

Collection of Full Public Comments on Amendment VII to Virginia's Consolidated State Plan

Public Comment Period: July 25 to August 24, 2024 **Communicated to the public through:**

- Virginia Education Update on July 25, 2024
- VDOE Website
- Email to Division contacts (235) on Friday, July 25, 2024

Comments submitted by

- Parents or Caregivers of Current Students in a Virginia Public School
- Board Members of Various Organizations
- School Board Members
- Community Members
- Business Owners
- Virginia K-12 Educators
- Representatives of local or state governments
- Educators at Institutions of Higher Education

Comments are generally organized by topic, but since some comments cover multiple topics, they may not appear in that category. Comments that cover multiple topics will appear in the topic that is first mentioned. Comments were left intact without any editing and are separated by rows within each table.

Topics of Feedback

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Table of Topics with Total Amount of Comments

Topic	# of Comments	% of Favorable Comments	% of Concerned Comments
Graduation	4	50%	50%
Virginia's Visualization and Analytics Solution (VVAAS)	3		100%
<u>Chronic Absenteeism</u>	18	89%	11%
Advanced Coursework	19	95%	5%
Performance Level Description	5	80%	20%
N-size (Reporting Group size of Students)	12	42%	58%
Exemption of English Learners by Time of Entry	28	57%	43%
Weighting of Mastery Index	21	95%	5%
General Support	17	100%	
Other (Performance Task, Calculation Questions)	7		

Topic: Graduation

Total Number of Comments:

4

Regarding Accreditation Framework - I applaud ALL the New Standards.

Our Schools need to be held accountable for their outcomes, and if failing, need to be deemed as such

Claiming this would be disparaging to low income or minority populations is backwards - it's time for those districts to look in the mirror, admit their strategies are not working, and focus on providing more quality education, interventions and resources to help their students learn.

Other reasons I support ALL the New Standards are as follows:

Graduation Rate: Aligning with the federal graduation rate to ensures transparency and accountability.

Growth and Achievement: Focusing on high expectations and providing resources to help students.

Chronic Absenteeism: Reducing chronic absenteeism and improve regular attendance.

English Learners: Aligning state and federal requirements to support English learners after 3 semesters.

Middle School Advanced Coursework: Prioritizing advanced coursework in middle school math.

3E Framework: Awarding schools for success in Enrollment, Employment, and Enlistment.

Performance Labels and Cuts: Clear and transparent language to show how schools are performing.

I am concerned that reducing the points that schools receive for GCI for GED diploma earners from 75 points to 0 points encourages students to remain dropped out instead of returning to their base school to complete the ISAEP program. The ISAEP program helps them with job skills, resumes, computer skills, personal finance in addition to the GED.

Graduation Rate: Transitioning to the federal graduation rate to ensure transparency and accountability across all states.

Growth and Achievement: Focusing on high expectations and providing resources to help students recover from pandemic-related learning loss.

Chronic Absenteeism: Reducing chronic absenteeism with innovative approaches that improve regular attendance.

English Learners: Aligning state and federal requirements to support English learners after 3 semesters rather than 11.

Middle School Advanced Coursework: Prioritizing advanced coursework in middle school to prepare students for success, particularly in math.

3E Framework: Awarding schools for success in enrollment, employment, and enlistment, focusing on real outcomes for students.

Performance Labels and Cuts: Clear and transparent language to show how schools are performing and ensure accountability.

Topic: Virginia's Visualization and Analytics Solution (VVAAS)

Total Number of Comments:

3

The state intends to lower the minimum n for subgroups from 30 to 15 for accountability purposes (see pg. 10 of the 2023724 Item C1 document). The assertion is that it is statistically reliable and will identify more students in each subgroup (p. 11). The claim that it is statistically reliable is somewhat dubious given the variability of the data with a sample that small. Given that the n for suppressing is 10, an n of 15 for accountability is too small.

Arguably growth (p. 20) should have a greater weighting in the index. Of minor concern is the use of VVAAS to determine growth and the lack of details provided regarding the proprietary algorithms used by the program. It is concerning that the accountability system is connected to a specific tool.

Comments submitted on behalf of Fairfax County Public Schools (submission 1 of 3)

Thank you for the opportunity to submit public comments through this Virginia Department of Education portal. In finalizing revisions to the Revised State Template for the Consolidated State Plan (Amendment VII) under The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act, Fairfax County Public Schools (FCPS) continues to urge the Virginia Board of Education to be mindful of how outcomes will be measured for students with disabilities, including those taught using the Virginia Essentialized Standards of Learning (VESOL), and for multilingual/English learners, particularly Students with Limited or Interrupted Formal Education (SLIFE).

GROWTH AND MASTERY

We highlight the need to ensure that expected Growth targets for students with disabilities and multilingual/English learners within Virginia's Visualization and Analytics Solution (VVAAS) are appropriately normed to these unique student populations. We also suggest that Growth calculations should use students' highest result for the year, such as when a student retests and earns a better score.

FCPS supports the inclusion of Virginia Alternate Assessment Program (VAAP) performance within both Mastery and Growth calculations to ensure inclusion for students with significant cognitive disabilities and we recommend that, when reporting scores to the public, results for Standards of Learning (SOL) and VAAP be separated for transparency.

Further, FCPS continues to advocate for maintaining the current research-based allowance of 11 semesters (5.5 years) for language acquisition before students are accountable for reaching the proficient level on course content standards assessments. If the Board determines it is necessary to reduce the multilingual/English learner adjustment, FCPS strongly encourages using only EL Progress outcomes within Mastery calculations and/or using only Growth calculations for the intervening years. FCPS also supports consistently including Formerly English Learners during their four years of monitoring within both Mastery and Growth calculations.

ASSESSMENT CONSIDERATIONS

In light of the proposed system's heavy reliance on standardized assessments, we advocate for the adoption of valid and reliable native language assessments--as encouraged within the Every Student Succeeds Act (ESSA) Consolidated State Plan template--to serve as testing accommodations to accurately measure multilingual/English learners' content knowledge and skills.

