



INDIANA STATE BOARD OF EDUCATION

Public Comment Summary: LSA Document #18-7

Current As Of: 3/16/18

Total Comments Received: 219

Individuals Submitting Comments: 188

Top Issue: Academic Progress – High School, Elimination of Growth

Applicability

Total Comments: 3 | Top Issue: General – Delay Implementation

Citations Affected: 511 IAC 6.2-10-0.5; 511 IAC 6.2-11-1

- **General:** [100], [112], [130]

Overall Framework

Total Comments: 62 | Top Issue: High School – Elimination of Growth

Citations Affected: 511 IAC 6.2-11-3

- **Indicator Weights:** [7], [18], [71], [74], [98], [122], [133], [150], [188], [189]
- **Elementary/Middle School:** [135], [136], [140], [171], [174], [178], [185], [215]
- **High School:** [14], [21], [28], [38], [66], [91], [93], [94], [95], [96], [99], [100], [102], [103], [106], [110], [111], [118], [120], [122], [123], [124], [131], [134], [137], [138], [139], [142], [143], [144], [145], [152], [153], [158], [159], [183], [199], [209], [210]
- **General:** [96], [98], [103], [105], [215]

Academic Achievement - Proficiency

Total Comments: 54 | Top Issue: Calculation – Use of Multiplier/Goal Factor

Citations Affected: 511 IAC 6.2-11-3; 511 IAC 6.2-11-5

- **Indicator Weight:** [7], [23], [69], [79], [105], [113], [122], [174], [188]
- **Calculation:** [11], [14], [21], [29], [69], [79], [82], [91], [94], [97], [99], [100], [102], [118], [120], [123], [124], [148], [151], [180], [183], [192], [199]
- **SAT College & Career Ready Benchmark:** [11], [14], [69], [91], [94], [95], [97], [99], [100], [102], [110], [111], [118], [120], [123], [124], [183], [199]
- **General:** [77], [95], [105], [113]

Academic Progress - Growth	
Total Comments: 138	Top Issue: High School – Elimination of Growth
Citations Affected: 511 IAC 6.2-11-3; 511 IAC 6.2-11-6	

- **Indicator Weight:** [23], [38], [73], [80], [105], [113], [114], [133], [150], [163], [208], [209]
- **Calculation:** [40], [82], [105], [113], [117], [118], [123], [124], [180]
- **Growth Caps:** [6], [12], [13], [14], [19], [23], [24], [26], [28], [29], [37], [40], [63], [105], [107], [113], [118], [123], [124], [135], [136], [140], [157], [158], [159], [166], [169], [171], [178], [185], [191], [192], [193], [195], [197], [199], [200], [202], [208], [210], [214], [218]
- **Elementary/Middle School:** [11], [135], [136], [140], [174]
- **High School:** [10], [21], [28], [38], [66], [82], [91], [93], [94], [96], [99], [100], [102], [103], [105], [117], [118], [120], [122], [123], [124], [131], [134], [137], [138], [139], [140], [142], [143], [144], [145], [151], [152], [153], [158], [159], [183], [190], [191], [199], [202], [209], [210], [215]
- **General:** [4], [10], [30], [42], [67], [73], [75], [77], [95], [104], [106], [116], [121], [122], [134], [135], [136], [137], [140], [149], [158], [189], [193], [211], [214], [215]

Graduation Rate	
Total Comments: 10	Top Issue: Calculation – Students Included/Excluded
Citations Affected: 511 IAC 6.2-11-7	

- **Indicator Weight:** [180]
- **Calculation:** [28], [71], [91], [103], [106]
- **General:** [18], [137], [156], [215]

English Language Proficiency	
Total Comments: 6	Top Issue: Indicator Weight; General
Citations Affected: 511 IAC 6.2-11-3; 511 IAC 6.2-11-8	

- **Indicator Weight:** [63], [122], [180]
- **Calculation:** ---
- **General:** [139], [149], [199]

Chronic Absenteeism	
Total Comments: 8	Top Issue: General - Opposition
Citations Affected: 511 IAC 6.2-11-9	

- **Indicator Weight:** ---
- **Calculation:** [180]
- **General:** [73], [95], [141], [149], [150], [152], [205]

College & Career Readiness

Total Comments: 13 | Top Issue: Graduation Pathways

Citations Affected: 511 IAC 6.2-11-10

- Indicator Weight: ---
- Calculation: ---
- Graduation Pathways: [15], [32], [99], [119], [120], [132], [154], [176], [183], [196], [199], [210]
- General: [196]

Well-Rounded Education

Total Comments: 17 | Top Issue: General - Opposition

Citations Affected: 511 IAC 6.2-11-11

- Indicator Weight: [63]
- Calculation: [122], [131], [149]
- General: [6], [28], [60], [63], [97], [134], [135], [136], [140], [154], [180], [191], [199]

High School On-Track

Total Comments: 30 | Top Issue: General - Support

Citations Affected: 511 IAC 6.2-11-12

- Indicator Weight: [7], [180]
- Calculation: [7], [69], [71], [97], [111], [151]
- General: [5], [16], [17], [20], [22], [28], [69], [79], [82], [91], [97], [99], [111], [122], [137], [138], [151], [191], [199], [202], [214], [215]

Performance Goals

Total Comments: 0 | Top Issue: N/A

Citations Affected: 511 IAC 6.2-11-13

- Model Attendee Goal: ---
- College & Career Readiness Achievement Goal: ---
- High School On-Track Achievement Goal: ---

New Schools

Total Comments: 0 | Top Issue: N/A

Citations Affected: 511 IAC 6.2-11-15

- General: ---

Small Schools	
Total Comments: 1	Top Issue: General – Opposition to Null Grades
Citations Affected: 511 IAC 6.2-11-16	

- **General:** [123]

Accountability - General	
Total Comments: 52	Top Issue: General
Citations Affected: 511 IAC 6.2-11	

- **Testing:** [1], [31], [34], [35], [39], [78], [87], [89], [92], [102], [135], [136], [140], [164], [165], [175]
- **A through F Grades:** [135], [136], [140], [150], [155], [156], [171], [175], [178], [185], [217], [219]
- **General:** [8], [11], [15], [27], [33], [69], [73], [94], [100], [101], [106], [107], [111], [113], [123], [138], [139], [155], [183], [209], [210], [214], [217], [219]

Assessments	
Total Comments: 40	Top Issue: SAT/ACT - Concerns
Citations Affected: N/A	

- **ISTEP/ILEARN:** [39], [139], [178], [180], [185], [215]
- **SAT/ACT:** [15], [32], [41], [59], [75], [97], [117], [118], [120], [123], [124], [131], [148], [151], [159], [176], [179], [180], [182], [183], [186], [187], [199], [214]
- **General:** [1], [33], [76], [92], [98], [104], [149], [164], [189], [213]

Other	
Total Comments: 64	Top Issue: State ESSA Plan - Support
Citations Affected: N/A	

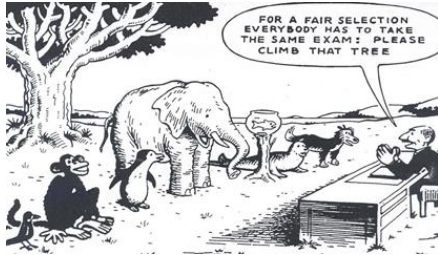
- **General:** [2], [4], [13], [36], [60], [61], [68], [72], [97], [108], [109], [112], [115], [126], [129], [130], [132], [142], [143], [144], [145], [153], [159], [172], [173], [179], [207]
- **State ESSA Plan:** [14], [28], [44], [45], [46], [47], [48], [49], [50], [54], [55], [56], [58], [60], [62], [64], [65], [70], [79], [81], [90], [112], [122], [124], [126], [127], [128], [131], [148], [154], [160], [161], [162], [168], [191], [202], [214]

Summary of Comments:

[1] Amy Wojasinski

Believes standardized tests should not define or label a child.

