mind, I am greatly concerned that the draft Every Student Succeeds Act (ESSA) plan, submitted to me for review on August 14, 2017, reflects a missed opportunity to set high expectations for Georgia students and schools and to move toward even more effective innovation in K-12 education in our state. These concerns also appear to be an underlying theme, as shared in the ESSA plan feedback, of some of Georgia's leading business partners.

Prior to the Georgia Department of Education's (GaDOE's) submission of the final ESSA plan to the U.S. Department of Education, there are several specific areas of the draft plan that should be addressed and revised to ensure that Georgia does not miss this opportunity to support and further the progress the state has already made. In particular, there are opportunities to provide great flexibility to local districts with appropriate support and accountability so that they are best able to meet the needs of the individual students each serves. I have enumerated the needed changes below and have provided a brief explanation.

The first major area of plan that should be revised and strengthened is that of state assessments. ESSA presents an opportunity that certainly should not be missed for the state to apply for the Innovative Assessment Demonstration Pilot or to develop and implement statewide cumulative interim assessments in all tested grades and subjects. This work would support the expansion of blended, personalized learning and the effective use of flexible grouping to personalize classroom instruction as recommended by the Education Reform Commission in 2015. It would provide greatly expanded opportunities for schools and districts to flexibly meet the needs of individual students and escape the constraints of grade- and time-bound scheduling.



Assessment flexibility is discussed only in Appendix H of the plan, and there is no clear indication in the appendix that GaDOE intends to proactively request or apply for participation in the allowable Innovative Assessment Demonstration Pilot or to develop statewide cumulative interim assessments, despite the interest expressed by several school districts and the opportunity to develop and implement competency-based assessments of student learning. In fact, the specific recommendations state that “further study and analysis is needed before considering interim assessments for statewide implementation” and invite “interested districts to present detailed, evidence-based innovations for consideration by the state.” The recommendations suggest “that interested districts specify their intent to the state and be prepared to show evidence of all required criteria” before consideration will be given for statewide interim assessments in the innovative assessment pilot, or the use of nationally recognized high school academic assessments in the place of the Georgia Milestones End of Course assessments (EOCs). Although intent is expressed to convene an Assessment Task Force, the language in Appendix H emphasizes the barriers to implementing interim and innovative assessments when the focus should be on the possibilities and GaDOE’s clear intent to pursue these possibilities.

Gwinnett, Putnam, and several other counties are interested in and already exploring this work. Henry County has done a great deal of work implementing personalized, competency-based learning that is hindered by the absence of a compatible assessment tool. As I have already stated, action in this area would also be responsive to a recommendation from the 2015 Education Reform Commission report: “Begin the transition to a competency-based education system.” Georgia should aggressively pursue the Innovative Assessment Demonstration Pilot and the opportunity to develop statewide interim assessment, and the ESSA plan should state that intention clearly.

Related to the need to pursue this pilot opportunity and implement a series of cumulative interim assessments is the fact that primary school (grades K-2) accountability is not adequately addressed in the draft plan. There is no clear or meaningful indication of how the state will develop a plan to provide accountability for primary schools, so there is no direct school accountability until third grade. The plan indicates DOE’s intention to engage stakeholders to discuss possible ways to “enhance” accountability for primary and alternative schools. Primary schools are of great concern due to the importance of this time in a child’s educational development, the length of time that students attend, and the urgent need for appropriate instructional data to support more effective progress in meeting the third grade reading goal for every student. It is critical to have some instructionally useful interim assessment information on how students are progressing along the developmental continuum in grades K-3 for the state to make appropriate progress toward the goal of having all students reading on grade level by the end of third grade. The DOE’s plan for a first and second grade game-based formative assessment, Keenville, does not meet this need. Developmentally appropriate summative measures or a series of cumulative interim assessments should be implemented for the purposes of providing critical instructional data and of establishing K-2/primary school accountability.

A second major area of the draft plan that should be revised is that of the state accountability measure, the College and Career Readiness Performance Index (CCRPI). While the proposed CCRPI has been improved by removing the Exceeding the Bar and elementary and middle school graduation indicators, the draft plan includes several indicators that actually serve to lower the anticipated educational outcomes for students in Georgia, rather than setting appropriately high expectations for them, and that effectively limit the flexibility that schools and districts have to meet the needs of the individual students served. In a state that places a great premium on providing districts and schools with maximum flexibility to develop and implement education solutions specific to the needs of each community’s students, a state that has strongly encouraged and supported innovation in K-12 education for several years, a clear accountability system based on student outcomes, instead of restrictive or prescriptive measures and inputs, is a critical tool for achieving Georgia’s educational goals.



