# APPENDIX

**Remarks to the Joint Committee on Public Schools**

**Commissioner Lamont O. Repollet**

**Tuesday, December 4, 2018**

Good Morning. Thank you for inviting me to testify today on behalf of the Department of Education regarding New Jersey's Quality Single Accountability Continuum (QSAC), Senator Rice, Assemblywoman Jasey and members of the Joint Committee on the Public Schools.

I am joined today by members of my team: Robert Bumpus, Assistant Commissioner, and Paula Bloom, Acting Director, Office of Field Services Coordination.

For more than a decade, QSAC has been in place to ensure districts are meeting the minimum requirements for district performance and to provide guidelines for initiating or withdrawing from partial or full state intervention.

/x

Our agency uses QSAC to measure public school districts' performance and capacity in five key components: Instruction and Program; Fiscal Management; Governance; Operations; and Personnel, to determine the extent to which districts are performing efficiently.

As a former superintendent, I can empathize with the argument that regulations like these can be burdensome for already overworked educators. However, as a Commissioner, I recognize the validity of QSAC from an accountability standpoint. There has to be some way to measure the success of a district, especially when we are re-investing millions of dollars into school districts.

That's why in 2017, the State Board re-vamped QSAC: adopting changes as part of a broader effort to streamline New Jersey's accountability systems, as well as accurately reflect state initiatives such as the adoption of New Jersey Student Learning

Standards, State Assessments, ESSA school accountability, and the TEACHNJ educator evaluation system.

Many Superintendents and other Stakeholders shared that the QSAC process was too cumbersome and time consuming for districts. Therefore, reducing the burden of the district evaluation process was the central principle of the 2017 revisions to QSAC regulations.

These revisions have allowed our Department to clarify what makes a quality education;

- to focus on growth and performance for all students throughout the district;
- to ensure point values and indicators reflect state priorities and that scoring is easier to understand; to reduce the number of overall indicators and further eliminate redundancy;

- and to ensure all accountability systems – state, local, federal – complement one another to create a cohesive set of goals for students, educators, and districts.

Currently, the highest percentage of districts are below 80 percent in instruction and program, we will continue to focus on the differences between the previous QSAC district performance review and the current review.

Because we've incorporated student growth into the new QSAC measures, it provides an opportunity for districts that are below 80 percent to demonstrate that students are improving, and we reward districts who demonstrate gains in this area. We anticipate the changes made to the indicators will increase the number of high performing school districts.

I understand some legislators may have concerns with a QSAC tool that can trigger state control of a school district.

However, this is one of the mechanisms we have in place to intervene in struggling districts. Under our department's regulations, a district under full state control must remain in that status for at least three years.

But as three of the four districts under State intervention move through the transition back to local control, our agency remains committed to embedding ongoing and meaningful support and technical assistance through the entire transition process.

The revamped QSAC system is well-aligned to empower districts to assess and remedy their needs on an ongoing basis, and to leverage Department supports available to meet those needs.

Our current approach to QSAC corresponds both with our NJDOE 2.0 goals to continually assess, create, and execute improved educational outcomes and Gov. Murphy's vision of a stronger and fairer education for our 1.4 million school children throughout New Jersey.

Thank you.

# New Jersey Department of Education

## Evaluation of School Districts: New Jersey Quality Single Accountability Continuum (NJQSAC)

# New Jersey Quality Single Accountability Continuum (NJQSAC)

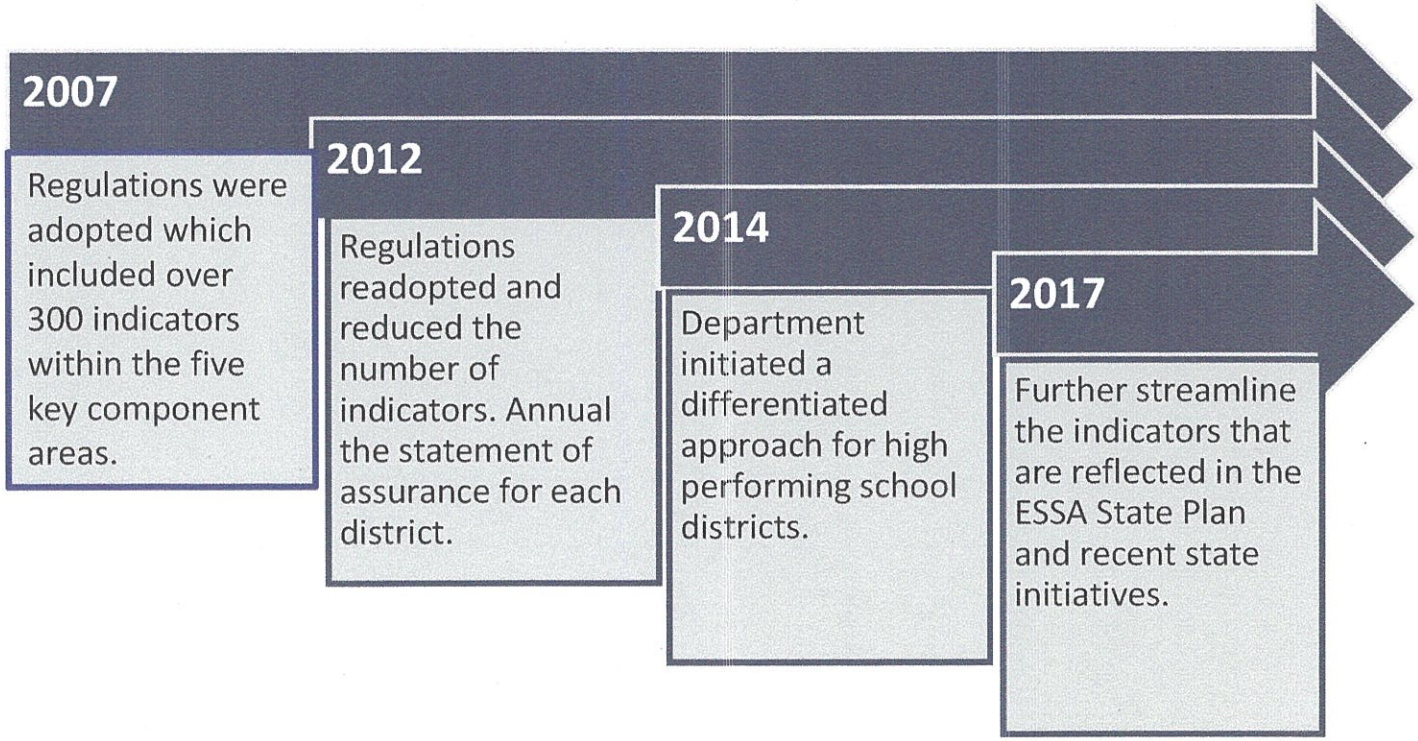
Originally enacted by the New Jersey Legislature in 2005 as N.J.S.A. 18A:7A-1.1, et seq., and codified in N.J.A.C. 6A:30-1.1, et seq. NJQSAC was created to ensure districts are meeting the minimum requirements for district performance and to provide guidelines for initiating or withdrawing from partial or full state intervention.

NJQSAC includes quality performance indicators in five key component areas:

- Instruction and program
- Fiscal management
- Governance
- Operations
- Personnel

# Continually Improving Accountability and Support Systems

The changes adopted in 2017 to N.J.A.C. 6A:30 were part of a broader effort to streamline New Jersey's accountability systems, as well as accurately reflect key state initiatives such as the adoption of New Jersey Student Learning Standards, State assessments, ESSA school accountability and TEACHNJ educator evaluation system.



# Objectives of the New Indicators

**Make them more understandable**

- Ensure indicators are, where possible, **clear, objective and measurable**
- Ensure point values and weighting of indicators reflect **State priorities and scoring is easier to understand**
- Focus on growth and performance for **all students** throughout the district

**Align**

- Ensure all accountability systems (state, local, federal) compliment one another to create **a cohesive set of goals** for students, educators, and districts
- Ensure NJQSAC overall ratings **align with measures** used in other accountability systems (e.g., state assessment proficiency, student growth, graduation rates)

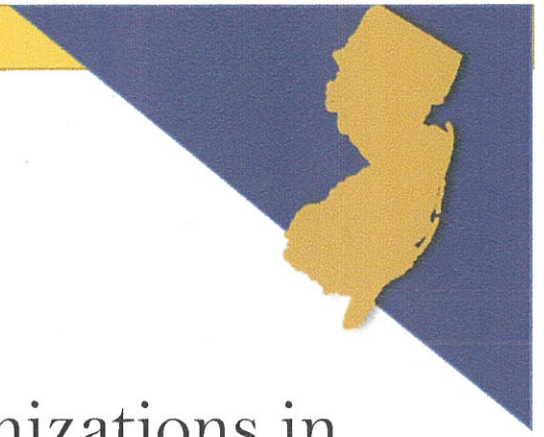
**Streamline**

- Reduce the number of overall indicators and further **eliminate redundancy**
- Reduce the time and resources educators must prepare for a NJQSAC visit, **allowing more time to focus on instructional needs of the district**
- Focus NJDOE's role more on **support rather than compliance**

# Improving Mutual Engagement in the Evaluation of School Districts

- To achieve success oriented monitoring, the NJDOE has done the following:
  - Increased stakeholder engagement
  - Trained districts on NJQSAC through the same PowerPoint to improve consistency.
  - Conducted a simulation to improve consistency in evaluating districts
  - Created the NJQSAC User Manual
  - Included all NJDOE program offices in analyzing the indicators
  - Conducted extensive professional development with intent of increasing consistency in 21 counties
- The Department will continue to find ways to support districts in order to achieve success oriented monitoring

# Stakeholder Engagement



- Engaged New Jersey professional organizations in conversations regarding the proposed regulations.
- Over 150 superintendents attended the Department statewide outreach sessions to provide feedback on the implementation of NJQSAC and the NJQSAC User Manual.
- Internal NJDOE Program Office feedback was incorporated throughout the regulatory process as well as the creation of the NJQSAC User Manual.
- Over 80 comments during public testimony through the code adoption process.

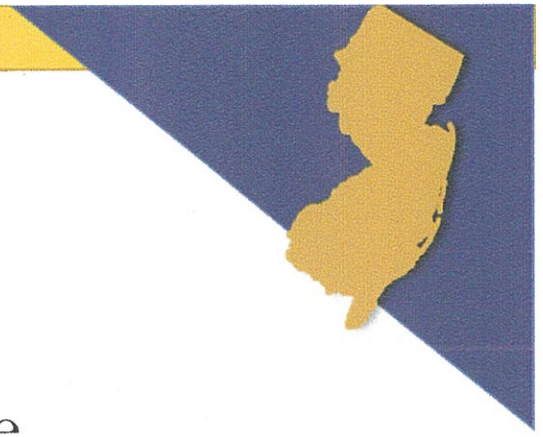
# NJQSAC Process

- Every district is in 1 of 3 cohorts and monitored every three years.
- District completes a District Performance Review, which is a *self-assessment* tool that measures the district's strengths and weaknesses in all five (5) areas of school district effectiveness.
- Department's county offices of education *review and verify* the district self-assessments and then calculate the districts' NJQSAC scores.
- Districts are placed on a continuum based on the scores.

# NJQSAC Process (cont.)

- N.J.S.A. 18A:7A-14(b): If a district scores 80% or higher in all five areas they are certified as "high performing."
  - High performing indicates that a district has met the minimum requirements of district performance.
- If a district scores between 50% and 79% they must create a district improvement plan (DIP) in collaboration with the Department
  - The Department provides support in the development and implementation of the (DIP)

# State Intervention



- According to N.J.S.A. 18A:7A-14(c), the Commissioner may seek to initiate partial State intervention if a district satisfies less than 50% in four of the five areas of the DPR and has met one of five other factors listed in N.J.A.C. 6A:30-6.2.

- The Commissioner may seek full State intervention if the district scores below 50% in all five areas of the DPR or has a State fiscal monitor and scores below 50% in all areas but Fiscal and has met one of five other factors listed in N.J.A.C. 6A:30-6.2.

| District Performance Review Area | Percent of Districts Scoring Below 80% |
|---|---|
| Instruction and Program | *24.7% |
| Fiscal Management | 1.1% |
| Governance | 2.3% |
| Operations | .5% |
| Personnel | .5% |

*These statistics are based on the previous NJQSAC indicators.

# Statewide Snapshot

- The NJDOE anticipates reduction in the number of districts scoring below 80% in the area of Instruction and Program using the new indicators.
- All 21 county offices of education have provided training and technical assistance on the new QSAC to ensure a complete understanding of the elements being evaluated.
- In support of implementation the Department extended the self evaluation submission deadline to ensure adequate training and technical assistance.

# Instruction and Program (I&P) Indicators

Indicators 1 through 7 align QSAC, ESSA, and other metrics used by New Jersey to **ensure that districts, schools and classrooms are focused on the same outcomes. Examples include:**

| Previous QSAC Indicators | Indicators as of July 2018 |
|---|---|
| • Used NJASK/HSPA | • Uses current State Assessments |
| • District met 'Annual Measureable Objectives' (AMOs) for total student population. | • District score is based on proficiency of overall student population and subgroups of students |
| • Based on proficiency of total student population or incremental improvement in proficiency. Does not monitor for academic growth. | • Measures growth using median Student Growth Percentile (mSGP) for both the total student population and all subgroups of students |
| • Used average daily attendance rate of district (at least 90% attendance over prior three years) | • Uses chronic absenteeism (students who miss 10% or more of school) |
| • Science: at least 70% proficient or advanced proficient in statewide science assessments | • Science: Achievement scores use proficiency of total student population and subgroups of students |
| • Graduation: Based on the percentage of students who graduated from high school via HSPA | • Graduation: Based on a school district's 4- and 5-year cohort graduation rate of total student population and of all student subgroups |
| • Districts were penalized for having classified schools under the requirements of Federal regulations. | • Districts are no longer penalized for having classified schools under the requirements of Federal regulations. |

# Personnel Indicators

The Personnel District Performance Review indicators are used to assess a school district's performance and capacity in fulfilling the requirements for staffing and staff development.

| Previous QSAC indicators | Indicators as of July 2018 |
| --- | --- |
| Emphasized rules compliance, such as:<br>• Use of board-approved job descriptions<br>• Documenting successful criminal history checks<br>• Adopting of policies and procedures for physical examinations and annual evaluation for staff<br>• Use of multiple sources of data for professional development | Emphasis on practices promoting teacher and leader quality:<br>• Detailed expectations for staff evaluations; high-quality professional development<br>• Support for new teachers (including mentoring)<br>• Quality supervision practices<br>• Detailed and accurate tracking of the position control roster, reconciled to the district's budget<br>• Continue important compliance activities, e.g., criminal history check, physical exams |

# Governance, Fiscal & Operations Indicators

**Governance:** Collecting data/information from families at least annually to measure the effectiveness of district communications and programs to support student learning; establishing programs/services for English language learners (N.J.A.C. 6A:15 *et seq.*); ensuring the budgeting process addresses curriculum implementation; developing curriculum that is aligned with state standards; developing all district board of education approved policies; evaluating the superintendent; and reviewing and approving all contracts for superintendents, deputy/assistant superintendents, school business administrators.

