



400 Atlantic Avenue, Boston, MA 02110 • tel 617-737-3122 fax 617-737-3126 • www.mbae.org

Statement of the Massachusetts Business Alliance for Education regarding Massachusetts ESEA Flexibility Proposal – November 2, 2011

The Massachusetts Business Alliance for Education (MBAE) is committed to a high quality public education system that will prepare all students to engage successfully in a global economy and society. As business leaders, our relentless focus is ensuring that all students graduate from high school prepared to meet the demands of college, career and citizenship. Our position on the Massachusetts proposal for a waiver from the requirements of the Elementary and Secondary Education Act (ESEA) reflects that same focus.

In the absence of Congressional action to reauthorize and update ESEA, MBAE supports the Board of Elementary and Secondary Education's decision to seek a waiver from the current provisions of ESEA (also known as No Child Left Behind or NCLB) that categorize 81% of Massachusetts schools, across 90% of the Commonwealth's districts as failing to meet Adequate Yearly Progress (AYP). We agree with Commissioner Mitchell Chester's assessment in his October 14 Memorandum to the Board¹ that "AYP is not reflective of the proportion of schools that are stagnant or faltering" and is therefore "of little value in identifying those that are most in need of resource-intensive intervention."

The risk of federal sanctions, including loss of education funding, for not meeting the 2014 deadline for "all students at proficiency levels" makes it prudent to seek a waiver. Our support is conditioned on the Commissioner's assurance that he has "no interest in watering down our standards and expectations" and that he plans to continue the state's vigorous support of high standards, rewards for strong performance, and aggressive pursuit of continuous improvement.

On this basis, MBAE responds to the four issues raised for public comment:

- Is the Department's goal of reducing the proficiency gap by half by 2016-17 ambitious, yet attainable?

The right question might better be: how will reducing the proficiency gap by half by 2016-2017 raise student achievement across the board to prepare every student for the postsecondary training essential for gainful employment? Massachusetts is projected to be the top state in the nation by 2018 for jobs requiring bachelor's degrees, with over two-thirds of jobs here continuing to require some postsecondary training.² The only way Massachusetts can maintain a competitive edge is to produce more citizens with degrees. We can't afford to get this wrong.

¹ Accessed at: http://www.doe.mass.edu/boe/docs/1011/item2_spec_item1.html

² Anthony P. Carnevale, Nicole Smith and Jeff Stohl, [Help Wanted: Projections of Job and Education Requirements through 2018](#) (The Georgetown University Center on Education and the Workforce, June 2010)

The DESE proposes that the "Goal is same for all; targets are differentiated". The one-size-fits-all approach used by NCLB has proven ineffective; why continue to use it? The state should instead set a floor and a growth goal for student proficiency. So, every district would have to get to a minimum goal (a percentage dictated by the data, that is also ambitious – at least 80%) either by cutting the proficiency gap *at least* in half or meeting the floor, whichever is higher.

- Does the Department's approach to measuring school and district progress make sense?

We agree with the five criteria to be used for Annual Measureable Objectives (AMO) but this approach will only make sense if targets are set high enough. As stated above, the Department should encourage targets that bring all students to proficiency as quickly as possible. For schools with small gaps, the 50% target may not be ambitious enough. For example, schools with a gap of less than 10% for all students or any sub-group should have an accelerated timetable for meeting not only a 5% increase, or about 1% each year, but 100% proficiency.

- Will the proposed interventions meet the needs of districts and schools?

Even our highest performing schools produce too few graduates with the skills and knowledge to meet current (and future) job demands. We therefore do not agree with establishing a "No Level" category. Proficiency is a floor, not a ceiling. Our schools should be bringing all students to proficiency while continuing to raise achievement. The five-level accountability system should be maintained, with the highest performing schools comprising Level 1.

We agree with the classification of Priority, Focus and Commendation schools.

- Concerns about aspects of the proposal and what the state would have to do to alleviate this concern

All of the intentions of the system proposed in the waiver depend upon the capacity of the Department to provide the oversight and support needed to reach the goal of delivering a world class education. As the representative of the business community on the Accountability and Assistance Advisory Council, and with a Board member chairing it, MBAE has had an opportunity to help shape the state's accountability system. We understand the frustration of districts coping with the confusion, duplication and drain on resources created by the current dual system of state and federal requirements. We therefore support the opportunity for a unitary system, but only if that system is fully operational. As Council members, we have repeatedly expressed concern about underfunding the accountability work required by statute and the reduced number of random district reviews. Similarly, we have questioned the capacity of the regional centers to provide the assistance required for sustained improvements. MBAE would like to see evidence of an explicit and strong commitment to provide the resources required to conduct the 40 district reviews mandated by law, and to give regional centers the staff and authority necessary to make a real difference.

For additional information, please contact:

Linda M. Noonan, Executive Director
Linda.Noonan@mbae.org 617-737-3122