To prevent the introduction of new testing requirements in grades 5 and 8 readiness, FCPS encourages the Board to measure 5 C's skills using the existing performance task for grades 5 and 8, the Integrated Reading and Writing (IRW) component of the SOL Reading test. While this approach would require adjustments in scoring and alignment to map performance to the 5 C's, using this existing performance task would increase the attention offered to the IRW while preventing the addition of yet another required test in grades where students are already tested more than at any other grade level.

FCPS also supports greater implementation of universal design principles, such as "plain language" assessments and continued inclusion of Board-approved substitute exams (e.g., ACT WorkKeys, Advanced Placement) at the high school level, as these tests may offer a more relevant and authentic assessment experience to better reflect content knowledge and skills, including for twice exceptional students.

Thank you again for this opportunity to provide input in the process and we appreciate your consideration.

Topic: Chronic Absenteeism

Total Number of Comments:

18

Chronic absenteeism as an indicator, while important, is not 100% in the school's control. There has to be support from court services and DSS in each county/city. If schools are held accountable, there needs to be funding for more human resources to monitor it and connect with families. Teachers and administrators cannot do it all.

Growth needs to be clear and easy to understand for parents and school personnel. The past growth measures have been so hard to follow and understand. I have had the VVASS training and the programming is confusing. The why behind it is not as important as making it simple for everyone to understand.

I am writing to support the the proposed School Performance and Support Framework revisions to the Consolidated State Plan under ESSA.

Currently, the current combined accreditation and accountability system is not effectively reporting our student's mastery and progress in school. As an example, despite the plunge in student achievement scores post-COVID and the expansion of achievement gaps, the overwhelming majority of Virginia's schools are nonetheless deemed to be performing at the highest level. Families and communities need an honest and transparent accounting of school performance so that they can advocate for improvements within their schools.

I support the Framework's emphasis on mastery over growth. While growth is important, we need students to actually achieve proficiency, not just journey toward it. It is important, however, to ensure that learning loss is caught up, gaps are closed and advanced students stay advanced. I also support

giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress academically, we need them to be at school. I also strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential. Lastly, it is important to hold schools accountable for newly arrived English Learners to ensure that they are building content knowledge as well as English proficiency.

Topic: Advanced Coursework

Total Number of Comments:

19

I would like to express that middle schools who have 8th grade students who have completed Algebra I, Geometry and Algebra II prior to the 8th grade should have the option to be able to use the Algebra II SOL score from a previous year or an ESSA Math substitute test (AP/IB/SAT Scores) for determining completion of the "Advanced Coursework" and the points associated with that category for middle schools. Under the current proposed amendments, it seems that if a student were to take Pre-Calculus, Calculus, or a higher level math course during 8th grade, they would not count towards the numerator of the advanced coursework category for middle schools. Specifically where it is "The numerator then measures the percentage of those students who score proficient or advanced on a high school EOC math assessment in grade 8 (i.e., Algebra I, Geometry, or Algebra II)."

Additionally, I would like for VDOE to consider adding the AP Precalculus exam towards the list of eligible substitute tests for the state substitute assessment list for EOC math exams for verified credits towards graduation, just like how AP Calculus exams can be used as a substitute for SOLs as well. I would also like VDOE also think about advocating for the AP Precalculus Exam to also qualify as an ESSA Math substitute test for the federal level as well. I know that this is something that VDOE can not decide on its own but it would mirror the different levels of IB exams for math (IB Math Studies SL, IB Math SL, IB Math HL) that could also count towards federal accountability as well.

Lastly, as the state adopts science and history towards the advanced coursework category for middle schools in future years, I would like for VDOE to advocate for AP Biology, IB Biology SL & HL, Chemistry SOL, AP Chemistry, and IB Chemistry SL & HL exams to also be added as options for federal reporting as ESSA substitutes for science accountability at the high school level for middle school students who might take Biology during middle school.

Thank You.

I strongly support the revisions to the Consolidated State Plan under ESSA for the proposed Accountability Framework.

With this new Accountability Framework, Virginia will finally live up to its disclosure responsibilities under the 2015 Every Student Succeeds Act to Virginia students, parents and communities. As is well documented, Virginia's current combined accreditation and accountability system failed to reflect the dramatic swings in academic achievement from COVID-era learning loss.

Support Mastery vs Growth Weighting

I also strongly endorse the Accountability Framework's greater weighting of achievement vs. growth similar to Massachusetts. First, parents' goal for their kids is to reach proficiency or mastery, not to endlessly grow towards it. Second, Maryland's accountability system weighs mastery and growth almost equally, and Maryland's accountability system also failed to reflect COVID-era academic achievement swings. As a result, Maryland is revamping its system.

Support Middle School Advanced Coursework Readiness Factor

Lastly, I strongly endorse the Middle School accelerated coursework readiness factor. Civil Rights leader Bob Moses referred to the ability to take Algebra by 8th grade as a Civil Rights issue. It has been a longstanding goal of the US Department of Education and many organizations.

With Algebra in 8th grade, kids can take without doubling up: Geometry in 9th grade; Algebra II in 10th grade; Precalculus in 11th grade; and Calculus in 12th grade. That math sequence is crucial for kids who are not only interested in STEM, but any quantitative field, such as economics or business.

As noted at the VBOE meetings, Florida has a similar readiness factor they've had place for over 10 years that's working very well there. And Virginia's readiness factor should take place immediately, considering Virginia schools should have been accelerating 8th graders into Algebra who are ready for decades now.

Just 3 years ago, numerous Virginia math school leaders fervently supported the Virginia Math Pathways Initiative's (VMPI) initial proposal that no kids should take Algebra until 9th grade, which copied San Francisco's inequitable Algebra for None program. Virginia school districts should not be rewarded for doing or having done their own local district versions of San Francisco's Algebra for None or decelerating 8th graders who are ready for Algebra in 8th grade into Pre-Algebra instead.

But just offering Algebra in 8th grade is not enough – school districts need to start as early as possible to prepare kids to successfully take Algebra by 8th grade. The Board of Education adding this readiness factor will provide that incentive. Notably, kids with money are already being prepared – in private schools and via tutors and private math supplement companies, like Kumon and Russian Math.

