

## FSBA ESSA Workgroup Comments

### Title I, Part A- Improving Basic Programs: General Comments:

1. Since Florida differs from other states in many respects, but especially with regard to charter school authorizers, the designation of a Local Educational Agency in Florida should be limited to Constitutionally-elected boards only, as they are accountable to the public.
2. Any commitments this plan makes should connect to language that maintains each commitment only so long as adequate funding is provided.
3. Any provisions in this state plan must not impose limitations on state and local flexibility or place restrictions or implement policies that Congress has already discussed and rejected.

### Title I, Part A: Specific Comments:

Part A, 2. Eighth Grade Math Exception: Maintain current position. Continue to avoid double testing students; protect and allow students whose course requires competency mastery of subject matter to be illustrated through passage of an EOC to substitute the passage of that EOC for the FSA requirement if the course competency is at a higher level than the FSA.

Part A, 3. Native Language Assessments: We support maintaining minimally, a 2-year time to achieve proficiency, but welcome consideration of additional flexibility.

Part A, 4. Statewide Accountability System and School Support and Improvement:

Subgroups: With regard to 4ic, while not opposed to administering state assessment in English, there needs to be some ability to discern an ELL student's learning gains in English language acquisition in comparison to student's performance on appropriate state assessments.

Establishment of Long-Term Goals: We support the long term goals set forth but must recognize that adequate resources will be necessary to achieve these goals. With limitations that have been enacted on Title I funding by current Florida law, school districts will no longer be able to direct funds to the most vulnerable students, or the lowest performing schools. District-wide services which were targeted to these populations are also expected to be limited or omitted due to current legislation.

As percentage of Title I funds retained by the state is increased from 4% to 7%, districts will be receiving fewer Title I dollars which will create negative impacts on districts, again affecting Florida's most needy and vulnerable students

Indicators. We support school quality or student success indicators as described, which include science, social studies, and acceleration.

We support waiver request from ESEA section 1111 (c)(4)(B) and (C). It is critically important that disaggregation of data by subgroup continue for district's ability to improve instruction to all students.

We support the waiver request from ESEA section 1111 (c)(4)(E) (p.22) to continue to allow 95% be measured at the school level rather than the subgroup level, as is current practice.

It's important to note that the stated goals are based on test whose contract expires in 2018. If the tests change, that may affect goals and require review and/or adjustment.

**Title I, Part C – Education of Migratory Students: General Comments:**

1. Since Florida differs from other states in many respects, but especially with regard to charter school authorizers, the designation of a Local Educational Agency in Florida should be limited to Constitutionally-elected boards only, as they are accountable to the public.
2. Any commitments this plan makes should connect to language that maintains each commitment only so long as adequate funding is provided.
3. Ensure that any provisions in this state plan do not impose limitations on state and local flexibility or place restrictions or implement policies that Congress has already discussed and rejected.

**Title I, Part C: Specific Comments:**

As a result of HB 7069, to meet the goals stated, resources targeted to migratory students should be restored.

**Title I, Part D – Prevention and Intervention Programs: General Comments:**

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3. Ensure that any provisions in this state plan do not impose limitations on state and local flexibility or place restrictions or implement policies that Congress has already discussed and rejected.

**Title I, Part D: Specific Comments:**

Funds can currently be set aside for neglected and delinquent students, however, with the passage of HB 7069, districts are prevented from setting aside funds for at-risk students. The ability to set funds aside for this purpose should be restored.

**Title II, Part A – Supporting Effective Instruction: General Comments:**

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2. Any commitments this plan makes must connect to language that maintains each commitment only so long as adequate funding is provided.
3. Ensure that any provisions in this state plan do not impose limitations on state and local flexibility or place restrictions or implement policies that Congress has already discussed and rejected.

**Title II, Part A: Specific Comments:**

Requirements contained in Title II, Part A, can only be implemented if federal funding is retained. Failure to retain federal funding will compromise districts' ability to meet the established requirements.

Improving Skills of Educators is highly compromised due to pending elimination of Federal Title IIA funding.

Teacher preparation: Require institutions of higher education to raise the quality of teacher preparation programs to deliver graduates ready to have immediate impact in today's classrooms.

**Title III, Part A – English Language Acquisition: General Comments:**

1. Since Florida differs from other states in many respects, but especially with regard to charter school authorizers, the designation of a Local Educational Agency in Florida should be limited to Constitutionally-elected boards only, as they are accountable to the public.
2. Any commitments this plan makes must connect to language that maintains each commitment only so long as adequate funding is provided.
3. Ensure that any provisions in this state plan do not impose limitations on state and local flexibility or place restrictions or implement policies that Congress has already discussed and rejected.