**Fiscal:** Maintaining monthly reports and standard operating procedures; satisfying annual audits; managing grants and capital funds; implementing facilities plan; conducting annual safety reviews; preparing and analyzing fiscal year cash flow; and employing a certified facilities manager, completing the Health and Safety Evaluation of School Buildings Checklist.

**Operations:** Implementing policies on student conduct, attendance, Alcohol, Tobacco and Other Drugs, Harassment Intimidation and Bullying; reporting data to NJ SMART (data bank for teacher and student information) and the Student Safety Data System; maintaining a positive school climate; and providing transportation, health, counseling and guidance services and existence of a data management process.

# Thank you

NJPSA
NEW JERSEY PRINCIPALS
AND SUPERVISORS ASSOCIATION

**NJPSA Recommendations on NJQSAC**
**Before the Joint Committee on the Public Schools**
**December 4, 2018**

Thank you for the opportunity to share the perspective of the NJ Principals and Supervisors Association on the issue of New Jersey's accountability system for our public schools, the NJ Quality Single Accountability Continuum, (NJQSAC). The State Legislature constructed the NJQSAC statute as a strong framework for district and school accountability in order to fulfill the Legislature's constitutional role of providing a thorough and efficient system of public education throughout New Jersey.

The structure of the NJQSAC system provides a process to monitor district compliance with state standards, identify struggling schools, establish a tied system for NJDOE intervention, and track improvement through corrective action plans. This is an effective framework, but there have been implementation challenges in past efforts of the NJDOE's Regional Assistance Centers to effectively support schools at risk, monitor districts uniformly across the state, and provide constructive feedback and expertise to struggling districts. As the current Department works to establish a new approach, it is important to address past capacity issues, including the need for staff with educational field experience, the need for quality NJDOE staff training and procedures for uniform DOE monitoring approaches across the state.

State regulations, developed by the NJ Department of Education and adopted by the State Board of Education through a public hearing process, provide the details of implementation at the local level. This regulatory process allows the system to be responsive and adaptive to the field (and the public) to meet changing educational needs and the realities of implementation in school districts. Recently, the State Board amended the process for the 2018-19 school year, with the goals of:

- clarifying the indicators in the District Performance Review in the required five statutory components of NJQSAC review (Fiscal, Operations, Instruction and Program, Personnel and Governance);
- aligning New Jersey's multiple accountability systems (local, state, federal);
- simplifying the system; and
- eliminating redundancy so districts can focus their efforts on the instructional needs of students in the district.

Our members who are currently working with the state monitoring system are experiencing the revised system this school year for the first time. Fortunately, with me today is Heather Moran, Principal of the Logan Middle School, in Logan Township, Gloucester County whose district has just successfully completed the monitoring process through this new NJQSAC process. Following Heather's remarks,

12 Centre Drive • Monroe Township, New Jersey 08831-1564
Phone 609-860-1200 • Fax 609-860-2999 • njpsa@njpsa.org • www.njpsa.org

Our members believe that **all** districts would benefit from a monitoring system that was more formative in nature, where districts can establish compliance through multiple indicators/approaches (similar to the approach adopted with the menu of options for graduation), where statements of assurance are permitted in some areas and data collection is streamlined and ongoing. This would allow the formal monitoring process to focus on areas where a gap or deficiency exists, to promote growth and to help schools/districts improve.

4. **Support NJDOE reorganization efforts through funding continuity and legislative support.**

The NJDOE recognizes the capacity and resource issues of the past and is working to restructure its monitoring and tiered system of support to districts. We applaud these efforts and pledge to work in partnership with the NJDOE in this regard. We already provide joint training to NJDOE staff in certain areas. The Legislature can assist in this through stable funding to the NJDOE for this purpose and the promotion of a variety of public-private partnerships to meet these goals.

Thank you for your leadership and your consideration of the views of the NJ Principals and Supervisors Association.

Submitted by:
Debra Bradley, Esq.
NJPSA Director of Government Relations

NJPSA
NEW JERSEY PRINCIPALS
AND SUPERVISORS ASSOCIATION

## Testimony of Heather Moran
## Before the Joint Committee on the Public Schools
## December 4, 2018

Good Morning. My name is Heather Moran and I am the proud principal of Logan Middle School in the Logan Township Public School District in Gloucester County. Our PK – 12 district serves 861 PK to 8th grade students onsite. Our high school students are served at two high schools in the county. We are extremely proud of our academic growth over the past few years in both mathematics and ELA as measured by state assessments. Our staff is fully committed to student growth and to our district goal to ongoing professional learning in the area of equity. Our focus has been to make our classrooms and schools more equitable for ALL students regardless of their race, religion, sexual orientation, and ability and we are currently working to make sure our curriculum is culturally responsive. These changes require all "hands on deck" and have collectively been the focus of our staff's instructional efforts to benefit all our students.

I appreciate the opportunity to share my perspective on the **new** New Jersey Single Accountability Continuum (QSAC) and its impact on such school-based instructional efforts. Let me begin by stating that school principals understand the need for accountability and we are not afraid of the hard work of **any** process that has a direct, positive impact on the quality of a student's educational experience. I also appreciate the efforts that are underway to balance the need for accountability with a less cumbersome and time-consuming compliance process, though I think there is more to be done in this area.

Recently, my district was the first in our county to use the new QSAC indicators and I am happy to share what that means at the school building level. Extensive preparation is needed even before the process begins:

- School and district leaders must review the 134 page QSAC procedural manual to become familiar with the five required sections, various indicators, and to develop a list of the documentation needed for verification;

- Once a solid understanding is established, the lead administrators assign tasks for data compilation to all district and school-based administrators from the Special Services Supervisor to the Curriculum Supervisor to the Business Administrator to the Principals;

- In addition, many administrative assistants are given long lists of materials to gather and label appropriately;

12 Centre Drive • Monroe Township, New Jersey 08831-1564
Phone 609-860-1200 • Fax 609-860-2999 • njpsa@njpsa.org • www.njpsa.org

- Data is then uploaded into the NJDOE system, often data, reports and procedures that have been previously provided to the Department;
- Internal meetings and reviews of the procedures, scoring and local materials are ongoing;

- Ultimately, a site visit takes place after all materials are submitted and checklists finalized.

This process takes an enormous number of staff hours and, as you can see, is extremely compliance-focused. Unfortunately, it results in a major diversion of school/district effort from our instructional goals and our forward momentum on other local goals. It prevents me as a building level principal from interacting with my staff and students in the same manner I normally would. The process occupied even more time for my Curriculum Supervisor, my right-hand person when it comes to improving instruction in my district. Planning learning activities for teachers, discussing observation results, dissecting data about individual students in need – these are just a few examples of the things we do on a regular basis together that have truly changed our student achievement levels in positive ways. In a small district where everyone wears many hats, the QSAC process significantly impacts our ability to do these things.

**Pros and Cons of the New System**

In terms of the new QSAC system itself, there are a number of things which set it apart from its predecessor. First, the use of technology to submit documentation digitally has made the system far less cumbersome from a data collection perspective. Once an organizational structure is put in place to name documents in a common way, people from throughout the district can help amass verification materials easily and get them to the person who is managing the process. From my perspective in the building, this was far easier than making sure physical materials were available for review. I also was pleased that we were able to use the most up to date standardized test information in the Curriculum/Instruction portion to capture our school's academic growth over the past four years.

However, the new QSAC still suffers from some clarity issues:

- There are places where a disconnect occurs between the documents requested for verification and the description asked for in the short narrative piece at the end of each section.

- There are times when a district collects all of the checklist pieces of documentation and then the bottom portion states that if you have these two specific things you receive all the points;

- There continues to be a great deal of redundancy between reports that are required throughout the year and the QSAC verification requirements. ( Examples: HIB reports that are required biannually, school policies - why is it necessary to re-verify and re-upload); and

- Finally, the curriculum and instruction piece of monitoring does not reflect best practice or the nature of curriculum itself as a collaborative and changing document. Instead, QSAC requires extensive details in all curricular areas, delineated and highlighted accommodations, career ready practices, 21st Century skills, and technology. If a curriculum document is truly the result of teacher collaboration through the unpacking of standards accompanied by a true study of student work product, it is never a "finished product" and therefore may not have every detail included. This is especially possible in special areas where we may only have a staff member or two in the whole district.

**Recommendations**

In closing, I do see real NJDOE efforts to improve the QSAC process. I understand the need for a compliance process to ensure that all students in New Jersey have access to high quality curriculum, instruction and a well-run and managed school system as a whole. Yet, we must balance this need with the fact that the time-consuming QSAC process can side-track the quality conversations and instructional work that are occurring in a district.

I recommend that the NJDOE work with districts to develop an ongoing data collection system that truly eliminates redundancy. Efficiency can be enhanced through Statements of Assurance in some areas as districts have done in the past. Compliance in these areas can be ensured through a system of spot checks, rather than a full-blown review if a district is meeting standards. If such changes occur, educators can re-focus our efforts on the quality of a student's educational experience and a collaborative approach to school improvement and support. This would be a game changer for our students and schools.

Thank you for your consideration. I will do my best to answer any questions you may have. Thank you for your time.

PATERSON PUBLIC SCHOOLS

*Preparing All Children for College and Career*

# NJ Quality Single Accountability Continuum
# QSAC Review

Eileen Shafer
State District Superintendent
Susana Peron
Acting Deputy Superintendent

# Agenda

- **Is QSAC…**
  - **Meeting its intended goals**
  - **Measuring school quality**
  - **Unduly burdensome**
  - **A tool for determining State Takeover**
- **Recommendations**

# QSAC vs. Paterson's Reality

- Paterson was expected to meet or exceed state targets in standardized assessments without taking into consideration the challenges faced by the district:
  - 90+ % of our students are economically disadvantaged
  - Approximately 30% of our students are classified as special populations
  - Expectations of ELL students' participation on state assessments upon entry to the country
  - Underfunded 280 million dollars
- QSAC's model in Instruction & Programs of having arbitrary set target scores vs. growth measures

# Is QSAC burdensome to complete?

- In the past there were as many as 120 indicators with each one requiring extensive documentation. Between 2007 – 2017, the District had 9 QSAC cycles, which lasted several days.

| Year | Type of Visit |
|---|---|
| July 2007 | Initial Placement Full Review |
| January 2010 | Interim Review Placement |
| December 2010 | Interim Review Placement |
| September 2011 | Full Review Placement |
| June 2013 | Interim Review Placement |
| June 2014 | Full Review Placement |
| November 2015 | Interim Review Placement |
| February 2016 | Interim Review Placement |
| March 2017 | Full Review Placement |

# Is QSAC burdensome to complete?

- With limited direction in the past, the district had to guess and prepare documentation as evidence that the evaluation team may ask for. The task of documentation is arbitrary based on the review team.
- Review team members are not consistent with each of the visits.
- In preparation of the evaluation, our daily operations are interrupted, shifting the focus away from the core business of teaching and learning.
- Preparing the schools for the visits is timely and disruptive for both District and School administrators.

# Is QSAC meeting goals for which it was designed?

- **QSAC was supposed to be designed to do the following:**
  - Ensure a thorough and efficient education
  - Comply with state and federal mandates
  - Identify strengths and weaknesses of a District
  - Identify areas the NJDOE can provide support, assistance or intervention
- **QSAC should not be used to do the following:**
  - Penalize Districts for unrealistic expectations, such as state assessment targets versus growth
  - Determine State Takeover without providing intensive support and intervention
  - Establish mandates without providing funding to fulfill expectations (ie, staff requirements)

# Recommendations

- Regarding Assessments, look at growth measures rather than targeted scores
- Design a grading scale based on evidence submitted regarding the DPR

| | |
|---|---|
| $\frac{1}{3}$ of evidence required is completed or on target | Targeted Intervention |
| $\frac{1}{2}$ of the evidence required is completed or on target | Intervention |
| $\frac{3}{4}$ of the evidence required is completed or on target | Probation |

- If you do not improve over a period of three years in the specific DPRs, then you would have state intervention for that specific DPR. Should you have three DPRs in state intervention, it would mean state takeover for those specific DPRs, not all five areas.
- Once you score 80% on any of the DPR areas, you will exit State takeover status for that specific DPR. Any DPR area meeting the 80% threshold should not meet punitive measures.

# Recommendations

- Only time that the Local Board of Education loses authority is if Fiscal, Operations & Governance are all under State Intervention

| | |
|---|---|
| 1 area (Fiscal, Operation, Governance) under State Intervention | Probation |
| 2 areas (Fiscal, Operation, Governance) under State Intervention | Targeted Intervention |
| 3 areas (Fiscal, Operation, Governance) under State Intervention | Local Board would relinquish power; act only as advisory |

# Is QSAC an appropriate tool for decision regarding state takeover?

- In a report to the Commissioner of Education from the "Working Group on State Takeover" published in 2003, the panel noted that:

*"While uniform standards should apply to every district, no one would suggest that the districts with the most difficult educational conditions should have to perform at a higher level than their suburban peers."*

- Additionally it was said that, the early move toward state takeovers of "failing school districts" had more to do with alleged mismanagement and corruption at the local level than it did with student underperformance in these districts

- The report and subsequent QSAC data indicates that the move to state takeover of the 4 district wasn't evenly applied across all districts

**TESTIMONY OF**
**ROGER LEÓN**
**Superintendent of Schools, Newark Board of Education**

**Presented to the Joint Committee on the Public Schools**
**of the New Jersey State Legislature**
**December 4, 2018**

Good morning, Honorable Co-Chairs Senator Rice and Assemblywoman Jasey and Members of the Joint Committee on the Public Schools, thank you very much for the opportunity to appear before you this morning. I am Roger León, and since July 1, 2018, I have had the honor and pleasure of serving as Superintendent of Schools in the school district of the great city of Newark, New Jersey, which – as you all know – was returned to full local control, effective February 1, 2018, after 23 years of state operation and state intervention. The process of the return to local control is continuing, pursuant to a Transition Plan established by the district and the Department of Education and issued in December 2017.

