New York State's Draft Every Student Succeeds Act (ESSA) Plan

Final Stakeholder Feedback Analysis

(Based on testimony given at public hearings held from May 11-June 15 and written comments submitted to NYSED through June 16)

Overview and Purpose of Presentation

- This presentation synthesizes and analyzes our stakeholders' feedback on our draft Every Student Succeeds Act (ESSA) state plan.
- The presentation covers 13 public hearings from May 11-June 15, the June 14 ESSA Think Tank meeting, and emails or letters received from May 8-June 16.
- Stakeholders' feedback will help us refine the draft before we submit the final plan to the U.S. Department of Education in September for review.

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New York's Voices, New York's Plan

New York's Voices, New York's Plan:
Most Recent Stakeholder Feedback on Draft Plan

Public Hearings

- **13 public hearings statewide:** Long Island, Staten Island, Bronx, Manhattan, Syracuse, Rochester, Plattsburgh, Yonkers, Brooklyn, Buffalo, Queens, Binghamton, Albany
- **ESSA Think Tank meeting on June 14**
- **270+ speakers**

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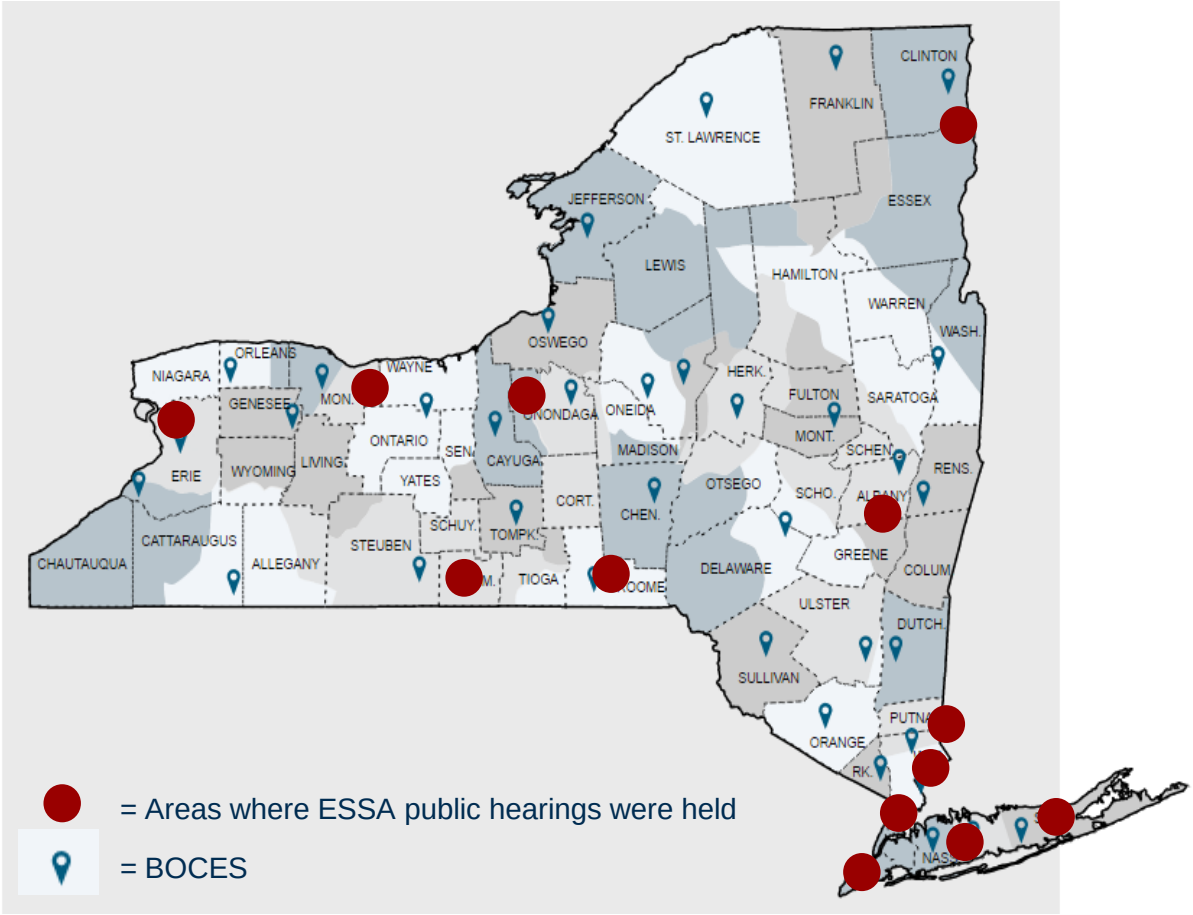
Written Comments