**Title III, Part A: Specific Comments:**

Funds can currently be set aside for neglected and delinquent students, however, with the passage of HB 7069, districts are prevented from setting aside funds for at-risk students. The ability to set funds aside for this purpose should be restored.

As mentioned in our comments under Title I, Part A, there needs to be some ability to discern an ELL student's learning gains in English language acquisition in comparison to student's performance on appropriate state assessments.

**Title IV, Part A – Student Support and Academic Enrichment Grants: General Comments:**

1. Since Florida differs from other states in many respects, but especially with regard to charter school authorizers, the designation of a Local Educational Agency in Florida should be limited to Constitutionally-elected boards only, as they are accountable to the public.
2. Any commitments this plan makes connects to language that maintains each commitment only so long as adequate funding is provided.
3. Ensure that any provisions in this state plan do not impose limitations on state and local flexibility or place restrictions or implement policies that Congress has already discussed and rejected.

**Title IV, Part A: Specific Comments:**

Allow flexible use of funds--those beyond the 40% required by federal directives which must be spent on activities to support well rounded educational opportunities and safe and healthy students—to be used technology, mental health, or other priorities as determined by each LEA .

**Title IV, Part B - 21<sup>st</sup> Century Community Learning Centers: General Comments:**

1. Since Florida differs from other states in many respects, but especially with regard to charter school authorizers, the designation of a Local Educational Agency in Florida should be limited to Constitutionally-elected boards only, as they are accountable to the public.

2. Any commitments this plan makes must connect to language that maintains each commitment only so long as adequate funding is provided.

3. Ensure that any provisions in this state plan do not impose limitations on state and local flexibility or place restrictions or implement policies that Congress has already discussed and rejected.

**Title IV, Part B: Specific Comments:**

Support these programs but funding streams must be maintained. If the funding is not retained, an extreme negative effect will be felt by our most vulnerable learners.

Expand eligibility to receive 21st CCLC funds to include schools beyond those receiving a school grade of D or F. Any schools whose students are at-risk for academic failure or in need of academic supports ought to be considered, including schools which may have raised out of academic emergency status and are in need of continued supports to sustain growth and improvement.

**Title V, Part B, Subpart 2 – Rural and Low Income School Program: General Comments:**

1. Since Florida differs from other states in many respects, but especially with regard to charter school authorizers, the designation of a Local Educational Agency in Florida should be limited to Constitutionally-elected boards only, as they are accountable to the public.

2. Any commitments this plan makes must connect to language that maintains each commitment only so long as adequate funding is provided.

3. Ensure that any provisions in this state plan do not impose limitations on state and local flexibility or place restrictions or implement policies that Congress has already discussed and rejected.

**Title V, Part B, Subpart 2: Specific Comments:**

We support the aggressive goals, however, changes to Title I may prevent full achievement of goals

High Impact Teacher Corps funding must be maintained to meet the goals.

Maintain funding for rural districts either directly or indirectly through consortiums to provide support for this goal.

**Title VII, Subpart B – McKinney-Vento Homeless Assistance Act: General Comments:**

1. Since Florida differs from other states in many respects, but especially with regard to charter school authorizers, the designation of a Local Educational Agency in Florida should be limited to Constitutionally-elected boards only, as they are accountable to the public.

2. Any commitments this plan makes must connect to language that maintains each commitment only so long as adequate funding is provided.

3. Ensure that any provisions in this state plan do not impose limitations on state and local flexibility or place restrictions or implement policies that Congress has already discussed and rejected.

**Title VII, Subpart B: Specific Comments:**

We support these provisions.

**Waiver Requests:**

1. We support the waiver from ESEA section 1111(c)(4)(B) and (C) to calculate the components of the accountability system based on all students and to report on the performance of each subgroup separately for each component.
2. We support the waiver request from ESEA section 1111 (c)(4)(E) to continue to allow 95% be measured at the school level rather than the subgroup level, as is current practice.
3. We support the waiver of ESEA section 1111(b)(2)(B)(v)(I)(aa) so that students in grades lower than 8th grade who take a statewide high school end-of-course (EOC) assessment do not have to also take a grade level assessment in the same subject area. Florida also wishes to expand the subject areas covered to include science since Florida administers a statewide EOC assessment in the high school course of Biology 1.