[2], [3] Lance Garvin



[4] Duane L. Davis – *Doctoral Candidate (Spring 2018), Walden University*

Believes the Proposed Rule is directed at attacking schools and teachers and pushes the GOP agenda for school choice. Believes the Proposed Rule will result in most private and charter schools will receive an “F” grade at the high school level. Suggests growth has everything to do with learning. Concerned about the use of norm-referenced test to set a benchmark for proficiency. Requests that the Board respect schools, listen, and make an accountability system based on best practices.

[5] Kim Preston – *Midwest Regional Advocacy Director, ExcellinEd*

Believes the Proposed Rule contains a drafting error (page 7, lines 10-11) with respect to the weight assigned to the On-track measure.

[6] Karen Wesely – *Principal, Charlestown Middle School*

Supports the addition of the well-rounded education indicator, as it provides weight to areas of the school beyond ELA and math. Opposes the cap on growth and believes it’s unfair to schools serving students with the toughest demographics. Urges the Board to 1) remove the cap on growth, or 2) increase the cap.

[7], [88] Tony Walker

Recommends and supports lowering the weight of the proficiency indicator to 15% at the high school level. Recommends increasing the weight of the On-track indicator. Recommends an additional On-track indicator be added to measure students through the sophomore year.

[8] Candace Hoffacker

Opposed generally to the A through F accountability system. Opposes A to F because it does not account for differences between individuals, schools, school districts, or communities. Opposes A to F because she believes it gives to the state that which should be handled by those closely involved with students and students’ families.

[9] Andy Arndt – *Principal, Prairie Heights Middle School*

No Comment Attached

[10] Tim MacIntosh – *Principal, Holy Redeemer Catholic School*

Urges the Board to consider leaving the growth model as it is now. Suggests that adjusting the manner in which points are awarded for growth is not in the best interest of schools, communities, or children. Believes the growth model, as it stands now, gives students of all abilities the opportunity to see success.

[11] Russell Degitz – *Principal, Huntington North High School*

Supports accountability, but concerned generally about the Proposed Rule. Concerned by the elimination of growth from the high school model. Concerned about capping growth in elementary and middle school. Concerned about the manner in which high school proficiency scores are calculated. Believes using an SAT cut score at or above the nation average is unrealistic. Believes the Board is sending mixed messages to schools and stakeholders by utilizing multiple accountability systems (state and federal). Believes the Board should avoid changes to the Graduation Rate Indicator if those changes will negatively impact schools. Recommends growth be measured from PSAT to SAT. Recommends adjusting the SAT cut score to align the use of SAT with initiatives for ensuring students are college and career ready. Recommends that the Board align the Proposed Rule with the State ESSA Plan. Recommends using a multiplier for calculating Graduation Rate to alleviate perceived penalties associated with students earning a certificate of completion or general diploma.

[12] Keith P. Dicke – *Principal, Northwest Elementary*

Concerned with the cap on growth being applied at the subject-level. Suggests more could be done to address drug problems that destroy families. Asks whether the Board can find ways to increase the funding available to schools.

[13] Jerry Lasky – *Principal, Union Township Middle School*

Believes the Proposed Rule demonstrates the Board's lack of respect for educators. Believes capping growth is disrespectful. Suggests capping growth will make it more stressful and difficult for students and schools to succeed. Suggests disadvantaged students feel like failures when they fail to meet achievement goals.

[14], [117] Steve Baker – *Principal, Bluffton High School*

Concerned as to why the Board deviated from the State ESSA Plan, which was approved by the U.S. Department of Education. Concerned and disappointed that 3 or 4 State Board members continually override the expertise of educators. Concerned with the subject-level caps on growth. Concerned by the elimination of growth from the high school model. Suggests measuring growth is possible from PSAT to SAT. Believes 91% of high schools in Indiana average below the college and career ready benchmark set by SAT. Suggests SAT is not an adequate assessment for high schools. Concerned that the well-rounded and high school on-track indicators were included in the Proposed Rule and suggests no review of data was conducted to determine whether the aforementioned indicators are relevant to Indiana's policy goals. Proposes implementing a cap on growth at the indicator level, as opposed to the subject level. Proposes keeping growth in the high school model while ISTEP is in place and reviewing growth from PSAT to SAT. Proposes using a multiplier to measure academic achievement.

[15] Kathleen Miltz – *Principal, Shelbyville High School*

Questions why schools would administer SAT to all students as an accountability measure. Suggests that judging high schools through the use of SAT is unfair and short sighted. Believes accountability should be based on how successfully schools implement the Graduation Pathways. Recommends the College and Career Readiness indicator score be determined by various benchmarks set by the Board. Suggests the benchmark percentages should increase every few years. Believes many of the pieces for accountability are in place as part of Graduation Pathways.

[16] Anna Chaney – *Parent*

Supports including a 9th grade on-track measure in the state accountability model. Believes the on-track measure will encourage schools to identify students that are falling behind. Believes early warning indicators, such as on-track, are more effective. Suggests a focus on getting students on-track will increase the state's overall graduation rate.

[17] Ashley Thomas – *Parent*

Supports including on-track indicator in the high school accountability system. Believes the on-track indicator will encourage schools to educate parents and students about what needs to be done to graduate before it's too late.

[18] Bob McDermott – *Educator*

Believes the Proposed Rule contains a drafting error with respect to the weight assigned to the graduation rate indicator.

[19] Chuck Werth – *Principal, Crestview Middle School*

Opposes capping growth at the subject level. Believes growth has no limits. Recommends the Proposed Rule be modified to include growth to the fullest extent ESSA allows.

[20] Shanika Davis – *Parent*

Supports the use of a high school on-track measure.

[21] Julie Hollingsworth – *Retired Educator*

Concerned that removing growth from high school creates an unlevel playing field. Believes growth represents the work teachers and schools do with students. Suggests Pathways reduced the importance of tests, and is concerned that tests no longer important to students are being used to grade schools. Recommends the State Board use a proficiency goal factor in lieu of proficiency rates.

[22] Katonga Radford – *Parent*

Supports the use on high school on-track in the accountability system. Believes high school on-track will force schools to provide support before it's too late (junior or senior year).

[23] Scott Peters – *Principal, Klondike Elementary School*

Concerned with proposed cap on growth. Believes capping growth does not reflect the actual gains students are making. Supports the equal weighting of growth and proficiency.

[24] Nicole Rich – *Teacher, Crestview Middle School*

Opposes the cap on growth.

[25] *Withdrawn*

[26] Tim Wickard – *Principal, Stout Field Elementary*

Opposes the cap on growth. Opposes capping growth at the subject level.

[27] John F. Elcesser – *Executive Director, Indiana Non-Public Education Association*

Believes language related to college and career readiness and associated fees does not adequately take into consideration the manner in which nonpublic schools operate. Points out that sections of proposed rule that relate to targeted and comprehensive support do not apply to nonpublic schools.

[28] Larry Getts – *School Board President, Garret-Keyser-Butler*

Concerned that the Proposed Rule is not aligned to the State ESSA Plan. Concerned the lack of alignment will lead to two accountability systems. Recommends capping growth at the indicator level, as opposed to the subject-matter level. Recommends maintaining growth in the high school accountability model. Recommends implementing a graduation multiplier or goal factor to account for differences in diploma types. Recommends discussing further the addition of the well-rounded education indicator and the high school on-track indicator.

[29] Lucas Fielden – *Principal, Garrett Middle School*

Opposes capping growth at 100 points. Believes growth is the only fair thing about the accountability system because all kids can grow, but not all can pass. Proposes the Board place a larger emphasis on growth. Opposes using proficiency rates to determine the academic achievement indicator score.

[30] Dr. Gloria Earl

Believes it's imperative the final rule include the concept of progress rather than a single test score. Urges the Board to focus on growth from year to year.

[31] Steve Gonser – *Retired Educator*

Believes weekly grades on assignments and projects should be used in lieu of tests to calculate school grades.

[32] Christine Hickman

Concerned about the impact the Proposed Rule will have on Choice Schools. Concerned about the impact Graduation Pathways will have on the graduation rate of smaller schools. Believes SAT/ACT scores should count towards graduation regardless of who pays for them.

