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Commissioner Pam Stewart
Florida Department of Education
Turlington Building, Suite 1514
325 West Gaines Street
Tallahassee, Florida 32399

RE: Florida Public Comment Window Open for Every Student Succeeds Act (ESSA)

Dear Commissioner Stewart:

The Florida Chamber of Commerce is Florida's largest federation of employers, local chambers, and trade associations; we are focused on securing Florida's future. That means making choices for Florida that will ensure our students are the best prepared students in America. Every year, one of the top issues identified by our members is to continually close the gap between our educational outcomes and the needs of Florida's employers. Too often, Florida's employers have difficulty finding and hiring qualified talent. It is clear that talent is quickly replacing tax incentives as the most important tool for the continued economic development of our great state.

The Florida Chamber Foundation's researchers estimate that by 2030, Florida will add six million more residents and we will need to create two million more jobs. Education is the key to every single one of those jobs. Education and economic development go hand-in-hand.

The President signed the "Every Student Succeeds Act" (ESSA) on December 10, replacing the 2001 Elementary and Secondary Education Act – No Child Left Behind (NCLB). The headline is that the responsibility for creating state accountability systems now rests with each state. The federal government is no longer going to dictate the criteria, goals, or metrics, nor are they going to dictate specific interventions for chronically underperforming schools. It is a huge victory for state control and an enormous call to action. Holding the line on the hard fought victories that focus schools on outcomes for every student—centered around high academic standards, rigorous coursework, end of year assessments aligned to standards, and closing the achievement gap—has never been more critical.

Florida has gone from one of the worst-performing states in the nation to the top quartile in K-12 academic achievement over the past 15 years. Our graduation rate is at a 12-year high and Florida is ranked third in the nation with the percentage of students passing Advanced Placement exams.

(ESSA) gives states greater flexibility and control over their accountability systems, which is important for each state to meet the unique needs of their students. However, states with strong accountability systems that measure student learning gains and other academic factors, like Florida, are at risk of backsliding.

Many groups see this new flexibility as a way to water down the way we measure student success. We need to stay the course and continue with our rigorous K-12 accountability systems that focus on student outcomes and give parents easily understandable information on their children's schools.

Securing Florida's Future

There is still more work to do, not less. Florida needs to continue championing education reforms that ensure students are globally competitive and prepared for success in college, career and in life.

The following are key principles for your consideration:

- **Student achievement must be the driving force:** ESSA requires states to use multiple measures as part of their new accountability systems. While academic indicators must constitute a “much greater” proportion of the system, there is still much leeway for states to weigh non-academic indicators in a manner that masks whether schools are truly successful in ensuring their students are on track to be college and/or career ready. There is an opportunity for the business community to be a strong voice to ensure these new index systems are focused on meaningful academic outcomes instead of questionable inputs, such as teacher surveys and average daily attendance.
- **What is measured matters.** States with strong longitudinal data systems measuring “college ready” indicators will be in a position of strength. Strong academic indicators include:
 - ✓ Student Achievement in Math and English as measured in years 3-8 and once in high school
 - ✓ Student Achievement Growth to promote continuous improvement for all students and ensure that schools serving those students most in need are not penalized
 - ✓ Graduation Rates
 - ✓ Postsecondary and Career Readiness - AP, IB, college going rates, dual credit, vocational certificates, remediation rates (not required under the law)
- **States must set challenging and meaningful goals.** The new law continues the requirement that student achievement be reported by race, income, and special needs. Goals need to be set at the state, district, and school level every year. While there is no longer a 100% proficiency requirement as mandated under NCLB, states will still need to set clear, high goals that are both realistic and challenging for students.
- **High standards and aligned assessments should be the foundation of a strong accountability system.** ESSA requires “high standards aligned to entrance requirements for credit-bearing coursework in the system of public higher education in the State and relevant State career and technical education standards.” How this new language impacts states that have adopted college- and career-ready standards over the last several years is something we will be watching closely. The law also affirmatively prohibits any federal official, including the Secretary of Education, from mandating or incentivizing states to adopt or maintain any particular set of standards, including the Common Core, which the bill language explicitly names. At the same time, it does not prohibit states from adopting Common Core.
- **Teachers and parents must be provided real information that is accessible, actionable and improves instruction.** ESSA continues the requirement for school report cards and expands the type of information that will be available to parents, students, and the public. However, current report cards have proven to be overly complex and are often presented in a way that is not useful. The business community can play a role working with states to ensure that data is not only available, but that it is presented in a meaningful way to help inform parents –particularly as they are making academic decisions for their child.
- **States will no longer be required to maintain teacher evaluations systems.** NCLB mandated that all teachers must be highly qualified, with the goal of addressing the teacher equity problem, wherein the least qualified teachers were disproportionately instructing the most disadvantaged students. NCLB did not go so far as to require teacher evaluation systems. However, the Department of Education, under the waiver system, did require states to develop and implement teacher evaluation systems in order to receive flexibility from the law. ESSA **does not prohibit** states from implementing teacher evaluation systems and, in fact, allows funds to be used to implement teacher and leader evaluation systems and to develop mechanisms for effectively recruiting and retaining highly effective teachers.

- **There must be rigorous interventions based on proven practice implemented in the lowest performing schools.** ESSA no longer prescribes the specific interventions low-performing schools must implement. Instead, districts and, in some cases, schools will be driving these decisions, while states will be required to provide oversight. The business community can play a role in ensuring that schools, districts and states are truly meeting the intent that interventions are meaningful and holding schools accountable.
- **More choices of schools for parents and families.** ESSA also provides flexibility for states to promote choice programs, such as course selection for students in low-performing schools to access courses otherwise not available in their school, seek tutoring, or have transportation provided if they enroll in other public schools. The law also creates new opportunities for states to promote or expand charter schools.

The Florida Chamber of Commerce, which serves as the voice of job creators all over Florida, has consistently advocated for several key principles when it comes to meaningful education reform: high quality standards and annual assessments, transparency of student outcomes and school performance, accountability for the academic achievement of all students, consequences for low performing schools, and more choices for students and families.

ESSA requires the development of a state plan describing how Florida will implement the new law. The business community has an opportunity to be part of this process and has a role to play in helping to shape new state accountability systems; we stand ready to assist you in making Florida the most competitive state in America.

Sincerely,



Brittney Hunt
Director of Talent, Education, and Quality of Life Policy
Florida Chamber of Commerce

CC: Mark Wilson, President & CEO, Florida Chamber of Commerce