For excellent public school Algebra readiness efforts, we can already look within Virginia to Fairfax County Public Schools (FCPS). One of FCPS' strategic plan's goals is to have as many kids as possible successfully take Algebra in 8th grade. FCPS Superintendent Michelle Reid has spoken about how their Algebra readiness efforts start in early elementary. She was recently favorably featured in the Wall Street Journal for such efforts.

The following quote is taken from page 24 of the proposed ESSA Consolidated State Plan in reference to using advanced math coursework in middle school as part of the readiness indicator: "However, some stakeholders expressed concern that including a measure based more on participation of middle school students in high school math assessments (rather than simply performance of middle school students already in these pathways) would place pressure on educators to push students into advanced math prematurely. Moreover, research suggests that advanced math courses are good for students— but only if those students are ready to succeed."

The plan then goes on to delineate which students will be counted in the denominator of this metric: "Ready students" in the denominator will be determined by including (1) any grade 8 student taking a high school math EOC in grade 8, (2) any grade 8 student who took a high school math EOC in grade 7 (regardless of result), and (3) any grade 8 student who scored proficient or advanced on the grade 7 math test.

Counting any student who passes the Math 7 SOL test seems to be in direct conflict to the paragraph indicating that advanced math courses are good for students, only if they are ready to succeed. The All in Tutoring Playbook, distributed by the VDOE last fall, recommended that students who scored in the range of 400 – 440 on their Math 7 SOL test receive 18 weeks of high intensity tutoring because they were "at risk." How can a score of 400 on the Math 7 SOL test be categorized by the VDOE as indicating an "at risk" student in need of 18 weeks of high dosage tutoring in order to be successful with grade-level content, but also be considered a "ready student" for taking accelerated coursework? One of the goals of taking accelerated coursework in middle school is to open more opportunities for advanced math coursework in high school. If students who are not ready are placed in Algebra I in eighth grade and they are not successful, they will have built a very shaky foundation on which all other math coursework is based. This will not lead to future success. Rather, it will likely have the opposite impact.

I believe that instead of counting any student who scored proficient or advanced on the Math 7 SOL test as "ready," only students who scored higher than a 440 on the Math 7 SOL test should be included to better align with the VDOE's previous interpretation of SOL scores, at least for the 24-25 school year which will base the denominator of this metric on a student's performance on the spring 2024 SOL test.

In addition, on page 19 of the proposed plan, it indicates that test results for students who take Algebra I in the 8th grade will be included in the mastery index and in the participation rate. What about the scores for students who take Geometry or Algebra II in eighth grade? Will those be included as well in state reporting?

I write in support of the revisions to the Consolidated State Plan under ESSA for the proposed School Performance and Support Framework.

The current combined accreditation and accountability system is not working. Despite the plunge in student achievement scores post-COVID, the overwhelming majority of Virginia's schools are nonetheless deemed to be performing at the highest level. Families and communities need an honest and transparent accounting of school performance so that they can advocate for improvements within their schools.

I support the Framework's emphasis on mastery over growth. While growth is important, we need

students to actually achieve proficiency, not just journey toward it. I also support giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress academically, we need them to be at school. I also strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential. Lastly, it is important to hold schools accountable for newly arrived English Learners to ensure that they are building content knowledge as well as English proficiency.

Thank you for the opportunity to provide comments to the revisions to the Consolidated State Plan under ESSA and for the excellent work that has been done with the School Performance and Support Framework.

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Topic: Performance Level Description

Total Number of Comments:

5

While I understand the plan to align with Federal requirements, I don't understand the expectation for ELs to be fully English literate in a little over a year after coming from a country with another language and potentially no formal schooling. That's not my main concern. Chronic Absenteeism is my main concern. School divisions should not be held accountable for parents not sending their children to school. They take time for vacations, appointments, and make the decision on sick days. This day and age, doctors will write excuses for any and all reasons. They will even write excuses for days students haven't missed yet; future days. The fact schools can be Level 1 or Green in academic areas and yellow or red with chronic absenteeism is amazing. They should be rewarded for this!

There is a conflict with some expectations. Students who "move in" after the twentieth day of school get special coding. Students that come on Day 1 but miss 40 to 60 days of school throughout the year do not get the same accommodation. Schools would be better off telling chronically absent families to keep their children home for the first twenty days of school. I wish someone could explain how a school division is responsible for a decision a parent makes about keeping their child home for 20, 30, 40 or more days throughout the year. If a parent excuses it or a doctor excuses it, a judge doesn't want to hear it. The topic of chronic absenteeism is the one that needs the most review.

My other issue is "Off Track." Picture a train that is off the track. This is considered a disaster. A failure. And, many passengers may not be safe. The difference between a school that is "On Track" and one that is "Off Track" could be a handful of students who may or may not have passed an SOL assessment by one or two questions. An "On Track" school could be going backward and an "Off Track" school could be making tremendous strides with some very challenging students. Please reconsider this. I believe some other states were used as the example for these categories but Virginia didn't actually adopt the ones that were used as the model. Why?

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Topic: N-size (Reporting Group size of Students)

Total Number of Comments:

12

I support the new framework because Virginia's previous system has been excluding significant numbers of students. Over 20,000 students—including 10,028 students with disabilities, 6,547 Black students, and 5,607 English learners—were not accounted for, which masked how schools were supporting these students and prevented targeted interventions. Every student matters, and by including as many students as possible in the accountability measures, we can ensure that schools and students receive the necessary support quickly, rather than waiting until it's too late. This approach will help us better serve student groups that need additional resources, ensuring timely assistance to both schools and students.

It isn't a good thing to reduce the minimum participation from 30 students to 15 students. This will be very detrimental to small schools. We know that SPED students struggle on the Writing SOL test. If the number is reduced to 15, this group will no longer be too small to count in accountability and it will be nearly impossible to achieve accountability.

I support the new framework because Virginia's previous system overlooked more than 20,000 students, including 10,028 students with disabilities, 6,547 Black students, and 5,607 English learners. This lack of inclusion hid how well schools were supporting these students and prevented needed interventions. Every student counts, and by including more students in accountability measures, we can provide schools and students with the support they need sooner. This approach ensures timely help for the student groups that require additional resources.

Provide the minimum number of students 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.

I am asking to please do not lower the minimum number of 30 to 15. Buchanan County is comprised of small schools and many children with disabilities. Lowering the number would put our schools in great jeopardy of keeping our accountability status.

