

TO: Commissioner Lizette Reynolds, Tennessee Department of Education

FROM: President Tanya T. Coats, Tennessee Education Association

DATE: September 15, 2023

RE: Public comment on proposed implementation and changes to the A-F school grading system



This document shall serve as the public comments from the Tennessee Education Association (TEA) concerning the first year of implementation of annual school letter grades following the invitation from the Tennessee Department of Education (department) to Tennesseans to comment on possible changes to the calculation of those grades.

Under TCA 49-2-228, districts are required to receive a grade from A-F each year, based on student performance on state tests, growth, and any other measure of student achievement that the department deems reliable. However, Tennessee public schools have never received a letter grade due to state testing system failures and the COVID-19 pandemic.

TEA has several concerns about the implementation of the school letter grading system, many of which echo those voiced by stakeholders in the town hall meetings over the last several weeks. The proposed timeline for when letter grades will be provided to school districts and the public is still unclear, as is what measures will be included in the model and how they differ from the model originally developed by the department.

Other states that have previously adopted a similar grading system have realized its inherent flaws: “It’s hard to boil down all the hard work of teachers, students and staff into one letter grade that may not show the whole picture,” said Utah Rep. Tyler Clancy (R-Provo) during discussion of a bill passed in March repealing their A-F school grading system¹. The repeal bill passed both chambers unanimously and included the support of the President of the Utah Senate, who carried the original enacting legislation.

TEA strongly objects to the use of a single letter grade to describe school quality and supports legislation to repeal the requirement. This concept—when it was still pending legislation—was opposed by educators, administrators, and even school boards, some of whom, such as Knox County, passed resolutions opposing the proposal.² However, until such time as repeal is possible, there are several important considerations relative to implementation of the system as outlined in current statute.

¹ “‘Long overdue: Utah lawmakers push to end school grading.’ The Salt Lake Tribune. February 15, 2023. <https://www.sltrib.com/news/education/2023/02/15/some-utah-lawmakers-want-stop/>

² A Resolution of the Board of Education of Knox County in Opposition to Letter Grades for Schools (2017) <https://www.knoxschools.org/cms/lib/TN01917079/Centricity/Domain/974/17-003%20In%20Opposition%20to%20Letter%20Grades%20for%20Schools.pdf>

Problems with Outcomes, Validity, and Equity

As a policy instrument, single, summative school letter grades have failed to produce consistent gains in academic outcomes. Despite being adopted in some states for over two decades, there has not been any empirical evidence demonstrating a correlation between school letter grades and student achievement.³

One of the biggest challenges when considering a single-letter summative grade is determining whether the grades provide valid and equitable measures of school performance. Using the results of high-stakes standardized tests and data derived from their use for the bulk of the weights in a school grading system presents inherent equity concerns, as standardized tests have frequently been found to be an imperfect measure of teacher effect.⁴ Furthermore, standardized tests themselves have been criticized for implicit cultural bias and as an inadequate way to measure a student's higher order thinking.⁵

This is not to say that test data is not useful. Educators value assessments as the primary means by which educators can determine student knowledge and skills and—when it is necessary—to differentiate instruction. But it should be noted that painting an accurate and valid picture of school performance necessarily involves isolating factors beyond the scope of control of the school, something standardized tests do not do.

Researchers have found the use of single-letter school grades to exacerbate equity concerns by masking the differences between and within schools, especially those of underserved populations. Researchers studying school letter grades in Oklahoma found that “minority and poor children tested highest in ‘D’ and ‘F’ schools and lowest in ‘A’ and ‘B’ schools. Put differently, according to the State’s own effectiveness grades, ‘A’ and ‘B’ schools are the least effective for poor and minority children.”⁶

Accounting for these differences in student body composition is critical to ensuring validity of results. Demographics can have a multiplicative effect, and “when student data is aggregated to the school level, the relationship between demographic variables and outcomes becomes even stronger.”⁷ The state already monitors the performance of subgroups and uses student growth as part of the state’s current accountability system, weighted at 35% for elementary and middle schools and 25% for high schools. Even when states have made efforts to account for out-of-school factors such as poverty and language barriers, the single-letter grading systems have still been found to over-identify underserved populations in the lowest accountability ratings.⁸ This illustrates how difficult demographic effect is to overcome and underscores the importance of monitoring subgroup performance.