- **800+ comments submitted** via email or mail
- **Half of those comments came from three form letter campaigns**



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1000+ Comments Received

New York's Voices, New York's Plan:
Past & Ongoing Stakeholder Engagement

For the past year, NYSED has intentionally and meaningfully coordinated and engaged diverse groups of stakeholders to solicit a range of thoughts, opinions, and recommendations on how to craft an ESSA plan that best meets the needs of the state's students, schools, and communities. In these efforts, NYSED:

Established an ESSA Think Tank

- Includes representatives from over 100 organizations, including district leaders, teachers, parents, community members, and students
- Met at least monthly since June 2016

Engaged in extensive research and meetings

Including, but not limited to:
- U.S. Department of Education (USED)
- Brustein & Manasevit law firm
- Experts made available through the Council of Chief State School Officers (CCSSO)

Consulted with national education experts

- Linda Darling-Hammond (Learning Policy Institute)
- Scott F. Marion (National Center for the Improvement of Educational Assessment)
- Pete Goldschmidt (California State University, Northridge)

Met with the Title I Committee of Practitioners

- Includes teachers, school and district leaders, school board members, parents, and representatives of other educational stakeholders
- Met 10+ times

Held 120+ fall and winter regional in-person meetings

- Across the state in coordination with the state's 37 BOCES and five largest city school districts
- 4,000+ students, parents, teachers, school and district leaders, school board members, and other stakeholders participated

Posted online survey stakeholder surveys

- 2,400+ responses for the potential indicators of school quality and student success survey
- Survey collecting additional feedback on regional meeting topics

New York's Voices, New York's Plan:
Timeline for Submitting Final Plan

The Department will adhere to the following timeline for submitting the final plan:

May 8 - 9, 2017
- May Board of Regents Meeting – Staff will present draft plan

May 9 - June 16, 2017
- The Department will accept public comment on the draft plan
- Public hearings on draft plan beginning May 11; staff will gather public comments on the draft plan

July 17 - 18, 2017
- July Board of Regents Meeting – Staff will present any changes to the draft plan based on public comment, and request permission to send revised draft state plan to Governor

July 19 - August 18, 2017
- **Application with Governor for 30 days**

September 11 - 12, 2017
- **September Board of Regents Meeting – Staff will seek approval to submit final state plan to USED**

September 18, 2017
- **Deadline to submit ESSA State Plan to USED**

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Key Findings

Key Findings:
Major Areas of Agreement

Extended-year graduation rates	Stakeholders generally praised the use of 5- and 6-year graduation rates, noting that some students take longer to fulfill graduation requirements than others.
Stakeholder engagement	Many commenters commended NYSED for the extensive stakeholder engagement: 80+ hearings in the winter, numerous surveys, 13 regional hearings in the spring/summer, etc.
Focus on English Language Learners	Stakeholders appreciated the focus in the plan on helping English Language Learners/Multilingual Learners reach English proficiency while acknowledging their different starting points.
Possibility of innovative assessments	Commenters supported the proposal to apply for a new innovative assessment pilot and had numerous ideas about how New York State could make assessments more engaging and fulfilling.
School improvement flexibility	Stakeholders appreciated the shift from compliance to assistance regarding schools in need of improvement and how NYSED will tailor its support.