I support the new framework because Virginia's previous system left out over 20,000 students, including 10,028 with disabilities, 6,547 Black students, and 5,607 English learners. This exclusion hid how well schools were supporting these groups and blocked targeted interventions. Every student matters, and by expanding accountability measures, we can ensure that both schools and students receive timely support, rather than delaying help. This approach better addresses the needs of underserved student groups, providing them with essential resources.

I am very concerned about reducing the subdivision from 30 to 15 students. In small schools, especially Southwest Virginia where we have smaller schools. If this reduction is made our schools will be heavily impacted and have very little chance of success.

I support the new framework because Virginia's old system overlooked more than 20,000 students, including 10,028 with disabilities, 6,547 Black students, and 5,607 English learners. This exclusion concealed how effectively schools were serving these students and hindered targeted interventions. By broadening accountability measures, we can ensure that every student receives the necessary support promptly. This change helps schools and students access timely assistance, particularly benefiting student groups that require additional resources to thrive.

I am constantly awestruck at how our education system continues to leave our students behind especially the students with disabilities. Forget how much pressure and stress the education system continues to place on teachers, think about the stress the system is putting on all students then add that times ten even thousands sometimes with sped students. Now you want to basically place all the blame on these students when small, rural schools do not make accreditation because you want to lower grouping numbers. I never understood where the idea of differentiating the material but taking a grade level standardize test came from. It had to be some one that had never stepped foot in a classroom to teach, one that could not teach, or one that has not taught in years. (By the way, you should try teaching after 2020, when most students and parents could care even less about the education system.) We have to reach that student on their level which could be years behind his/her actual grade but yet, we turn around and test them on the grade level they are in; not level ability. The education system needs a complete change and we need to go back to teaching students how to master skills not prepare for a test.

I have two grandchild one (in school now) is nonverbal autistic and one (not in school yet) that is nonverbal possible apraxia of speech (waiting on testing results), I dread when they reach third grade because of all the stress that comes with SOL testing but if this plan passes it will be even worse for them.

I feel it will hurt small schools if you lower the too small to count number from 30 to 15. This could possibly cause small schools to be in improvement. As an example: if you have 50 students taking an English SOL test and 15 of those students speak a different language making it hard for them to be proficient on the English SOL test, the school would be in improvement because the pass rate would be 70%. I do not see this as being fair. Thank you for reading my opinion.

Comments submitted on behalf of Fairfax County Public Schools (submission 2 of 3)

Thank you for the opportunity to submit public comments through this Virginia Department of Education portal. In finalizing revisions to the Revised State Template for the Consolidated State Plan (Amendment VII) under The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act, Fairfax County Public Schools (FCPS) continues to urge the Virginia Board of Education to be mindful of how outcomes will be measured for students with disabilities, including those taught using the Virginia Essentialized Standards of Learning (VESOL), and for multilingual/English learners, particularly Students with Limited or Interrupted Formal Education (SLIFE).

READINESS INDICATORS

When making decisions about Readiness indicators, FCPS urges the Board to consider how to appropriately accommodate students with disabilities and SLIFE students for whom traditional advanced courses may not be appropriate or may be accessed on an adjusted timeline. These

Readiness measures should allow adjustments or alternatives for students assigned VAAP for their state assessments.

If students transferring into the cohort late in high school will continue to be part of the high school accountability cohort, then the Ready for Life Enrollment calculation ought to accept coursework and exam scores completed outside Virginia. FCPS also asks the Board to consider continued acceptance of a student's documented completion of a high-quality work-based learning or service learning experience within the proposed Ready for Life measure for all students, particularly as accommodated options for certain students with disabilities and SLIFE students for whom currently outlined pathways may not be appropriate. FCPS likewise urges that the Board continue to provide fair weighting for employment credentials that promote access for multilingual/English learners and students with disabilities, such as the National Career Readiness Certificate (NCRC), which reflects qualification in multiple applied skills.

Furthermore, we feel it is important to include the current Graduation and Completion Index (GCI) within the Readiness indicator rather than the extended six-year graduation cohort, as a way to reflect a full range of diploma and completer outcomes for students with disabilities and multilingual/English learners (e.g., Applied Studies Diploma, High School Equivalency, Certificate of Completion) while also providing students whose individualized education program (IEP) teams or EL committees have determined additional time is needed in high school to prepare for postsecondary success.

N-SIZE

FCPS asks the Board to reconsider the proposed reduction of the n-size for accountability to maintain the current 30-student minimum. Lowering the n-size to 15, as proposed, paired with the proposal to reduce school performance category levels for schools under federal Targeted Support. While each individual student's performance is of great import for our work as educators, the significant impact of a single student's outcomes on an accountability measure would not provide adequate allowance for the unique circumstances an individual student may be experiencing. With a reduction to n-size 15, the passing or failing result for each individual student would shift a school's indicator rate by up to 7 percentage points. While again highlighting the importance of focusing on the achievement of every individual student, it is vastly different to label an entire school as needing improvement when a subgroup of 15 students falls below benchmark in a school of 250 total students (6% of that school's population) than it is to label a school where a subgroup of 15 students falls below benchmark in a school of 2,500 total students (0.6% of that school's population).

Thank you again for this opportunity to provide input in the process and we appreciate your consideration.

Topic: Exemption of English Learners by Time of Entry

Total Number of Comments:

28

I have recently moved from one VA district to another in the Norther VA area. In my new district--one that is known for its diversity of cultures--I am more aware than ever the need for adequate support for learners of English.

One of the primary goals of the new school performance and support framework is to ensure that schools and students receive the necessary resources to improve outcomes. Currently, Virginia's accreditation system excludes English learners for 11 semesters—approximately 5.5 years—leaving an estimated 35,000 students without targeted support. Under the revised framework, state and federal requirements will be aligned, and English learners will be included after just 3 semesters, or 1.5 years. This change is vital, as research shows that delaying support for 5.5 years significantly reduces the chances of English learners becoming proficient in English. By providing targeted support earlier, we can help English learners and the schools serving them achieve success more quickly.

I write in support of the revisions to the Consolidated State Plan under ESSA for the proposed School Performance and Support Framework.

