

Memorandum

To: Margaret MacKinnon

Date: July 21, 2017

From: David Kohler, Chair; Education Committee of the Governor's Council on Disability & Special Education (GCDSE)

Re: 2nd Draft Application for the ESSA State Plan

The Education Committee of the GCDSE submits the following comments as stakeholder feedback for consideration in developing the Alaska State ESSA Plan:

Minimum N-Size:

The 2nd Draft State ESSA Plan must propose the minimum number of students (n-size) that the State determines are necessary to be included to carry out the requirements of any provisions under Title I, Part A of the ESEA that require disaggregation of information by each subgroup of students for accountability purposes. The minimum n-size represents a balance between recognizing the small size of many subgroups and schools, prioritizing and ensuring student privacy, and incorporating actionable data into the accountability system.

Alaska has proposed ten as the minimum n-size of students necessary to be included for accountability purposes. The Council is concerned that this number is too high. Only 87 percent of Alaska's schools would be included in the academic achievement indicator with a minimum n-size of ten. Alaska had n-sizes of five and six under its previous accountability system. Schools with a smaller number of students in subgroups are often those that have the greatest need to be identified and have targeted interventions for those subgroups. With the smaller n-size, those schools would be held accountable for lack of progress. An n-size of five can result in a single student's performance having a large statistical effect on the accountability picture of a single school. However, the State has used that n-size previously and has not provided clear justification explaining the need for doubling the n-size. Alaska should hold accountable the maximum number of schools that can be identified, while still protecting the privacy of the students in subgroups. The n-size for ensuring privacy in other areas is five, so it would seem that using that number for achievement accountability would insure privacy.

Accountability System Indicators:

The Education Committee of the GCDSE is concerned that the long-term goals for academic achievement in the accountability system indicators do not include achievement in science. While the State will be assessing science in grades 4, 8, and 10, those assessments will not be part of the system indicators prompting a need for school improvement. Science achievement and growth is critical to the

competitiveness of Alaskan students in the state and national economy, and should be included as a long-term goal for academic achievement.

The Council is concerned about the change in the 2nd Draft State Plan Other Academic Indicator which removed subgroup progress as a stand-alone indicator and replaced it with growth for grades 4-8. Subgroups progress is a crucial part of providing and ensuring equal access to quality education, and should be included as a stand-alone indicator. Additionally, the measures of academic achievement perpetuate the gap between underperforming subgroups and the all-student group. By setting the goal as a uniform rate of change in proficiency across all groups, the goals preserve the inequality of outcome and access that exists between subgroups and the all-student group. The rate of change goal for students with disability should be set so as to close the achievement gap over the 10 year period, not enshrine it as a policy objective.

The Education Committee welcomes the opportunity to provide this comment, and looks forward to reviewing the final draft.

END