Key Findings: *Assessments*

- Many stakeholders asked **how the 95% participation rate requirement** would affect some school accountability classifications.
  - On the one hand, some stakeholders stated their understanding that schools would be penalized unfairly by including students who opt-out of assessments as Level 1 scores on the Achievement Index.
  - Conversely, other stakeholders indicated that schools might be tempted to encourage lower-achieving students to stay home when state tests are given because the disincentives for taking such action were not sufficiently robust.
- Several stakeholders questioned NYSED's plan to provide **below-grade level assessments** to Students with Disabilities, indicating that it could provide inaccurate data about these students' proficiency and that such a request was rejected by USED as recently as 2015.
- However, other stakeholders supported that proposal, saying the information from **instructional-level assessments** would be more valuable.

Key Findings:
School Accountability Methodologies and Measurements + Supports and Improvement for Schools

Expand school accountability indicators

- A form letter submitted by nearly 250 stakeholders that addressed many issues thanked NYSED for:
  - Including **chronic absenteeism** and the **College, Career, and Civic Readiness Index**
  - **Limiting the number of indicators** for accountability
- Dozens of stakeholders urged the state to consider expanding school accountability indicators to include:
  - **Opportunity to learn indicators/index** (e.g., class sizes; access to guidance counselors; many other possibilities)
  - **Student access to and/or participation in a full educational program** that includes science, arts, music, and physical and health education
  - Inclusion of the Centers for Disease Control and Prevention's **"School Health Index"** as the indicator of school quality
  - **Suspension rates** as indicators of school quality and student success

Continue and support transfer high schools

- More than 200 supporters of transfer high schools in New York City voiced their support for the continuation of these schools as well as **special consideration for school accountability requirements.**

Key Findings:
Supporting Excellent Educators

Focus on teacher preparation

- Stakeholders praised the idea of greater **collaboration between teacher preparation programs and school districts.**
  - They liked the idea of **re-examining field experience** requirements in light of the struggles that some novice teachers have.
  - Higher education leaders said that **quality of the field experience** is more important than quantity of time spent.
- Various stakeholders encouraged NYSED to **improve teacher preparation in general.**
  - Costs for **certification** can be prohibitive.
  - Educators need more preparation on **teaching students with different learning styles**, including English Language Learners and students with disabilities.

Key Findings:
Supporting English Language Learners/Multilingual Learners

Praise for ELL/MLL proposals + some testing requirements concerns

- Many stakeholders praised the focus on **English Language Learners and Multilingual Learners.**
- Some asked about **testing requirements for ELLs/MLLs:**
  - **English language arts assessment exemptions** should be extended.
  - Some stakeholders said that students can take 4-7 years to **learn English proficiently** instead of the 3-5 years NYSED cites in its proficiency expectations.

Key Findings:
Supporting All Students

Increase access to well-rounded and culturally responsive education, career-ready coursework, and digital technology

- **Well-rounded education, including arts, health and physical education:** Numerous stakeholders called for a greater emphasis on arts, health, and physical education in the plan as key components of a well-rounded education program.
- **Culturally responsive education:** Many stakeholders, particularly at the public hearings in the Bronx and Rochester, supported culturally responsive education, and praised a proposal that calls for a task force on the issue.
- **Career readiness:** Several stakeholders asked that career and technical education pathways and coursework get as much attention as Advanced Placement or International Baccalaureate classes.
- **Digital technology:** Many supporters from the New York Library Association/Section of School Librarians (NYLA/SSL) wrote to the Department to commend the support of "students' equitable access to digital technology through the promotion of school libraries," and recommended that the state include additional, allowable school library provisions in the final plan.
- **Art therapists:** Almost 100 stakeholders wrote to encourage NYSED to include art therapists in its definition of Specialized Instructional Support Personnel.