The current combined accreditation and accountability system is not working. Despite the plunge in student achievement scores post-COVID, the overwhelming majority of Virginia's schools are nonetheless deemed to be performing at the highest level. Families and communities need an honest and transparent accounting of school performance so that they can advocate for improvements within their schools.

I support the Framework's emphasis on mastery over growth. While growth is important, we need students to actually achieve proficiency, not just journey toward it. I also support giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress academically, we need them to be at school. I also strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential. Lastly, it is important to hold schools accountable for newly arrived English Learners to ensure that they are building content knowledge as well as English proficiency.

Thank you for the opportunity to provide comments to the revisions to the Consolidated State Plan under ESSA and for the excellent work that has been done with the School Performance and Support Framework.

Do not reduce the time ESOL students have to acquire English. Right now they have eleven semesters before their SOLs count which is in line with research. Research states that it takes five to seven years for language acquisition. Would any of you be able to move to another country, and take a test -in their language within a year and a half of being there if no one in your home spoke that language? Now add on that you had no formal education before getting to that country. Now add on that the alphabet of the country is not like yours. Let's stay I move you to Korea or India.

In a study of the highest achieving ELL schools in California, Stanford University researchers determined it takes 4-7 years for a child to become proficient in English language. Why would we

change the requirement to take an SOL after 3 semesters of ELL (barely 18 mos) vice the current requirement of 11 semesters (5.5 years)? Are we intending to let these ELL kids fail their SOLs, resulting in accreditation losses and possibly the loss of Federal funding? While the SOLs are nonsense in the first place, causing extreme stress and anxiety for students and staff, adding this layer of stress to students already dealing with major life changes and possible trauma is not in the best interest of students, staff, or Virginia schools. These are children; they deserve the best possible start when they enter school. The proposed change will tank SOL scores, stifle learning environments, deplete already stretched resources, taint the student-teacher relationship, and leave our schools even more underfunded than they are currently. Reconsider this change and follow the proven research vice the political motives.

English Language learners should continue to be given 11 semesters to gain the language skills necessary for SOL scores to count. The research is clear that it takes students 5-7 years to gain language proficiency equal to their English speaking peers. Changing the criteria when the research suggests otherwise will only hinder students language growth.

I would like to comment on the change from English Learners' accredation requirements from 11 semesters to 3. Though we wish language acquisition were instantaneous, the human brain does not work that way. Research shows that takes at least 5 to 7 years to effectively learn a language, sometimes longer. Giving our English Learners the opportunity to learn the language across multiple years (i.e., 11 semesters) is not only best practice in education, but also provides justice for our students. In Virginia we are using the latest research to drive many instructional decisions (science of reading especially), so let's use research to make this one as well. Changing this practice makes it appear that Virginia lawmakers are out to get English Learners and their families, and that simply cannot be! Virginia, we are better than this! In this Commonwealth, diversity is our strength and we must honor the contributions our of English Learners by giving them time to learn the language before being subjected to state assessment requirements. The previously accepted 11 semesters is an appropriate amount of time for our English Learners to prepare for accredation requirements. Please respect our students and change the requirement back to 11 semesters. Thank you.

Requiring our ESOL students to pass state tests after less than 2 years of English language learning is unreasonable, discriminatory, and mean. Please use actual research about how long it takes students to become fluent in English and change this ridiculous requirement for students, teachers, and schools.

This goes against all research for ELL students. Research states it takes anywhere from 5 to 7 years for language acquisition. This is another attack by the governor on teachers to be able to blame educators by creating a system set up for failure.

The feedback is like to offer is in regards to the new accountability, particularly for our ELL students. The old guidelines gave the students 11 semesters, the new guidelines are shortened to only3. The old would equate to 5.5 years, the new 1.5 years. Research has shown that it takes children 1-3 years to learn social language and 5-7 years for academic language. This goes against many language acquisition theories as well as research. Please rethink those guidelines and extend thd timeframe back yo 11 semesters. Thank you for your consideration.

Regarding decreasing the number of semesters expected for mastery of the English language which affects school accreditation; I challenge each of you to do the same with another language and see if you could pass a reading SOL after 3 semesters. This decrease would severely affect our ELL populations and a realistic assessment of our schools. Support ALL the students! Support PUBLIC education!

Have you tried to learn a new language? Have you had to move your family from your home given 30 minutes to gather what you can to live in a new country? That's a lot of stress. Now students are learning English and expected to succeed in school. Research shows it takes 5-7 years to acquire a new language with proficiency. Why would you think it's a good idea to change the Every Student Succeeds Act to 3 semesters and count the Sol's taken by these students? Do you want these students to fail. It seems like that is the goal here. The Sol tests are tough enough for English speaking students and we know that English is a very difficult language to learn. This makes absolutely no sense to me. I have been an educator for 41 years in the Elementary level and I now work with an Afghan refugee family, tutoring the school age children. Changing Every Student Succeeds Act to 3 Semesters is NOT in the best interest of students, families or schools. I hope you reconsider your position and think of the students. Put YOURSELF in their shoes.

Pertaining to the change in accreditation for our English Language Learner Students across Virginia: Instead of them having 11 semesters to acquire their language and their SOL to count toward accreditation, you want to change it to 3 semesters. Research says it takes a minimum of 5-7 years for proficient language acquisition, so why do you want our students' SOL tests to count in less than two years? This is not what is best for our students or schools.

Respectfully, Rhonda Kapus - ESOL teacher

I write in support of the revisions to the Consolidated State Plan under ESSA for the proposed School Performance and Support Framework.

The current combined accreditation and accountability system is not working. Despite the plunge in student achievement scores post-COVID, the overwhelming majority of Virginia's schools are nonetheless deemed to be performing at the highest level. Families and communities need an honest and transparent accounting of school performance so that they can advocate for improvements within their schools.

I support the Framework's emphasis on mastery over growth. While growth is important, we need students to actually achieve proficiency, not just journey toward it. I also support giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress academically, we need them to be at school. I also strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential. Lastly, it is important to hold schools accountable for newly arrived English Learners to ensure that they are building content knowledge as well as English proficiency.

