

Sondra Erickson
State Representative
Chair: Education Policy; Ethics
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Mille Lacs, Kanabec and Sherburne Counties



Minnesota House of Representatives

COMMITTEES:
COMMITTEE ON EDUCATION INNOVATION POLICY
COMMITTEE ON EDUCATION FINANCE
COMMITTEE ON TAXES
DIVISION ON LOCAL AND PROPERTY TAX

October 18, 2017

The Honorable Betsy DeVos
Secretary, U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

via electronic delivery

Secretary DeVos,

We are writing to you about several concerns with Minnesota's Consolidated State Plan under the Every Student Succeeds Act (ESSA) submitted to the U.S. Department of Education on September 18, 2017. We believe that Minnesota's plan should undergo a major revision focusing on student outcomes, empowering local school districts and charter schools, and providing more meaningful school performance feedback to parents, educators, and taxpayers.

While we applaud the considerable amount of time the Minnesota Department of Education (MDE) has spent consulting stakeholders, outlining ambitious achievement goals, and focusing on student proficiency, major improvement is necessary.

In 2017, Minnesota finds itself at a crossroads in how to boost student achievement after statewide test results have shown little improvement in math and reading, continuing a substantial achievement gap that persists between white students and students of color. We believe Minnesota needs an ESSA plan that is truly innovative and that adequately addresses these concerns.

Unfortunately, Minnesota's current ESSA plan lacks transparency and clarity, key elements of public reporting remain undecided, and school identifications are difficult for the general public to understand. Moreover, there appears to be attempts to scrap our state's Minnesota Comprehensive Assessments (MCAs) without working through the proper legislative channels.

You should not hesitate to send the plan back to the Minnesota Department of Education for further development and improvement. For example, one of the most puzzling components of the plan centers around the use of a "funnel system" or "decision tree" found in the Title 1, Part A: Accountability section, the system is used to identify schools for "comprehensive support and improvement."

While MDE had an opportunity to develop an accountability system that parents, teachers, and taxpayers can clearly understand, their efforts fell flat. MDE has failed to shed light on the performance of every



school in the state and only focuses its attention and resources on a handful of schools at the very bottom. It remains to be seen how Minnesota's highest performing schools will even be identified.

Another major concern we have is how the public will understand how schools identified under the funnel system exit their designation as a school needing support, as well as what those interventions and supports entail. It is extremely confusing to sort through all of the different kinds of supports listed in Title 1, Part A: School Support of Minnesota's plan and comprehend the impacts they will have on schools. Among those are "priority," "comprehensive," "targeted," "enhanced core," and "core supports." We are skeptical about the expansion of bureaucracy with the Centers of Excellence which have been tasked with administering these supports and will ask of our state additional full-time employees and financial resources.

To address some of the preceding concerns, we strongly encourage replacing the funnel system with a report card that provides a summative rating on a school that will allow parents to compare schools and find the best fit for their children, as well as a system of supports that is more clearly delineated and explained. The plan should also provide options for families of students attending schools identified as low-performing a second time, not limited to additional tutoring services, expanded school choice options, or a stronger role in determining the future direction of the school.

Yet another troubling aspect of Minnesota's ESSA Plan is the clear indication that the Minnesota Department of Education will work around the legislature to develop an alternative assessment system that differs from our Minnesota Comprehensive Assessments. Despite statements made in Title 1, Part A: Assessments that the state will continue using our current standards and MCAs, MDE has convened an assessment task force and has proceeded with developing a process for school districts to replace the MCAs with the ACT or SAT. While this would not likely happen for two to three years, our MCAs provide critical, comparable information on student performance and how schools adhere to teaching our standards. Phasing out the MCA in lieu of the ACT or SAT threatens the survival of a valuable tool our teachers, parents, and others have when evaluating how our schools are doing.

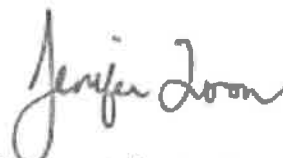
The plan has the potential to hide underperforming teachers due to a focus on teacher qualifications rather than teacher quality. Just this past year, Minnesota overhauled its teacher licensing process and is in the process of transitioning to a tiered teacher licensure system. There is currently an open action item for stakeholders to figure out how to make teachers in our 1st and 2nd tiers a negative in our evaluation system, seemingly holding them "below" teachers that have a higher tiered license.

We believe Minnesota's current ESSA plan needs to be returned to the Minnesota Department for further clarification, work, and the removal of portions of the plan that threaten the delivery of innovative instruction in Minnesota.

Sincerely,



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Chair, Education Innovation Policy Committee
Minnesota House of Representatives
District 15A



Representative Jenifer Loon
Chair, Education Finance Committee
Minnesota House of Representatives
District 48B

Copies (via electronic delivery):

Mr. Jason Botel, Assistant Secretary for Elementary and Secondary Education, U.S. Department of Education

Mr. Adam Honeysett, Managing Director of State and Local Engagement, Office of Communications and Outreach, U.S. Department of Education