Key Findings:
Other Stakeholder Feedback

Strong stakeholder engagement and funding concerns

- **Stakeholder engagement**: Many stakeholders expressed appreciation for the opportunity to provide input and feedback on the development of the state's draft plan over the past year, and noted the wide variety of stakeholders that have been engaged along the way as well.
- **Funding**: Some stakeholders asked for more clarity about the level of funding that is needed to fully achieve the plan, particularly for high-poverty schools and districts.

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Detailed Stakeholder Feedback on Draft State Plan

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Aligned Assessments

Aligned Assessments:
What We Heard from Stakeholders

	Summary of Comments
General	• Many stakeholders voiced enthusiasm for **expanded or alternative assessment options**, such as portfolio-based assessments. • Some commenters shared their opinion that there is **too much focus on standardized testing** in the state's draft plan and in high-stakes decisions in general (like educator evaluations).
Students with disabilities	• Stakeholders offered different opinions on assessing students with disabilities. The New York State Parent Teacher Association supported **testing on developmental levels** rather than chronological age levels. • At least three advocacy groups and the New York City DOE questioned a proposal in the draft plan to **permit below-grade level assessments for students with disabilities** if those assessments are more consistent with their level of instruction. They noted that the U.S. Department of Education has denied a previous request to do the same.
Time on testing	• Commenters wanted the state **to reduce the time** students are spending on tests. • A few stakeholders thought less testing time would help **decrease the financial burden** on districts associated with assessments, such as administration, scoring, etc.
Innovative Assessment Demonstration Authority	• Representatives from the New York Performance Standards Consortium and other commenters, expressed support for and interest in helping the state with the **Innovative Assessment Demonstration Authority** in terms of application preparation and wanted to be considered as a pilot participant.

Aligned Assessments – Assessment Participation/Opt-Out:
What We Heard from Stakeholders (continued)

Impact on schools of the 95% participation rate requirement	Both opt-out supporters and critics asked about how the 95% participation rate requirement would affect school accountability classifications. Many stakeholders thought that assigning the lowest score to students who opt out would unfairly penalize schools. Others thought that the consequences needed to be increased to prevent schools from encouraging low-achieving students to opt out.
Respect for parents' rights	Stakeholders understood that parents can **exercise their rights** in deciding whether their children participate in assessments. But they thought schools might be penalized if they do not meet the 95% participation rate.
Low accountability ratings because of opt-out could divert resources	Stakeholders said that based on their understanding schools with high opt-out rates could get low accountability ratings that would result in the **diversion of school improvement resources** from schools with genuinely lower performance.

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School Accountability Methodologies and Measurements

School Accountability Methodologies and Measurements:
What We Heard from Stakeholders

	Summary of Comments
Overall transparency and ease of understanding	• Numerous stakeholders signed a form letter **praising the creation of the same "end goals"** for students and the **primacy of English and math achievement and growth** in determining accountability decisions.
Long-term goals	• Stakeholders thought that the five-year long-term goals for subgroups who traditionally struggle **were too ambitious** unless the state spent massive resources for those students.
Transfer high schools	• Dozens of New York City teachers, students, and parents asked that **transfer high schools** get special consideration for accountability rules, given the unique nature of the students they serve.
School ratings	• A number of stakeholders supported the **use of a 1-4 scale** for indicator ratings for each school. • However, numerous stakeholders signed a form letter saying that a **single overall rating for a school**, plus a dashboard with indicator ratings, would be easier to understand.

School Accountability Methodologies and Measurements – Accountability System Indicators:
What We Heard from Stakeholders

	Summary of Comments
Academic measures	• While many stakeholders expressed support for including science and social studies as measures of academic achievement, one advocacy group suggested that using **science scores for the academic achievement measure** violates ESSA, which states that only English and math can be used for the academic achievement measure (while science can be used to measure growth).
Graduation rate	• Many stakeholders (including the major stakeholder groups representing parents, teachers, students, administrators, and civil rights groups) applauded using **extended-year graduation rates.** • A few stakeholders thought ESSA's 67% graduation rate threshold was **too low.**
English-language proficiency	• Several advocacy groups praised the treatment of ELLs/MLLs' scores for accountability purposes, while others thought that waiting for three years to include **ELLs fully in accountability ratings** was too long.