I have spent my entire career – indeed, my entire life – in the Newark Public Schools and in the city of Newark. I was first employed in the Newark Public Schools as a substitute teacher in the district in the late 80's when I was still in college and later hired as a teacher, several years before the infamous state takeover, and then I was promoted to principal and assistant superintendent before being appointed Superintendent. Thus, I have lived and worked in Newark's public schools through the entire process of state takeover, state operation, and the gradual return to local control pursuant to the law known as the Quality Single Accountability Continuum (QSAC).

Newark's capacity for local control of its schools, as measured by QSAC's five components of school district effectiveness, was assessed many times since the law's adoption in 2005. The QSAC assessment process is challenging for district administrators and their staffs. It requires compilation of voluminous documentation. Some say the work required to do that is not the best use of employees' time, and QSAC reviews should be less frequent in high-performing districts. But, I submit that the task is not that onerous. I cannot say whether it is the best use of time in other school districts, but I know that in Newark we have completed the assessment efficiently and successfully many times. In my opinion, the result was worth the effort.

Authority was returned to the District in the area of Operations in 2008, in Fiscal Management in 2014, in Personnel in 2016, and finally in the areas of Governance and

Instruction and Program in September 2017. Local control became effective February 1, 2018, subject to completion of the District's Transition Plan.

Of course, all of the five components of school district effectiveness are important and essential. By definition, instruction of students is our core mission and reason for being. How well we instruct our students, and the evidence of student learning and achievement, must be the most important measure of school district success and capacity. Unfortunately, we saw in Newark that for a myriad of reasons QSAC's benchmarks in the area of Instruction and Program were simply inapplicable and not an accurate indicator of school district effectiveness. There is universal agreement, as far as I know, that school district effectiveness and capacity for local control cannot and should not be determined by reference to students' scores on standardized tests of student achievement, as QSAC's quality performance indicators do. To avoid any confusion or any doubts, I strongly believe that student achievement must be an indicator, it is now as it should be. However, growth should be a criterion too. Not including growth as an indicator may unfairly, inadvertently, and even negatively label school districts across this state less than what they actually are. Student achievement is important, but growth matters. Therefore, Newark submitted an Equivalency Application to the Department of Education, requesting that the effectiveness of its instructional program be gauged through a variety of student performance measures specifically focused on the current needs and circumstances of the school district and its students. The Department approved that Equivalency Application in 2016, and those measures – in addition to QSAC's quality performance indicators – were the benchmarks used to determine Newark's effectiveness in the area of Instruction and Program, and its readiness for return to local control.

This is a large part of QSAC's success story in Newark: the fact that the Department of Education saw fit to grant an exception to QSAC's requirements through the Equivalency process. I understand a similar process was followed in Jersey City and Paterson. I urge this committee and the State Legislature to consider this fact in your review of QSAC and its provisions. In the all-important area of Instruction and Program, given the complexities of the lives of our students and their families, school district effectiveness should not be determined solely by reference to students' scores on standardized tests. Instead, as the Department found appropriate, the use of multiple measures of capacity and effective instruction and program should be encouraged if not required.

I submit to this Committee that Commissioner Repollet and his staff have served as supporters and allies of the work in Newark. From the day of his start and since the evening of my appointment. I would be further remised if I did not thank Essex County Superintendents Feinsod and Zarra and their respective staff for their strong support of Newark's schools. I want to commend and thank the Newark Board of Education, the hard-working employees of Newark Public Schools, members of the community for their undying support, parents who have entrusted their children to our care, and most of all our 55,000+ students. All to say, the real progress in Newark and arguably all of the other school districts in New Jersey remains in the critical work that happens with, as I always refer to my students as, the single most important heartbeats in our classrooms, at each of our respective schools across every school district. I will be the first to share that we have much more to do in Newark and my students deserve us all to be the very best, all of us.

Thank you for your time and consideration.

CHRIS CHRISTIE
*Governor*

KIM GUADAGNO
*Lt. Governor*

State of New Jersey
DEPARTMENT OF EDUCATION
PO BOX 500
TRENTON, NJ 08625-0500

DAVID C. HESPE
*Commissioner*

August 1, 2016

Mr. Christopher D. Cerf
State Operated District Superintendent
Newark School District
2 Cedar Street
Newark, NJ 07102
contactsuper@nps.k12.nj.us

Dear Mr. Cerf:

Pursuant to the requirements of N.J.A.C. 6A:30, the Newark School District has undergone a Quality Single Accountability Continuum (QSAC) district performance review. Based on that performance review, I have updated the placement of the district on the QSAC continuum. The complete performance results are enclosed. The chart below lists all full and interim placement results:

| DPR Areas | Full Review Placement (7/2011) | Interim Review Placement (6/2012) | Interim Review Placement (6/2014) | Full Review Placement (7/2015) | Interim Review Placement (7/2016) |
|---|---|---|---|---|---|
| Instruction and Program | 64% | 34% | 33% | 58% | 64% |
| Fiscal Management | 93% | 88% | 88% | 82% | 82% |
| Governance | 89% | 55% | 76% | 72% | 88% |
| Operations | 83% | 83% | 83% | 95% | 95% |
| Personnel | 94% | 48% | 100% | 60% | 100% |

Since the district still has not satisfied at least 80 percent of the weighted indicators in instruction and program, you are directed to continue to implement the district improvement plan (DIP) to address indicators that have not met QSAC standards. The interim executive county superintendent will conduct the next review in school year 2016-17.

Sincerely,

David C. Hespe
Commissioner

DCH:RLB:PJL:newark/interim review
Enclosures
c: Robert Bumpus
Joseph Zarra

CAMDEN CITY SCHOOL DISTRICT
1033 CAMBRIDGE STREET, CAMDEN, NEW JERSEY 08105
856-966-2000 • www.camden.k12.nj.us

KATRINA T. MCCOMBS
ACTING SUPERINTENDENT

Katrina McCombs statement – Joint Committee on Public Schools, QSAC hearing, December 4, 2018

Thank you Committee Members for inviting Camden City School District to be including in your hearing to review the Quality Single Accountability Continuum. As a 25-year veteran educator in Camden, I am familiar with the QSAC tool from my time as a Principal, Early Childhood Director, Deputy Superintendent, and most recently as Acting State Superintendent. I look forward to sharing my feedback from the Camden perspective with you today. I have come with my Deputy Superintendent, Dr. Taryn Fletcher, and Chief of Staff, Wayles Wilson. We are here to help answer specific questions you may have about the current rubric, or the transition to the new measures.

As a graduate of Camden City School District and someone who believes deeply in the limitless potential of our students, I believe, first and foremost, that it is critical the State holds all school Districts to high standards – because that is what our students deserve. In the same way I use evaluation tools, test results, and building walks to hold each of my school leaders to high standards, QSAC does the same – holding every Superintendent accountable for delivering a full and fair education to the children they serve. By this measure, QSAC meets a critical goal for NJ school districts – to provide a consistent way to hold Districts accountable to students and families.

In my previous role of Deputy Superintendent, I was most recently responsible for completing the QSAC self-assessment for Instruction and Programs under the old rubric. This year I am overseeing all aspects of our self-assessment under the revised rubric. While we are still in the middle of completing our 2018 self-assessment, I believe that the revised rubric is providing a more robust measure of school quality – specifically in the Instructions and Programs indicators. The biggest shift in Instruction and Programs has been to include more indicators that measure both the inputs and the outputs of high quality instruction. If QSAC measures both how we prepare and execute our instructional program – curriculum, lesson plans, college and career tracking, and how that preparation translates into student achievement – the measures become more useful in understanding where a District is doing well, and in what areas we need to continue to make improvements.

As a District, there is no doubt that QSAC evaluations and self-assessment require a great deal of time and energy for District administrators to complete. However, the time we spend preparing QSAC results is a way for our teams to come together to norm around the critical work streams that deliver for our schools and students. In the new rubric, electronic document sharing and a reduction in the total number of indicators will reduce the number of staff and hours dedicated to the QSAC review and evaluation.

In Camden, we have made marked progress since entering into State intervention in 2013. Our graduation rate is rising, our proficiency gains have been steady, and our student growth scores are rising. Our personnel management processes have improved, and we have made significant investments in modernizing our processes, protocols, and ways of working. Many of these improvements have been captured in our QSAC evaluations. As a leader on the ground, I do believe that our return to local control must be both stable and sustainable. QSAC is a critical tool for measuring our progress toward that goal, but it is not the only

consideration – specifically as it relates to the timing of a return to local governance. As we work to address challenges and broken systems decades in the making, QSAC is a guide and support to help us stay on course.

The guidance provided by QSAC evaluations is most effective when it is partnered with the resources and supports of the State and County, who can help us to deliver a corrective action plan that brings about meaningful, sustainable improvements to District processes and operations. I have been extremely lucky to have the support of the Commissioner, DOE, and a strong County Superintendent and County BA who are actively helping Camden review our QSAC findings and work together to find ways to make the changes necessary to lead to a sustainable return to local control.

Thank you for your time, and we welcome any questions you may have.

NJ Association of School Administrators
Education & Research Foundation

**920 West State Street • Trenton, New Jersey 08618-5328**
**609.599.2900 / Fax: 609.599.9359 website: http://www.njasa.net**

**Testimony Regarding NJ QSAC**
**By: Melanie Schulz, NJASA Director of Government Relations**
**Joint Committee on Public Schools**

**December 4, 2018**

Senator Rice, Assemblywoman Jasey and Members of the Joint Committee on the Public Schools:

On behalf of the New Jersey Association of School Administrators (NJASA), I would like to thank you for inviting our voice to your table this morning to discuss New Jersey's school monitoring law and Regulations.

I want to take some time during my testimony today to talk about the development of school district monitoring and how we got to the NJ QSAC process.

The Joint Committee on the Public Schools has a long history of discussing school monitoring. This has been written into the statutes for the purpose of having legislative responsibility regarding notice from the Executive Branch when the State Board of Education issues an administrative order to establish a district under full intervention, as well as timely updates on the status of those districts from the Commissioner of Education.

In 1991, (then) NJ Governor Jim Florio, signed a law to strengthen the school district monitoring system as well as the performance standards for evaluating public schools.

In addition, the new law created a Task Force on Educational Assessment and Monitoring and that group of 17, appointed by Commissioner of Education, Dr. John Ellis, worked for about 8 months to create the monitoring process that directly preceded the creation of NJ QSAC.

During this time, monitoring was suspended for 2 years.

At that time, both Jersey City and Paterson were in State Takeover.

When the new process was implemented, school districts had to have verified achievement on indicators for student performance, governance, program reviews and analysis of data through an on-site visit.

There were various levels of certification and this process also laid the groundwork for the eventual adoption of State standards for curriculum. The first set of curriculum standards were adopted in 1996.

While that monitoring law was implemented for over 10 years, in the early 2000s it became apparent that this statute needed updating.

Senator Rice, you were the primary sponsor of this effort in 2004 along with Senator Tom Kean, Jr.

The NJ Quality Single Accountability Continuum was a truly bipartisan effort (passing the Senate 40-0 and the Assembly 73-4-2).

While these statutes and all the amended versions are well intended and based on good effort, the consequences in the field always manifest themselves in a truly burdensome and time-consuming process.

In this 21st century, technology has advanced to the point where school districts should not be so overburdened. Access to data should be seamless between districts and the NJ DOE. School districts provide massive amounts of information and data to the Department of Education annually that should be readily and remotely available to NJ QSAC reviewers.

I would ask that this legislative body support a review of the technology landscape at the NJ DOE and how information is passed and accessed between districts and the Department.

My members are here today to give you and up-close view of how their time and that of their faculty is diminished from the instructional day when they undergo a QSAC evaluation.

Thank you for allowing us to present on this vital topic.

BC ASA
BERGEN COUNTY ASSOCIATION OF SCHOOL ADMINISTRATORS

Dear members of the committee,

Good Morning to the members of this committee. My Name is Dr. Adam Fried and I am the Superintendent of the Harrington Park School District and I am also the President of the BCASA. I would like to thank you for holding today's hearings and for offering the Bergen County Association of School Administrators the opportunity to offer our testimony. For background purposes, the BCASA represents the Superintendents of schools as well as central office personnel that works on behalf of Bergen counties 133,000 students and over one million residents. We take great pride in the work that we do, and are proud to offer some historical references as well as suggestions and guidance to the committee as they undertake this incredibly serious work.

Over the last several years, the BCASA in cooperation with representatives from the NJDOE convened a series of think tanks and meetings with school leaders and critical stakeholders from Bergen and Passaic counties. The mission was to come together to work in creating a better user manual that meets the vision of QSAC, while looking forward to how we as an association can support districts in this rigorous growth model. As an association we felt that it was our duty to not come to the NJDOE with complaints and circumstances, but join them in creating a user manual that honors the tremendous work being done throughout the State of New Jersey, while recognizing the need to create a system of accountability across all of our stakeholders. In the spring of 2017 we compiled a sixteen-page letter outlining areas of concern that was shared with the NJDOE. We suggested that working together we could help create an open dialogue between the two groups in the spirit of collegiality and for the betterment of the children we serve on a daily basis. Throughout the summer and fall of 2017 robust and rich conversations allowed not only districts but the NJDOE to understand and mutually agree on areas of concern as well as areas that needed greater depth of understanding for all involved.

It is fair to say that as district leaders we had hope that the time and effort put into the work would be shown in a newly revised manual and create a new paradigm where the the DOE and the districts work hand in hand in creating a continuum of growth that is rigorous and obtainable. This past summer the BCASA and PCASA met with then Interim Commissioner Repollet and his transition team to discuss our concerns. We were appreciative of his willingness and openness during that meeting to the work and our concerns surrounding the user manual. Sadly, what we have seen and learned is that there is still significant concerns and a lack of genuine understanding in relation to manual set forth in its current state. As leaders of our schools we are strongly advising to this committee that there be a slowdown in the QSAC Manuel implementation, thereby honoring the work that has been done previously as well as allowing a fully implemented pilot which would result in vast data which could then be analyzed and reviewed to create a more seamless implementation and greater success. As Bergen County we are again willing to to step forward and help in the creation of a robust pilot program across multiple types of districts that will allow the

BC ASA
BERGEN COUNTY ASSOCIATION OF SCHOOL ADMINISTRATORS

DOE and this committee to make the best possible decisions for the children and the districts we serve. I leave you with a quote from Teddy Roosevelt "Nothing in this world is worth having or worth doing unless it means effort, pain, difficulty. No kind of life is worth leading if it is always an easy life." Bergen county is ready to serve and live a strenuous life for the betterment of children.

