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District School Superintendents

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Florida Association of District School Superintendents

November 9, 2015

Ms. Marva Johnson, Chair
State Board of Education
325 West Gaines Street, Suite 1520
Tallahassee, Florida 32399

Dear Chair Johnson:

Florida's District School Superintendents support the achievement level cut scores that Commissioner Stewart has recommended to the State Board of Education. These recommendations are based on a comprehensive process that included recommendations from educators and the community representatives. A significant variance from the recommendations established through this inclusive process negates the process and calls into question the need for the process itself.

Achievement Level Cut Scores

An understanding of this multi-stage process is critical in recognizing that the recommended cut scores accurately and reasonably reflect student achievement levels.

Achievement Level Descriptions (ALDs) – The Achievement Level Description Panel was a four-day workshop with 42 panelists from around the state. The panel was to specify what students in each achievement level are expected to know and be able to do. This panel is the link between content and achievement level standards. The panel met in Tallahassee on April 28-May 2, 2015.

Educator Panel – The Educator Panel consisted of over 300 K-12 and postsecondary educator panelists from across Florida – reflecting the regional and demographic diversity of the state. The Educator Panel met from August 31- September 4, 2015 in Orlando.

Seventeen groups set cut scores concurrently. Cut scores were recommended based primarily on content, identifying the point where they individually judged that students scoring at and above that level can be accurately described by the Achievement Level Description for that level.

Four rounds of judgments. Educators were given multiple chances to evaluate potential cut scores and make changes based on content, discussion, and impact and benchmark data. Impact data (introduced after 2 rounds of judgments) and benchmark data (introduced after 3 rounds of judgments) were used as context to inform panelists' recommendations, but not determine their recommendations.

It is important to note that the Educator Panel members received access to student items organized by difficulty. The goal of each panel was to set the cut points in a way that reflected where the difficulty of items made a meaningful distinction between achievement levels. They did not receive student data on individual items, though they knew which items were easier or harder based on how the items were organized when they were presented. They did not receive individual item data (e.g. how students scored on individual items), though they did receive impact data on how the cut levels would result in the percent of student scoring at each level.

Reactor Panel – The Reactor Panel was a two day meeting (September 10-11, 2015 in Orlando) composed of 16 community/education organization leaders, state university leaders, business leaders, school board members, and superintendents. The three superintendents were Dr. Barbara Jenkins, Orange County Public Schools, Dr. Diana Greene, Manatee County Public Schools and Mr. Robert Edwards, Lafayette County Public Schools. The Reactor Panel reviewed the recommended cut scores and impact data of the Educator Panel and recommended cut scores. In developing the recommendations the Reactor Panel reviewed impact data and considered two questions:

- Given the description of what students should know and be able to do at each Achievement Level, are the recommendations from the Educator Panel consistent with the expectations of student achievement?
- Given the results that are seen from other Florida assessments, are the impact data based on the Educator Panel's recommendations reasonable?

Public Input Workshop – Three public workshops were held to solicit public input on the cut scores recommended by the Educator and Reactor Panels. (Ft. Lauderdale – 9/15/2015; Orlando – 9/16/2015; and Tallahassee – 9/17/2015) The Tallahassee workshop was also provided as a webinar so that stakeholders from across the state could watch and listen. This feedback was considered in the recommendations.

Commissioner's Recommendations – The recommendations made by the Commissioner reflected the work of the various panels listed above as can be seen from the chart below.

**FCAT/Florida Standards Assessments
Cut Scores and Recommendations**

Grade Level Subject	2011 FCAT 2.0 (First Year)	2014 FCAT 2.0	2013 NAEP at and Above Proficient	Educator Panel	Reactor Panel	Commissioner Recommendations
Grade 3 ELA	57%	57%	NA	55%	53%	53%
Grade 4 ELA	59%	61%	39%	54%	56%	54%
Grade 5 ELA	58%	61%	NA	49%	56%	52%
Grade 6 ELA	58%	60%	NA	49%	52%	51%
Grade 7 ELA	58%	57%	NA	51%	51%	51%
Grade 8 ELA	53%	57%	33%	59%	55%	55%
Grade 9 ELA	51%	53%	NA	55%	55%	53%
Grade 10 ELA	52%	55%	NA	51%	51%	51%