³ School Letter Grades and Achievement: Have graded accountability systems improved student learning? (2020). <https://www.nsba.org/ASBJ/2020/February/Grades-Achievement>

⁴ Adams, C.M., Forsyth, P.B., Ware, J., & Mwavita, M. (2016). The informational significance of A-F school accountability grades. *Teachers College Record*, 118(7), 1-31.

⁵ Neil, Monty, Guisbond, Lisa, Shaeffer, Bob (2004). *Failing Our Children: How “No Child Left Behind” Undermines Quality and Equity in Education*. <https://files.eric.ed.gov/fulltext/ED529802.pdf>

⁶ Adams, C.M., Forsyth, P.B., Ware, J., & Mwavita, M. (2016). The informational significance of A-F school accountability grades. *Teachers College Record*, 118(7), 1-31.

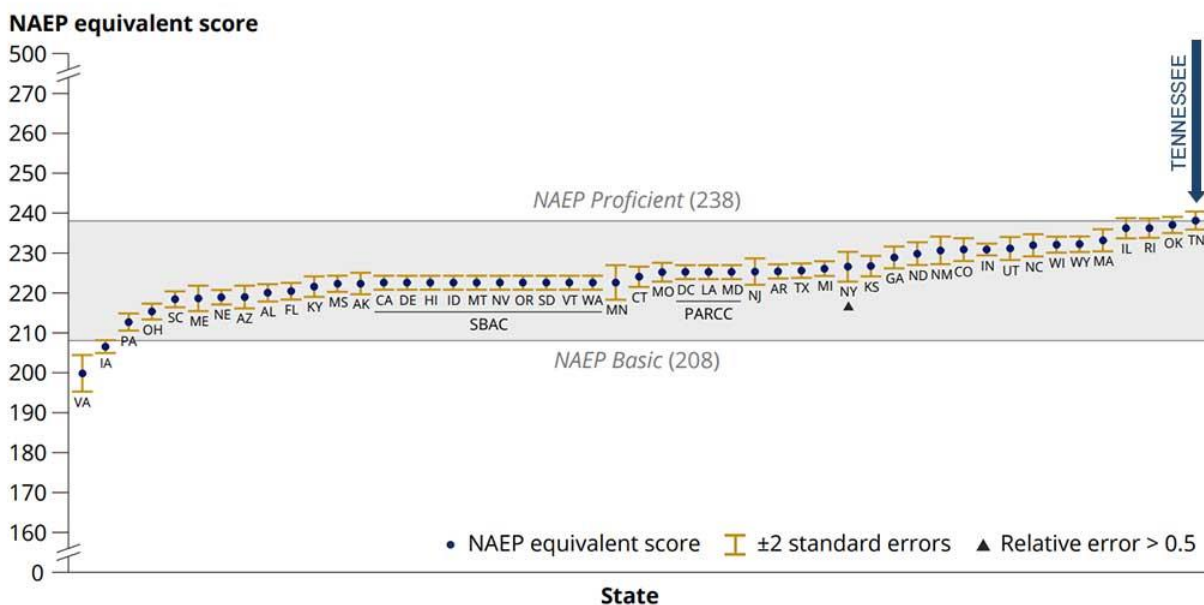
⁷ Sunderman (2022). *State Accountability Rating Systems: A Review of School Report Cards as Indicators of School Quality*. <http://nepc.colorado.edu/publication/report-cards>

⁸ “Do A-F grades Punish the Poor?” Wagner (2015). <https://ncnewsline.com/2015/02/04/do-a-f-school-grades-measure-progress-or-punish-the-poor/>

In addition to papering over achievement gaps, the same study also found “that a single, summative letter grade cannot accurately identify school performance.”⁹ This, again, was attributed to a letter grade’s inability to distinguish performance within schools across different student populations, which accounted for the overwhelming majority of the achievement variance found in the authors’ analysis.