# 2019 QSAC SCHEDULE

| | |
|---|---|
| January 4 | Rutherford |
| **January 7** | **Ridgewood** |
| January 8 | Cliffside Park |
| **January 9** | **Fairview** |
| January 11 | Englewood Cliffs |
| **January 18** | **Old Tappan** |
| January 22 | Northvale |
| **January 24** | **Dumont** |
| January 25 | Norwood |
| **January 28** | **Allendale** |
| January 29 | Cresskill |
| | |
| **February 1** | **South Hackensack** |
| February 4 | Harrington Park |
| **February 5** | **New Milford** |
| February 6 | Northern Highlands |
| **February 8** | **Hillsdale** |
| February 12 | Paramus |
| **February 15** | **Haworth** |
| February 20 | Fort Lee |
| **February 22** | **River Vale** |
| February 25 | Glen Rock |
| **February 26** | **Wallington** |
| February 28 | Westwood |
| | |
| March 4 | Fair Lawn |
| **March 5** | **Ramsey** |
| March 6 | Wood-Ridge |
| **March 8** | **Maywood** |
| March 12 | Elmwood Park |
| **March 13** | **Ridgefield** |
| March 15 | Carlstadt-East Rutherford |
| **March 19** | **Tenafly** |
| March 25 | Park Ridge |
| **March 26** | **River Edge** |

4/21

# BERGEN COUNTY ASSOCIATION OF SCHOOL ADMINISTRATORS

2017-2018

EXECUTIVE COMMITTEE

PRESIDENT
ADAM D. FRIED
HARRINGTON PARK

PRESIDENT-ELECT
MICHAEL JORDAN
MAYWOOD

VICE PRESIDENT
BRIAN P. GATENS
EMERSON

SECRETARY
MICHAEL FOX
DEMAREST

TREASURER
JAMES ALBRO
WALLINGTON

MEMBER AT-LARGE
JOANNE MEGARGEE
LEONIA

NJASA REPRESENTATIVE
RICHARD KUDER
WYCKOFF

NJASA REPRESENTATIVE
KEN ROTA
FORT LEE

IMMEDIATE PAST PRESIDENT
MATTHEW MURPHY
RAMSEY

INTERIM EXECUTIVE COUNTY SUPERINTENDENT
NORAH PECK

PAST PRESIDENTS:

C. LAUREN SCHOEN
MAHWAH

PATRICK FLETCHER
RIVER DELL

DAN FISHBEIN
RIDGEWOOD

June 16, 2017

To the New Jersey Board of Education,

The Bergen County Association of School Administrators (BCASA) and the Passaic County Association of School Administrators (PCASA) is grateful for both the presentation made by Interim ECS Norah Peck and the input of the representatives from the NJDOE at the recent BCASA general meeting. Our countywide group, working in conjunction with our colleagues from Passaic County, have taken great interest in the proposed revisions to the New Jersey School Quality Accountability Continuum. Based on the information gleaned from Ms. Peck's presentation and our review of both the Powerpoint and the proposed revisions to NJQSAC, we would like to see changes in the following areas:

- It appears that the proposed revisions puts greater weight on the results of standardized tests as percentage of school quality. Our concern is that by moving from 40% to 60% the evaluative tool places too much weight on a single assessment. Connected to this topic is the ongoing issue of students refusing to take the test entirely or taking the test without merit. Our districts are diligent in emphasizing the importance of the PARCC, but have no recourse when families choose not to participate. This has the side effect of driving down student test results. It's unfair to have school districts accountable for a significant change in score that is not due to school quality.

- In the interest of a full understanding of the impact of these changes, we are requesting that the NJDOE run an impact study to see the effect of this change on school districts. The move from 40% - 60% will look like an arbitrary decision (why not 50% or 5%?) and before any decision is made an understanding of the impact on districts should be quantified.

- Further to the role of standardized tests, we encourage the revisions to include a multi-year student growth cohort model rather than the results of a single year's assessment. The single-year model unfairly impacts schools with small student

populations as the performance of a few students can significantly skew the results.

- Regarding the personnel indicators, while we applaud the move away from the draconian early draft that cut possible points in half with one file being incomplete and then to zero when more than one staff file was incomplete, we still feel that consequences in that area are too pejorative, and likely to lead to reduced scores for a minor clerical error.

Aside from these granular concerns with the current proposed document, the BCASA feels that a larger conversation has to be held regarding the one-size-fits-all model of the NJQSAC indicators. New Jersey, with its 600 plus districts, is far too large to effectively layer a single blanket evaluation model on every district. Time and consideration should be given to developing provisions for districts of varying socioeconomic conditions and size. The current system creates a set of winners and losers, with larger more wealthier districts more likely to enjoy great success as a result of NJQSAC monitoring. We want to emphasize our need to move away from such a system.

Thank you for your consideration and we look forward to our ongoing conversation.

Respectfully Yours,

BCASA
Executive Committee

PCASA
Executive Committee

CC:
Kimberley Harrington, Commissioner, NJ Department of Education
Norah Peck, Interim Executive County Superintendent, Bergen
Robert Davis, Interim Executive County Superintendent, Passaic

Enclosure:

BCASA Questions regarding NJQSAC
June 12, 2017

1. What is the philosophy behind NJQSAC? Is it a compliance document to confirm that districts are meeting some organizational benchmarks or is it being used as an external stick to drive district performance?

2. Based on the new proposal, the accountability metric for the weight of standardized test scores is moving from 40% to 60%. What is the research-base for this as being a valid measure of district performance?
    a. Based on the impact study conducted by the NJDOE how many districts will move into an area in which they become a district in need of improvement using this metric. As a follow up, how would that impact the waiver process?
    b. Why is this calculated over a single-year snapshot and not as part of a multi-year cohort? And we all know that increasing that score is all about test prep?

3. What is the future status of the waiver program? Districts that met the necessary benchmarks have made valuable use of the time returned to the district, and the BCASA is focused on preserving that.

4. Participation rates are based in a large way on the public's reaction to the overall idea of state testing. While our districts have worked hard to encourage students to take the tests, there is a limited capacity for districts to compel the students to take the test. What is the NJDOE's response to that?

5. Multiple valid indicators (PISA, NAEP, SAT results, etc.) are used as nationwide benchmarks for state educational performance, and per these measures, New Jersey excels in educating its students. What will the conditions be for these tests to be considered as part of our overall performance? A good reference point is the idea of The Honesty Gap http://honestygap.org/state/new-jersey/

6. The scope of the indicators is simply too exhaustive. We have been given varying messages as to what the essence of the NJQSAC visits are. Some say we need folders upon folders of information for review. Others say we should not have massive amounts of folders and files but instead be ready to discuss.

7. PARCC Assessments: The extent of the use of statewide testing data is not relevant to the fact that it is only one portion of a true student assessment. Participation rate, attendance rate, subgroup performance

and overall proficiency numbers are too myopic in scope and should not be worth as much in this section as they currently are proposed to be.

8. I'm unclear about why mSGP scores are considered the best way to measure academic progress. I would strongly recommend, again, using a simple measure of charting cohort growth with the same group of students year after year from one's own school district in terms of meeting and exceeding expectations.

9. What exactly are the 21st century skills being referred to in the curricular sections? Different than 21st century life and career standards?

10. How exactly is subgroup performance going to be averaged in with overall performance? What about districts with very small sub groups?

11. For the achievement scores in Science, will they include the Biology test or are we still only using the NJASK 4 and 8?

12. The points awarded for achievement scores in Science, Math, and ELA are an all or nothing proposition. So you only get points if you meet the cut score. There should be a range involved for districts who may have just missed the cut score to earn a portion of the points. This was addressed in the old QSAC where point values were assigned to the percentage of students passing the LAL and Math assessments.

13. Item 6, graduation rate, is weighted too heavily. This is an unfair burden to districts in communities with transient populations, higher ESL population, and higher free/reduced lunch populations.

14. Item 6, graduation rate, fluctuates greatly in smaller districts. For example: my current grade 12 is around 80 students. Therefore if only 5 students fail to graduate, we would fall below 95%. I also do not see a range of points awarded, but rather an all or nothing proposition of 10 points if you achieve it and 0 if you don't.

15. There is no option to award points for districts that decrease the achievement gaps from one year to another. This currently exists in the old QSAC.

16. The tiered scoring is unacceptable. Losing half of the allotted points if one or two files are incomplete is simply wrong. We would never score a student assessment or rate a teacher's performance in such a manner. I also wonder what incomplete is defined as. Is it defined as a missing evaluation which is currently housed on the digital portal that all districts are told to use? The questions and concerns surrounding such a requirement are endless and need clarification.

# BERGEN COUNTY ASSOCIATION OF SCHOOL ADMINISTRATORS

**2017-2018**
**EXECUTIVE COMMITTEE**

PRESIDENT
**ADAM D. FRIED**
HARRINGTON PARK

PRESIDENT-ELECT
**MICHAEL JORDAN**
MAYWOOD

VICE PRESIDENT
**BRIAN P. GATENS**
EMERSON

SECRETARY
**P. ERIK GUNDERSEN**
PASCACK VALLEY

TREASURER
**JAMES ALBRO**
WALLINGTON

MEMBER EMERITUS
**JOANNE MEGARGEE**
LEONIA

NJASA REPRESENTATIVE
**RICHARD KUDER**
WYCKOFF

NJASA REPRESENTATIVE
**KEN ROTA**
FORT LEE

LEGISLATIVE REPRESENTATIVE
**JOSEPH CIRILLO**
PALISADES PARK

LEGISLATIVE REPRESENTATIVE
**SHAUNA DEMARCO**
LYNDHURST

IMMEDIATE PAST PRESIDENT
**MATTHEW MURPHY**
RAMSEY

INTERIM EXECUTIVE COUNTY SUPERINTENDENT
**JOSEPH ZARRA**

**PAST PRESIDENTS:**

**C. LAUREN SCHOEN**
MAHWAH

**PATRICK FLETCHER**
RIVER DELL

**DAN FISHBEIN**
RIDGEWOOD

February 8, 2018

Dear Dr. Repollet,

The Bergen County Association of School Administrators (BCASA) would like to begin by congratulating you and wishing you all the best as you transition into your new position as the New Jersey Commissioner of Education. As stewards of public education, the BCASA is committed to support the 136,000 students we serve with the creation of schools that challenge the next generation to greatness. We are honored that a colleague of ours has now taken up the charge of continuing the excellence that is the New Jersey Public School System.

As you are aware, in the spring of 2017 the New Jersey Department of Education (NJDOE) undertook a significant and comprehensive restructuring of the Quality Single Accountability Continuum (QSAC). The BCASA was proud to participate in both the QSAC setting process along with the creation of the User Manual for local districts to reference as they prepare for monitoring.

As part of our work as an association, a task force was created in which questions and concerns regarding the implementation of the new QSAC regulations were created and sent to the NJDOE as well as the NJBOE. Please note that this task force has identified significant concerns regarding the new regulations as well as how they will impact the children we serve. As a result, we respectfully request that the NJDOE leave the current QSAC process in place for at least the 2018 - 2019 school year and take the opportunity to revisit the QSAC process during the 2018 - 2019 school year. Doing so will enable districts to better meet the expectation set forth in the document. We welcome the opportunity to support in continuing the greatness that is the New Jersey Public School System.

Please see the supporting documentation attached for your review and consideration.

Respectfully,

Adam D. Fried, Ed.D.
President, BCASA

SN

## 1- Instruction and Program

What is the time frame that is considered a valid test score 2- The minimum N size for subgroups in districts with low populations is more impactful that for those with large subgroups. For example, a district with 20 hispanic students in a subgroup would lose 5% of their points for every student who does not pass a specific test. Is that really indicative of what students are learning or how successful the district is?

Chronic Absenteeism, recognized as part of NJ's ESSA plan, needs to be better clarified via the NJQSAC regulations.

Does that mean that "5s" are also being counted separately?

Science is still in the field testing phase. As a result will this be part of the NJQSAC evaluation while it's still field testing?

What does research say about language acquisition as an indication that a student can be held accountable for a grade level based test in math when they may only be in the country for 8 months? This creates participation rate among ELL population for instances as a moving target. In addition, it now reflects that half a year of attendance in district counts toward participation. This does not even account for curriculum differences between nations.

Where is the QSAC Academic Progress Calculator Score Conversion Chart?

Why does the makeup of a school such as K-8 vs K-12 make a difference? Still looking at same targeted gr. 3-8

How will individual subgroups be reviewed in districts small districts? What will the minimum number be for a subgroup?

| |
|---|
| How do we account for small school size? Small subgroups and their resulting percentages are more impactful. |
| While we like the focus on subgroups, allocating 50% of the total score for an indicator to subgroup performance seems excessive |
| When Students with Disabilities are permitted to remain in an ed program from the ages of 18-21 how are they factored into the 4 year cohort and 5 year cohort? As students with disabilities are permitted to remain in a program through the age of 21 they are well outside the 4 or 5 year cohort. Districts will automatically be penalized for students remaining in a program beyond the 4th year of high school. |
| Should the SpEd students remaining beyond age 18 be considered according to a different formula so that their required program does not negatively impact the graduation rate of the district? |
| When ELL students enter the system during the high school years it is difficult to ensure that they meet all of the graduation credit requirements by the end of his or her senior year |
| How are student who have an attendance exemption through an IEP or 504 recognized in this count? Districts should be mindful of how students who are medically fragile are counted for absenteeism. Districts should pay close attention to students who leave school for extended periods of time for vacations. Be sure that students who are medically fragile, or have attendance exemptions in IEP or 504 are accounted for according to QSAC standards. |
| Why are suspensions counted in chronic absenteeism? This will unfairly influence districts not to suspend students who are in danger of going beyond the 10% absence rate for the school year. This can impact board of education in that they will opt to pass codes of conduct with less severe suspension penalties so as not to adversely impact chronic absenteeism rates. |

What shifts in teacher certifications will be expected? This has impact upon Personnel and Budget for providing the courses. Special area of concern: requirement of certified staff for Theater and Dance

Districts should be aware that companion standards for grades 6-12 should be included in curriculum maps for Science, Social Studies and Technical subject areas.

Will the DOE shift from the recommended minutes to required minutes for each content area K-8? District should be aware that they will need to present the master schedule in order to show evidence that it is viable in its ability to effectively deliver the curriculum.

Will districts have to provide samples of formative/summative assessments and student work?

90% in the target language seems high especially for elementary. Is language still a requirement K-2? Bands are mentioned starting in gr. 3. Are computer-based programs acceptable? How would this be supplemented?