There are several specific elements of the CCRPI that should be changed to set the appropriate expectations for student learning and to focus on the strongest possible student learning outcomes while preserving the greatest possible degree of school and district flexibility.

- ♦ Additional CCRPI points in Closing Gaps for economically disadvantaged students (ED), English-language learners (EL), and students with disabilities (SWD) exceeding targets for improvement were removed in an earlier draft after GOSA's objection to this as inappropriate and complicating to the index, but those points have been returned in the August 14 draft. Adding the possibility of earning 1.5 points for "greatly exceeding" the target, as the first draft phrased this measure, generates a mean increase of about one point, which does not seem like a huge impact, but the maximum points a school earns for this indicator could be as much as 18.8 points, meaning that some schools will get more than three "bonus" points above the maximum intended score for the Closing Gaps indicator. In addition, this would award "bonus" points based on the economically disadvantaged (ED) subgroup, which is determined in CCRPI by free/reduced lunch (FRL) percentages in the school or district. Due to the Community Eligibility Provision (CEP) for FRL, in many cases this over-represents the actual population in a school or district that is impacted by poverty. This adds complexity to the calculation and gives an advantage to schools participating in the CEP, because all their students are counted as ED. Additional points for EL, SWD, and ED subgroups unnecessarily complicates the index and may effectively lower student learning expectations. This "bonus" point opportunity should be removed from the Closing Gaps section of the index for elementary, middle, and high schools.
- ♦ Lexile levels, used to indicate "on grade level" reading performance in the CCRPI Readiness section, have been set at the lowest level of the "stretch band" for each grade level in the ESSA draft, representing a significant decrease in expectations for 3<sup>rd</sup> graders and high schools students especially, but also a lower expectation for 5<sup>th</sup> and 8<sup>th</sup> grade students than in prior CCRPI iterations. The Lexile measures should be adjusted to remain at or near what have previously been considered the grade level targets, which set higher expectations for student learning, or more narrow performance ranges within each "stretch band." Expectations for Georgia students, especially in the area of grade level reading, should not be lowered or softened in any way. The Lexile performance levels should set a higher expectation and put students on a firmer foundation for reading on grade level and future literacy success. In addition, the level of expectation should provide a more consistent comparison with the National Assessment of Education Progress (NAEP) proficiency rates of Georgia students.
- ♦ Student Attendance is a Readiness indicator for elementary, middle, and high schools that holds schools accountable for a measure that is not a student outcome and over which they may exert influence but not control. No one would argue that consistent student attendance is unimportant to strong student outcomes, but it is not an appropriate measure for the accountability index and should be removed.
- ♦ The Beyond the Core Readiness indicator effectively adds a new input, rather than a strong student outcome, measure to the CCRPI calculations that will effectively "pad" up to 6.7 points for many elementary and middle schools that are already offering the included courses (art, music, PE, health, language, and career exploration) in elementary "specials" or middle school "connections" classes. Most importantly, schools and districts offering additional reading and math instruction to at-risk students during the time frames available to the Beyond the Core courses, precisely what lower performing schools especially should be doing, will be penalized by this indicator. This indicator also complicates the CCRPI calculations and creates challenges for schools and districts in terms of accurate data collection. In addition, the inclusion of this number of CCRPI points possible for an input measure strongly dis-incentivizes schools and districts from implementing innovative learning opportunities that



might require a different scheduling model or the integration of these subject areas into core content areas.

While I certainly support the inclusion of the fine arts, physical education, and other languages in a student's well-rounded education and agree that they are important learning opportunities, it is critical to provide maximum flexibility for schools and districts to innovate and personalize learning and to refrain from incentivizing inputs within the CCRPI. More succinctly, there should be a clear and strong focus in CCRPI on student outcome measures instead of input measures. For these reasons, the Beyond the Core indicator is inappropriately constructed and should be removed from the Readiness section of the accountability system for elementary and middle schools.