[33] Sandy Einhaus

Concerned about the fact the Board will, again, be changing the process for assigning school letter grades. Opposes adding greater weight to test scores. Believes teachers should not be rated based on test scores. Believes the Proposed Rule will make teachers, administrator, schools, and students feel like failures.

[34] Toni Carter

Troubled by the fact standardized tests are used to evaluate schools. Believes tests can be used to measure whether students grow and achieve at their level but that an emphasis on scores devalues the work of students.

[35] Renee Ruocco

Opposes changes to accountability rule that would place more emphasis on test scores. Believes the Board should focus on student growth.

[36] Robin Lynch – *Principal, Oak Trace Elementary*

Questions why students with IEP's are required to take and pass ISTEP+.

[37] Deb Carlson – *Principal, Longfellow Elementary School*

Opposes capping growth at 100 points. Believes the cap on growth will be detrimental to schools with high poverty rates and large populations of transient students. Believes capping growth at 100 points means schools will not receive the full amount of points the school's students have earned.

[38] Wanda Siebert – *Teacher*

Concerned that growth is being given less weight and that growth is being eliminated from the high school accountability system.

[39] Mary Lynn Watson – *Retired Educator*

Believes the proposed rule is a bad idea. Believes the Board already places too much emphasis on test scores. Recommends a group of educators be consulted to develop a shorter, simpler test. Believes elementary students should not take tests on computers.

[40], [43] Randy S. Cripe – *Principal*

Believes capping growth at 100 points for each subject places schools at a disadvantage. Recommends the Board cap growth at the indicator level as opposed to the subject matter level. Believes capping growth means schools will not be awarded the proper amount of credit.

[41] Wayne Funk – *Vice President, GKB-CSD*

Believes school counselors are being relegated to paper processors by the State. Believes the Proposed Rule is, at best, complex and onerous. Recommends value stream mapping the proposed rule. Believes that if, as is proposed in Senate Bill 177, algebra II is replaced as a graduation requirement, requiring students to take the SAT sets them up for failure.

[42] Judy Tucker – *Educator*

Requests that the Board reconsider its decision to move away from growth and towards test scores. Concerned that under the Proposed Rule, schools in poor and rural communities start in a hole.

[44], [83] Ryan Snoddy – *Superintendent, Northwestern School Corporation*

Supports allowing schools to operate under the DOE accountability plan because the DOE accountability plan was developed by educators.

[45], [84] Maggie Hoernemann – *Superintendent, Avon Community Schools*

Recommends aligning the Proposed Rule to the State ESSA Plan. Suggests that 2 different accountability systems will cause confusion.

[46], [85] Tom Hunter – *Superintendent, Greensburg Schools*

Supports aligning the Proposed Rule to the State ESSA Plan.

[47], [86] Lucinda Douglass – *Superintendent, Caston School Corporation*

Concerned generally about the Proposed Rule. Supports aligning the Proposed Rule with the State ESSA Plan. Supports receiving 1 letter grade.

[48], [52] Ann Rice – *Assistant Superintendent, M.S.D. Steuben*

Opposes using 2 separate accountability systems. Believes schools should receive 1 letter grade. Supports the State ESSA Plan.

[49] Ron Green – *Superintendent, Shenandoah School Corp.*

Urges the State Board to rewrite the Propose Rule to match the State ESSA Plan.

[50], [51] Ruth Tobias – *Assistant Director, Vigo Schools*

Believes the Proposed Rule should match the State ESSA Plan.

[54], [57] Susan Cobb – *Covered Bridge Special Education District*

Believes the Proposed Rule should match the State ESSA Plan. Believes receiving 2 letter grades will create chaos.

[55] Bob Lichtenberger – *Superintendent, Mill Creek Community Schools*

Believes the Proposed Rule should match the State ESSA Plan.

[56] Jim Diagostino

Believes the Proposed Rule should match the State ESSA Plan.

[58] Destin L. Haas – *Superintendent, North Newton School Corporation*

Questions whether “why” has been asked when discussing the need for changing the accountability system. Wonders why the Board did not use the language submitted by the DOE to the federal government. Questions why accountability systems are tied to school funding.

[59] Linda Wiltfong – *Superintendent, South Central Community Schools*

Concerned about administering the SAT to all high school students. Suggests that valid and appropriate tests are those tests used for their intended purpose. Suggests the SAT was not intended to be used for measuring growth and proficiency.

[60] Tonya K. Weaver – *Superintendent, Garret-Keyser-Butler*

Opposed generally to the Proposed Rule. Opposes having 2 separate accountability systems. Supports the idea of a “well-rounded” measure, but opposed to more weight being placed on testing.

[61] Dr. Donovan Garletts – *Assistant Superintendent, Greencastle Community Schools*

Urges the Board to listen to educators around the state. Urges the Board to listen to the Superintendent of Public Instruction.

[62] Ben Parrish – *Assistant Superintendent, Porter Township Schools*

Believes the Proposed Rule should match the State ESSA Plan.

[63] Amy Sander – *Principal, Greenwood Community School Corporation*

Concerned about the caps on growth. Recommends leaving growth uncapped at the subject level. Believes capping growth penalizes schools in high poverty areas. Concerned about the well-rounded education indicator. Recommends increasing the weight of English Language Proficiency to 10% and decreasing the weight of the well-rounded education indicator to 5%.

[64] Anne Olson – *Curriculum Coordinator, MSD Wayne Township*

Concerned the Proposed Rule doesn’t match the State ESSA Plan. Believes this will be problematic for administrators responsible for addressing two separate accountability systems.

[65] Wayne Baker – *Superintendent, Bluffton-Harrison*

Finds the Proposed Rule absurd. Does not see a need for two accountability systems. Believes one should only use a single metric to assess the work of schools.

[66] Denise Diener – *Teacher*

Recommends using growth in the accountability model.

[67] Cheryl Vargo – *Educator*

Concerned generally about the Proposed Rule. Believes her students thrive on rigor despite the fact they’re not proficient. Believes her students take pride in academic growth. Urges the Board to consider growth worthy of recognition.

[68] Angie Day

Believes the Board's Proposed Rule sets up kids, parents, teachers, and schools up for disappointment. Suggests teachers teach to gain growth in students. Suggests test scores are ignorant and do not show gain. Urges the Board to step aside and let educators have input. Urges the Board to allow educators to do what educators believe is best for students.

[69], [93] David L. Mangel – *Principal, Northwood High School*

Supports an accountability system that is both challenging and achievable. Supports the weight of the academic achievement indicator but believes the use of the SAT and ACT benchmark is unreasonable. Recommends including a multiplier for proficiency. Concerned that measuring whether students are on-track is unfair to schools with struggling students. Recommends measuring whether a student is on-track after the 10th grade year.

[70] Beth Crowe

Suggests listening to professionals in the education community equates to supporting research based systems to measure student growth. Opposes having two separate systems for school accountability. Urges the Board to listen to educators instead of political appointees and business leaders.

[71] Ronda Harner – *Educator/Parent*

Concerned by the weights used in the Proposed Rule. Concerned by the High School On-Track Indicator. Questions why Growth was removed from the high school accountability model. Suggests pushing the measure of on-track to the end of a student's sophomore year. Concerned that students receiving a standard diploma are not counted towards a school's graduation rate.

[72] Jill Weikart – *Parent*

Opposes removing the average. Suggests students do not all learn the same way. Believes using only two letter grades forces the majority of students to fall under a politically run system. Urges the Board to refrain from removing the average.

[73] Randy Dahms – *Principal, Mentone Elementary School*

Supports accountability. Believes a schools overall growth should be the largest factor in a school's rating. Believes the measure of a good school is whether a student grows more than one grade level during the course of one school year. Believes the expectation should be that students grow a minimum of one year. Believes prioritizing proficiency is wrong. Supports maintaining the current grading system – 50% growth/50% proficiency. Opposes using student attendance in the accountability system as most of the reasons a student might be absent are out of the school's control.

[74] Rose Benjamin

Supports a system that weighs equally growth and proficiency.

