



**WEA**  
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Kim Mead, President  
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November 9, 2016

Isabel Muñoz-Colon  
Executive Committee Chair  
Members of the State Board of Education  
Washington State Board of Education  
600 Washington Street SE  
P.O. Box 47206  
Olympia, Washington 98504

Dear Isabel Muñoz-Colon and Members of the State Board of Education:

On behalf of the Washington Education Association (WEA), representing over 90,000 public school educators in the state of Washington, we submit these comments in response to Washington State's "ESSA" consolidated plan process.

The ESSA law that passed last December, 2015, provided us with hopes that our state would take full advantage of new flexibility provided by the federal Department of Education. ESSA replaced the top down No Child Left Behind approach that negatively affected our students for much too long. We were excited at the prospect of rethinking and redesigning our accountability and assessment system in ways best suited to our students' needs. We looked forward to finally providing innovative, meaningful, and actionable data on a variety of indicators. These would include ones that could and should reveal more than student test scores. We also welcomed the demise of AYP that labeled schools failures when unrealistic and unfunded goals were not met.

We were not alone in these hopes and expectations for the planning process. Many other groups who spent long days over many meetings shared these same hopes. The participation of those appointed to the groups that we were on was enthusiastic and we felt that our members' contributions were well received by others because they represented the realities in the classroom.

Overall, we had hoped to be part of creating a more innovative, student-centered education system based on a balance of accountability measures that identifies needs and provides supports and resources to assure that all students regardless of zip code, background, or disaggregated subgroup get what they need to graduate successfully. We hoped that we could reduce the number of state tests exacerbated by our state exit exam policy, and make it possible for schools to provide more instructional

time, supports and attention to all students, but especially to struggling students and those from under-represented populations.

But as the development of the state plan comes to a close in our state, these hopes have been largely left unfulfilled and we are frustrated by number of concerns which we would like to share with you stemming from:

- 1.) Inadequate stakeholder participation,
- 2.) Rushed timeline,
- 3.) Compliance based rather than an innovative approach, and
- 4.) Missed opportunities that ESSA provided but which our state did not encourage or embrace.

### **Stakeholder Participation**

The ESSA bill was lauded by its co-author Senator Patty Murray for its requirement to include sincere and meaningful input from practitioners and other stakeholders as key to the development of each state's ESSA plan.

“In general. -- For any State desiring to receive a grant under this part, the State educational agency shall file with the Secretary a plan that is--

“(A) developed by the State educational agency with timely and meaningful consultation with the Governor, members of the State legislature and State board of education (if the State has a State board of education), local educational agencies (including those located in rural areas), representatives of Indian tribes located in the State, teachers, principals, other school leaders, charter school leaders (if the State has charter schools), specialized instructional support personnel, paraprofessionals, administrators, other staff, and parents;” (ESSA Section 1111(a)(1))

But, in fact, this is what happened:

1. Despite multiple efforts of WEA to recommend practitioners for each of the ESSA workgroups, the number of classroom or student based practitioners came nowhere near representing the scope of input required by ESSA.
2. The voice of staff critical to supporting school success such as counselors, psychologists, school social workers, nurses or physical or occupational therapists was nearly absent, with only a single school social worker in any of the groups.
3. Several workgroups, such as School and District Improvement, Community and Family Engagement, and the Fiscal Workgroup had not a single classroom teacher, paraprofessional or specialized instructional support personnel (SISP) appointed.
4. OSPI initially appointed no paraprofessionals to any of the eleven workgroups, and ultimately only two paraprofessionals were appointed at WEA's request: a Head Start coordinator to the Early Childhood workgroup, and half-way through the process, a paraprofessional to the Effective Educators workgroup.
5. Only one teacher was appointed to the Student Assessment Workgroup and while our students with disabilities and English learners are our lowest performing student subgroups on the state

assessment, not a single teacher, paraprofessional or SISIP who works with these students and/or administers assessments to these students was included on that workgroup.

6. Representation of principals was only marginally better, but the inclusion of parents (or families), especially from communities of color, was nearly non-existent.
7. In addition, there are hundreds of comments that were gathered from parents, teachers, and other community members during hours of public comment that have not been utilized in any meaningful way within the state's plan.

### **Timeline**

OSPI began forming the ESSA workgroups last spring with meetings starting as early as March. Although OSPI and State Board of Education staff invested significant time and effort, it became clear that the process was too massive to be done in the spirit of the new law within the timeline OSPI established.