How Tennessee measures achievement, and whether it is given more weight than growth in the formula, may also drive inequities in a school grading system. When mapping National Assessment of Educational Progress (NAEP) proficiency scales to all state tests, federal researchers in 2021 found Tennessee to have the highest bar for reading proficiency, and well above the national average for math¹⁰. Only Tennessee sets its proficiency level for reading at or higher than NAEP for both 4th and 8th grades. Such high proficiency standards—a benchmark set by state policymakers—lowers achievement numbers for schools.

NAEP equivalent scores of state grade 4 reading standards for proficient performance, by state: 2019



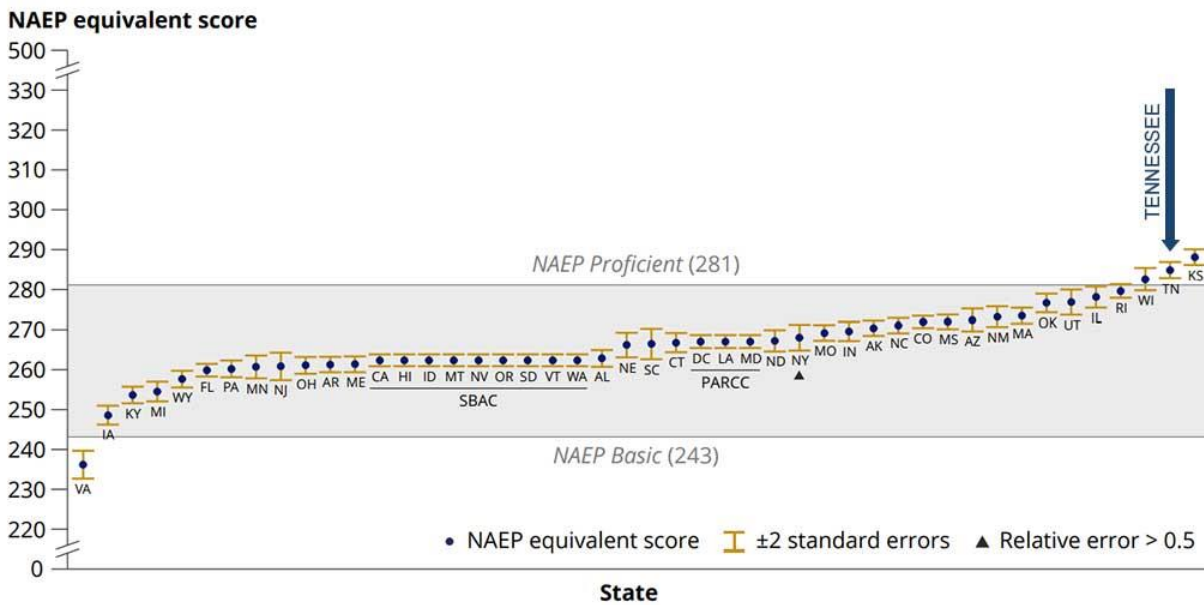
A school grading formula that gives more weight to achievement than growth will lower grades for most Tennessee schools, and especially those with more students who are economically disadvantaged. The federal researchers did not imply NAEP achievement levels (and by extension Tennessee’s) are more

⁹ Adams, C.M., Forsyth, P.B., Ware, J., & Mwavita, M. (2016). The informational significance of A-F school accountability grades. *Teachers College Record*, 118(7), 1-31.

¹⁰ Source: Ji, C.S., Rahman, T., and Yee, D.S. (2021). Mapping State Proficiency Standards Onto the NAEP Scales: Results From the 2019 NAEP Reading and Mathematics Assessments (NCES 2021-036). U.S. Department of Education. Washington, DC: Institute of Education Sciences, National Center for Education Statistics. (Tennessee reference added)

valid than other state standards¹¹. There is no correlation between higher state proficiency scales and NAEP state rankings. There is no evidence states setting higher scores for proficiency improve overall student outcomes. However, exceptionally high TCAP proficiency standards can only drive down the number of students who score “on-track” or “mastered,” and therefore lower school achievement scores. Lower achievement scores will lower school letter grades, regardless of the weight achievement scores have in a school grading formula.