School Accountability Methodologies and Measurements – Accountability System Indicators:
What We Heard from Stakeholders (cont'd)

	Summary of Comments
Chronic absenteeism	• Stakeholders were split over this issue: Some wanted schools to be held accountable for students' chronic absenteeism, while others were concerned that schools with students with **high populations of homeless, economically disadvantaged, and immigrant students** would be penalized, especially if this is the only school quality indicator for elementary and middle schools. • Numerous stakeholders wanted **additional indicators** reflecting other issues parents cared about (class sizes, climate, social and emotional indicators). • Some stakeholders noted that **suspension data** should be included if chronic absenteeism is used.
College, Career, and Civic Readiness Index	• Some stakeholders wanted more details about how **authentic civics education** would be incorporated into the measure. • One advocacy group questioned whether **students who take the alternate assessment** will have their scores removed from this index.
Other feedback	• Many stakeholders suggested elevating **parent and community engagement** and **school climate** as indicators in the accountability system.

School Accountability Methodologies and Measurements – Accountability System – Additional Indicators:
What We Heard from Stakeholders

A number of stakeholders wanted the Department to **consider expanding the indicators for school accountability** and highlighted findings from the state's possible indicators of school quality and/or student success survey results, including:

	Summary of Comments
Opportunity to learn indicators/index	• Several stakeholders expressed interest in having the **Opportunity to Learn Indicators** (e.g., class sizes; access to guidance counselors; many other possibilities) as a part of the state's accountability system. o The state previously shared that "Opportunity could be defined as access to resources, learning practices, or learning conditions that promote student achievement and engagement. For example, for each student in a school, a determination could be made regarding the classes in which the student is enrolled meet specified class size criteria. Other possible opportunities to learn indicators could include such things as the ratio of guidance counselors to students at a school."
Student access to and/or participation in a full educational program	• In addition to the Opportunity to Learn indicators, stakeholders urged that NYSED track whether students have access to a **full educational program that includes science, arts, music, social studies, and physical education**, to ensure that students receive a well-rounded and more holistic education. • A few stakeholders thought that the potential inclusion of student participation in Advanced Placement (AP), International Baccalaureate (IB), and honors courses might **"narrow the curriculum"** and reduce access to art, music ,and PE.
Other suggestions	• **Excessive discipline** index (e.g., suspensions) • **School health** index (many stakeholders signed a form letter advocating for this) • **School climate** • **Social and emotional learning**

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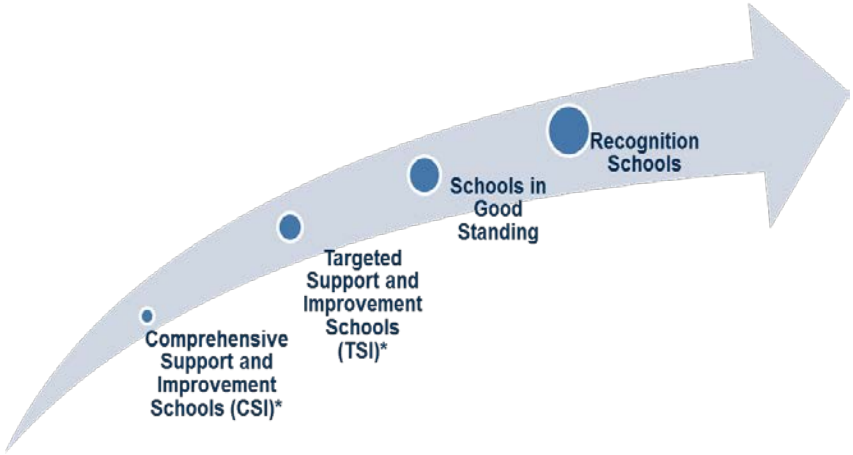
Supports and Improvement for Schools

