



Comments to the Florida Department of Education on Development of Florida's State Plan

Background Information:

Florida went from one of the worst-performing states in the nation to the top quartile in K-12 academic achievement over the past 15 years. Our graduation rate is at a 12-year high and Florida is ranked third in the nation with the percentage of students passing Advanced Placement exams.

The Every Student Succeeds Act (ESSA) gives states greater flexibility and control over their accountability systems, which is important for each state to meet the unique needs of their students. However, states with strong accountability systems that measure student learning gains and other academic factors, like Florida, are at risk of backsliding.

Many groups see this new flexibility as a way to water down the way we measure student success. We need to stay the course and continue with our rigorous K-12 accountability systems that focus on student outcomes and give parents easily understandable information on their children's schools.

There is still more work to do, not less. We need to continue championing education reforms that ensure students are globally competitive and prepared for success in college, career and in life.

Opportunity to Provide Comments to FDOE and Suggested Comments:

[The Florida Department of Education \(FDOE\) is requesting public input on the components of ESSA](#) to assist in the development of Florida's State Plan. The input is organized by major topic areas, which are also listed below, along with our suggestions. (Please note that there are not comments for every area or subtopic.) Individuals/organizations can provide input on any or all of these areas.

FCSBM Comments:

Challenging Academic Standards

(A) In General

- We recognize that the Florida Standards are baseline academic standards intended to ensure our state's students are ready for success in college and career. It is essential that Florida continues to use rigorous standards and that these standards are developmentally appropriate. We suggest convening a panel that includes experts in cognitive development to determine the neurodevelopmental appropriateness of the timing and sequencing of existing standards and consideration of other rigorous standards.

(E) Alternate Academic Standards for Students with the Most Significant Cognitive Disabilities

- We support Florida's approach (creation of access points) to establish high expectations for students with significant cognitive disabilities. These students deserve a quality education that meets their needs.

(F) EL Proficiency Standards

- We support Florida's long-standing goal of English proficiency and the public reporting of such data.



Academic Assessments

(A) In General

- Florida has a rich history of high expectations for our students and rigorous academic standards. We measure each student's achievement through the Florida Standards Assessment, a valid and reliable assessment.

(B) Requirements

- We support Florida and nationally recognized assessments that have demonstrated validity and reliability. Specifically, we support the ACT and SAT and subject tests (including AP) for secondary students, as well as the establishing of concordance scores for a variety of rigorous alternative K-8 assessments such as the Iowa Basic Test.

(C) Exception for Advanced Mathematics in Middle School

- We support Florida's law that provides an advanced mathematics exception for all students that take the high school End of Course exams. This is an effective strategy for "fewer, better tests."

(D) Alternate Assignments for Students with the Most Cognitive Disabilities

- We support Florida's current implementation of alternate assessments for students with cognitive disabilities.

3) Exception for Recently Arrived English Learners

- We support Florida's approach which makes decisions about participation in the state assessment for year 1 based on the needs of the individual English Language Learner.

Statewide Accountability System

(A) Establish of Long-Term Goals

- We support the establishment of aggressive goals to improve student achievement and graduation rates.
- We encourage the department to consider establishing goals based on school grades.
- We caution the department not to recreate NCLB-like categories of achievement.
- We wholeheartedly support the requirement for goals to be based on proficiency, which can be confusing in Florida with changes to the definition of achievement levels by the department and State Board of Education. Level 3 is no longer defined as "proficient," but rather "passing." We encourage the department to make clear to the public the difference between "passing" and "proficiency" in the meantime.

(B) Indicators

- We believe that Florida's school grading model already meets ESSA requirements with the exception of English language proficiency.



- We support the inclusion of learning gains for elementary and middle schools and graduation rate for high schools as “another academic indicator” in the school accountability formula.
- We believe learning gains of the lowest 25 percent for all schools and acceleration success for middle and high school meet the requirements for “additional indicators of school quality or student success.”



(C) Annual Meaningful Differentiation

- We believe Florida’s current A-F grading system already provides for the annual meaningful differentiation of schools via a single summative score that is easily understood by the public.
- We strongly urge the use of a weighted average approach to meet the ESSA requirement of § 200.18(c).
- We strongly disagree with the proposed regulations § 200.18(b)(2)&(4) that require at least three distinct levels of performance for each indicator for each school. This regulation will likely lead to an NCLB-like system.

(D) Identification of Schools

- We support continued annual identification of schools and the strong presence of the department via oversight and accountability for identified schools. As noted in the Final Judgment of the adequacy lawsuit, there is concern when schools are allowed “to remain in F status for an extended period of time...”
- We respect Florida’s progress in closing achievement gaps and have concerns over proposed regulation § 200.19(a)(3) that requires any targeted school with a subgroup that has not made the state required improvement over three years to be automatically identified as schools for comprehensive support and improvement.

School Support and Improvement Activities

(1) Comprehensive Support and Improvement

(D) Public School Choice

- We commend Florida’s expansion of public school choice by the 2016 Legislature for implementation beginning with the 2017-18 school year.
- We encourage the expenditure of ESSA funds to offset the costs of transportation.

(2) Targeted Support and Improvement Plan & Alternative Strategies

(B) Targeted Support and Improvement Plan

- We encourage the department to explore options such as the creation of a statewide clearing house to vet and identify activities that will meet the federal definition of “evidenced-based.”

(3) Continued Support for School and Local Educational Agency Improvements

Establish Exit Criteria

- We recommend that the exit criteria provide sufficient time for a school to make “lasting” changes and includes a plan for sustainability.

Direct Support Services

- We encourage the department to consult with districts about the most effective way to use these funds to support improved academic achievement.
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