Thank you for the opportunity to provide comments to the revisions to the Consolidated State Plan under ESSA and for the excellent work that has been done with the School Performance and Support Framework.

Topic: Weighting of Mastery Index

Total Number of Comments:

21

I write in strong support of the proposed ESSA State Plan and its revised School Performance and Support Framework. Virginia needs an accountability and support system that is transparent, provides an accurate accounting of school performance, and ensures support is directed to schools most in need. The proposed ESSA State Plan does just that. It emphasizes the importance of content mastery which is the ultimate goal of elementary and secondary education. It rightly emphasizes the importance of reducing chronic absenteeism; students cannot achieve if they are not in school. It incentivizes schools to develop students to their maximum potential via the advanced coursework metric and by giving credit to schools whose students achieve pass advanced on their SOL exams. It ensures that schools are held accountable for Virginia's recently arrived English Learners, both for content mastery and language acquisition. It will also increase district accountability for all student groups by lowering the minimum number of students for accountability purposes.

Virginia has invested considerable time and thought into the development of its School Performance and Support Framework and its ESSA State Plan. These plans hold great promise for boosting achievement and enhancing post-secondary success for all Virginia students. Thank you for your excellent efforts.

Bravo for the explicit focus on and weighting given to mastery. Of course a school's success in producing growth is essential but at day's end what determines a child's future is the extent to which he/she has actually met standards, mastered the requisite skills and knowledge and gained the wherewithal to succeed in the real world. Schools that cannot cause that to happen should not be viewed as entirely successful. "Growth" is a measure of means, "mastery" the gauge of ends.

I support the revisions to the Consolidated State Plan for the proposed School Performance and Support Framework.

The current combined accreditation and accountability system is not working. Despite the recent plunge in student achievement scores, the majority of Virginia's schools are deemed to be performing at the highest level.

Families and communities need an honest and transparent accounting of school performance so that they can advocate for improvements within their schools.

I support the Framework's emphasis on mastery over growth. While growth is important, we need students to actually achieve proficiency, not just journey toward it.

I support giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress academically, we need them to be at school.

I strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential.

I agree wholeheartedly support the proposed School Performance and Support Framework. I agree with the changes the State BOE has made and I want them to stay the course. Do not bend, do not lower any performance standard or criteria for school accreditation. Stay with the higher expectation

for the Mastery Component within the Academic Achievement Indicator. I would favor getting rid of any growth component indicator. We need to elevate our expectations to ensure our students strive for higher achievements. The Board of Education has implemented the reforms many educators and school board leaders, including myself, have long advocated for. We rely on you to be bold and courageous, demonstrating to all local Virginia school boards that setting higher student expectations is the path to success. Thank you. Mrs. Sherri Story

I write in support of the revisions to the Consolidated State Plan under ESSA for the proposed School Performance and Support Framework.

The current combined accreditation and accountability system is not working. Despite the plunge in student achievement scores post-COVID, the overwhelming majority of Virginia's schools are nonetheless deemed to be performing at the highest level. Families and communities need an honest and transparent accounting of school performance so that they can advocate for improvements within their schools.

I support the Framework's emphasis on mastery over growth. While growth is important, we need students to actually achieve proficiency, not just journey toward it. I also support giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress academically, we need them to be at school. I also strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential. Lastly, it is important to hold schools accountable for newly arrived English Learners to ensure that they are building content knowledge as well as English proficiency.

Thank you for the opportunity to provide comments to the revisions to the Consolidated State Plan under ESSA and for the excellent work that has been done with the School Performance and Support Framework.

Topic: General Support

Total Number of Comments:

17

As an educator of 34 years and a newly elected School Board Member of New Kent County, I am writing to express my support for the proposed revisions to Virginia's Consolidated State Plan under the Elementary and Secondary Education Act (ESEA) and the Every Student Succeeds Act (ESSA). I appreciate that Amendment VII focuses on the first year of the School Performance and Support Framework and believe these revisions are crucial for strengthening our accountability system. I fully support the Board's efforts to improve educational outcomes for all students while maintaining high standards. Thank you for your dedication to advancing education in Virginia. I look forward to seeing the positive impact these changes will bring to all school divisions in our great Commonwealth.

The Virginia Institute for Public Policy is pleased to announce its support for the School Performance program and its accompanying Support Framework. We believe this program will be a crucial step in the ongoing fight to revitalize and improve Virginia's education system.

The Support framework addresses and corrects current failures in our education system and increases

educational accountability in the following ways.

Firstly, it advocates adopting a more transparent and comparable measure of student performance. By doing this, the federal graduation rate will provide a clearer picture of student achievement and allow for more effective identification of areas for improvement.

Next, it will prioritize equality and inclusion in education by establishing high academic expectations for all students, taking bold new measures to decrease chronic absenteeism from courses, and by providing special attention and support for students currently learning English as a second language. By doing this, the Support framework aims to address and bridge the learning gaps that disproportionately affect marginalized student populations in Virginia.

The program also promotes the development of vital mental and social skills by emphasizing the need for students to think critically, collaborate with their peers, and prepare themselves for their future careers and entry into the workforce. These vital mental and social skills equip students to succeed in today's rapidly changing world.

Lastly, the framework will improve Virginia's education system by focusing on data-driven accountability. Targeted student support will play a key role in its accomplishment. While some individuals have expressed concerns about comparing performance across districts, data-driven accountability will better Virginia's educational system by identifying the most effective results and practices, thus allocating resources more effectively. This balance between mastery and growth will ensure that educators are not just tracking students' progress but their achievements as well.

In conclusion, the School Performance and Support Framework offers a fresh, unique, and comprehensive approach to polishing and improving Virginia's education system. By embracing these reforms, we will ensure that every student has the opportunity to reach their full educational potential, achieve their goals and dreams, and work towards a bright, prosperous tomorrow for our beloved state.

I would like to voice my support for the framework regarding accreditation and the changes proposed. I write in support of the revisions to the Consolidated State Plan under ESSA for the proposed School Performance and Support Framework.

The current combined accreditation and accountability system is not working. Despite the plunge in student achievement scores post-COVID, the overwhelming majority of Virginia's schools are nonetheless deemed to be performing at the highest level. Families and communities need an honest and transparent accounting of school performance so that they can advocate for improvements within their schools.