Minutes of PE per week are in competition with other new requirements in World Language;What are the criteria for the recess/PE curriculum? Will PE/Recess curriculum follow PE standards? These subject specific requirements collectively will kick off a series of issues impacting: length of school day, certifications needs, staffing, contract concerns and ultimately budgetary impact.

Do we need a certified teacher for each of the 4 discipline areas-MS and HS? Can it be taught virtually? These subject specific requirements collectively will kick off a series of issues impacting: length of school day, certifications needs, staffing, contract concerns and ultimately budgetary impact. Clarification is needed for fulfilling dance requirement 9-12 if PE can no longer satisfy this requirement. Is it still required?

Will the mSGP provide the most accurate measurement of student growth? Is this worth

exploring as it compares to the "old" DPR rubric?

Should subgroups be based on the percentage of students, rather than the set number of 20?

What are the recommended programs and strategies to address all subgroups fairly? (Apart from articulation, data analysis, modified instruction etc.)

Why are we measuring growth in K-8 schools and not in 9-12? When measuring schools there needs to be consideration to the grade levels. Ex: An elementary school that is K-8 will have 6 testing (MSGP) grades, while an elementary school with K-3 will only have one.

Some district high schools have msgp grades 7 and 8 in them. Scoring them the same way you would score a traditional 9-12 high school seems unfair.

Where is the formula used for the calculation of district score, subgroup score, etc? When you calculate the district score with the subgroup scores and then average it at the end, you get a different result than of you were to average the score first and then calculate as a second step.

Where is the school MSGP conversion chart? How did the state BOE vote to approve this document with that important piece missing? How can districts measure themselves now? The conversion chart is not published anywhere in the document or on the DOE website.

**2. Fiscal Indicators**

Why 60 days compared to 45 days?

Is there partial credit for each indicator? If not, will partial credit be implemented for each indicator?

For each department in the business office, do we have to have a detailed job description of that

role in the department? How involved will the County Office be with the review CAFR and all Homeroom Documents?

What is Published Notice of Grant Opportunities? Will NJDOE change the grant amendment process so we can have quicker to access to funds?

If no emergent project are evident in the district, will Districts receive all points?

Partial credit should be given for each individual school as opposed to "Compliance in All Buildings"

What does evidence of input from all relevant programmatic staff? Sign in Sheets? Email? Summary Notes? Agendas? Pictures?

What does evidence of input from all relevant programmatic staff? Sign in Sheets? Email? Summary Notes? Agendas? Pictures?

Does the Budget Calendar have to adhere to County/State deadlines? Do you had in the public hearing and the County Superintendent approval?

Is this true? Certified educational facilities manager" means a person who meets any one of the following criteria:

Do we have to create a separate document to prove cash flow?

**3. Governance Indicators**

How do new BOE members get trained for evaluating Sup't? State Sub Groups are not required for evaluation of CSA

CAP/ clarification that the CAP under this indicator is for compliance, not personnel? Are we sharing personnel info with the BOE?

Will the Strategic Plan become a mandatory document in the future? Can we define evidence? If noted on BOE Agenda; does that constitute evidence?

Clarification needed on budget stakeholder meetings? Is Public Budget hearing considered such a meeting? Are we talking about notes from all meetings having to do with budget process?

We are clarying that the current requirements for Federal Program compliance is the same as previous; posting of information on website, Parent Compact, stakeholder meetings, notifications, etc.?

Will there be language clarification here? For example, meeting minutes should be posted after approval at next BOE meeting and not 2 weeks.

**4. Operations Indicators**

The timestamp requirement is severe. Why is the time stamp so important if the info is being presented publicly anyway?

Clarification needed "Five days of the proposed change" Is that from the date of the BOE action?

Clarification of what is meant by "internal communication/information dissemination procedure."

Specific information is needed regarding the documents/data that is expected by the state and at what time? i.e. October 15th?

"variety of data"? Can the NJDOE clarify what is meant by these documents? Listing the expected data sources will facilitate this process. What specific policies by # is the NJDOE referring to here?

What is the provision for the change of language now that V&V has shifted to SDSS?

HIB/EVVRS is now SDSS so Section 7 does not reflect the new reality as established by the NJDOE.

Is the QSAC Motor Vehicle compliance section necessary as the SOA is completed anyway?

Error rate of less than 1.5% inclusive of student sync errors. What is a student sync error? This used to be 2%, so why was it reduced?

Does this mean that the original submission of data must be before the deadline? Or does this mean that the final submission of data must be before the deadline?

What is considered training for district employees or volunteers for potentially missing, abused, or neglected children reporting?

[redacted]

Is the mathematical calculation for the auditing of personnel files reasonable? Seems draconian to lose half the points for a one percent error and to only get half the points for a five percent error.

Does district have any discretion in the selection of personnel files to be audited?

| |
|---|
| Is this an all or nothing awarding of points? For example, if you have three people who did not complete mandated training (2f), do you get 0 points? |
| Will number of audited files be based on district size? |
| Is there a specific requirement for "analysis of staff attendance" This would seem to be different in every district and overly intrusive. |
| What is considered evidence of training? Does it need to be done by an outside entity or can this be done "in house"? |
| What is considered evidence of "support for school-wide evaluation processes, mentoring of teachers, and PD opportunities that support school PDP? |
| Use of aggregate evaluation data and student achievement data. Use of aggregate evaluation data and student achievement data are not the only factors driving school or district PDP. Other factors, such as anticipated implementation of 1:1, or transition to google suite, etc can also translate into school and district goals. |
| Is the district required to demonstrate when observation and evaluation rubrics were board approved? If so that may be several years ago, and also several superintendents ago. How are we going to verify this? Should we simply re-approve each year? |
| It is not possible to align district or school goals to a teacher individual PDP in all cases. For example: reduction of chronic absenteeism for students may be a school goal but would not translate to a teacher personal PDP goal. 2- For teachers who are highly effective, there may not be many measurable examples of items that are targeted for professional development in their summative evaluation. Therefore we would not be able to align their personal PD goals to their summative assessment. |

What is an example of justification as to why a specific PDP goal was selected for the district?

What would be considered appropriate training for mentors? Does this need to be a state approved workshop? Or can this be done with current staff?

Why is the district required to monitor the annual transcript of a teacher who has enrolled in an education preparation program? How would the district know if a teacher was enrolled in such a program? They are not required to receive permission from the district to take courses.

How is the measurement of a position control roster "reconciling with the budget" documented? How can districts calculate these measurements? Is there a formula that we can look at?

What is evidence of goal setting procedures with principals, supervisors, and teaching staff? This is usually done in a summative evaluation conference. Districts log or timestamp that these meetings occur, but there are no specific agendas as they are different for different teachers.

60x

**Testimony of Shauna C. DeMarco, Tenafly Superintendent to JCPS 12.4.18**

I echo Dr. Fried's gratitude to you for conducting this hearing. We appreciate your attention on this matter that is extremely significant to the education of NJ's students.

I am Shauna DeMarco and I am the Superintendent of Tenafly Public Schools. I also serve with Dr. Joseph Cirillo, as the BCASA Legislative Representative to the NJASA, and was a proud participant in the meetings conducted over that past few years regarding QSAC. As one who has moved from one district type and size to another, my experience and insight is rather unique.

I served as the former superintendent of Lyndhurst, a district that was placed on an district improvement plan in the summer of 2015, following our 2013-14 performance scores which fell short of the 80% requirement. I swiftly became familiar with the QSAC process and the amount of time, manpower and attention it required, as we underwent routine visits and reviews throughout each school year for which we had to prepare, both qualitatively and quantitatively.

I also became quickly familiar with the frustrations associated with knowing that no opportunity for "passing" QSAC would present itself until PARCC scores were accepted. So, for the three years that followed, we like many other districts, were relegated to QSAC purgatory. Regardless of how hard our teachers worked, how many changes we made to enhance programming and improve instructional strategies, those performance numbers were not going to change, thus we had no chance at "passing" QSAC. Now I find myself in a high-performing district which, because of its student achievement scores, has been waived of the QSAC process for many, many years and is now preparing for a new form of a process that is unfamiliar to most of the district's stakeholders.

The concerns we presented in February of 2018, which we share with you in this handout of the exact letter, were grounded in the overwhelming emphasis placed on standardized test scores, the subjective measures to assess the quality of Curriculum & Instruction, the lack of reliability in a random sampling of an indicator's requirements, and the general sense that the NJQSAC regulations were detached from the reality of what a high-quality and successful district looks like. These concerns and questions remain despite tremendous efforts to receive answers and clarity.

The results of our analysis in this handout serve as examples of just how much time we dedicated to this cause and as direct examples of our concerns. For example, let's look at the differences between small and large districts .. . what constitutes the sampling size of material in a small district versus a large district? If only 10 files were examined in a small district, the impact of one or two errors would be tremendous. But in a larger district, if 40 files were examined, there is much more room for errors with less negative impact. Likewise, smaller subgroups and their resulting percentages when considering student achievement have greater

impact upon that district. Speaking of achievement, it is difficult to overlook the impact upon schools when considering student growth . . . we measure student growth in K-8 schools, yet do not do so in grades 9-12. Therefore, this measure of achievement, based on one test in each specified area, does not impact high school districts, but does impact K-6, K-8 and K-12 districts.

Further, it should be noted that the implementation of this process will result in schools that "pass" NJQSAC but still struggle in multiple areas. And alongside that, we do have concerns about the inter-rater reliability of NJQSAC evaluations across counties. What measures have been put into place to make certain that one county's NJQSAC visit aligns with the work of a team in a different county? We recognize the subjective nature of any such process, but believe that granting more time, collaboration, and attention to it will result in clarifying language throughout the manual that will greatly reduce the subjectivity of this process.

**Testimony from Dr. Brian Gatens, Superintendent of Emerson Public Schools to JCPS 12.4.18**

Please don't mistake the intentions of the BCASA. We are open, welcome to and understanding of the oversight of qualified outside evaluators. We are very proud of the work that we do and look forward to opportunities to show it off to state representatives. What we are not open to is an illogical, detached, compliance-driven, and subjective system that aside from consuming valuable district resources will continue to offer inaccurate and unreliable information about our schools. In the presence of NJDOE representatives, we acted as committed leaders for our districts, professionally articulating our questions, respectfully requesting clarification and more specific direction, and repeatedly inquiring about the inequities discovered in our analysis of the process during its pre-proposal review. All of this was for naught, as it resulted in no changes, no clarifying information, no responses to demonstrate consideration . . . nothing. And so we persevered, doing our best to prepare for a process' expectations that we still, to this very day, do not fully understand nor are we able to get direct answers to our concerns due to their complexity and vagueness.

In closing, we share with you the 2019 QSAC Schedule of the Bergen County Office. This alone appears to illustrate exactly how intrusive this process is on so many levels and why it, in its current state, is ineffective. Can we truly believe that one team visit to a district for a one day is expected to result in a determination as to the quality of the district? Or is it for compliance purposes only? And if for compliance, let's remember we are one of the highest performing states in the country . . . can we really believe that we are only about compliance? This is not a message to send to NJ's districts and Boards of Education. And if we are striving for high quality, then we cannot expect the county educational teams to assess this factor while adhering to calendar requirements like those set before you.

Members of the committee, PLEASE press pause in this process. Work directly with us and all those closest to the day-to-day reality of our schools so that together we can develop and

implement an evaluation system that not only identifies areas of need, but also recognizes the value that New Jersey's schools bring to all of our state's children. Dr. Fried's mantra is "Let's get to work" and the BCASA demonstrates their agreement through the work that is done in Bergen County Districts each and every day. Thank you for granting us, and all of NJ's superintendents, the opportunity to collaborate with you in determining equitable, reliable, and quality-based indicators which accurately measure our educational success as a state.

Thank you.

#########

SOUTHAMPTON TOWNSHIP SCHOOLS
*in Historic Vincentown Village*
177 Main Street
Southampton, New Jersey 08088
Telephone (609)859-2256 ext. 127 Facsimile 609.859.1542
Website: www.southampton.k12.nj.us
*"Building a Tradition of Excellence"*

Michael L. Harris
*Superintendent of Schools*

# QSAC TESTIMONY

**District Information:**

Michael L. Harris, Superintendent of Schools
Southampton Township, Burlington County
K-8, 3 schools, current enrollment 710 students

**Background Information:**

During the 2017-2018 school year, Southampton was asked by the NJDOE to participate in the Pilot of Personnel District Performance Review for QSAC. Presently, Southampton is in the process of undergoing QSAC monitoring and is scheduled for an onsite visitation on February 21, 2019.

The comments, observations, and recommendations provided via the testimony are based on the experience as serving in the pilot DPR and a district that is currently undergoing QSAC.

**QSAC DPR Pilot and Revised Process:**

One of the benefits pertaining to QSAC is it enabled our school district to enhance our understanding and practices pertaining to Achieve NJ. Specifically, due to participation in the Personnel DPR pilot process our district enhanced the link between teacher evaluation, the development of Student Growth Objectives and development of professional development plans.

Conversely, at the time we were submitting documentation for the Personnel DPR we had not yet finalized teacher evaluations from the previous school year because SGPs for teachers had not been released. This continues to be an issue this year as SGPs were issued to districts in early November and we are just now concluding the evaluation process.

There are no issues to report with respect to the QSAC District Steering Committee process. Southampton formulated our Team in early September and met in October to complete the self-assessment. It was a labor intensive process for our Administrative Team as we invested a full-day meeting to conduct our preliminary review of each DPR and the indicators. This process was completed shortly after the Department released the QSAC User's Manual, but was highly beneficial in preparing for the Steering Committee to meet and complete the self-assessment.

With respect to the QSAC User's Manual, we would like to commend the Department for the effort that was invested in developing this resource. It is a great concept, however, as we have been working through the process this year have found that there are a number of revisions that need to be effected to make it user friendly. There needs to be more specificity and clarity pertaining to documentation to be provided via uploads and information that will be reviewed onsite.

Over the years, the number of indicators for the District Performance Reviews have been reduced and this helped place a focus on the most critical aspects of the monitoring process. However, it is recommended that the Department continue to review the DPRs and where possible reduce the number of indicators.

The decision to award partial points for district performance on the Instruction and Program District Performance Review is also an improvement in the process.

What Southampton has learned through the Personnel DPR pilot and completing the process this year is how labor and time intensive it is to identify and upload documentation to support attainment of the DPR indicators. The revised process essentially requires districts to create an electronic monitoring box. Documents must be scanned, given the proper naming convention and then uploaded individually to software application in NJ Homeroom.

