

July 13, 2017

Mr. Richard Woods
State School Superintendent
Georgia Department of Education
205 Jesse Hill Jr. Dr. SE
Atlanta, GA 30334

Dear Superintendent Woods,

On behalf of the 18 undersigned civil and human rights and community-based organizations, we write to you to outline our recommendations on the Georgia Department of Education's draft plan, *Educating Georgia's Future: Georgia's State Plan for the Every Student Succeeds Act (ESSA)*.

We believe that ESSA provides Georgians a unique opportunity to ensure that all children receive a fair, equitable, and high-quality education and to close our state's educational achievement gaps. This is especially critical for historically marginalized communities such as students of color, students who are low-income, students with disabilities and English learners.

We thank the Department for its work in developing the draft plan. We believe that this draft plan is a declaration of our state's commitment to the education of all children and the state must get this right. The undersigned organizations believe that Georgia's plan could do more to ensure the future success of all Georgia students.

Georgians want to know that our state has a robust plan to educate all students, and what to do when schools need more help. The plan should set meaningful, aggressive, and achievable goals for ensuring all of Georgia's children are prepared for future success and explain how the state will hold schools responsible for how well schools are educating our children.

It is from this lens that we provide the following recommendations for improvement:

Assessment

- **Georgia should give explicit guidance to districts and schools regarding available assessment accommodations for English learners.** The draft plan does not detail what types of accommodations are available to English learners and whether non-English speaking parents can seek information (in their native language) regarding their child's eligibility for language accommodations.
- **Georgia should allow students to take assessments in Spanish.** Although, by the state's own admission, Spanish is a language present to a significant extent, the state does not intend to provide Spanish speaking students the opportunity to take the assessments in their native language.
- **Georgia should clarify under what situations a district will be allowed a waiver of the "1% cap," and how families and community members will know if their district**

has requested a waiver. Also, what will be done if a district has inappropriately identified students (especially disproportionately students of color) for the alternate assessment. Although this is a question that is not included in the template, compliance with the cap is required by law.

- **Georgia should clarify whether non-English speaking parents were included in the feedback sessions about native language assessments.** It is not clear what family engagement strategies were used to include parents from low-income backgrounds, parents of students with disabilities and English learners.
- **Georgia should include information regarding the disability groups that were consulted during the development of the plan.** It is not clear whether disability groups, including parents of students with disabilities were effectively engaged.
- **To help provide a fair and accurate picture of school success and how well individual subgroups of students are being served, Georgia should describe how it will ensure that all students are included in the statewide assessment, especially historically marginalized students.** Georgia should include information about efforts that will be taken to ensure that schools meet the 95% participation rate as required by law. (Additional concerns regarding the 95% participation rate are included below).

Long Term Goals

- **Georgia should set high expectations for all students and include more ambitious long-term goals that are the same for all groups of students.** While faster progress is expected of individual student subgroups, we are concerned that the long-term goals are not the same for all students. Setting different expectations for different groups of students sends the wrong message and gives the impression that not all students deserve to be held to the same high standards. We also believe that more ambitious goals are achievable and are critical for improving student academic performance.

Accountability

- **Georgia should include the disaggregated performance of each student subgroup on each indicator in the final rating given to schools. Georgia should ensure that school ratings reflect the performance of each student subgroup, and not just school wide averages.** In the proposed draft plan, the only indicator where disaggregated performance matters is in the “closing gaps” indicator. However, this indicator only measures whether schools are improving proficiency rates for all students for each student subgroup. This means that schools are not being held responsible for the disaggregated performance of individual student subgroups on each of the indicators in the system. The law requires that schools are held accountable for the achievement of ALL students.
- **Georgia should separate the English Language Proficiency (ELP) indicator from the “progress indicator”.** Currently the plan includes the ELP indicator as a sub-component in the “progress indicator.” This method is not in compliance with the law and should be separated to be its own indicator. This will ensure that schools are held accountable for English language acquisition in the state of Georgia.

- **To ensure that all students are included in the assessment, Georgia should use an n-size of 15 for participation rate accountability.** The proposed n-size of 40 for participation rate is extremely problematic because many students could be routinely excluded from the assessment without consequences for the school. The plan should include information regarding the number of schools that would be excluded from accountability for assessment participation if the n size were greater than 15. **We urge the state of Georgia to require the same n-size of 15 uniformly throughout its accountability plan.**
- **To improve educational outcomes for historically marginalized students, Georgia should not use Student Growth Percentiles, (SGPs), to measure student growth but instead use criterion referenced growth calculations, such as an “adequate growth percentile,” in its accountability framework as the academic progress indicator.** The use of SGPs are problematic because it doesn’t tell you how a student or group is performing when compared with the state standards. Comparing students or groups to other similar students or groups, does not result in meaningful data and does not tell us whether these students are on track to be college and career ready.
- **Georgia should clearly define each of its indicators and the method for combining sub-components into indicators.** The draft plan includes the “readiness indicator” which has six additional sub-components, but it is not clear how much value each sub-component has. Georgia should clarify how these calculations will be made.
- **Georgia should separate the 4-year ACGR and the 5-year ACGR, to ensure high expectations for graduating students on time.** While Georgia places greater weight on the 4-year ACGR (two thirds) than the 5-year ACGR (one third), the two are combined in the “graduation rate” indicator.
- **Georgia should indicate how English learner advocates, disability groups, parents who are low-income and parents of color will be engaged in developing strategies that are culturally sensitive and proven to increase student achievement.**