[75] Holli Fort – *Parent*

Opposes the Proposed Rule as she believes it emphasizes scores on a single test, the SAT or ACT. Believes using a single test will have a negative impact on students living in poverty, students with special needs, and students who speak a language other than English. Suggests a more fair system would measure student growth over the results of a single test.

[76] Michelle Mattucci

Opposes the increased focus on a single, standardized test. Urges the Board to reconsider the Proposed Rule. Urges the Board to focus on children.

[77] Marlene Jeffers Minker

Concerned generally about the Proposed Rule. Supports a system that is equitable. Believes student growth is a better measure of achievement than proficiency.

[78] Laura Kruyer – *Teacher/Parent*

Concerned with the Proposed Rule. Believes the Proposed Rule is unfair to school corporations with high poverty rates, high numbers of English Learners, and high numbers of special needs students. Opposes an accountability system that relies heavily on achievement.

[79] Julie Meitzler – *Principal, Bluffton-Harrison Elementary*

Opposes the Proposed Rule because it deviates from the State ESSA Plan. Concerned with caps on subject level growth. Urges the Board to consider whether all members support using On-Track as an indicator. Concerned so much is being put into SAT. Recommends using a multiplier to measure proficiency.

[80] Rhonda Williams

Urges the legislature to reconsider the diminished weight growth will carry in the Proposed Rule. Urges the legislature to reconsider the phase out of growth in high school. Urges the Board to give growth the celebration it deserves.

[81] Don Street – *Superintendent, West Central School Corporation*

Supports using the State ESSA Plan for accountability.

[82], [106] Robert McDermott – *Principal of Student Services, Crown Point High School*

Supports High School On-Track. Recommends using a multiplier or goal target for graduation rate. Recommends including growth in high school while the state uses ISTEP. Recommends measuring growth from PSAT to SAT when the state changes from ISTEP to SAT. Believes using the SAT College and Career Ready Benchmark will doom all schools to failure. Recommends proficiency be measured using a goal target percentage.

[87] Rachel Jones – *Teacher*

Believes the state focuses more on grades and testing than is necessary. Supports a simplified plan. Believes schools should focus on gaps in teaching connectivity, care, social and emotional regulation, and problem solving.

[89] Mike Richards – *Vigo Schools*

Wonders why education has become about tests. Urges the Board to move beyond test scores for accountability.

[90] Kevin Donnell – *PTSC*

Supports using the State ESSA Plan for accountability.

[91] Chip Pettit – *Principal, Crown Point High School*

Supports High School On-Track. Recommends using a multiplier or goal target for graduation rate. Recommends including growth in high school while the state uses ISTEP. Recommends measuring growth from PSAT to SAT when the state changes from ISTEP to SAT. Believes using the SAT College and Career Ready Benchmark will doom all schools to failure. Recommends proficiency be measured using a goal target percentage.

[92] Oletha Jones – *Education Chair, South Bend NAACP*

Opposed to the use of tests/assessments for accountability. Suggests the use of tests/assessments is unfair and unconstitutional. Concerned that focus on standardized tests creates a narrow definition of educational success.

[94] Tim Pletcher – *Principal, Oregon-Davis Junior/Senior High School*

Interested in accountability system that offers clarity and direction with respect to how schools can make meaningful change. Opposed to the elimination of growth. Opposed to capping growth at the subject level. Concerned capping growth will unfairly suppress school's real achievement. Concerned capping growth will negatively impact school's accountability rating. Concerned eliminating growth will negatively impact schools with large populations of free and reduced lunch students, high mobility students, and special education students. Recommends using a goal factor or multiplier in conjunction with proficiency rates if the State uses SAT or ACT for accountability purposes.

[95] Theodore Stevens – *Assistant Superintendent, School City of Mishawaka*

Concerned that schools with high poverty rates have lower overall achievement scores. Concerned generally about growth. Concerned generally about the use of chronic absenteeism because absenteeism often outside of the school's control. Opposes the elimination of growth from high school. Concerned about the use of the SAT College & Career Ready Benchmark as a measure of proficiency.

[96] John Ross – *Associate Principal, Mishawaka High School*

Believes comments about high stakes testing made by others before him are not valid. Believes the high school accountability model is about right. Supports adding growth to high school accountability. Suggests the State and schools have enough testing resources that show growth.

[97] Scot Croner – *Superintendent, Wanees Schools*

Concerned by the fact the Department is not in charge of leading recent changes (Graduation Pathways and Accountability) around the state. Considers the manner in which the Board operates to be dysfunctional. Considers the dysfunction unacceptable. Suggests the field needs the Board to work as a cohesive unit under the leadership and direction of the State Superintendent and with the Department of Education. Concerned with the addition of science and social studies. Supports using SAT, but urges the Board to lower the required proficiency rate. Supports the use of High School On-Track, but recommends the determination be made after the summer semester.

[98] Kathi Streeter – *Jefferson Middle School*

Concerned about how students in high poverty districts are effected by high stakes testing. Supports growth. Urges the Board to de-emphasize the weight placed on academic achievement and increase the emphasis placed on growth. Believes de-emphasizing growth negatively effects teachers' work environment. Recommends the Board develop and include indicators that measure social/emotional learning and climate.

[99] Chad Addie – *Regional Workforce Development*

Supports the comments made by David Maugel. *See* Comments **[69]**, **[93]**. Believes moving away from growth puts principals and teachers in an untenable position. Concerned with High School On-Track. Supports the idea of Graduation Pathways, but believes it's not an inclusive model of talent development.

[100] Bruce Jennings – *Principal, Bremen High School*

Accustomed to change in public education, but concerned by the increased frequency in change. Embraces/supports accountability. Agrees with and supports the comments made by David Maugel and Tim Pletcher. *See* Comments **[69]**, **[93]** and **[94]**. Supports one accountability system, not two. Recommends allowing ample time for the roll out of a new system. Requests funding for any new mandates. Urges the Board to make decisions that perceived as fair for all students and all school types.

[101] Michelle Penrod – *Wanees Community Schools*

Recommends the accountability rule be as clear and concise as possible. Recommends the Board determine what the Board wants schools to be able to do and gain as a result of the grades they earn.

[102] John Jensick – *Penn-Harris-Madison High School*

Supports the inclusion of growth in high school. Believes growth provides teachers with actionable data. Recommends adjusting the SAT/ACT College and Career Ready Benchmark and using a multiplier for proficiency. Recommends using growth from PSAT to SAT. Opposed to using a test for accountability if students taking the test have "no skin in the game."

[103] Hilary Baker – *Plymouth High School*

Concerned with the elimination of growth. Concerned that students who will never be able to earn a Core 40 Diploma will negatively impact a school's graduation rate. Proposes non-academic progress be included for schools serving larger English Language Learner populations.

[104] Jim Wellington – *Retired Educator*

Concerned that schools and school leaders have become less sophisticated in the appropriate application of testing measurements. Opposes the use of high stakes tests to ensure we have responsible, learned citizens. Concerned for teachers in classrooms today who are not having fun due to the fact they're worried about the unjust calculations upon which they are being judged.

[105] Mr. Ritzler – *South Bend Community Schools*

Recommends including measures that aren't influenced by factors other than school quality if we intend to measure school quality. Suggests that including achievement in the accountability model threatens the validity of the model. Supports the use of growth because growth is more reflective of the quality of instruction. Supports increasing the weight placed on growth and decreasing the weight placed on proficiency. Opposes capping growth at 100 points. Recommends implementing a floor of 50 points for a school's growth score. Believes the current model/calculation does not weigh achievement and growth equally.

[107] Bill Reicherdt – *Superintendent, Knox Community School District*

Opposes capping growth. Supports accountability.

[108] Andy Heartly – *Superintendent, Plymouth Community Schools*

Urges collaboration with respect to the Board's development of the accountability model. Believes collaboration between educators and the Board will likely achieve a system that's valued and achieves the results we all desire.