In addition, we find that some of the documentation is information that has been submitted to the Department and if their technology was enhanced and Department reviewers could readily access, then this documentation could be verified without districts having to upload the information.

Thus far, Southampton has invested 3 full days in preparing and uploading documentation and we still have not completed the process.

It is critically important that the Department and legislature appreciate how intensive the QSAC process is. Completion of the process enables districts to review their district procedures, self-reflect, and enhance their operations. However, make no mistake that when done properly it is time consuming and requires districts administrators to divert time from serving as instructional leaders and the management / operations of their buildings.

With this in mind, it is strongly recommended that the QSAC monitoring cycle be revised to enable districts that are determined to be a high performing district to either apply for a waiver in the next cycle or have a partial DPR review concentrating on the most critical DPR indicators.

As an example when Southampton last underwent a full QSAC monitoring six (6) years ago, we were identified as a high performing district. A review of our DPR scores from that monitoring compared to where we anticipate we will score this year is almost identical.

Finally, we would like to acknowledge and commend the Department personnel who worked with us on the Personnel Pilot DPR review last year and our County Office personnel this year. In particular, we would like to commend the Burlington County Office of Education, Executive County Superintendent Daryl Minus-Vincent, County Business Administrator Charles Muller, and Educational Specialist, Mrs. Joseph Seaman who have been incredibly collaboration and responsive to addressing our questions and concerns.

**Perceived QSAC Benefit:**

- Enables districts to review critical processes, enhance procedures, and ensure compliance with mandates and regulations

**QSAC Challenges:**

- Process is labor and time intensive
- 3 year monitoring cycle for districts that are high performing districts
- Number of DPR indicators (have been reduced, but further review and reduction needed)
- QSAC User's Manual is a great concept, but requires revisions to streamline / enhance clarity
- Uploads for supporting DPR documentation is very time consuming and labor intensive

**Specific Recommendations:**

- Re-establish a waiver, or create an abbreviated process for high performing districts
- Review, and reduce the number of DPR indicators, (some may be combined)
- Review and revise QSAC User's Manual (eliminate the term this indicator is monitored remotely and replace with one of the following: a.) indicator will be monitored onsite; b.) the district will upload supporting documentation; c.) NJDOE will review documentation submitted electronically via required NJDOE reports)
- Maximize the review of DPR supporting documentation available via required NJDOE or onsite review and minimize documentation uploaded to NJ Homeroom
- Improve NJDOE technology capabilities which will enhance their ability to review information

# LUMBERTON TOWNSHIP SCHOOL DISTRICT

**33 Municipal Drive**
**Lumberton, NJ 08048-4516**

***Joseph Langowski***
***Superintendent***

***(609)267-1406, Ext. 6614***
***Fax: (609)267-0002***
***E-Mail: jlangowski@lumberton.k12.nj.us***


Dear Co-Chairs Rice and Jasey and members of the JCPS:

I appear today to share my experiences in my 19 years as a NJ public school administrator, having served as a principal, assistant superintendent, and superintendent. I appreciate your willingness to listen to the voices in the field on the issue of QSAC.

I would like to start my comments by stating that the single most valuable commodity that any of us possesses is time. We have a fixed amount each day, and the way that we manage our time has a direct impact on the student achievement that takes place in our classrooms, our schools, our districts, our state. In fact, Hyrum Smith, an expert of productivity and time management, has written about a time famine in our country. Perhaps nowhere is this more prevalent than in school leadership.

In my time there is pattern that has emerged in QSAC. Simply put, we spend too much of our valuable time in the DPRs of governance, personnel, fiscal and operations. These are areas where districts earn passing grades, as the majority of districts are professionally led.

We, therefore, have an opportunity through the review of the QSAC process. We have a collective responsibility to simplify it. The current manual, while well thought out, is 134 pages long. The process, in the four areas mentioned above, is indicative of a bureaucratic waste of time. I am, therefore, opposed to any requirements that take school leaders away from the pursuit of improving teaching and learning. I proffer to the committee that our time is better spent on the Instruction and Program DPR, and call on the legislature to greatly streamline the other four areas of QSAC.

I stand willing to assist the New Jersey Department of Education or the Committee in any way.

Sincerely,

Joseph Langowski
Superintendent

JL/sm

6/9/14

ELC EDUCATION LAW CENTER

**TESTIMONY OF EDUCATION LAW CENTER**
**ON THE**
**QUALITY SINGLE ACCOUNTABILITY CONTINUUM**
**BEFORE THE**
**JOINT COMMITTEE ON THE PUBLIC SCHOOLS**

December 4, 2018

Senator Rice, Assemblywoman Jasey and members of the Joint Committee on the Public Schools, thank you for the opportunity to address issues concerning New Jersey's Quality Single Accountability Continuum, or QSAC.

Education Law Center (ELC) recommends the Legislature make two major changes in the QSAC statutory framework based on our involvement in enacting the law initially and in trying to address issues that have arisen over the past 15 years of implementation, especially with regard to State takeover of school districts. We also recommend this Committee examine and ensure the NJ Department of Education has the capacity, resources and expertise to provide quality and timely assistance to schools designated low performing under the federal Every Student Succeeds Act (ESSA).

As you know, QSAC created a road map for the return of State takeover districts to local control, while also serving as the monitoring system for all districts in the state.

QSAC was enacted in 2005, as a means for the State, through the Department of Education (DOE), to monitor district performance in key operational areas including budgeting, governance, personnel, facilities and the like. QSAC also required corrective action in these areas when district performance did not meet established benchmarks. The State district takeover provisions, which were enacted in 1989, were incorporated into QSAC as the ultimate sanction for continued performance in the areas of QSAC monitoring. The takeover provisions were also revised to put in place requirements for districts under partial or full State takeover to regain control of their school systems.

In enacting QSAC, the Legislature did not intend the takeover provisions to be used as a vehicle for allowing the Executive, through the DOE, to impose its preferred set of education reforms on districts under State operation, especially since those districts and their communities would have no say in reforms that could have long-lasting impacts after the State relinquished control.

Rather, the takeover mechanism in the QSAC framework was intended to allow the State to intervene and fix identified problems and exit as quickly as possible.

60 PARK PLACE • SUITE 300 • NEWARK, NEW JERSEY • 07102
PHONE: 973.624.1815 • FAX: 973.624.7339 • TTY: 973.624.4618 • WWW.EDLAWCENTER.ORG

67x

But in the case of Newark, Jersey City and Paterson, state intervention lasted for decades and only now is coming to an end. State takeover in Camden has continued for over half a decade with no end in sight.

It is also important to note that the four districts that have been subjected to State takeover serve very high concentrations of low-income children, English language learners, and students with disabilities. These districts are almost exclusively African-American and Latino. As a result of State takeover, voters, taxpayers and parents in these communities have effectively been disenfranchised and disconnected from the operation of their neighborhood schools for literally decades.

Put simply, there no question that State takeover is a failed strategy for improving school district performance.

Further, QSAC's inclusion of curriculum and instruction as a component subject to the monitoring regime is a major factor for State takeover becoming a means of permanent, long-term State control of districts. It is extremely difficult for many districts, including those under takeover, to achieve satisfactory performance in the curriculum and instruction component of QSAC. As a result, districts are unable to demonstrate the progress required to trigger a return to local control.

To address these concerns, a major overhaul of the QSAC statute is long overdue. ELC recommends the Legislature take the following actions:

1) Repeal the State takeover provisions of QSAC entirely: State takeover as a means to improve educational opportunities and outcomes has proven, over these many years, to be completely ineffectual. Furthermore, State takeover is obsolete. Since 1987, several new tools have been put in place to address fiscal and other problems in local districts. The fiscal accountability law was enacted over a decade ago to surgically deal with districts in fiscal and budgetary crisis, allowing for the appointment of a State Fiscal Monitor with power to override local boards of education and fix broken budgets. QSAC itself determines whether schools and districts are meeting educational performance benchmarks and, if not, prescribes interventions by the State to make needed improvements in program and instruction.

2) Eiminate the Curriculum and Instruction component from the QSAC statutory framework: QSAC is, at bottom, a district-wide compliance monitoring mechanism, not a strategy to support improvements in curriculum and instruction in schools designated as low performing. Further, because high need districts are often unable to meet the QSAC benchmarks for "satisfactory performance" on the indicators in this component, QSAC perpetuates the message from the State of "failing schools," which is counterproductive to building strong, inclusive efforts to improve outcomes in under-performing district schools. In fact, in order to exit takeover, Newark, Jersey City, and Paterson had to be given "waivers" because



68x

performance benchmarks in Curriculum and Instruction were unattainable for these districts (and many other high need districts).

Also, identification of under-performing schools and efforts to improve curriculum, instruction, professional development, student supports and other crucial issues are required separately under the conditions attached to New Jersey's ESSA plan mandated by federal law, the DOE rules for school improvement to implement the federal school improvement mandates, and DOE rules for programs to improve performance in districts classified as "high need." QSAC does not support, but can impede, the intense focus necessary to bring about improvement and positive change in schools designated as low performing under ESSA.

3) DOE capacity: This Committee is uniquely suited to focus considerable time and energy on examining the core barrier to improving curriculum and instruction in low performaning districts – the ongoing inability of the DOE to bring strong leadership and quality technical assistance and support to diagnose and address deficits in under-performing schools. This examination must include a thorough review of the now defunct DOE Regional Achievement Centers (RACs), which, at least based on anectodal evidence, failed in their core mission of supporting teachers, principals, administrators and parents in building and sustaining improvement efforts in schools designated under NCLB as low performing.

4) DOE resources: After two decades of test-based measures to identify low performing schools, followed my mandates for corrective action from the State, the DOE has proven itself under-funded and under-resourced to provide crucial assistance to work collaboratively with school stakeholders and bring high quality assistance to the table to support and sustain school improvement efforts. This Committee would do a huge service by digging in to examine, analyze and respond to build DOE capacity on this issue. ELC is ready to assist in this effort. Further, the Committee should enagage with representatives from the Newark, Jersey City, Paterson and Camden districts about their experiences under State takeover and with the RACS to evaluate which efforts by the DOE were helpful in terms of school improvement, and which were unhelpful or even counter-productive.

The time has come to put an end to the improper use of "full State intervention," including maintaining control for extended periods to further the preferred education policies and reforms of a given administration and the disenfranchisement of local communities. A streamlined and improved QSAC may well serve as a useful school district accountability system, but district takeover has no place in the law or in the State's arsenal for school improvement.

451 Van Houten Street, Paterson NJ 07501
Phone (973) 881-8914 • Fax (973) 881-8059
www.paterson-education.org

**Testimony to Joint**
**Tuesday December 4, 2018**
**Given by Rosie Grant, Executive Director**

Good Morning Chairman Rice, Chairwoman Jacey and members of the committee. Thank you for this opportunity to speak.

I'll start with the element of QSAC which I believe is most invasive and most problematic. That's State Takeover. Take over did not work in Paterson, and to the best ot my knowledge didn't work in any of the other districts takeover by NJDOE.

Paterson has been under State Takeover since 1991. Simply put, State Takeover does not work. Here's just one example of what we endured. As you can see from the following chart, 7 State Superintendents has served 13 Commissioners of Education and 6 Governors, each with different expectations.

| State Superintendent | Top 2-3 Interventions | Commissioner of Education | Date | Governor |
|---|---|---|---|---|
| **Laval Wilson 1991-97** | *Paradigm – Math and Language Arts only, at the elementary level | John Ellis | 1991-1992 | James Florio |
| | | Mary Lee Fitzgerald | 1993 | |
| | | Leo Klagholz | 1994-1999 | Christine Todd Whitman |
| **Edwin Duroy 1997-2004** | *Stupski Foundation<br>*Innovative Academies<br>*"Good to Great" PD | Leo Klagholz | 1994-1999 | |
| | | David Hespe | 1999-2001 | |
| | | Vito Gagliardi | 2001 | |
| | | William Librera | 2002 | James McGreevey |
| **Dennis Clancy [interim] 2004-05** | *Interim – Central Office Re-org | William Librera | 2004 | |
| **Michael Glascoe 2005-08** | *Created Curriculum and Instruction Dept.<br>*90 Minutes Block for Math and Literacy<br>*Swipe cards for all staff | William Librera | 2005 | |
| | | Lucille Davy | 2005 | Jon Corzine |
| **Dennis Clancy [interim] 2008-2009** | *Interim. No new initiative | Lucille Davy | 2008 | |
| **Donnie Evans 2009-current** 2017 | *Professional Development – *Institute for Learning<br>*Innovation Zone | Lucille Davy | 2010 | Chris Christie |
| | | Bret Schundler | 2010-2011 | |
| | | Chris Cerf | 2011-2014 | |

| | | | | |
|---|---|---|---|---|
| | *High Schools restructure<br>*Community Schools - | David Hespe | 2014-2016 | |
| | | Kimberly Harrington | 2016-2018 | |
| **Eileen Shafer** | *Community Engagement<br>*Community Schools Expansion<br>*Restorative Practices<br>*Local Control Transition | Lamont Repollet | 2018 | Phil Murphy |

We lost an entire generation of knowledge to Paradigm, a program that offered Math and Language Arts only at the elementary level, eliminating all other subjects. Those kids ended up in high school having never had arts, music, science or social studies at the elementary level. How does any child make up 8 years of elementary school education that forms the base upon which high school studies are built?

When QSAC was passed in 2005, although it did not eliminate takeover, we hoped it would be our means to return to local control. Under QSAC, the state can return local control when a district scores at least 80 percent of the indicators in a component, and when there is substantial evidence that the school district has adequate programs, policies and personnel in place to ensure that progress will continue, at the discretion of the Commissioner of Education. In the end, the clause that says "At the discretion of the Commissioner of Education" became the only real determinant. Even with passing QSAC scores, the governor said "Not over my dead Body" a phrase which would certainly influence and curtail any commissioner discretion, given that the commissioner serves at the discretion of the Governor. That clause should be eliminated with clear standards for regaining control.

Instead of takeover, I would recommend targeted intervention. Much like the way ESSA intervention is proposes. Implementation of best practices chosen to meet the specific needs of the schools and students in the affected district. Wherever possible, these measures and interventions should be aligned with ESSA so as not to duplicate efforts.

The Instruction and Program goals, as currently written are ineffective in determining progress. All 3 districts were granted waivers in order to replace the QSAC measurements with more realistic goals of growth over time. This section should be revised to reflect the growth measurements used in all the waivers.