Grade Level Subject	2011 FCAT 2.0 (First Year)	2014 FCAT 2.0	2013 NAEP at and Above Proficient	Educator Panel	Reactor Panel	Commissioner Recommendations
Grade 3 Math	56%	58%		60%	60%	58%
Grade 4 Math	58%	63%	41%	59%	61%	59%
Grade 5 Math	56%	56%		57%	59%	55%
Grade 6 Math	53%	53%		49%	50%	50%
Grade 7 Math	56%	56%		54%	52%	52%
Grade 8 Math	56%	47%	31%	49%	45%	45%

Grade Level Subject	2011 FCAT 2.0 (First Year)	2014 FCAT 2.0	2013 NAEP at and Above Proficient	Educator Panel	Reactor Panel	Commissioner Recommendations
Algebra 1 EOC	55%	66%	NA	51%	60%	56%
Geometry EOC	56%	64%	NA	50%	56%	53%
Algebra 2 EOC	NA	NA	NA	31%	39%	36%

Legislative Review – The 90-day statutorily-required legislative review of the proposed cut scores concludes on December 28, 2015.

State Board of Education – The draft rule including the new Florida Standards Assessment (FSA) Achievement Level cut scores will be presented to the State Board of Education for action in January 2016.

At the last State Board of Education meeting on October 28th, some state board members began a discussion of Commissioner Stewart’s recommended cut scores and suggested that the scores be adjusted to be more aligned with the National Assessment for Educational Progress or NAEP.

Superintendents strongly reject the concept that the standards set for the FSA should mirror the levels of the National Assessment of Educational Progress or NAEP. There is no evidence that NAEP is fully aligned to or measures the Florida Standards. This notion directly circumvents the work of the Educator and Reactor panels composed of Florida education stakeholders.

According to the National Assessment Governing Board, “NAEP is a representative-sample assessment. It reports on the achievement of large groups of students, and does not give results for individuals or schools. Participating schools are selected by the National Center for Education Statistics and its contractor according to a sampling frame in order to produce results that are nationally representative and also representative of participating states and urban districts.”

A specific question on their website asks, “Can I use NAEP results to find out how a participating school or student did?” Their answer, “No. NAEP is a representative-sample assessment, designed to report group results, and cannot provide accurate data on individual students and schools. By law, the assessment is required to make sure that all personally identifiable information about students and schools remains confidential.”

Another question: “Is NAEP related to the standardized tests mandated by my state?” Their answer: “No, NAEP is conducted and reported separately from any state-conducted tests. State tests are designed to provide information on individual students and schools. They are tied to the curriculum and academic standards of each state. In most cases, there are different test content, standards, test administration, and preparation between NAEP and state tests.”

“Will NAEP be matched to the Common Core curriculum standards?” Their answer: “...there are no plans for NAEP and the Common Core to become wholly similar or matched....Because of NAEP’s sampling methodology, designed to produce sound results for large groups of students, the NAEP assessments are much broader in content, item types, and levels of difficulty, than any exams designed to produce individual results, including those being developed for Common Core.” (<https://www.nagb.org/toolbar/faqs.html>)

Clearly, the two assessments have different purposes.

Furthermore, the achievement level cut scores should not be set in a way that creates a ‘forced fit’ with NAEP cut scores. As stated by the Commissioner and other Florida Department of Education representatives, the NAEP cut scores and their achievement level descriptors are not equivalent to those set by state statute. The NAEP assessment is provided every two years to a sample of students, so adjusting the entire scale based on a sample of students in two grade levels is not reasonable. It is also important to note that the material covered by the NAEP and new statewide assessments is not always similar. A recent study of NAEP conducted by the NAEP Validity Studies Panel found that the level of concordance was ‘reasonable’ overall between NAEP mathematics assessments and the Common Core State Standards (CCSS). The study also stated: “However, the agreement between NAEP and the CCSS is uneven across the five NAEP content areas, and, at grade 8, 42% of middle-grade CCSS standards are not assessed by any items in the 2015 NAEP item pool.”