[109] Danielle Harris – *Principal, Ambassador Academy*

Concerned generally. Urges the State Board to recognize that there is a diverse group of learners in Indiana and it's not one-size-fits-all. Urges the Board to consider the fact that schools have a lot of different children to serve and provide for.

[110], [151] Barry Youngmans – *Principal, Gosben High School*

Concerned by and opposes the elimination of growth from the high school model. Urges the Board to continue looking at the cut scores. Concerned about using SAT cut scores to measure proficiency. Recommends lowering the cut score to the average minimum score required by a sampling of Indiana colleges. Recommends using a multiplier to measure proficiency. Believes using SAT would be an improper use of an assessment tool. Concerned about the lack of growth in high school. Believes growth must be included because students often enter high school behind grade level. Supports On-Track indicator. Recommends focusing on ten credits and eliminating the "not more than one F in a core subject" requirement. Recommends allowing students to have until the end of their sophomore year to pass the required core subjects.

[111] Frank Serge – *Principal, Elkhart Central High School*

Supports and agrees with the comments made by Barry Youngmans. *See* Comment [110], [151]. Supports the inclusion of High School On-Track. Recommends the On-Track measure include the summer after a student's freshman year. Concerned about the proficiency cut scores and believes they're unreasonable. Supports accountability, but believes it should be fair accountability.

[112] Steve Thalheim – *Fairfield Community Schools*

Concerned by the fact the Proposed Rule deviates from the State ESSA Plan. Believes things included in the Proposed Rule that are not included in the State ESSA Plan should have been presented when Dr. McCormick presented the ESSA Plan. Concerned that the field has been left out of the development of the Proposed Rule. Concerned with how schools are supposed to track new measures. Recommends the State (SBOE or DOE) develop a centralized data reporting system. Urges the Board delay rulemaking to allow time for more conversations.

[113] Jack Caponigro – *First District Trustee, South Bend Community Schools*

Supports and is committed to accountability. Committed to increasing proficiency. Concerned generally about the proposed accountability model. Recommends decreasing the weight of proficiency and increasing the weight of growth. Concerned with the cap on growth. Believes capping growth does not fairly reflect student and school performance. Recommends implementing a floor of 50 points for growth scores.

[114] Jason Zook – *Union President, South Bend Community School Corporation*

Urges the Board to refrain from decreasing growth. Suggests success in the classroom is most accurately measured by growth. Suggests growth is important even if students fail to meet proficiency score. Urges the Board to refrain from increasing the weight of tests. Believes growth is success.

[115] Darice Austin-Phillips – *Director of Federally Funded Programs, South Bend Community Schools*

Interested in the Board's rationale for changes made to proficiency and growth.

[116] Karla Lee – *South Bend Community School Corporation*

Urges the Board to consider differentiating how we support students' growth points and growth measures.

[118] Wayne Funk – *Vice President of the School Board, Garrett-Keyser-Butler*

Supports the comments made by Steve Baker. *See* Comment [14], [117].

[119] Susan Berry – *Retired Educator*

Wonders, with respect to Graduation Pathways, if there will be enough service-based or project-based learning experience available to all the students; who is responsible for creating these activities; what accommodations have been made for our special education boys and girls; will the schools provide transportation; who will keep track of all these requirements; do you have the support of administrators and counselors; will the State provide dollars for the extra staff that will be required to keep track of all of this? Appreciates creativity and flexibility committee is showing, but concerned about increased workload for researching and implementing these opportunities.

[120] Julie Hollingsworth – *Fort Wayne Community Schools*

Concerned about schools that purposely keep their enrollments low to avoid the public consequences of accountability. Concerned about lack of growth in high school. Believes eliminating growth takes away the very measure that most closely measures what schools and teachers actually do with students. Regarding Graduation Pathways, supports the flexibility and the fact students will no longer have to pass any one test to graduate. Concerned SAT will be required by all students, but not needed to graduate. Questions the validity of a test that students are required to take, but that doesn't matter for graduation. Believes using SAT will be a bigger advantage to schools who get to choose which students to admit. Recommends the Board refrain from using a pass percentage and instead use a weighted goal factor to account for the range of students required to take the SAT. Concerned about lack of research on using the SAT or ACT as a measure to grade the effectiveness of teachers in schools.

[121] Tasha Getz – *Special Education Teacher, Garrett-Keyser-Butler*

Supports growth. Recommends keeping growth in accountability.

[122] Dr. Todd Bess – *Executive Director, Indiana Association of School Principals*

Supports the original language submitted by the IDOE. Recommends the Board refrain from capping growth at the subject level. Supports maintaining the current individual growth chart. Recommends preserving subject level growth as an indicator of what teachers and students are doing to raise achievement. Concerned that the well-rounded education factor will not include both science and social studies tests in most school grade configurations. Concerned about the weight assigned to ELP, as it doesn't reflect work schools are doing. Recommends modifying overall framework and changing indicator weights. Concerned about eliminating growth from high school when accountability test is still undetermined. Concerned with increasing weight assigned to proficiency if college entrance exam used for accountability. Recommends utilizing a goal factor or multiplier to measure proficiency. Believes on-track indicator is an interesting concept, but recommends careful consideration of this factor and the indices that go into it.

[123] Larry Getz – *School Board President, Garrett-Keyser-Butler*

Opposed to direction the Board is heading with respect to accountability grades. Concerned that if school grade goes down, it will negatively impact school enrollment. Supports the comments made by Steve Baker. *See* Comment [14], [117].

[124] Park Ginder – *Principal, Homestead High School*

Supports the comments made by Steve Baker. *See* Comment [14], [117]. Wonders what research was used to create this set of assessment and accountability rules? Wonders whether any research was done in terms of what's good for kids? Questions whether the Board and legislators know that SAT is not designed to measure student growth, but, rather, is designed to sort students for post-secondary college purposes. Questions whether the Board is aware the SAT cut score is currently set higher than what is necessary to get into Indiana State University, Ball State University, University of Southern Indiana, IPFW, etc.?

[125] Kathy Zoucha – *Special Education Teacher, Fort Wayne Community Schools*

Suggests socioeconomic status of a student's parents is best indicator of how student will perform on standardized test. Concerned about what this means for schools in Fort Wayne.

[126], [146] Phil Downs – *Superintendent, MSD Southwest Allen County*

Requests that the Board make a public declaration of why the Board wants to change IDOE’s plan (State ESSA Plan). Requests that the Board’s public declaration identify the faults with IDOE’s plan. Requests that the Board’s public declaration explain why the Board is suggesting these changes. Requests the Board make a public statement identifying the research done to support the statements included in the requested public declarations. Suggests that the Board does not have any research supporting the changes made to the State ESSA Plan. Urges the Board to provide its definition of “college and career ready skills.” Concerned there is a lack of rigor in the Board’s research.

[127] Dr. Wendy Robinson – *Superintendent, Fort Wayne Community Schools*

Supports and agrees with all comments made previously. Concerned with disconnects between ESSA plan and the Proposed Rule. Suggests State ESSA Plan was created with input from a great deal of diverse stakeholders. Questions the need for the Proposed Rule’s deviations from State ESSA Plan. Agrees with the comments made by Phil Downs. *See* Comment **[126], [146]**. Concerned new rule will lead to checking widgets and boxes to figure out how to meet the Graduation Pathways. Concerned that Proposed Rule promotes the concept of haves and have-nots.

[128] Brent Lehman – *Superintendent, North Adams Community Schools*

Opposed generally. Suggests respectfully that the Governor, some members of the State Board, the State Board staff, and the Indiana Chamber of Commerce have no knowledge of what is needed to provide a successful education. Encourages the Board to change past practice and set aside politics. Encourages the Board to listen to educators. Requests that the Board give value to the comments made by educators.

[129] Ann Lunson – *East Noble School Corporation*

Agrees with all comments made previously. Opposed generally to the Proposed Rule.

[130] John Houser – *Principal, Wayne High School*

Opposed generally to the Proposed Rule. Requests the Board delay further rulemaking to determine how the State can return to those practices that were best and that seemed to be most equitable for all schools and all school districts.

