



August 16, 2017

Commissioner Brenda Cassellius
Minnesota Department of Education
1500 Highway 36 West
Roseville, MN 55113

Dear Commissioner Cassellius,

As Executive Director for the Minnesota Rural Education Association (MREA), I support the key policy choices in the Minnesota State Plan Draft for the Every Student Succeeds Act (ESSA) and recommend its submission to the USDOE. The plan has many strengths, and I also have three areas of concern regarding plan implementation.

One strength is its balanced approach to accountability with five indicators to reveal different aspects of student performance within a school. The resulting five scores can be considered “features” of the school. Another strength is the Plan’s resistance to reducing these distinct features into a single score which would hide more than it would reveal.

The Plan’s stage approach to identifying schools for support can be applied uniformly and is very understandable. Using a “percent proficient” rating rather than an index score and using “growth to standard” rather than z-scores both choose clarity over complexity, but each will raise issues in implementation which will need to be addressed to take full advantage of those policy choices.

The Plan boldly focuses on student graduation and disaggregates graduation rates by student groups which meet the requisite cell size of twenty students. While this is commendable, it goes beyond federal requirements and requires the state to do more than call out high schools with student groups who graduate at less than a 67 percent rate.

As you move forward to implementation in 2018, I recommend efforts in three areas:

1. **Communicate:** This Plan has many changes from NCLB and the Minnesota waiver. A “features” approach to school data will require a rethink of the Minnesota report card, MDE’s website for school data, and data usage by school leaders. These efforts need to begin long before the release of the new data. It will be important to work with state policy leaders and others to ensure consistency in how the Plan and effects are communicated.
2. **Address these two specific Minnesota issues:**
 - a. The Growth to Standard decision departs from the statistically accurate but hard to explain relative z-score growth. It calls on the MCAs to measure growth from one year to the next -- something they were not originally

designed to do. This must be fixed. It will take investment and longer MCAs to create accurate vertical scaling of scores, leading to more precise results and a more reliable and valid measure of growth. Growth is a highly valued outcome and worth the investment.

- b. The timing of the Commissioner's decisions regarding districts' progress towards their World's Best Work Force (WBWF) goals needs to coincide with the identification of schools and districts in need of support under ESSA. ESSA decisions will be made in Summer 2018 and every three years after that; WBWF should follow the same timeline. Therefore, the data used in the WBWF should be the plan reports from 2015-2017. The Commissioner's determination regarding WBWF progress can be informed by the ESSA data and made prior to the beginning of the 2018-19 school year. This would add clarity, focus, and an additional factor in some districts to the well-designed school improvement process described in the ESSA Plan.
3. **Implement the school improvement process with fidelity:** Focus on longer term curricular and instructional alignment and improvement and avoid "quick fixes." This includes adequately resourcing the Regional Centers of Excellence (RCEs) and schools determined to be in need of support. Academic achievement growth in Minnesota has stalled, with only pockets of excellence. The state ESSA Plan ambitiously anticipates identifying nearly one-quarter of the state's schools for improvement. With all the challenges facing schools, including students in poverty, increasing numbers of ELL students, and teacher shortages, this is not the time for half measures. School leaders and teachers need to fully buy in and not view the 'identification' as another hoop to jump through.

I commend you for your leadership in the process to produce a state ESSA plan and seek public comments on it. You and the department have been diligent over the past 18 months to seek stakeholder input on all aspects of the plan.

MREA focuses on advancing the education, growth, and development of learners in rural areas to bring about our best possible future. It is in the furtherance of this vision that I support the ESSA Plan in its current draft for submission to the USDOE.

Respectfully,



Fred Nolan
MREA Executive Director