In fact:

1. Deputy Superintendent Mendoza announced in August that the last meeting of the Consolidated Plan Team scheduled for November 14th had been cancelled, despite a huge number of workgroup recommendations that had not been received or considered yet. In many cases, the Consolidated Plan Team members were forced to make decisions without meaningful data or a full understanding of the consequences the decisions would create.
2. The same applied to the Accountability Workgroup. It was only based on strong complaints from the workgroup members themselves that the Accountability Workgroup was provided an additional meeting—and even then it was not enough time to satisfactorily complete the work.
3. Despite the US Department of Education's announcement that the first date available to submit state plans would be March 6<sup>th</sup>, 2017, the Superintendent of Public Instruction announced the draft plan would be completed by early November 2016 and delivered to the DOE in December regardless of whether the workgroups and the Consolidated Plan Team had completed their work or not. This unnecessarily reduced the time by several months that could have been used to provide opportunity for the state to get the plan right.
4. In addition, it is unclear how the final plan will reflect the hundreds of pages of input OSPI solicited on-line and at regional forums from educators, parents, civil right groups and many others who care about our public schools.
5. Finally, there is still no clarity on what the federal budget will provide in terms of the final funding level for ESSA. This is a key factor upon which the successful implementation of our plan will depend. We think it is premature to lock down a plan, including interim and long term goals, until we know what funding supports we will have at our disposal.

### **Compliance Based—not innovative and not what our students need**

The ESSA Workgroups were not encouraged to take full advantage of the provisions under ESSA to change our state's accountability or assessment system to better gauge the true health of our schools or the true learning of our students. The state has pursued a compliance based approach maintaining the status quo rather than adopting a more flexible and innovative approach to support and enrich student learning and growth.

1. This compliance-based approach resulted in no significant change to our Accountability or Assessment system as shown by:
  - a. No decrease in the amount of standardized testing and the emphasis placed on test scores as main measures of school success.
  - b. Continued heavy reliance on the same academic measures utilized under NLCB (proficiency, student growth, graduation rates). Both proficiency and growth continue to be based on test scores.
  - c. Status quo use of a summative accountability score for schools rather than emphasis on each individual indicator which prevents nuanced, actionable data to focus support for school and student success. Such summative scores mask the performance of disaggregated student subgroups and interferes with the ability to support these students with more fine-tuned and specific interventions.

### **Missed Opportunities**

Washington State's plan has not taken full advantage of the provisions under ESSA to change and innovate our state's accountability system into an opportunity dashboard with multiple measures. These missed opportunities include:

- 1.) No serious consideration of provisions allowed under ESSA such as:
  - a.) interim tests throughout year used instead of single test score
  - b.) 8<sup>th</sup> grade alternative math test for advanced students
  - c.) limiting testing as a percentage of the school year
- 2.) Not weighting school quality and student success indicators in a way that recognizes positive performance and provides a way to improve practice.
- 3.) Not allowing workgroup members to recommend school quality and student success indicators that focused on inputs such as professional development, staffing ratios, class sizes, student access to technology or other measures of student learning opportunities.
- 4.) Creating long and short term goals for the state's accountability system that just repeat AYP by making schools solely accountable to state mandated test score measures without tying that accountability to full funding, staffing and resources.
- 5.) Refusing to address civil rights issues connected to the use of the state test for high stakes decisions about graduation and grade promotion. This ignores ESSA's provision requiring the state test to be used only for the purpose it was designed for. SBAC has clearly stated its test is not designed or validated for use as a graduation requirements or other high stakes decisions.

As a result of the concerns listed above, WEA cannot support this plan as drafted. Inadequate stakeholder input, rushed timeline, compliance-based approach, and missed opportunities for innovation have resulted in a plan that does not significantly improve the quality of our education system or serve our members and their students any better than the current status quo did.

For so many years under NCLB, our students have been the victims of an inflexible top down, one-size-fits-all, test score driven accountability system that narrowed the curriculum, promoted compliance rather than creativity, and focused on failure. Although it required data that identified under-represented subgroups of students, it did nothing whatsoever to help those students or any other students. In fact, our achievement gaps have increased over the past decade.

Now that we finally have this opportunity of a lifetime, we owe it to our students not to repeat the failed experiment that was NCLB, but to embrace the spirit of the long awaited Every Student Succeeds Act.

We urge the State Board of Education to join with us and others to take the time to finish the process and change this weak plan to better reflect what our students need and deserve and what teachers, parents, and communities know will address their children as whole people and not one-size-fits all data points. We believe that this Board can best contribute to this process by assuring a more diverse makeup of school based and diverse community participants and urge you to let those perspectives guide us all to a more flexible, more meaningful, and more productive education system for all.

Respectfully,

A handwritten signature in black ink, appearing to read "Kim Mead". The signature is fluid and cursive, with a large initial "K" and "M".

Kim Mead, President Washington Education Association

cc: Senator Patty Murray  
Washington Superintendent of Public Instruction