Finally, the entire process is time consuming and requires a massive effort from several levels of district staff. Please consider a streamlined process that makes use of all the other data that districts are already submitting to the DOE. Such an assessment should apply to all schools that receive public dollars.

njea NEW JERSEY EDUCATION ASSOCIATION

180 West State Street | P.O. Box 1211 | Trenton, NJ 08607-1211
p 609-599-4561 | f 609-392-6321
njea.org

# Testimony of Sean W. Hadley, Esq.
## Associate Director of Government Relations
## On Quality Single Accountability Continuum (QSAC)
## Joint Committee on Public Schools
## Tuesday, December 4, 2018

Chairman Rice, Chairwoman Jasey, and members of the Committee, my name is Sean Hadley and I am the Associate Director of Government Relations for the New Jersey Education Association. I am here to express the association's perspective on QSAC.

NJEA agrees with having a strong, but fair, system of accountability for all our public schools. Over the years, we have called on the Legislature and the Department of Education to ensure that QSAC focuses on being impartial, reasonable, and—most significantly—helpful for school districts to find ways to improve student learning. We support a collaborative approach that brings together the expertise of our educators and provides schools with the latest research and best practices in public education. A collaborative approach is the right course to keep our state at or near the top of all public education systems in the nation.

However, despite these good intentions, we know from our experience that QSAC has faced many challenges over the years. We're hopeful that current Department of Education efforts to work with stakeholders to remedy these problems will make these issues a thing of the past. We have heard that the system may not always be collaborative or helpful for school districts. We have heard that sometimes the process is overly bureaucratic and unfocused. We have also heard that QSAC is not always implemented uniformly across school districts.

What's more, we know that a gaping hole in QSAC is that it leaves out a whole category of schools in our public education system--charter schools. All public schools should be subject to the same accountability under QSAC and we believe the Legislature should amend the law to include charter schools. We also believe the system should be streamlined and not become a mere "check-the-box" exercise. Finally, we also want to ensure that schools that become the subject of state takeover within QSAC are provided a clear, and quick, pathway to return to local control. We know the Department of Education has taken many steps recently to solve these issues and we look forward to working with them to build upon these improvements.

Thank you again for the opportunity to submit my testimony on behalf of NJEA.

| The Joint Committee on the Public School QSAC | Newark Teachers Union<br>John M. Abeigon, President<br>Statement of Position |
|---|---|

It is the position of the Newark Teachers Union that the decades of State operation of the Newark Public Schools, that the QSAC system can be categorized in two distinct segments. The first as a system of cautiously slow progress, under Supt Marion Bolden, to a pattern of aggressive ignorance.

In this, we mean, that under Marion Bolden, progress was slow but took into consideration the stakeholders of the district through the SLT structure and various contractually required components.

Under the Cami/Cerf era, the train was sped up to an intolerable speed and blew through every station ignoring all stakeholders. Most prominently, the district continued to do poorly under the Instruction and Program component. Simultaneously, the district acknowledged the pockets of excellence that existed, yet chose to ignore the untapped potential our star teachers, and excellent schools represented. Instead, the district hemorrhaged money, pouring dollars into the coffers of consultants. This intentional waste was directly connected to the closing of schools under the guise of cost.

In previous years, the district offered their excellent teachers compensation to write curriculum. This ended under the Cami/Cerf era. The district continued to search for outside vendors, and despite having a head of each department, did very little to engage the content specialists in the district. Accordingly, the district made insufficient progress as a whole, while areas of the district continued to excel.

The elimination of attendance counselors, as well as other key areas may have had a negative impact on the Personnel component. Additionally, the lack of a serious effort to engage in contract negotiations for several years, as well as finally settling in a manner the turned away educators with advanced degrees could very well have prevented successful growth in the Personnel areas.

It is with conviction that under the State appointed leadership of Cami Anderson and Christopher Cerf, that the critical job that QSAC was intended to accomplishment, the goal was to render the Newark Public Schools useless with the only real solution being the grand charterization of the entire district.

A simple cursory analysis of the 5 QSAC components serves to highlight the total disregard these State appointed leaders had for the process.
1) Instruction and program; 2) Fiscal management; 3) Governance; 4) Operations; and, 5) Personnel.
**Continual teacher and school leader professional development:** Professional Development was offloaded to the schools under the ruse of Principal Autonomy. Requiring failing schools to create and provide professional development is akin to asking sailors to patch a sinking ship, without any tools.
**A district budgeting process aligned to improving student achievement and teacher practice; and,a tiered approach to supporting student achievement:** The district largely ignored key components of the 2012 agreement that were designed to encourage staff to further their education, which certainly would have had an impact on student success. Additionally, mismanagement and waste prevented the district from EVER making a budget that focused on Achievement & Practce. It was barely able to keep up with its own costs. Programs were canceled, materials were never purchased, etc.
**An improvement to the learning environment, culture and governance that is collaborative, consistent, and predictable:** Teachers were driven from this district by the attacks levied by Governor Christie, and continued attacks by Cami Anderson, who created an environment where teachers feared school closings, and arbitrary transfers. Additionally, the district adopted an evaluation tool that was supposed to be a tool of support, but was used as a weapon of class destruction.

Newark did not fail QSAC; QSAC, the State, and our legislators failed Newark.

**NAACP New Jersey State Conference**
4326 Harbor Beach Boulevard # 775
Brigantine, New Jersey 08203
www.NJSCNAACP.org (609) 310-0211

Richard T. Smith
*President*

Adrienne Sanders
*First Vice President*

Loretta Winters
*Second Vice President*

Bruce Morgan
*Third Vice President*

Vivian M.J. Darkes
*Secretary*

Kyra Price
*Assistant Secretary*

LaTanya Nelson
*Treasurer*

Francine Cartwright
*Assistant Treasurer*

# Reactions and recommendations on the current status of New Jersey's Quality Single Accountability Continuum (QSAC)

## A. **Social Studies Curriculum**:

The New Jersey State Conference NAACP strongly recommends that QSAC policies promote the implementation and monitoring of the Amistad and Holocaust Curriculums. Currently the Department of Education does not have an effective process of monitoring the implementation of the specified curriculums. As such, our organization

recommends protocols be established to address this concern. A possible recommendation would be the following:

**"Amistad Commission mandates that curricula in kindergarten through grade 12 include the teaching of the African Slave Trade, enslavement in America, the vestiges of enslavement in the United States and the contributions of African Americans in the development of the United States; and**

**Holocaust Commission mandates that curricula in kindergarten through grade 12 address issues of bias, prejudice and bigotry including bullying through the teaching of the Holocaust and genocide"**

**Should a school district not comply with either mandate the said school district would loss all points in Social Studies, which would require the submission of a corrective action plan to address the academic shortfall."**

**B. Removing political considerations from the QSAC process**

There is a perception that the Department of Education does not address all school district equally when their individual or collective (scoring below 80% in more than three components) QSAC results are below specified standards or when a district, under State Control achieves passing scores,

yet is not able to be relieved of State Control because the Commissioner of Education is the final determinate in the process (return to local control), regardless of the earned QSAC scores.

Likewise, there are concerns that some school districts are given a pass when their QSAC indicators are insufficient, however for political reasons the DoE does not adhere to the appropriate remedies/solutions/policies mandated by QSAC (state and federal guidelines). The Lakewood school district would be an example of this situation.

## C. Governance

It is unknown if all school district who have Title I status adhere to the Advisory Board mandates (parental involvement and budgetary). QSAC protocols should monitor and report on the implementation of all required Federal mandates.

## D. School Development Association

District's "Fiscal Plans" should be monitored and promoted in order to assure that formally Abbott school districts are able to have the building resources necessary to have quality instruction available for students.

## E. Implementation of ESSA plans/protocols

Although the Department of Education re-adopted QSAC regulations (November of last year), that specified the "aligning and simplifying the state's system of accountability including Every Student Succeeds Act (ESSA), there is a perception that currently school districts that have been specified as "in status" are not receiving the appropriate academic assistance mandated by ESSA. If correct, the specified alignment between QSAC and ESSA must be promoted in order to assure that district building corrective plans (as specified by ESSA mandates) are implemented.

## F. English as a Second Language

Our state has a growing population of students whose native language is not English. A greater emphasis on addressing the educational and social needs of students whose native language is not English should be achieved.

**NAACP New Jersey State Conference**
4326 Harbor Beach Boulevard # 775
Brigantine, New Jersey 08203
www.NJNAACP.org (609) 310-0211

# NEW JERSEY ASSOCIATION OF BLACK EDUCATORS (NJABE)

TESTIMONY TO NEW JERSEY LEGISLATURE JOINT COMMITTEE ON THE PUBLIC SCHOOLS
December 4. 2018

The New Jersey Association of Black Educators(NJABE) thanks New Jersey Legislature Joint Committee on the Public Schools for allowing NJABE an opportunity to comment on New Jersey Quality Single Accountability Continuum(NJQSAC). We are especially thankful for Senator Ronald Rice and Assemblywoman Mila Jasey for your leadership and dedication for inviting a broad base of diverse opinions about education in New Jersey. NJABE would like to also thank Education Commissioner Lamont Repolett for proposing changes and improvements to the NJQSAC Regulations.

NJABE is always concerned about the New Jersey Constitution mandate that the State is required and responsible to provide a "thorough and efficient racially integrated public education". New Jersey has not met its responsibility because many schools are not proving the Constitutional mandate because of racial discrimination and because New Jersey is so racially segregated.

NJABE recommend the following:

1. New Jersey Amistad Law must become part of NJQSAC. It is the law and the New Department of Education must support the New Jersey Amistad Commission's efforts to insure that all stakeholders are provided with guidance and professional training so all children in New Jersey are provide for knowledge about the Trans- Atlantic slave trade and the contributions of African Americans infused into the history of the United States of America. Since NJQSAC has a six year cycle of review, and because the Amistad Laws has be widely ignored or not fully implemented, NJABE request that an audit be conducted and that all districts found to be not compliant should be required to develop a corrective action plan as soon as possible

2. NJABE believes that ALL CHARTER AND RENIASSANCE SCHOOLS should be held to the same provisions of NJQSAC as all traditional public schools. Public funds should not be provided to any educational enterprises unless and until there is a system for public accountability and review. NJABE requests that high priory be given to audit and evaluate the use of public funds for education programs and activities in Camden and in Garfield districts.

3. NJABE is convinced that NJQSAC has allowed racial discrimination in the process. This must end now. We do not believe that Newark, Jersey City and Paterson schools were alone in non compliancy with NJQSAC standards. We believe there has been greater emphasis in finding deficiencies in school districts with populations and political leadership that is African American or Hispanic as well as urban and poor.

4. NJQSAC should be more intensive in reviewing and making commendations for improving districts performance of affirmative action and equal opportunity in areas of personnel and business operations as well as practices related to minority contracts and vendors. Affirmative action is the law of the land and therefore should be evaluated to determine if each school district provides more than paper documents that claim that a district is in fact "making good faith efforts" to recruit, hire and promote people of African ancestry and other racially and ethnically underrepresented diverse personnel and to award contracts to companies that are owned by people of African ancestry.

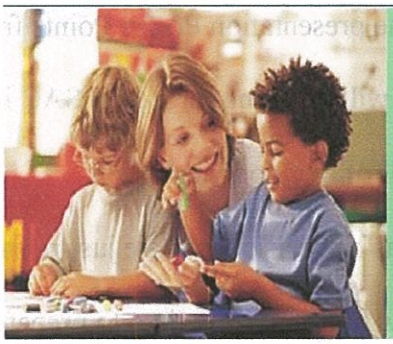
5. There should be a requirement that the NJQSAC process, progress and results should be made public as soon as the final report is made available to boards of education.

6. It is important to assess the impact of NJQSAC on morale and educational outcomes of classroom teachers and other educators. Many teachers are feeling overwhelmed and frustrated by certain practices that require paperwork that distracts from their enthusiasm and attitude about teaching.

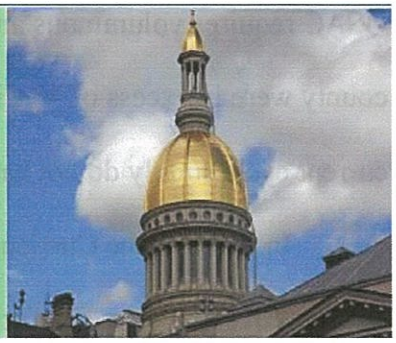
Resubmitted

James E Harris

James E, Harris
President
NJABE
973-518-2990



GSCS
Garden State
Coalition of Schools



***Quality Public Education for All New Jersey Students***
160 West State Street, Trenton NJ 08608
gscschools@gmail.com
609-394-2828 (office) 732- 618 5755 (cell)
www.gscschools.org

**TESTIMONY OF WINNIE BOSWELL**
**JOINT COMMITTEE ON PUBLIC SCHOOLS**
**QSAC HEARING**
**TUESDAY, DECEMBER 4, 2018**

Thank you, Senator Rice, Assemblywoman Jasey and members of the Joint Committee for the opportunity to testify on QSAC today. My name is Winnie Boswell, and I have served as Director of Curriculum and Technology for the Glen Ridge Public School District, a K-12 district in Essex County, for 24 of years. I have been through QSAC twice. Now, my district is preparing to go through QSAC once again.

The goal of any monitoring system is to ensure that all students have access to high quality public education. QSAC aims at that goal, but might come closer to achieving it if the process were both more productive and less onerous for school districts.

In my view, the following key areas are in need of improvement:

**Time to Prepare**

The new, 133-page QSAC manual was released in late August 2018. Key school district personnel have also taken the four-hour QSAC training offered by the Department of Education.

QSAC requires voluminous amounts of documentation. The presentation Power Points from the county were in excess of 40 slides. Districts like mine that will be going through QSAC in the current cycle simply do not have sufficient time to gather all of that documentation.

In addition the Curriculum portion of QSAC now has a specific template just released in August 2018. Once again districts preparing for QSAC now have too little time to prepare. Since most districts employ a comprehensive five-year curriculum cycle, having this template discourages educational creativity.

If nothing else, the DOE should consider not requiring districts to produce documentation that has already been uploaded to the Department's website, DOE Homeroom applications and/or NJ Smart.

**An "All or Nothing" Approach**

QSAC scoring uses an "all or nothing" approach that takes away all the points for a specific section when a district lacks some of the requirements for that section. An example of this is scoring for the arts portion of the "Curriculum and Instruction" section.

To fulfill the QSAC arts requirement, all high schools must make all four arts disciplines—music, dance, theater and visual arts--available to students so that they can "communicate at a basic level in the arts and demonstrate proficiency in at least one arts discipline." To accomplish this goal, all districts must employ certified theater and dance teachers. While the majority of districts have certified music and visual arts teachers, many cannot afford certified personnel in the other two areas. Under the current QSAC rules, those districts lose all points for the arts portion of the "Curriculum and Instruction" section of QSAC.