Supports and Improvement for Schools – School Classifications:
What We Heard from Stakeholders



Individual stakeholders …

- Applauded an individualized approach to school turnaround
- Wanted to know how the state's new approach for school improvement differs from past efforts
- Thought the exit criteria for TSI are too low
- Asked technical questions about TSI school identification
- Suggested that proposals limiting who can teach at CSI-identified schools to those rated Effective or Highly Effective would violate collective bargaining agreements

Supports and Improvement for Schools:
What We Heard from Stakeholders

- **Transfer high schools:** Dozens of supporters of transfer high schools in New York City voiced their support for the continuation of these schools as well as special consideration for school accountability requirements.
  - They thought that classifying these schools as 4-year high schools for accountability purposes ignores the kind of students they serve.

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Supporting Excellent Educators

Supporting Excellent Educators:
What We Heard from Stakeholders

Individual stakeholders …

- Supported improving the quality of field experiences for teacher candidates
- Wanted more in the plan about higher education partnerships with districts, teacher leadership opportunities, and educator salary increases
- Suggested reducing the out-of-pocket costs to attain teacher certification
- Suggested additional areas of focus for certification, such as transitioning students with disabilities
- Called for more educator training on Universal Design for Learning strategies to reach students with different learning needs
- Suggested other areas of teacher development, such as the arts and cultural responsiveness

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Supporting English Language Learners/ Multilingual Learners

Supporting English Language Learners/Multilingual Learners: *What We Heard from Stakeholders*

- Numerous stakeholders **applauded how explicitly ELLs/MLLs are addressed** in the state's draft plan.
- Individual stakeholders asked about:
  - Providing additional flexibilities for ELLs/MLLs who also have disabilities
  - Considering exempting or including additional accommodations from math assessments, since the assessments are based in part on reading comprehension
  - Allowing qualified staff to teach and administer assessments to ELLs/MLLs
  - Increasing funding and support for Dual Language programs
  - Removing ELL/MLL students from the 95% participation rate consideration when they are exempt

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Supporting All Students

Supporting All Students:
What We Heard from Stakeholders

Focus on culturally responsive education	Many stakeholders, particularly at the Bronx and Rochester public hearings, supported **culturally responsive education**. They urged more robust classroom materials that highlighted the lesser-known contributions of African-Americans to history, culture, arts, and sciences.
School libraries	Dozens of supporters from the New York Library Association/Section of School Librarians (NYLA/SSL) wrote to the Department to commend the support of "students' equitable access to **digital technology through the promotion of school libraries**," and recommended that the state include additional, allowable school library provisions in the final plan.
Greater emphasis on students with disabilities	One advocacy group called for more specifics on how **school improvement strategies** and efforts to **reduce exclusionary disciplinary policies** will affect disabled students. One stakeholder called for more services for dyslexic students.
Greater focus on social and emotional learning	Several stakeholders called for a greater focus on students' social and emotional needs, including a large number of comments made about **including physical and health education** in the data reporting and/or accountability system. Many asked that licensed art therapists be considered "Specialized Instructional Support Personnel" under ESSA.

Supporting All Students:
What We Heard from Stakeholders (continued)

	Summary of Comments
Migratory children	▪ *This area did not generate significant stakeholder feedback.*
Neglected and delinquent youth	▪ One stakeholder group asked for more specifics on how NYSED will ensure students with disabilities who are in these settings will **receive appropriate services.** ▪ A few stakeholders urged NYSED to **ensure consistency in services** among independently operated facilities that serve these students.
Homeless children and youth	▪ Several stakeholders asked how **homeless students** would be affected by the use of chronic absenteeism as the indicator of school quality.
Students attending rural schools	▪ *This area did not generate significant stakeholder feedback.*
Other	▪ Over a dozen stakeholders urged the NYSED to intervene and **ensure Hasidic youth attending nonpublic schools receive an education that is "substantially equivalent**" to that provided in the public schools of their districts of residence so that students can be better prepared post-high school.

