



**Minnesota Department of Education**  
**1500 Highway 36 West**  
**Roseville, MN 55113-4266**

March 28, 2018

Representative Sondra Erickson  
479 State Office Building  
100 Rev. Dr. Martin Luther King Jr. Blvd.  
Saint Paul, Minnesota 55155

Rep. Erickson,

Thank you for the opportunity to testify before the House Education Innovation Policy Committee on the House Education Policy bill as introduced. The bill was amended later in the week and as consideration of HF3315 continues in the House of Representatives, I would like to convey my positions on provisions in the current bill.

I would like to thank you for including many of Governor Dayton's proposals. Of note, inclusion of language prohibiting punishing students for school lunch debt by preventing them from participating in extracurricular activities is a promising change. Additionally, the inclusion of items like eligibility enhancements for early learning scholarships, report reductions, and enhancements to the department's investigatory authority around student maltreatment make for strong policy that will benefit more children. Those and the other included governor's proposals will improve our work and provide needed clarity for educators, policymakers and the public.

I would also like to express my appreciation for the inclusion of many of the governor's initiatives to improve school safety. Providing educators and districts with clear guidance and additional tools to work with students in a constructive manner will serve to promote a safe climate in our schools.

However, the removal of the current requirement for schools to offer a student alternative education services, at a minimum, before starting dismissal proceedings is extremely disappointing. Additionally, I encourage you to reconsider the omission of language around threat assessments. There is bipartisan support around threat assessments, which are a crucial part of the process of identifying appropriate services for students before they leave the school system.

Another area of major concern is the inclusion of a summative rating system. A star rating system was attempted more than a decade ago in Minnesota and it failed; further, current research tells us that such rating systems don't work. For months, MDE staff have actively engaged with stakeholders throughout the state to gain feedback in the development of a new school report card. Through our extensive conversations with hundreds of Minnesotans via focus groups and committee meetings, stakeholders—including parents, students,

educators, business leaders, advocacy organizations and many others—have expressed a strong desire to make our current report card more understandable and transparent. They have also explicitly said that they do not want a simplistic summative rating system like the one proposed in your bill. A rating system based primarily on test proficiency does not tell the whole story of a school. And an outward-facing tool based on stars and numbers that is not aligned to ESSA will create confusion for parents when a school or district is rated high on the summative rating system but is identified for support on the ESSA accountability system, which we are federally required to do. In addition to adding confusion and undoing efforts to create a simple, understandable system, your proposed system defeats the purpose of aligning our state’s ESSA plan and World’s Best Workforce legislation. The proposal is duplicative and expensive, and it does not reflect the clearly stated desires and needs of Minnesotans. Let the input of the group of wide-ranging stakeholders, including experts, take precedence over the construct of a few.

Governor Dayton feels strongly about teacher quality, and eliminating the Tier 2 experience pathway to a Tier 3 professional license is crucial to that. Allowing a teacher to have an ongoing professional license without any formal teacher preparation creates a serious gap in supporting teacher quality. I will continue to advocate for this change.

While we respect the intent to provide students with more information about careers and other opportunities in the armed forces, I believe that the provision allowing non-classroom educators who give academic, college or career support to achieve their professional growth training for relicensure through training on career options with the armed forces or in skilled trades goes too far. This eliminates the requirement to receive ongoing training on cultural competency and working with English language learners – some of the very students that could benefit the most from comprehensive academic, career, and college counseling.

As my staff and I have testified many times, adding requirements for our local districts around civics is unnecessary. Civics, as written in statute, is already embedded into our state academic standards. As we can see from massive student activism around school shootings, our young people are some of the most civically engaged in a generation. Requiring one credit of civics ignores this as well as disrupts the credit expectations for the other social studies subjects embedded in our standards. Creating this graduation requirement also squeezes out elective career pathway course offerings. An additional state reporting requirement of the civics test will only add to burdensome district reporting requirements and will carry an agency cost.

Next, I find it problematic that the bill lacks any language on the presence of lead in school drinking water. I recognize that language passed last year touches on this, but it only covers making a plan, an all too generous testing cycle, and making results available. We need language that requires districts to do something if they find a certain level of lead and provide notice to parents of their test results. House File 3315 misses the opportunity to increase water quality for our students, but I am committed to work with stakeholders and MDH on acceptable language.

There are some areas of your bill where we can commit to working with the chair to improve the intent of the proposals. The language on World’s Best Workforce (WBWF) alignment to ESSA is a good attempt, but there are many areas that need to changes in order to avoid creating two competing accountability systems. By placing the responsibility to do curriculum review under WBWF, the proposal has improved and is workable. However, to complete this task with the effectiveness I know the chair would want, we require adequate resourcing for our school support and academic standards teams to build up capacity.

Finally, in line with the costs of effectively conducting curriculum review and reporting civics test results, I would point out that several other provisions in the bill carry a cost. As mentioned above, it would demand upfront and ongoing fiscal resourcing to build out and then maintain an outward facing summative rating report card. Technical assistance and guidance that will be necessary from MDE due to the mandatory nature of the health-curriculum related topics of Erin's Law, sexual exploitation, Jake's Law, and affirmative consent education will carry a cost. And, opening up 10<sup>th</sup> grade career and technical education courses under postsecondary enrollment options to private school students will carry a cost. As a rough estimate, all of these together would cost close to \$800,000 for the first few years, and around \$500,000 per year after that. I would counsel you to consider these costs very carefully as they are absolutely necessary for effective implementation.

While there are many items in HF3315 that I oppose, there are many items that I believe we can continue to support and work together on for the betterment of our students, educators and schools. I look forward to our continued collaboration.

Sincerely,

A handwritten signature in black ink that reads "Brenda Cassellius". The signature is written in a cursive, flowing style.

Brenda Cassellius  
Commissioner of Education

cc: Representative Jenifer Loon, Chair of House Education Finance  
Representative Jim Davnie, Minority Lead of House Education Finance  
Representative Carlos Mariani, Minority Lead of House Education Policy Innovation