Many districts, including mine, do not have certified dance and theater teachers, but offer dance as part of PE. That that does not count for QSAC, because the certified PE teacher is not also certified in dance.

As mentioned above, districts operate on a five-year curriculum cycle. The Department released the NJ Standards less than five y ears ago. We have been told that any mention the old standards name—"Common Core"—will result in a loss of points for an entire section. This penalty has nothing to do with clarity—the numbering systems of Common Core and the newly-named NJSLS are identical.

This "all or nothing" approach encourages large penalties for small errors. Practices like those described above for arts instruction unfairly penalize small districts and poor districts, setting them up for failure in the monitoring process.

**Special Education Requirements: Bureaucratic not Constructive**

In previous QSAC iterations, descriptions of curriculum accommodations and modifications were listed according to individual students' Individual Education Programs (IEP). To satisfy QSAC requirements, districts would present lesson plans that showed those specific accommodations. The accommodation/modification process is a dynamic one for each student with an IEP, so this approach makes educational sense.

Now, lesson plans are not used for that purpose. Instead, all the various accommodations and modifications for each curriculum unit must be inserted into the descriptions of those units. This means that District personnel now have the added burden of rewriting existing curriculum solely for QSAC. This is a poor use of time that might otherwise be spent meeting students' needs.

Overall, the current iteration of QSAC, which was meant to be more streamlined, is more burdensome and bureaucratic. Certain aspects reflect a "gotcha" approach that transforms partial successes into total failures. This is not in the best interests of educators or students.

4 December 2018

Joint Committee on the Public Schools
Testimony on Quality Single Accountability Continuum (QSAC)
Submitted by Julie Borst on behalf Save Our Schools NJ

Thank you to the members of the Committee for the invitation to provide testimony today. As you all know, district public schools are evaluated using the Quality Single Accountability Continuum (QSAC), which was created by the NJ Department of Education to meet the needs of our state's public schools. Charter schools are evaluated using the Charter Performance Framework, which was originally created by the National Alliance of Charter School Authorizers, a national charter advocacy organization. The differences between these two evaluation frameworks are stark.

QSAC has more than twice the number of indicators of the Charter Performance Framework and encompasses five areas of performance versus the Framework's three. The most dramatic difference, however, is in the quality of the evaluation that each framework provides. Let's look, for example, at how they evaluate curriculum.

QSAC requires school districts to demonstrate that the curriculum they are using specifies the content to be mastered for each grade; includes benchmarks and interim assessments; and is horizontally and vertically articulated across grades and content areas. QSAC also requires districts "to verify that instruction for all students is based on the curriculum and includes instructional strategies that meet individual student's needs, including IEPs."

No such requirements exist in the Charter Performance Framework. In fact, the Framework does not even examine curriculum. Instead, the Framework's academic performance assessment asks only if "students in subgroups are making adequate growth based on the school's median SGP" (Student Growth Percentile), which measures changes in student standardized test scores relative to other students in the state with similar historical test results. Using standardized test scores as the only measure of academic performance for charter schools encourages those schools to focus on test preparation versus providing a comprehensive learning environment.

QSAC has more than twice the number of indicators of the Charter Performance Framework and encompasses five areas of performance –instruction & program, fiscal, governance, operations, and personnel indicators, versus the Framework's three – academic, financial, and organizational. The most dramatic difference, however, is in the quality of the evaluation that each framework provides.

QSAC requires school districts to demonstrate that the curriculum they are using specifies the content to be mastered for each grade; includes benchmarks and interim assessments; and is horizontally and vertically articulated across grades and content areas. QSAC also requires districts "to verify that instruction for all students is based on the curriculum and includes instructional strategies that meet individual student's needs, including IEPs."

SAV

There are only three curriculum-related requirements in the Charter Performance Framework. All are broad, barely scratching the surface compared to QSAC's nine criteria per academic subject, including art, science, and history. Instead, the Framework's academic performance assessment focuses on if "students in subgroups are making adequate growth based on the school's mSGP" (Median Student Growth Percentile), which measures changes in student standardized test scores relative to other students in the state with similar historical test results.

Using standardized test scores as the only measure of academic performance for charter schools encourages those schools to focus on test preparation versus providing a comprehensive learning environment.

Are the Amistad and Holocaust curriculum championed by the Education Commissioner, and now part of QSAC, required in charter schools?

As the state considers evaluation practices, it's time to have all schools supported by public money evaluated the same way. Rigorous accountability and transparency do not limit a school's ability to innovate.


*Quality Public Education for All New Jersey Students*
160 West State Street, Trenton NJ 08608
gscschools@gmail.com
609-394-2828 (office) 732- 618 5755 (cell)
www.gscschools.org

**TESTIMONY OF JOHN RAVALLY, ED.D**
**JOINT COMMITTEE ON PUBLIC SCHOOLS**
**QSAC HEARING**
**TUESDAY, DECEMBER 4, 2018**

Thank you, Senator Rice, Assemblywoman Jasey and members of the Joint Committee for the opportunity to share my thoughts on QSAC today. My name is John Ravally, and I have served as a public school superintendent in New Jersey for over 16 years. For the past three, I have been Superintendent of the Franklin Township Schools, a K-12 district in Somerset County. As a superintendent, I have been through QSAC more than a half dozen times. In my current district I dealt successfully with the challenges of two "Focus" schools, defined by QSAC as "schools that have room for improvement in areas that are specific to the schools."

The intent of QSAC—to ensure student success by providing a high level of accountability for schools and districts--is laudable. The execution is, in many cases, flawed. The following are my observations.

**Student Growth and Effective Accountability**

On the QSAC home page, the NJDOE states the following, "The system shifts the monitoring and evaluation focus from compliance to assistance, capacity-building and improvement." In my view, student achievement data is currently presented in a way that is focused more on compliance and less on "assistance and improvement."

Right now we assess improvement mainly by weighing student achievement against benchmark scores. I believe it would be more effective to place even less emphasis on these benchmarks and greater emphasis on growth in student achievement. The idea that a district is moving student growth in a positive direction is a much stronger indicator of educational progress than simple benchmark comparisons.

**Public Reporting**

Reporting and public accountability are important for every school and district. I believe the process of publicly reporting achievement data and district improvement efforts (such as aligning budgets to areas that are in need of improvement), can and does serve as an excellent accountability system. If the public trusts the district leaders and believes in the ways those leaders plan to create or invest in programs for improvement; the public will largely accept the recommendations and processes of the district. Conversely, if the public is dissatisfied with the ways that achievement is reported or the direction the leadership is taking to solve achievement issues, the public has the ability to make those feelings known at BOE meetings and through district communications channels. If they are really dissatisfied, they can vote to replace BOE members and/or make public judgments about the superintendent's performance. This system, to me, is the best public accountability mechanism and works much better than comparing districts to each other and relying on "rankings" that are based predominantly on questionable state assessment systems.

**Chronic Absenteeism**

Chronic absenteeism is the performance indicator chosen by the NJDOE to meet the requirements of the federal Every Student Succeeds Act (ESSA), but the use of chronic absenteeism as a measure of school success also raises some concerns. Though studies have linked achievement to attendance, those same studies also indicate that for particular subgroup populations the rate of absenteeism is inherently higher. This suggests that schools with students from those populations have greater challenges in overcoming the absenteeism problem.

**Timelines for Monitoring and Corrective Action**

If monitoring is to be truly effective, the DOE and the districts need to have the time and resources to do it properly. Monitoring every district every three years wastes resources that might be better spent on helping struggling schools and districts. Timelines more consistent with the older versions of district monitoring would seem to make sense, especially for districts that have been successfully designated as "high performing" according to QSAC criteria.

Monitoring "high performing" districts every three years is burdensome to those districts, especially for the personnel involved in the monitoring process. Once a district has been designated "high performing", it should be exempt from QSAC monitoring for the next cycle, meaning that the district would be monitored again six full years after successfully being labeled "high performing."

Improvement plans for the districts required to write them should be reviewed annually. Once a district meets the goal of the plan, it should be moved to "high performing" status and monitored again during the next QSAC cycle.

**Clear Goals for Struggling Schools**

When my current district had two focus schools, the challenge was to gain clearly defined approved goals that would afford the district the opportunity to exit the corrective action plans. The "goal line" seemed to constantly and consistently move from year to year, making it very difficult for the school to gain direction. Schools under corrective action plans need the NJDOE to provide a clear and unequivocal understanding on what it will take to move the schools forward.

**The Department's Role**

The NJDOE, through the County Office, should be responsible for overall monitoring, as well as monitoring improvement plans. When the NJDOE template used for creating district improvement plans itself invites unnecessary, redundant work already being done, the NJDOE, through its County Office officials, need to provide flexibility to that district allowing the use of a "made to fit" improvement plan rather than a "one size fits all" approach. The one size fits all approach isn't necessarily effective, especially in the most challenging of circumstances. The current template requires much detail and involves creating a mélange of action steps when in fact keeping a more focused approach specific to a particular district's needs would provide more clarity and a shorter path to reaching improvement goals.

**Closure or Consolidation for Struggling Schools?**

Closing or consolidating consistently struggling schools, or offering parents school choice, may seem like viable options, but I don't see the benefit of consolidation, closure or choice. Those strategies could result in masking achievement issues rather than facing them head on. Concentrating the most effective resources, personnel and strategies in those schools seems like a more direct and less disruptive option. To that end, we might consider building

incentives for administrators in high performing districts to partner with their counterparts in struggling districts so that all parties involved receive a benefit.

Dear Senator or Assembly Person,

I understand that you serve on our state's Education Committee and there will soon be a Joint Committee hearing on QSAC school district monitoring process. Please accept my input on the subject coming from the perspective that I am a district superintendent with 18 years of district leadership who has been through several rounds of QSAC as well as the older state monitoring process.

Some issues that I would suggest to be discussed are as follows:

1) The state administration has in the past discussed ways to quantify and cut down on the QSAC process yet it has only gotten more complex.

2) The process is designed to be completed by multiple school officials in many departments and is not in any way cost effective to implement. In fact, it has suddenly become even more costly.

3) Our district was very excited during the last monitoring round that we were considered "High-Performing District". We were informed that we would not have to go through this quagmire again for 7 years. Now we are informed we have to do so anyway. Would you like your child to make honor roll and then be told the entire process is wrong, they are retained and must start all over again?

4)The process throws an entire curriculum restructure and revision at schools after school budgets are approved by the state whereby costing districts non-budgeted dollars for curriculum revision. This is outrageous!

5) This has added burdensome compliance paperwork for districts who should be focusing on factors that are central to student achievement, health and safety, and fiscal accountability.

6) I would suggest the state stop the GOT-cha mentality costing millions of dollars and spend it's efforts on helping underperforming schools.

7) The first QSAC process gave districts a full year in advance to do the self assessment piece as we knew all the progress indicators in advance. This new QSAC threw the new progress indicators in for immediate self assessment.

8) District administrators and clerical staff are already over burdened with constant reports and compliance that multiply and change each year. It is time for some stability at the DOE and a streamlining of these extremely non-cost-effective and overburdensome reports and compliance information with constant uploading of data that in many cases the DOE already has.

9) The state monitoring process changed in an effort to treat all districts the same. Unfortunately, the urban school districts were being bombarded unfairly with extreme documentation requirements so the state decided to do the same for all districts and that is a Rube Goldberg model known as QSAC. Thank you for listening and hopefully you received this communication. I applaud you for your concern and taking the time to pay attention to this very needed and problematic issue.

Sincerely,

Frank Vanalesti, Superintendent
Ocean Gate School District
(732) 269-3023

December 4, 2018. Joint Committee on the Public Schools

As a member of the New Jersey Association of Black Educators, I would like to thank you for this opportunity to speak to the Committee concerning Camden City. It is imperative that the rights of the members of this community are based on our democratic system. The first measure is to elect members to the local school board and to empower the community to question and speak for the children. The open enrollment was implemented to give families an opportunity to sign up for school choice. This procedure did not happen and families were slotted into charter schools where the parents did not want their children there. I had asked for transparency to stop this occurrence since it violates parental rights. The next issue concerns the distribution of funding to the charter and traditional public schools. The "Mom and Pop" Charter Schools have been in Camden City for years and have operated within the parameters of the state. I find issue with the Renaissance Schools and the changing of the policy just within Camden City. These schools are nationally slated as Charter Schools; however, it is a constant contention within Camden City because the Renaissance Schools are constantly changing the rules and want the recognition of public schools which further miscommunicates to the community. I am concerned that parents of the Renaissance Schools have to come to the Traditional Board of Education meetings to speak about their concerns because this opportunity is not provided within the Renaissance Schools.

I would like to see the state department keep the funding and oversight of these schools and wait for the data to produce the results before any more charter school expansion. I would like to see "trades" being implemented so the children who do not want to go to college can find employment in Camden City and boost the economic development of the community. I would like to see funding for all children in Performing Arts, STEM, and dual certification of high school and college credits.

I would like to see that the traditional public schools have the same "new" facilities to insure maximum learning and surroundings. It is evident that the Acting Superintendent, Mrs. Katrina McCombs, is listening and gathering input to provide guidance to make the necessary changes. Funding is of upmost concern!

Another area of concern would include homeless children. I believe that the State Dept. of Education should compile the data and follow these children. If the children are placed in the Suburban Schools, then these children should go to these schools. For example, there are children placed in Cherry Hill School District and the children would benefit from Cherry Hill Schools instead being bussed to Camden City. The Cherry Hill District needs to pay for their schooling in Camden City which impacts on Cherry Hill's budget.

All in all I want the money spent on the children's education. As the world changes so do the demands of teaching and learning. Our children are our future leaders in which we must provide an education to provide optimal learning. QSAC or a new tool should apply to all children. Transparency is key and the rating should be consistent. It is our obligation to provide the blueprint. I stated a few concerns and I am hopeful that your consideration can make a difference at the state level. If you have any questions, please feel free to reach me at 856-952-3873 or oakteach6@gmail.com.
Thank you.

Lorraine Miller
[redacted]
Haddon Twp., NJ. 08108

96x

**ADDITIONAL APPENDIX MATERIALS**
**SUBMITTED TO THE**

**JOINT COMMITTEE ON THE PUBLIC SCHOOLS**

***for the***

**December 4, 2018 Meeting**

**Submitted by John M. Abeigon,** President, Newark Teachers Union:

Rebecca Panico, "5 Major Issues Newark Public Schools Inherited from State-Controlled Leadership," *TAPinto* ©2017 TAPintoLLC.