NAEP equivalent scores of state grade 8 reading standards for proficient performance, by state: 2019



Model Volatility and Imprecision

Adjusting the weights in a grading model for different student cohorts within schools is another potential pitfall for school grades to be meaningful and useful to parents and communities. Even slight changes to cohort calculations can substantially change the resulting school grades. As another researcher put it, “Changes to accountability formulas can affect the distribution of school ratings while not necessarily reflecting actual changes in school performance.”¹² It is conceivable that under a single-grading system there may be multiple schools whose students score at the top of the distribution in one content area or other factor, and fail to have that exemplary performance indicated on their summative rating (e.g., a “D” school that has some of the highest reading achievement scores in the state).

¹¹ Source: Ji, C.S., Rahman, T., and Yee, D.S. (2021). Mapping State Proficiency Standards Onto the NAEP Scales: Results From the 2019 NAEP Reading and Mathematics Assessments (NCES 2021-036). U.S. Department of Education. Washington, DC: Institute of Education Sciences, National Center for Education Statistics. (Tennessee reference added)

¹² Sunderman (2022). State Accountability Rating Systems: A Review of School Report Cards as Indicators of School Quality. <http://nepc.colorado.edu/publication/report-cards>

Such changes, when frequently applied, create chaos and confusion among both stakeholders and parents. Florida's school letter formula changed so many times in the 2011-2012 year that the state's superintendents' association called for its repeal.¹³

Tennessee has had a school grading formula in place to calculate school letter grades for some time, with weights and percentages delineated and published. If there are changes made to this model as part of this public feedback process, it will necessarily alter grades generated for schools. It will be important for the state to share with stakeholders any grades from both the existing formula and one with any changes to understand which attributes and data were given greater weight.

The use of school grades can fail to capture critical nuance as it relates to student and school performance. Labeling schools with a letter grade can lead to an outsized perception of the distinctions between schools that might have very little difference in rates of achievement, undermining confidence in the ratings themselves. Volatility in school grades through changes in the formula will also undermine confidence.

Considerations of Model Composition, Implementation Timeline, and Alignment

The many variables impacting possible outcomes raise important questions. Why are changes being considered by the department to the existing formula to calculate school grades? Have schools already been run through the existing formula using existing data to see what grades were generated? If so, have those grades and data sets been made available to stakeholders?

If the existing model has been run and school grades generated, TEA strongly encourages the data should be included in stakeholder engagement. The Standards for Educational and Psychological Testing outline in Standard 12.13, "When test scores are intended to be used as part of the process for making decisions about educational placement, promotion, implementation of individualized educational programs, or provision of services for English language learners, then empirical evidence documenting the relationship among particular test scores, the instructional programs, and desired student outcomes should be provided."¹⁴ All stakeholders should have a clear understanding of the evidentiary support for any changes to an existing model and how each proposed component meets standards for validity, reliability, and fairness.

Another major concern is how school grades will create two separate accountability systems in Tennessee. De-coupling the state and federal accountability systems would create enormous stress for districts and educators as they try to prioritize which goals are more important: those associated with federal mandates or those required by the state that impact a publicly facing letter grade. The resulting confusion could decrease student academic gains and increase stress among students and teachers.

Tennessee's ESSA plan states, "All growth is prioritized, and the focus is not simply limited to moving students to proficiency." However, developing a system of state accountability under the A-F grading system that is at cross-purposes to the federal plan will undermine the "All Means All" philosophy that has undergirded the work of the department for the last several years.

¹³ "Do A-F grades Punish the Poor?" Wagner (2015). <https://ncnewslines.com/2015/02/04/do-a-f-school-grades-measure-progress-or-punish-the-poor/>

¹⁴ <https://www.testingstandards.net/uploads/7/6/6/4/76643089/9780935302356.pdf>

Consideration of Future Consequences

According to the Standards for Educational and Psychological Testing, “efforts should be made to investigate any potential positive or negative consequences of the selected accountability system.” Implementing the state’s A-F school grading system could produce several negative unintended consequences.