[131] Matt Shieble – *Principal, Kekionga Middle School*

Opposed generally to the Proposed Rule, knowing the State has an ESSA Plan in place. Concerned about the lack of growth in high school. Concerned with using science and social studies in accountability. Raises concerns about how school configurations will impact the use of science and social studies in accountability. Concerned SAT will be used as a metric and suggests that’s not what the test was designed for originally. Believes the Board should adopt metrics in addition to standardized testing to assign grades.

[132] Maureen Bender – *Principal, Shawnee Middle School*

Supports the intent of Graduation Pathways. Believes the Graduation Pathways will not lead to as many avenues as intended. Concerned Graduation Pathways will close off doors to students who face greater complexities. Concerned the Proposed Rule is not as representative as it could be for all schools.

[133] Jamie Rose – *Teacher, Parkside Elementary School*

Supports placing more emphasis on growth.

[134] Mr. Lichtenberg – *Indiana State Teachers Association*

Concerned with the aspect of the rule that reduces or removes growth from the equation for assigning school grades. Concerned that taking growth out of the equation will penalize schools for having high poverty rates. Concerned that the well-rounded education component of the rule is based on a test score in science and social studies.

[135], [204] Tamara Skinner – *Principal, Glenwood Leadership Academy*

Concerned the current proposal will add areas of testing to accountability, and suggests this will inevitably increase testing time and student insecurity. Objects to the addition of science and social studies when schools are unable to find science teachers due to teacher shortages. Suggests growth is the most important factor in a child's achievement and the only fair way to measure one school against another. Opposed to caps on growth by subject, and opposed to caps on growth overall. Recommends creating multiple measures for elementary and middle school, similar to those used in high school. Supports the use of attendance in the K-8 model. Recommends using a system that puts schools into quadrants instead of one that assigns grades. Recommends the Board refrain from adopting the proposed language, and instead consider alternative solutions.

[136] Angie Oliver – *Assistant Principal, Glenwood Leadership Academy*

Supports the comments made by Tamara Skinner. *See* Comment **[135]**.

[137] Ms. Myers – *High School Teacher, EVSC*

Opposed to eliminating growth from the high school model. Suggests that by eliminating growth, we are not accurately assessing students or schools. Concerned High School On-Track will punish schools for students transferring in after their freshman year that have already failed their classes. Concerned schools may be penalized twice for graduation rates.

[138] John Hurley – *South Spencer High School*

Concerned with the elimination of growth. Concerned the elimination of growth unfairly punishes schools in poor communities. Concerned High School On-Track will incentivize teachers to move students to the next grade even if they're not ready. Recommends the rule reward schools for taking in students that have dropped out. Recommends creating the accountability system in a way that provides feedback teachers can use to help students.

[139] Marcia Mishler – *Teacher, South Gibson School Corporation*

Concerned with the accountability system itself. Suggests the indicators are diametrically opposed to the interests of the students. Concerned the federal guidelines and the state guidelines don't meet with respect to WIDA. Opposed to the elimination of growth from high school. Concerned generally with ISTEP. Suggests ISTEP has flaws and shouldn't be used for accountability.

[140] Kelsey Wright – *Director of School Transformation, EVSC*

Supports the comments made by Tamara Skinner. *See* Comment [135]. Opposes the elimination of growth. Believes growth is the only way to measure improvements in every single type of student. Opposed to testing science and social students for accountability.

[141] Velinda Stubbs – *Deputy Superintendent, EVSC*

Opposed to using chronic absenteeism because in many cases, absenteeism relates to factors outside of the schools control. Opposed to absenteeism because of the disproportionate impact it will have on high poverty schools. Suggests the reasons students are absent frequently have to do with poverty.

[142] Jill Wright – *Teacher, Princeton*

Opposes the elimination of growth. Urges the Board to vote “no” on the Proposed Rule. Supports the state’s current accountability system.

[143] Cheryl Hollingsworth – *Teacher, Princeton Community High School*

Opposes the elimination of growth. Urges the Board to vote “no” on the Proposed Rule. Supports the state’s current accountability system.

[144] Holli Nelson – *Instructional Assistant, Princeton Community Primary School*

Opposes the elimination of growth. Urges the Board to vote “no” on the Proposed Rule. Supports the state’s current accountability system.

[145] Sasha Berry – *Teacher*

Opposes the elimination of growth. Urges the Board to vote “no” on the Proposed Rule. Supports the state’s current accountability system.

[147] *Withdrawn*

[148], [170] Steve Morris – *Superintendent/Principal, Lanesville Community Schools*

Supports the State ESSA Plan. Concerned the Proposed Rule received no prior input from educational practitioners. Supports one accountability system, opposes two. Opposes eliminating growth from the high school accountability system. Opposes the use of SAT as the state’s graduation exam. Recommends proficiency on SAT be measured using a multiplier. Supports any changes that prepare students for future work-force demands. Urges the Board to follow the leadership of the Department of Education.

[149] Robin Angermeier – *Retired Educator*

Supports the use of growth. Believes the Proposed Rule is unfair insofar as it penalizes schools for students who are not high achievers. Believes the well-rounded education indicator should take into consideration participation in the arts or other measures. Believes high school on-track will negatively impact credit recovery programs. Concerned the high school on-track indicator provides an incentive to pass students who are not ready. Believes use of WIDA for English Language Proficiency is counterproductive as students are incentivized to fail. Opposes the use of attendance/chronic absenteeism. Suggests testing does not grow students.

[150] Travis Wolfe – *Teacher, Mt. Vernon Jr. High School*

Opposes the Proposed Rule. Believes poverty stricken schools and small communities were not taken into consideration. Opposed to using absenteeism, reducing growth, and grades generally. Believes schools are not to blame for the majority of failures in academics that our youth continue to experience.

[152] Matt Fyfe – *Teacher*

Concerned about the use of chronic absenteeism and the elimination of growth. Opposes both.

[153] Jennifer Fisher – *Teacher, Princeton Community Intermediate School*

Opposes the elimination of growth. Urges the Board to vote “no” on the Proposed Rule. Supports the state’s current accountability system.

[154] Dr. Stacey Schmidt – *Superintendent, Porter Township School Corporation*

Supports using the State ESSA Plan for accountability. Opposes the use of two accountability systems (state and federal). Opposes being held accountable for science and social studies. Believes State Board staff has taken on too prominent of a role. Believes this has reduced the quality of what’s being produced. Believes the Department should be in charge of implementation of policy. Believes Board staff should not be involved in Graduation Pathways. Believes Board staff is lacking educational background and training. Believes the Board should adjust its own role.

[155] Ann Schapker – *School Psychologist, South Gibson School Corp.*

Believes the “A” through “F” grading system gives parents the wrong idea about where they should choose to send their children. Supports accountability. Believes the answer to high quality education is expert supervision of teachers.

[156] Matthew P. Costello

Opposes having letter grades assigned to schools. Believes schools in economically disadvantaged districts may receive a D or F because of the quality of the students attending the schools. Believes that by measuring graduation rates, teachers are pressured to graduate students regardless of whether they’re prepared.

[157] Jodie Norwood – *Teacher, Crestview Middle School*

Believes that a system created to grade school performance translates into telling students growth is not important. Opposes capping growth at the subject matter level.

[158] Dan Dragon – *Clay*

Believes the proposed rule is absurd. Believes removing growth from a system created to grade school performance is misleading students. Believes that by capping growth, the Board is telling students growth is not necessary. Urges the Board to maintain the current accountability rule.

[159], [167] Jeff McCullough – *Principal, Adams Central Community Schools*

Concerned generally about the Proposed Rule. Believes capping growth will hamper a school’s ability to show progress in the classroom. Believes eliminating growth from the high school model will hurt her school’s grade. Questions the purpose of using SAT for accountability.

[160] Charles Grable – *Superintendent, Pioneer Regional School Corp.*

Opposes the Proposed Rule because it differs from the State ESSA Plan. Opposes two accountability systems.

[161] Dr. Beth Dean – *Principal, Pioneer Elementary School*

Believes the accountability rule should mirror the State ESSA Plan.