I support the Framework's emphasis on mastery over growth. While growth is important, we need students to actually achieve proficiency, not just journey toward it. I also support giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress

academically, we need them to be at school. I also strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential. Lastly, it is important to hold schools accountable for newly arrived English Learners to ensure that they are building content knowledge as well as English proficiency.

Thank you for the opportunity to provide comments to the revisions to the Consolidated State Plan under ESSA and for the excellent work that has been done with the School Performance and Support Framework.

Im emailing in support of the revisions to the Consolidated State Plan under ESSA for the proposed School Performance and Support Framework.

The current combined accreditation and accountability system is not working. Despite the plunge in student achievement scores post-COVID, the overwhelming majority of Virginia's schools are nonetheless deemed to be performing at the highest level. Families and communities need an honest and transparent accounting of school performance so that they can advocate for improvements within their schools.

I support the Framework's emphasis on mastery over growth. While growth is important, we need students to actually achieve proficiency, not just journey toward it. I also support giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress academically, we need them to be at school. I also strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential. Lastly, it is important to hold schools accountable for newly arrived English Learners to ensure that they are building content knowledge as well as English proficiency.

Thank you for the opportunity to provide comments to the revisions to the Consolidated State Plan under ESSA and for the excellent work that has been done with the School Performance and Support Framework.

I am writing to express my support for the proposed revisions to Virginia's Consolidated State Plan under the Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA). I understand that the Board is preparing to submit Amendment VII to the United States Department of Education for approval and that this amendment focuses on changes within the first year of the School Performance and Support Framework.

I believe that the revisions in Amendment VII are essential steps toward ensuring a stronger and more effective accountability system for our schools. The focus on school performance and support reflects a commitment to improving educational outcomes for all students while maintaining high standards. I fully support the Board's efforts to continue refining and enhancing Virginia's accountability system.

Thank you for your hard work and dedication to advancing the quality of education in Virginia. I look forward to seeing the positive impact these revisions will have on our schools and students.

I am writing to express my support for the proposed revisions to Virginia's Consolidated State Plan under the Elementary and Secondary Education Act (ESEA) and the Every Student Succeeds Act (ESSA). I appreciate that Amendment VII focuses on the first year of the School Performance and Support Framework and believe these revisions are crucial for strengthening our accountability system. I fully support the Board's efforts to improve educational outcomes while maintaining high standards. Thank you for your dedication to advancing education in Virginia. I look forward to seeing the positive impact these changes will bring.

I support All of the changes VDOE is proposing

I am writing to voice my support for the proposed revisions to Virginia's Consolidated State Plan under the Elementary and Secondary Education Act (ESEA) and the Every Student Succeeds Act (ESSA). I am encouraged by Amendment VII's focus on the first year of the School Performance and Support Framework and believe these changes are vital to reinforcing our accountability system. I fully back the Board's efforts to elevate educational outcomes while upholding high standards. Thank you for your commitment to advancing education in Virginia. I look forward to the positive results these revisions will bring.

As a member of a county school board, I am very invested in the students' success in school and in their lives after school. In order to succeed, they need the opportunity to have the best education they can obtain. In order to measure this, students and schools need to be compared to other schools. Otherwise, a very good student in a lackluster school may get a spot in college over a mediocre student in a very good school. I know that "standardization" is a bad word these days, but how else can one student in one district be compared to a student in another district (or school)? Some people call it racist, but it's not. It's comparing one student to another.

I believe that SOLs are an important component to comparing students to one another. Yes, it's nice for students to "grow" during the year (MAP scores), but if a 6th grade student is reading at a 4th grade, 0 month level at the beginning of the year and "grows" to a 4th grade, 8 month level at the end of the year, should the student really be promoted to 7th grade where the material is even more complicated? Sooner or later they will finally give up, OR will have to be tutored all day (1:1). And if they get too frustrated and don't come to school, they won't learn anything.

I have heard that subjects like math aren't necessary and shouldn't be taught. Or, if taught, the students should be told there aren't any wrong answers. Speaking from experience, yes, there ARE wrong answers. Please keep teaching the important subjects which we all use every day (English, reading, math, science, history, etc.).

My county has a very good CTE curriculum and our students graduate high school with a good job in hand. Please keep that going. Of course, the basics (English, reading, math, science, history, etc.) still need to be taught and even though they don't realize it, will come in handy with their success in their chosen field.

Please keep your new accreditation framework. Keep it as stringent as it can be. Please don't give in to those that oppose it, for whatever their reason. Sometimes children and schools have to fail in order to overcome that failure and achieve amazing success! I speak from experience. Thank you for your time in reading this note and for doing the best for our future.

I write in support of the revisions to the Consolidated State Plan under ESSA for the proposed School Performance and Support Framework.

The current combined accreditation and accountability system is not working. Despite the plunge in

student achievement scores post-COVID, the overwhelming majority of Virginia's schools are nonetheless deemed to be performing at the highest level. Families and communities need an honest and transparent accounting of school performance so that they can advocate for improvements within their schools.

I support the Framework's emphasis on mastery over growth. While growth is important, we need students to actually achieve proficiency, not just journey toward it. I also support giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress academically, we need them to be at school. I also strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential. Lastly, it is important to hold schools accountable for newly arrived English Learners to ensure that they are building content knowledge as well as English proficiency.

Thank you for the opportunity to provide comments to the revisions to the Consolidated State Plan under ESSA and for the excellent work that has been done with the School Performance and Support Framework.

I write in strong support of the revisions to the Consolidated State Plan under ESSA for the proposed School Performance and Support Framework.

The current combined accreditation and accountability system is not working. Despite the plunge in student achievement scores post-COVID, the overwhelming majority of Virginia's schools are nonetheless deemed to be performing at the highest level. Parents don't know the reality of where their students are, and we're losing time in helping children gain valuable and fundamental reading, math, and writing skills.

I support the Framework's emphasis on mastery over growth. While growth is important, we need students to actually achieve proficiency, not just journey toward it. I also support giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress academically, we need them to be at school. I also strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential, and not to continue to allow our highest learners to falter, stall, and fall. Lastly, it is important to hold schools accountable for newly arrived English Learners to ensure that they are building content knowledge as well as English proficiency.