- ♦ The Accelerated Enrollment Readiness indicator for high schools continues to provide points for students earning only high school, instead of postsecondary, credit in Advanced Placement (AP), International Baccalaureate (IB), and Dual Enrollment (DE, formerly Move On When Ready) courses. In many schools students are not required to take the AP or IB exams, and the CCRPI does not require them to score at appropriate levels when they do take the exams, to earn these points. This creates an incentive for schools and districts to enroll students in AP courses where there is little monitoring and regulation of quality, except as would be indicated by students scoring at a certain level (3 for AP, 4 for IB) or higher on the exams or earning a passing grade in DE courses from the postsecondary institution. For example, a recently audited Georgia high school required every high school senior to take AP American Literature, no matter their past academic performance, but very few students actually took the AP exam. The principal stated that he implemented the policy primarily so that he could earn 100% of the possible points on this CCRPI indicator as it is based on graduates earning only high school credit. Without any assessment of course quality or actual learning, CCRPI points were earned for each student who earned a passing grade in the course. The Accelerated Enrollment Readiness indicator should be adjusted to incorporate AP and IB exam scores and award points only for postsecondary credit earned.

The Pathway Completion Readiness indicator is another outcome measure that should be left to the determination of the local school and district instead of being incentivized as an element of the state accountability index. While the pathways are numerous and efforts certainly have been made to focus on high demand career initiatives, and while pathway completion may expose students to career relevant experiences and learning opportunities, the decision about enrollment should be based on individual student aptitude and interest and left to local discretion in seeking to best meet the needs of individual students. The Pathway Completion Readiness indicator should be removed from the high school index.

These two CCRPI indicators have the potential to both encourage high schools to enroll students in accelerated or pathway courses simply to earn points, which some have already admitted doing, and to actually discourage innovation and personalized learning expansion. As such, they actually serve as limits to school and district flexibility and as potentially negative influences on efforts to meet the needs of individual students. The indicators for Accelerated Enrollment and Pathway Completion should be adjusted or removed in the Readiness section for high schools.

In sum, the CCRPI index should provide a clear and concise assessment of school and district performance on student outcome measures that set high expectations and that do not limit the flexibility Georgia has worked to provide so that schools and districts have maximum flexibility to develop and implement education solutions specific to the needs of each community's students, and it should encourage and support – not limit - innovation in K-12 education.





A third major area of the ESSA draft plan that serves to limit district flexibility, and that ignores the requirements that Georgia has already put into place through the State Board of Education's contracts with charter and strategic waiver school systems, is the requirement that all districts complete and submit the Comprehensive Needs Assessment (CNA) and District Improvement Plan (DIP). While these tools may provide much-needed support and guidance for some school districts, their required utilization actually places constraints on school districts that have already incorporated robust strategic planning and district/school improvement processes into the development and fulfillment of their flexibility contract requirements. Recognizing that some structured reporting related to federal funding must be required, this reporting should be minimized so that district flexibility and ability to innovate is maximized. Use of the CNA and the DIP templates should be clearly communicated as optional in the ESSA plan, and the plan's focus should be on supporting the use of the state charter and strategic waiver contracts already in place.

Finally, the ESSA draft plan should intentionally align with and support Georgia's school turnaround work, as outlined in the 2017 First Priority Act (HB 338), to the greatest extent possible. The statement in the draft that Turnaround Schools will be a subset of Comprehensive Support and Improvement (CSI) schools is incorrect. The Department of Education has not maximized alignment with the planned criteria for the First Priority Act lowest performing five percent schools list. The Governor's Office of Student Achievement will calculate and communicate that list using an average of the three most recent CCRPI scores, a process about which several discussions have taken place with both Department staff and members of the State Board of Education. This misalignment should be corrected in the plan to minimize confusion and maximize support for the First Priority Act and for the Chief Turnaround Officer's lowest performing school supports and interventions.

These recommended revisions support continued emphasis on encouraging innovation in K-12 education while setting high expectations for Georgia's K-12 students. They also empower local schools and districts with flexibility and options for meeting the specific needs of students in their local communities while setting clear state accountability measures of student outcomes to balance that flexibility. I look forward to reviewing a revised draft, with these changes considered and incorporated, prior to the Georgia Department of Education's submission of the ESSA plan to the U.S. Department of Education.

Sincerely,

A handwritten signature in black ink that reads "Nathan Deal".

Nathan Deal

cc: Lieutenant Governor Casey Cagle  
Speaker David Ralston  
Chairman Brooks Coleman  
Chairman Lindsey Tippins  
State Board of Education Members