[162] Missy Shrontz – *Technology Director, Pioneer Regional School Corp.*

Believes the accountability rule should mirror the State ESSA Plan.

[163] William Catt

Recommends placing a higher emphasis on growth. Concerned that proficiency is too highly correlated with poverty. Believes alternative schools are placed at a disadvantage if growth is removed.

[164] Nan Polk – *Retired Educator*

Concerned about using test scores to determine a school's letter grade. Concerned that the accountability rules and tests change frequently. Believes tests should be used for assessment and growth. Suggests that students spend 92 out of every 180 days on testing.

[165] Tamisyn Grantz

Believes putting increased emphasis on ISTEP/ILEARN to determine school grades places too much power on a single test. Concerned by the fact the test has no personal impact on those taking it but has a significant impact on those administering it.

[166] Donna Wiktorowski – *Principal, Prairie View Elementary*

Concerned about the impact capping growth will have on the school's letter grade. Recommends capping growth at the indicator level, as opposed to the subject level.

[168] Jeremy Tucker – *Principal, Pioneer Jr-Sr High School*

Believes the accountability rule should mirror the State ESSA Plan.

[169] Glenn Barnes – *Principal, KCES*

Urges the Board to reconsider changes to the state's accountability framework. Concerned by the proposed cap in growth. Believes capping growth is punitive. Believes measures of growth validate students' effort.

[171] Wendy Wells – *Director of Curriculum, EVSC*

Urges the Board to refrain from capping growth by subject. Urges the Board to refrain from capping growth overall. Opposes increasing the subjects used to calculate letter grades. Urges the Board to create multiple measures for elementary and middle schools. Urges the Board to consider creating growth quadrants, which she believes will provide a better picture of achievement and growth.

[172] Donald DeWeese – *Superintendent, Community Schools of Franklin*

Suggests it can be difficult for schools and communities to overcome “F” letter grades. Urges the Board to consider the difficulties faced by communities with “F” schools.

[173] Kathleen Stark – *Retired Superintendent*

Believes the Proposed Rule does nothing to close achievement gaps. Believes the Board should utilize a true value-added system. Believes a value-added system provides robust data at the district, building, teacher, and individual student level.

[174] Aretha Britton – *Principal, North Wayne Elementary*

Urges the Board to refrain from increasing the emphasis placed on testing at the elementary level.

[175] Gwen Leininger – *Parent*

Asks the Board to listen and understand the position of parents, whose only interest is doing what’s best for children. Believes the proposed A-F accountability system is not what’s best for children. Believes the proposed A-F accountability system is what’s best for the College Board and partisan politicians. Questions where in the Proposed Rule the accountability system accounts for 1) increased opportunities offered to students wishing to take AP, IB, and dual credit classes; 2) exposure to art, music, and physical education; 3) increased opportunities to learn through play; 4) instruction given by teachers; 5) growth students make year-to-year; 6) students who will not attend four-year colleges; 7) students with learning disabilities? Questions the use of SAT. Urges the Board to adopt an accountability system that is as fair as possible.

[176], [177] Jennifer Matthias – *Parent*

Concerned about Graduation Pathways. Requests the Board answer questions regarding testing requirements. Believes erroneously that students will be required to “pass” the SAT in order to graduate. Concerned that all students will be required to take the SAT.

[178] Jake VanWinkle – *Glenwood Leadership Academy*

Suggests it is frustrating that GLA has been unable to work its way out of “F” status because ISTEP or the A-F accountability system changes each year. Believes a system meant to hold schools accountable sends messages of failure to students. Recommends the Board refrain from capping growth in any way. Recommends the Board refrain from increasing the subjects tested or testing time. Recommends the Board create multiple measures for elementary and middle schools, similar to the measures used in the high school accountability model. Recommends the use of quadrants in lieu of an A-F system.

[179], [184] Beverly Burgess – *Parent*

Concerned that all students will be required to take the SAT. Urges the Board to consider children with IEP’s.

[180], [181] Dr. Beth Niedermeyer – *Superintendent, Noblesville Schools*

Believes if the SAT/ACT are used for achievement, it will be trouble. Understands SAT/ACT are part of the new pathways for graduation, but is unsure whether SAT/ACT are intended to replace the math and English ECA's for accountability.

Recommends a system that utilizes a benchmark for academic achievement as a trigger – schools hitting the benchmark would trigger a lower weight for growth and higher weight for achievement. Concerned about how growth will be measured during the transition from ISTEP+ to ILEARN. Agrees with the weight assigned to English Language Proficiency. Concerned that reducing chronic absenteeism is measured in a manner different than it is measured under the State ESSA Plan. Concerned teachers will obsess over inclusion of science and social studies when it's only worth 5.0%. Concerned that tests at the high school level are no longer part of the graduation requirements. Agrees with the weights assigned to Graduation Rate and High School On-Track.

[182] Anne Duff – *Fort Wayne Community Schools Board of Trustees*

Believes administering SAT to all children is the most egregious attack on public education she has witnessed. Suggests only 20-35% of jobs require a 4-year college degree and questions why the Board will subject the other 70% of Indiana's students to a test that is unnecessary.

[183] Phyllis A. Bush

Believes school letter grades are more a measure of ZIP codes than of learning. Agrees with and urges the Board to consider the comments provided by FWCS Board President, Julie Hollingsworth. *See Comment [120].*

[185] Jessica Felker – *Teacher, Glenwood Leadership Academy*

Suggests it is frustrating that GLA has been unable to work its way out of "F" status because ISTEP or the A-F accountability system changes each year. Believes a system meant to hold schools accountable sends messages of failure to students. Recommends the Board refrain from capping growth in any way. Recommends the Board refrain from increasing the subjects tested or testing time. Recommends the Board create multiple measures for elementary and middle schools, similar to the measures used in the high school accountability model. Recommends the use of quadrants in lieu of an A-F system. Urges the Board to disavow the current Proposed Rule, and recommends the Board look at alternative accountability systems.

[186] Mary Locker – *M.S. Education, M.S. Counseling*

Questions the use of SAT/ACT as a graduation requirement. Suggests special education students, students attending vocational classes, and students thinking about attending a 2-year technical school are not academically prepared to take the SAT. Suggests those students will not have taken the classes needed to be proficient in the subjects tested on SAT.

[187], [201] Annette Bowen – *Parent, Fort Wayne*

Concerned about using SAT/ACT as the test required for graduating. Concerned using SAT/ACT will lower graduation rates. Believes erroneously that SAT/ACT passage required for graduation. Believes erroneously that the Board, not the legislature, is the entity responsible for choosing to use SAT/ACT in lieu of ISTEP 10.

[188] Sharon Johnson – *Retired Educator*

Asks the Board to reconsider placing so much weight on test scores. Believes more emphasis should be placed on classroom learning experiences. Believes learning experiences that take place outside of the classroom should promote programs to careers, industry demands, and market trends.

[189] Morgan Kitzman – *Educator, Evansville*

Believes the plan to make pass/fail a greater weight is wrong. Believes the new state test is going to be designed around making growth. Suggests that in her school, most of the students come in behind grade level. Believes the Board is saying students who show growth but don't pass the test don't count. Believes growth matters a lot.

[190] Jennifer Smith-Margraf

Concerned the high school model does not include growth. Believes we should be measuring how much a student learns in one year. Prefers to see growth added back to high school model.

[191] Mary Walkers – *Wayne Township*

Believes the accountability plan should mirror the State ESSA Plan because the State ESSA Plan was developed using state-wide input. Believes growth should not be capped at the subject level. Requests the Board refrain from increasing the emphasis on accountability (standardized) testing. Believes using science and social studies scores places undue emphasis and testing stress on students. Takes issues with the On-Track Indicator because it's not standardized and will require advanced tracking systems. Believes removing growth from high school model will result in an inability to monitor school impact over time.

[192] Justin Brown – *Principal, Seymour-Jackson Elementary*

Urges the Board to consider eliminating caps on growth. Believes Limited English Proficient students should be excluded from academic proficiency calculation.