Thank you for the opportunity to provide comments to the revisions to the Consolidated State Plan under ESSA and for the excellent work that has been done with the School Performance and Support Framework.

I support all indicators above to increase transparency, accountability, and student achievement in Virginia public schools!

I support any effort that raises the bar for students. For too long, students have been socially promoted without evidence they are ready for the next level. Providing resources to students who were forced into virtual learning to no fault of their own is also very important.

The new standards are just what we need in VA. Raising expectations will help us produce excellence in our students and help give them a competitive edge in the market place. Thank you for your hard work to get the standards raise. Keep things moving in this direction.

The regular people of VA are with you!

Virginia students' SOL scores have declined sharply in the wake of the pandemic. Additionally, Virginia saw the largest drop in NAEP scores for 4th graders among all states between 2017 and 2022, with performance falling twice as much as the national average in Math and three times as much in Reading. Despite these struggles, the current accreditation system classifies 88% of schools as accredited—the highest category—in the 2023-2024 school year, giving a misleading impression of school success while students continue to fall behind. The existing accreditation and accountability systems are overly complex, obscuring true proficiency levels and depriving students of needed support. I appreciate the Board's swift action to ensure school performance is communicated clearly and that schools receive the support necessary to improve.

I am writing to express my support for the proposed revisions to Virginia's Consolidated State Plan under the Elementary and Secondary Education Act (ESEA) and the Every Student Succeeds Act (ESSA). I appreciate that Amendment VII focuses on the first year of the School Performance and Support Framework and believe these revisions are crucial for strengthening our accountability system. I fully support the Board's efforts to improve educational outcomes while maintaining high standards. Thank you for your dedication to advancing education in Virginia. I look forward to seeing the positive impact these changes will bring.

A key principle of the new school performance and support framework is to communicate school performance to the public clearly and transparently. Virginia's current accreditation and accountability systems have failed to reflect the true performance of schools, with 88% of schools being labeled as fully accredited—the highest category—in the 2023-2024 school year. The Board has now adopted clearer, more transparent language to accurately convey school performance and has set defined targets to guide all schools toward distinguished status.

I'm emailing my support of the revisions to the Consolidated State Plan under ESSA for the proposed School Performance and Support Framework.

The current combined accreditation and accountability system is not working. Despite the plunge in student achievement scores post-COVID, the overwhelming majority of Virginia's schools are nonetheless deemed to be performing at the highest level. Families and communities need an honest and transparent accounting of school performance so that they can advocate for improvements within their schools.

I support the Framework's emphasis on mastery over growth. While growth is important, we need students to actually achieve proficiency, not just journey toward it. I also support giving chronic absenteeism a meaningful weight in the performance measure. If we want students to progress academically, we need them to be at school. I also strongly support the inclusion of middle school advanced coursework in the performance measure, particularly for math. We want to incentivize schools to challenge students to their fullest potential. Lastly, it is important to hold schools

accountable for newly arrived English Learners to ensure that they are building content knowledge as well as English proficiency.

Thank you for the opportunity to provide comments to the revisions to the Consolidated State Plan under ESSA and for the excellent work that has been done with the School Performance and Support Framework.

Topic: Other

Total Number of Comments:

7

I feel that smaller class sizes creates a better atmosphere for not only learning, but for accurate data that enables teachers to reteach as needed.

During the Board of Education's July review of the new school performance framework, the 3E Readiness Framework identifies ASVAB test results as part of the Enlistment measure. The current process for school divisions to report ASVAB scores is on the CTE Credential Collection (CTECC) report submitted through SSWS. Currently, the data elements on the text file that is uploaded to SSWS require a CTE SCED code, otherwise, the upload fails. Not all students that take the ASVAB will be currently enrolled in a CTE course during the reporting year. How will school divisions report ASVAB test results for this group of students?

On page 19, the description of the mastery index calculation for high schools indicates that it will be based on the 12th grade cohort of students. Does this mean that the scores of ninth - eleventh grade students will not be made public the year they test? Only the 12th grade cohort index will be reported and placed in the achievement "bucket?" If so, I think that should be reconsidered. Students and teachers work hard to prepare for these end-of-course assessments. If a school has a 90% pass rate the year the tests are administered, but some of those students move away before 12th grade, do those scores never reflect positively on the school in which the student received the instruction? If a student moves into a high school in 11th grade, having failed their high school math SOL test already in another school in Virginia, does the receiving school get penalized for that when they had no control nor opportunity to fix it? Please clarify this. It looks as though this is what could happen, and that may not be an accurate reflection of a school.

Comments submitted on behalf of Fairfax County Public Schools (submission 3 of 3)

Thank you for the opportunity to submit public comments through this Virginia Department of Education portal. In finalizing revisions to the Revised State Template for the Consolidated State Plan (Amendment VII) under The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act, Fairfax County Public Schools (FCPS) continues to urge the Virginia Board of Education to be mindful of how outcomes will be measured for students with disabilities, including those taught using the Virginia Essentialized Standards of Learning (VESOL), and for multilingual/English learners, particularly Students with Limited or Interrupted Formal Education (SLIFE).

PARENT REFUSAL

Recognizing the importance of parent/guardian involvement and decision-making regarding their

students' education--particularly for students with disabilities and multilingual/English learners--FCPS urges the Board to maintain current calculation adjustments in cases where a parent/guardian makes the choice to refuse participation for their student in SOL or VAAP assessments. FCPS supports the current accountability approach, in which a parent/guardian refusal counts to fulfill federal participation requirements but is removed from pass rate calculations since the outcome does not reflect actual student performance. If including parent refusals in mastery calculations, we suggest that they be counted like other scores using their assigned performance level (Fail Below Basic) for the Board's adopted weighted index.,

Thank you again for this opportunity to provide input in the process and we appreciate your consideration.

Virginia's schools are working diligently to prepare students for life beyond academics. The focus on the 5 C's—critical thinking, creative thinking, communication, collaboration, and citizenship—and career exploration is essential to providing a well-rounded education. By measuring these skills in elementary and middle school through innovative performance tasks, schools can highlight the full breadth of their efforts to support student development and success.

Α