Identification for schools needing support and improvement

- **Georgia should integrate subgroup student performance in the CCRPI framework so that there is greater alignment between the CCRPI index score and identification as a school in need of targeted support and improvement.** As mentioned earlier, the proposed plan does not include the performance of individual student subgroups. Georgia should include these student subgroups in the CCRPI framework to ensure that schools are held accountable for the academic achievement of ALL students.
- **Georgia should include outreach efforts to meaningfully engage parents from marginalized communities and ensure that they are included in the development of school improvement plans.** While the plan recognizes that that the state’s underperforming schools are primarily located in underserved communities and that

meaningful actions are necessary to “break the cycle,” it is not clear *how and what* steps will be taken to engage this community. We strongly recommend that Georgia consult civil rights organizations for support in using demonstrated strategies that have successfully contributed towards the decline of systemic barriers faced by families in these communities.

School Improvement Efforts

- **Georgia should clarify whether the school improvement plans will be made available to the public and whether there will be meaningful stakeholder engagement that includes historically marginalized communities, especially parents of color, parents of students with disabilities and non-English speaking parents in developing those plans.** The draft plan mentions that stakeholder engagement will be included when developing school improvement plans, but does not provide enough detail about *how* this process will take shape. We have outstanding questions in this section including: what are the requirements for schools gathering feedback for their improvement plans and what platform will be used to communicate about this to families?
- **Georgia should also ensure that any information about school improvement efforts is translated into the parent’s language and available in user-friendly formats to parents of English learners, parents with disabilities and low-income parents.** Access to data is an important advocacy tool to advance educational equity and it’s essential for the public to identify areas where schools or districts need to improve. Although the draft plan recognizes that the disproportionate number of underperforming schools in underserved communities is an issue, it does not provide intentional steps to ensure that data and information is translated into languages other than English.

Access to Quality Educators

- **Georgia should provide definitions for ineffective, out-of-field and inexperienced teachers as required by law. Georgia should also clarify what efforts will be taken to address inequitable access to strong teachers for low-income students and students of color.** Most of the information included in this section addresses the data that will be reported to districts and schools (the plan references the online equity dashboard that will be launched next year) but does not include current disaggregated data regarding the effectiveness, experience and background of teachers, especially in historically underserved communities. This data is extremely important as research shows that students of color are disproportionately taught by ineffective teachers. To help rectify these disparities, Georgia should provide current disaggregated data and provide definitions for ineffective, out-of-field and inexperienced teachers. These definitions will provide additional clarity to LEA’s when they develop their annual reports to stakeholders.

School Conditions

- **Georgia should define what a “safe and respectful school climate” is and whether it employs approaches that address the overuse of exclusionary discipline practices**

and seclusion and restraint, especially for marginalized students, students of color, and students with disabilities.

School Transitions

- **Georgia should include evidence of engaging parents of students with disabilities in the State Systemic Improvement Plan (SSIP).** Georgia should be commended for taking steps towards remedying graduation rate outcomes for students with disabilities, and should go further to include effective strategies it will employ to engage parents and families of students with disabilities in the development of these plans.

Additional recommendations:

- **Georgia should clarify whether ESSA materials, including the draft of this plan, will be made available in languages other than English and whether translation services were provided to non-English speaking parents and accommodations given parents with disabilities during the stakeholder engagement process.**
- **Georgia should clarify the type of technical assistance that will be provided to districts applying and acquiring Title I and Title IV funding.**
- **Georgia should clarify how it will ensure that high-poverty schools will receive equal state and local funding as low-poverty schools.**
- **Georgia should clarify what strategies will be employed to ensure that all data is reported in a way that is easy to understand and accessible to parents, especially information about school discipline, access to advanced placement courses and school funding.**

We thank you for the opportunity to provide feedback on the state ESSA draft.

Sincerely,

Center for Pan Asian Community Services
Georgia Coalition for the People's Agenda
Urban League of Greater Atlanta
Absolute Body Symmetry
Bauch Marketing
College Park Community Coalition, Inc.
Friends of Refugees
Georgia NAACP
Global Village Project
The Jamaal Addison Motivational Foundation Inc.
Mayor Ted Terry, City of Clarkston
MC Healthcare Inc.
Positive Growth Education Center
Public Eye Relations

SOSI- Saving Our Sons & Sisters International
The Tomorrows, LLC.
Truly Living Well Center for Natural Urban Agriculture
Understood