[193], [194] Eric Gilpin – *Principal, MCCSC*

Appreciates efforts to recognize student growth. Currently averages 136 growth points and receives an A. Believes the Propose Rule will result in the school receiving 100 growth points and a B. Believes a B does not accurately reflect the work done at the school. Concerned about caps on growth at the subject level. Believes capping growth could result in schools letter grades dropping by a full grade. Concerned that the well-rounded indicator does not include growth.

[195] Tony D. Hack – *Principal, Brown Elementary*

Believes capping growth will harm schools. Suggests schools work hard to achieve more than typical growth in English language learning populations. Urges the Board to reconsider the caps on growth.

[196] John Kurdelak – *Senior Director of Advancement, Trinity School at Greenlawn*

Supports changes made to the College and Career Readiness Indicator and the inclusion of the Graduation Pathways.

[197] Julie Kelly – *Seymour Community Schools*

Urges the Board to refrain from capping growth. Believes growth should not be restricted. Believes the developmental progress of a child's mind is not equal because students make developmental progress at different rates.

[198] Kayla Baldwin – *On behalf of ISBA Members and Associate Members*

See Comment [28], [97], [120], [159], [167], [218], [219]

[199], [206] Kayla Baldwin – *On behalf of Terry Spradlin – Executive Director, Indiana School Boards Association*

Supports the use of English Language Proficiency and Attendance. Supports the use of On-Track. Believes the well-rounded indicator adds value. Urges the Board to refrain from capping growth at the subject matter level. Concerned the Proposed Rule does not include growth in high school. Urges the Board to consider using PSAT to measure growth. Shares the concerns of Julie Hollingsworth. *See Comment [120]*. Questions the data used to develop models around the use of SAT and the calculation of Proficiency scores. Supports the use of goal factors for proficiency. Supports the use of a data dashboard system in lieu of an A through F system.

Informs the Board that a new study released by Achieve contends that states should not use SAT/ACT to measure high school achievement because the tests do not adequately reflect the states' academic standards or gauge students' understanding of those standards. Concerned about the use of a nationally recognized college entrance exam for accountability. Believes neither SAT nor ACT are aligned to Indiana standards and would require augmentation. Believes 91% of high schools have a composite math score below the SAT benchmark. Believes 78% of high schools have a composite aggregate score below the 1010 SAT benchmark.

[200] Steve Bush – *SCSC*

Urges the Board to refrain from capping growth.

[202] Judy Stegemann – *Wayne Township*

Believes the accountability plan should mirror the State ESSA Plan because the State ESSA Plan was developed using state-wide input. Believes growth should not be capped at the subject level. Requests the Board refrain from increasing the emphasis on accountability (standardized) testing. Believes using science and social studies scores places undue emphasis and testing stress on students. Takes issues with the On-Track Indicator because it's not standardized and will require advanced tracking systems. Believes removing growth from high school model will result in an inability to monitor school impact over time. Supports increasing the weight assigned to Graduation Rates. Supports decreasing the emphasis on proficiency. Supports measuring growth from PSAT to SAT.

[203] *Withdrawn*

[205] Barbara Fondren – *Director, Community Montessori*

Informs the Board of the following: 1) Juvenile Probation no longer supports Truancy, 2) DCS will not support truancy unless there have been over 10 unexcused absences, or 94% attendance; 3) schools hold family meetings to no avail for some students; 4) schools' other option is to suspend or expel students, which she believes is the wrong direction.; 5) the school's overall attendance is 95%; however only 54% of students have 96% attendance or higher. Believes the Proposed Rule (attendance) will negatively affect the school. Urges the Board to eliminate the Addressing Chronic Absenteeism Indicator.

[207] Edward Taylor

Acknowledges comments aren't relevant to the Proposed Rule. Asks whether the State Board evaluates college-level school of education programs.

[208], [212] Pat Murphy – *Principal, Milan Middle and Intermediate School*

Asks what is more important, performance or growth? Suggests not all students learn the same, but believes all students can learn. Believes growth is more of an indicator of learning than performance. Believes there is no reason to cap growth at 100 points. Urges the Board to refrain from capping growth at 100 points. Concerned about the use of SAT.

[209] Andy Melin – *Superintendent, Greater Clark County Schools*

Believes in accountability. Supports holding schools accountable. Suggests growth is important. Believes his school system has achieved success because of growth. Concerned about figuring out how to continue to use growth in the high school model. Supports increasing the weight of the growth indicator at the K-8 level. Believes both SAT and ACT should be considered at the high school level. Urges the Board to develop a high system that includes growth.

[210], [216] Tami Geltmaker – *South Harrison Community School Corporation*

Supports the comments made by Pat Murphy and Andy Melin. *See* Comment [208] and Comment [209]. Opposes capping growth at 100 points. Supports the College and Career Readiness Indicator. Urges the Board to be clear about which CTE courses will count. Believes SAT is fine. Supports the State ESSA Plan. Opposes deviating from the State ESSA Plan.

[211] Mark Stewart – *Teacher, Madison Junior High School*

Appreciates measures of student growth. Believes growth is important to show students what they're capable of doing.

[213] Carl Glesing

Believes that when it comes to finding a test to evaluate students and schools, the Board does not have a good batting average. Believes the Board should tell the Indiana General Assembly to "bug out" because they've never been in a classroom.

[214] Rob Moorhead – *Superintendent, South Ripley Community Schools*

Points out schools in his district have flourished despite having a free and reduced lunch rate at or above 60%. Committed to studying student level data and individualizing instruction based on that data. Frustrated the accountability system seems to change year-to-year; the bar seems to move. Expresses frustration at the fact the Proposed Rule doesn't match the State ESSA Plan originally submitted to USDOE. Believes having 2 accountability systems will cause the entire system to lose credibility with the public. Concerned about capping growth. Supports the use of On-Track. Supports the current growth-to-proficiency table. Concerned about the use of SAT. Does not believe making all students take a test designed for college-bound students is right. Urges the Board to develop a goal factor or multiplier if the SAT is used for accountability. Urges the Board to do 3 things: 1) take the time to get the accountability system right; 2) consider the input received from educators; and 3) consider the impact changes to the accountability system will have on students, parents, educators, and the community. Believes uncapped growth gives schools a fair playing field.

[215] Rod Hite – *Principal, South Ripley High School*

Supports using On-Track as an indicator. Concerned about growth in high school and the cost of requiring the use of PSAT to measure growth. Wonders why the Board doesn't look at extending ILEARN to freshman and sophomore year. Suggests an adaptive test for grades 3 through 8 could be modified to extend to grades 9 and 10. Suggests this would allow for stable, accurate growth measures. Concerned SAT was never meant to be given to students to determine performance in high school. Believes the State should look into using a common, formative assessment before getting to end-of-year, summative assessments. Believes Graduation Rate should factor into the grade of all schools because they all have a hand in helping students graduate. Opposes subject level caps on growth. Believes the accountability system is disassociated from the effort put forth by educators.

[217] Carrie Hillyard – *Chief Transformation Officer, Evansville Vanderburgh School Corporation*

Believes the questions she poses seem important to consider in the research and design phase of an accountability model. Believes wholeheartedly in accountability. Urges the Board to help children and school employees to see students are more than test scores. Urges the Board to help children and school employees to see schools and districts as more than letter grades and labels of failure.

[218] Mike Yankauskas – *Board Member, Knox Community School Corporation*

Believes the Proposed Rule (caps on growth) is heavily weighted towards affluent school districts. Believes the Proposed Rule (caps on growth) penalizes school districts that serve children of low socioeconomic circumstances.

[219] Robert Stwalley – *Purdue*

Believes the idea is so flawed that to ask where to adjust or make it better is a fairly hopeless cause. Believes that unlike specifically defined unique performance metrics, meta-metrics have no real utility in process evaluation or improvement. Believes collapsing multiple complex factors into a single index provides little useful information for process improvement. Believes the Proposed Rule is a logically indefensible evaluation. Believes the State and school children would be better served by an accounting style audit of school corporations that produces findings that are actionable.