Proponents of the policy have often stated that the single, summative letter will be an easy way for parents to make clear distinctions about academic performance amongst and within schools. However, there is evidence to suggest the contrary is true. A study found “these grades are more likely to alienate parents from democratic participation in the education of their children than to promote healthy school involvement.”¹⁵

A study of private market school ratings came to a similar conclusion, finding “parents should be provided more, not less, info about their schools and a reductionist approach could be associated with lower positive perceptions about their school quality. Used improperly, especially with backwards facing data, would just be another tool to undermine parent and public confidence in public schools.”¹⁶

In addition to providing negative motivation for parents, low-graded schools are also likely to lower teacher and student morale. They may ultimately lead to selection bias, wherein parents choose to leave a zoned school with a low letter grade, thereby exacerbating low achievement by removing parents who might have a higher socioeconomic status and therefore have children more positively predisposed to higher achievement.

Evidence also suggests that schools with low letter grades may have problems with teacher retention. A study in North Carolina found “the state’s strategy of sanctioning low-performing schools—most of which serve low-income students and students of color in communities with few resources—has made it harder to attract and retain qualified teachers.”¹⁷

In addition to possible unintended consequences associated with school grades, TEA is concerned about punitive consequences articulated elsewhere in state law. The TISA school funding formula states school districts with multiple schools receiving a “D” or “F” designation could potentially be called before the State Board of Education, required to submit plans for corrective action, and potentially be subjected to a financial audit. It is especially alarming that these consequences have been defined prior to the model being finalized. Does this indicate that school letter grades could act as a precursor to state intervention? State takeover by the Achievement School District (ASD) is considered the state’s most drastic intervention, but the ASD has been a significant policy failure and its schools have consistently shown lower rates of achievement and growth than demographically similar schools managed by home school districts.

¹⁵ Adams, C.M., Forsyth, P.B., Ware, J., & Mwavita, M. (2016). The informational significance of A-F school accountability grades. *Teachers College Record*, 118(7), 1-31

¹⁶ Powers, Jeanne. (2023). *Consumer-Oriented School Rating Systems and Their Implications for Educational Equity*. <https://nepc.colorado.edu/sites/default/files/publications/PB%20Powers-1.pdf>

¹⁷ Clotfelter, C. T., Ladd, H. F., Vigdor, J. L., & Diaz, R. A. (2004). Do school accountability systems make it more difficult for low performing schools to attract and retain high-quality teachers? *Journal of Policy Analysis and Management*, 23(2)

Mutually Exclusive Timelines and Problems with Retroactive Implementation

The implementation timeline of the school letter grading system is unclear given that statements about the anticipated timeline provided in town halls have differed from what is available on the department's website. According to the website, "In November, A-F letter grades will be published for each school on the State Report Card, as part of the department's annual accountability release." However, during discussions in town hall meetings, representatives of the department stated that following the conclusion of the public discussions, working groups of stakeholders will be assembled to review public feedback and make the final determination as to what will ultimately be included in the model.

School districts were notified in August of last year that school letter grades were not going to be assigned using data from the 2021-2022 school year, citing, among other things, concerns over low rates of participation on state tests. "This A-F letter grading accountability system should always reflect consistent and trustworthy information to families, and especially so in this inaugural year," said then-Commissioner of Education Penny Schwinn.¹⁸ Those concerns remain valid this fall.

Issuing school grades this fall—especially if there is a new formula—provides no opportunity prior to the start of the school year for schools to learn the ways in which the grades were determined to inform administrators, teachers, and parents. Retroactively applying grades breaks with best practices of how to secure buy-in from all stakeholders. It could even result in court challenges, as is the case in Texas after Texas Education Commissioner Mike Morath made changes to the state A-F accountability system and retroactively applied it to school districts.¹⁹ Like Tennessee, there are punitive measures written into Texas law should schools or districts receive low letter grades.

It is also unclear how the department could provide districts with the appropriate windows for vetting data and appeals and still meet the stated timeline of delivering school grades on the State Report Card in November.