The study also recommends that NAEP developers review its mathematics framework in light of changes to the CCSS and other states’ college and career ready standards. This study is particularly relevant to Florida because the NAEP Validity Studies Panel has been maintained by the American Institutes for Research (AIR) since 1995. As the developer of the Florida Standards Assessment, concerns AIR expresses about the valid connection between NAEP and states’ college and career ready standards are particularly relevant. The complete study may be found at:

<http://www.air.org/sites/default/files/downloads/report/Study-of-Alignment-NAEP-Mathematics-Items-common-core-Nov-2015.pdf>

Forcing a fit between the NAEP proficiency levels and statewide achievement levels would result in other concerns. If nearly 70 percent of Florida students are declared non-proficient in Grade 10, this would result in unconscionable harm to students and their ability to graduate. Such an outcome would also create negative impacts to the Florida economy. Aligning 10th grade ELA with 8th grade NAEP cut scores could mean failing a majority of students, including some who are currently completing college level courses. This limits, rather than provides, opportunities to thousands of Florida students and impedes their access to both career and college pathways. Forcing grade three cut scores to align to fourth grade NAEP also potentially places the majority of Grade 3 students in need of remediation or retention.

School Accountability and the Proposed Rule (School and District Accountability)

Superintendents support school accountability and continue to support an aligned and appropriate school grading system. More than at any time in Florida’s history, support for accountability measures is challenged due to rushed transitions, concerns about assessment validity and the inability to include

all meaningful measures. Most importantly, the lack of a learning gain measure does not permit the initial release of grades to act as an informational baseline. Learning gains represent the enduring commitment of the state to ensure all students are making meaningful growth or maintaining their current achievement each year. Not including these gains erodes that commitment and eliminates the possibility that the initial grades are an informational baseline. Additionally, setting percentage cut scores for determining a school grade of “A”, “B”, “C”, “D”, or “F” on a model that excludes almost 50 percent of the points is irresponsible and premature and could lead to the revisiting of these cut scores for 2015-16. It should be noted that statutorily, once those cut scores are set by the State Board, they can only be adjusted upwards. The continued confusion over these issues and the repeated need to then ‘tweak’ the grading system each year risks further damage to school accountability.

The calculation of learning gains within the proposed rule (6A-1.09981 – School and District Accountability) is of great concern. The new learning gains measure is built on splitting achievement levels into multiple subcategories. Students in one subcategory would have to move to the next subcategory in order to receive a learning gain. This creates many circumstances where students within subcategories have very different growth expectations simply based on their placement within the range. In addition, the band of error on statewide assessments can be significant which further impacts the calculation of a learning gain when there are subcategories within an achievement level.

Superintendents recommend that sufficient progress is demonstrated when a student is able to maintain a score in level 3, 4 or 5. As a student progresses from one grade level or subject area to the next higher grade or content area, the expectations are increased for both subject content and the vertical scaling of the assessments. Therefore scoring a Level 3, 4 or 5 is sufficient for demonstrating adequate student growth. This concept is supported in the definition of “learning gain” specified in section 1008.34, F.S., as the degree of student learning growth occurring from one school year to the next. While the statute also requires learning growth toward levels 3, 4 and 5 as part of the learning gains calculating, it does not preclude the state board from defining “learning gain” as maintaining a Level 3, 4 or 5.

The current rule development text eliminates the use of ‘banked’ scores for high school accountability. As schools have increased acceleration opportunities for students, more students are taking high school courses in middle school. The prior school accountability system allowed for banked scores to be included in proficiency measures for high school. Middle and high schools were working together to ensure students met standards on an accelerated timeline. This should be added to the new rule to ensure this success continues.

Acceleration measures in the rule create strong expectations for all graduates to have at least one college and career measure before exiting school. We suggest two additional opportunities for acceleration. First, CLEP assessments recognized by college and universities across the nation for college credit should also be recognized in our accountability system. Second, students taking alternative assessments could be meaningfully included in this measure if we provided acknowledgement of career transition programs or internships built on providing opportunities to ESE students. For middle school acceleration measures, until there are adequate EOC assessments in English/Language Arts courses, we recommend that the middle school acceleration measure only use prior to Grade 8 performance on Mathematics assessments for inclusion in the acceleration denominator and only include students who scored at level 4 or above.

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Superintendents recommend that the proposed rule be amended to reflect the above concerns.

In conclusion, Florida's District School Superintendents are united in their support of the achievement level cut scores that Commissioner Stewart recommended to the State Board of Education. The Commissioner's recommendations are based on a comprehensive process that includes recommendations from educators and the community. This process must not be circumvented. We recommend that the State Board of Education adopt Commissioner Stewart's recommendations without modification.

Sincerely,



Barbara M. Jenkins, President



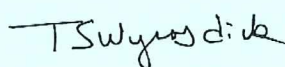
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