Other Stakeholder Feedback

Other Stakeholder Feedback

	Summary of Comments
Stakeholder engagement	• A number of stakeholders expressed **appreciation for the opportunity to provide input and feedback** on the development of the state's draft plan over the past year, and noted the wide variety of stakeholders who have been engaged along the way. • Some didn't see their previous input reflected in the draft plan and asked how NYSED would **incorporate their feedback.**
Funding	• Some stakeholders raised concerns about the **level of funding that is needed to fully achieve the plan**, particularly for high-poverty schools and districts.
Transportation	• One stakeholder group asked for the plan to **better address transportation services** in higher-need districts.

Appendix

Appendix:
List of Public Hearings

Date	Location	Time	Meeting Site
Thursday May 11, 2017	**Long Island** Judicial District 10	6:00-8:30 PM	Half Hollow Hills HS East 50 Vanderbilt Pkwy, Dix Hills, NY 11746
Monday May 15, 2017	**NYC – Staten Island** Judicial District 13	6:00-8:30 PM	The Michael J. Petrides Campus 715 Ocean Terrace , Building H, Conference Room 1, Staten Island, NY
Tuesday May 16, 2017	**NYC – Bronx** Judicial District 12	6:00-8:30 PM	Bronx Borough Hall Third Ave & Tremont Ave, Bronx, NY 10457
Saturday May 20, 2017	**NYC – Manhattan** Judicial District 1	9:00-11:30 AM	Borough of Manhattan Community College Richard Harris Terrace, 199 Chambers Street, New York, NY 10007
Wednesday May 24, 2017	**Syracuse** Judicial District 5	6:00-8:30 PM	Henninger High School 600 Robinson Street Syracuse, NY 13206
Tuesday May 30, 2017	**Rochester** Judicial District 7	6:00-8:30 PM	Rush-Henrietta Sr. High School Sperry Building, 1799 Lehigh Station Road, Henrietta, NY 14467
Thursday June 1, 2017	**Plattsburgh** Judicial District 4	6:00-8:30 PM	SUNY Plattsburgh Yokem Lecture Hall, Room 202, 101 Broad Street, Plattsburgh, NY 12901
Monday June 5, 2017	**Yonkers** Judicial District 9	6:00-8:30 PM	Lincoln High School 375 Kneeland Ave, Yonkers, NY 10704
Tuesday June 6, 2017	**NYC – Brooklyn** Judicial District 2	6:00-8:30 PM	Prospects Heights Educational Campus 883 Classon Avenue, Auditorium, Brooklyn, NY 11225
Thursday June 8, 2017	**Buffalo** Judicial District 8	6:00-8:30 PM	Erie 1 BOCES Building B, 355 Harlem Road, West Seneca, NY 14224
Saturday June 10, 2017	**NYC – Queens** Judicial District 11	9:00-11:30 AM	Queens Borough Hall 120-55 Queens Blvd., Hellen Marshall Atrium, Kew Gardens, NY 11424
Wednesday June 14, 2017	**Binghamton** Judicial District 6	6:00-8:30 PM	Johnson City CSD High School Auditorium, 666 Reynolds Road, Johnson City, NY 13790
Thursday June 15, 2017	**Capital District/Albany** Judicial District 3	6:00-8:30 PM	Questar III BOCES Administrative Building Conference Center, 10 Empire State Boulevard, Castleton, NY 12033

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Thank You

For more information and the latest updates on the state's ESSA planning, please visit the NYSED Every Student Succeeds Act (ESSA) webpage:
http://www.p12.nysed.gov/accountability/essa.html