



ESSA Public Hearing**June 5, 2017****WPSBA Comments**

I am Lisa Davis, Executive Director of the Westchester Putnam School Boards Association (WPSBA). We thank you for this opportunity to speak on the draft NYS ESSA Plan.

There is much positive momentum, and we recognize the measured process that the Board of Regents and Commissioner Elia have implemented; it included all stakeholders in a reflective, iterative process. I was involved with the fall and spring regional meetings, and attended or live-streamed several Regents' meetings and events, so I know first-hand the resources and energy that have gone into the development of this plan.

We appreciate your efforts to try to get it right this time. This plan includes several potentially transformative modifications from past practice:

- Flexibility
- Focus on student growth
- Consideration of multiple measures
- Expanding College and career readiness indicators beyond the single measure of student scores on state assessments
- Adding a 3rd "C," Civic engagement, to College and Career readiness
- State supports for improvement in Identified Schools (support vs monitoring for compliance)

For while ESSA requires that standardized assessments remain a central element, the states have flexibility to go beyond them. WPSBA has long advocated for including additional measures as well as a data dashboard, and we are hopeful that this work will be accelerated. The civic engagement measure is a bold statement that has great potential for student development, but it is not clear how it will be incorporated from an early grade. We are hopeful that it will entail more than the high school experiences suggested to date.

Another positive change is the counting of 5 and 6-year graduates in the State's official graduation rate. WPSBA has long used the 4 year August graduation rate in our Facts & Figure\$ book, and is pleased to see NYS acknowledge those students who need a bit more time to graduate, and who persevere nonetheless. Similarly, NYS needs to acknowledge students who would benefit from a more flexible path to graduation, and ensure that graduation culminates with a valid high school diploma for these students.



While the recently announced designations of Reward Schools were based solely on measures related to state assessments and graduation rate, the criteria needs to be expanded. When will the State's school rating scale include other elements from your Tier 2 and 3 lists, and what process will be used to prioritize the lists? We also note that NY is initially only incorporating chronic absenteeism as its school quality indicator, and encourage the use of at least one other element. Education Week reports that Connecticut, Illinois, Louisiana, Michigan, the District of Columbia, and others are incorporating school quality indicators such as curriculum access, school climate, surveys, student engagement and/or the social emotional needs of all students. NY State must provide the funding for SED to accelerate this process.

Our organization represents local boards of education, and as such, we are energized by the promise of local control versus top-down edicts. New York has already identified high school assessments as an area for local school district discretion. We encourage New York to follow the lead of states such as Kentucky, North Dakota and California in shifting more authority to local school boards for decisions around teacher evaluation, curriculum, spending flexibility, and school interventions.

In closing, we would like to share some regional thoughts regarding per pupil funding and statewide comparisons, as we know the ESSA plan includes an analysis of per school expenditures. New York State is somewhat unique in the great disparities in regional costs- salary, housing, healthcare, and other costs of living- between the NY metro area (including the 1st ring suburbs) and the rest of the state.

Salary differentials impact regional cost, and must be considered when allocating resources or considering the variance in per pupil expenditures. The United Way ALICE study and SED's county-level building aid factor and regional cost index multiplier confirm this differential. The NYS Comptroller's February 2017 Special Report on Education in New York includes compelling data on how per pupil expenditures flat line when regional cost is factored into the equation. We have attached these documents and regional analysis for your reference.

Daniel Gonzales and Ross Wiener of the Aspen Institute recently wrote that "equity is about giving every student what they need, not giving every student the same. We applaud your efforts in this regard.