Moreover, districts should be provided with time to acclimate to the new grading system prior to the data being publicly released. Following the initial passage of the law, the department engaged districts and informed them of a plan to issue letter grades under embargo during the first year of implementation so that district leadership and teachers could familiarize themselves with new requirements under the model and make certain appropriate changes were made to instructional delivery. TEA strongly recommends continuing with this plan and embargoing grades.

Trendline Moving Away from Single, Summative School Grades

Ultimately, as stated above, TEA believes the interests of students, parents, and teachers are best served by repealing the A-F school grade law. Multiple states repealed their school grade requirements this year alone, while others are in discussion to do so in the coming legislative session.

Among those states was Utah, whose school grades had been in place since 2011. "[It] consolidated things and really did not give parents an accurate picture of what was actually going on in a school,

¹⁸ "Tennessee delays issuing A-F letter grades- again." Aldrich, Marta W. Chalkbeat Tennessee. August 24, 2022. <https://tn.chalkbeat.org/2022/8/24/23321095/tennessee-school-letter-grades-delayed-again>

¹⁹ "Texas school districts sue commissioner over changes to A-F accountability system." Fogel, Becky. KUT 90.5. August 24, 2023. <https://www.kut.org/education/2023-08-24/texas-school-districts-sue-state-education-commissioner-over-changes-to-a-f-accountability-system>

because we would just label it with one letter rather than give the nuance of what makes up that letter,” said Sen. Lincoln Fillmore (R-South Jordan), the Senate sponsor of the bill.

Michigan also repealed their A-F school grades system this year in a bi-partisan vote. Bill sponsors wrote in their bill rationale that the repeal was needed as the process of issuing school letter grades was, “simplistic, punitive, and redundant when compared to the School Index Score.”²⁰

Both the state department of education and lawmakers in Oklahoma have signaled an interest in changing and possibly repealing their own school letter grading system. “While it’s valuable, I think we also have to be careful about what we pull from it. You don’t want to overemphasize it,” said Rep. Chad Caldwell (R-Enid).²¹

TEA Resolution on School Accountability

Throughout its 158-year history, the Tennessee Education Association has been advocating for a strong and effective public education system. Guiding this advocacy are democratically drafted and approved resolutions delineating association positions on teaching and learning.

Well prior to the 2016 passage of the school letter grade law in Public Chapter 680, the Tennessee Education Association resolutions on School Accountability defined an equitable and effective accountability system. Within that resolution is a list of criteria necessary for a high-quality school accountability system, including the development and implementation of a valid methodology for use as an assessment tool to determine the required funding necessary to enable all students to achieve educational excellence as well as multiple assessment tools that are universally designed and sources of data that are meaningful, relevant, valid, and reliable. The resolution further calls for a school accountability system that identifies the quality, quantity, and impact of support provided by each stakeholder in addition to identifying and addressing the internal and external factors that impact student learning and development.

A simplistic A-F school grading system does not meet the criteria of the TEA resolutions on School Accountability.

Recommendations

Educators have always relied on data to track and improve student performance and want nothing more than to see their students improve and become successful adults. But they do not support punitive accountability systems that stigmatize schools and districts without providing resources to improve student outcomes. There is nothing in the state law requiring schools to receive letter grades that establishes any additional supports for those schools. Letter grade designations should be accompanied by the resources and support from the state necessary to improve them.

Tennessee currently provides a wealth of information on the State Report Card about how schools are achieving their mission. This data could be further expanded, producing a school quality index which is in line with the policy recommendations of school accountability experts.

²⁰ <https://legislature.mi.gov/documents/2023-2024/billanalysis/Senate/pdf/2023-SFA-4166-F.pdf>

²¹ “Lawmakers agree report cards for state schools not working.” Denwalt, Dale. The Oklahoman. May 14, 2023. <https://www.oklahoman.com/story/news/politics/state/2023/05/14/oklahoma-school-report-cards-lawmakers-want-change-grading-system/70203656007/>

There is no one more committed to the success of their students than teachers. The TEA supports creating an accountability system that creates a holistic view of not just the student but also the systems and supports that exist in a school. This includes multiple indicators of school quality and student success that are valid, reliable, and fair. TEA stands ready to work with all stakeholders in the policymaking community to ensure every Tennessee student receives a world-class education.