# FNSB_logo_lt-blueFairbanks North Star Borough School District

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April 6, 2021

Members of the Senate Education Committee

RE: SB111

This letter is to provide input on SB111, the Alaska Academic Improvement and Modernization (AIM) Act. My name is Ellis Ott, Ph.D. and I am the statistician for the Fairbanks North Star Borough School District.

I fully support universal preschool and evidence-based reading interventions utilizing periodic assessments during the school year to inform intervention decisions. As such, I support the majority of this bill, but have one central concern around the 3rd to 4th grade promotion policy.

In reference to recent testimony on the current Senate Bill asking about retention rates for other states (namely Florida and Mississippi), here are some analyses:

* In 2018-2019, 7.9% of 3rd grade students in Florida were retained ([Florida Dept of Education Data](http://www.fldoe.org/accountability/data-sys/edu-info-accountability-services/pk-12-public-school-data-pubs-reports/archive.stml%20)). Also note that 13% of African American students were retained in grade 3 (similarly for Alaska Native/American Indian students). In comparison with Fairbanks’ third grade retention rate (2 per 1,000), Florida’s retention rate of 7.9% is a 38.5-fold increase (+3,850%).
* In 2017-2018, the 3rd grade retention rate in Mississippi was 4.2%, and skyrocketed to 9.6% in 2018-2019 due to an increase in the cut-score for promotion from 3rd grade to 4th grade ([Mississippi Literacy based Promotion Act Annual Report](https://www.mdek12.org/OPR/Reporting/Reports)). Mississippi’s 3rd grade retention rate is a 47-fold increase compared with Fairbanks.

I would not describe these figures as “small” and insignificant.

Information was provided both by Senators and invited testimony arguing that ‘strong promotion’ states were showing greater increases in 4th grade NAEP scores than “weak promotion” states. With more than doubling their 3rd grade retention rate, Mississippi artificially increased their 4th grade NAEP scores. They were the only state in the entire nation to show an increase in 4th grade NAEP Reading in 2019 as much of the increase would be specifically due to a more limited group of students taking the 4th grade NAEP (those that were exempt or met the assessment score threshold in grade 3 the previous year). All states that use this method are artificially increasing their 4th grade NAEP scores. Thus comparing “strong promotion” states with proclaimed “weak promotion” states carries substantial bias in favor of the “strong promotion” states because they aren’t testing the retained students. What would the data show if at least 95% of students in the 4th grade based on age were tested on the NAEP? The only way to have comparable ‘apples to apples’ data is for there to be consistency. High retention rates cause the data to be incomparable.

I want there to be an actual change in achievement for students in Alaska. Universal preschool and evidence-based interventions are the path to success and **real** success. Don’t use a false impression of improved student literacy as a basis for legislation when real improvement is needed. The data provided for 4th grade NAEP increases in “strong promotion” states are wildly overestimated in relation to real improvement in achievement.

I appreciate the addition of a ‘waiver’ for parents. With that provision, my efforts will be to fully inform parents about the necessary substantial evidence showing a student is well behind grade level before we would recommend retention (and in alignment with current school board policy). My previous comment noted that proficiency on the state’s current test in 3rd grade had an accuracy of a mere 55% for predicting graduation. Therefore, arguing that students are doomed to failure or to become illiterate if they don’t achieve ‘proficient’ on the 3rd grade assessment in reading is a complete fallacy. Lack of proficiency on the state assessment in grade level reading and illiteracy are not equivalent. To illustrate, I’ve analyzed the average GPA, achievement level in 2016-17, and graduation rate of the 19-20 student cohort:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| State Assessment Achievement Level in 2016-17 (grade 9) | % of students | Average GPA  (in 2016-17) | Graduation Rate  (in 2019-2020) | Predicting Graduation Accuracy Using Achievement level as Threshold |
| Far Below Proficient | 33.3% | 2.57 | 69% | 71% |
| Below Proficient | 25.6% | 3.07 | 87% | 52% |
| Proficient | 29.7% | 3.42 | 92% | 27% |
| Advanced | 11.3% | 3.74 | 96% | 17% |

To clarify, “below proficient” scoring students had a graduation rate of 87% and the average student in the group was a “B” student. Scoring “below proficient” is not an indication of illiteracy or even a reason for concern for the student’s academic future. Thus, I partially agree with Mr. King’s comment with this Senate Bill to change the promotion threshold from “NAEP proficient” to “on grade level” as a step in the right direction. However, the threshold should be much lower. Florida’s threshold is “level 2 or higher” amongst 5 achievement levels where levels 4 and 5 coincide with Florida’s definition of “proficient.” Florida describes Level 1 as “Inadequate: Highly likely to need substantial support for the next grade” and that 20% of students in grade 3 received a Level 1 in English Language Arts in the Spring of 2019. Thus, if there’s intention to align with Florida’s policy – why is Alaska’s threshold so drastically different? I recommend that you seriously consider this data when defining your threshold/cut-score for “reading deficiency” (9th grade achievement levels are used to connect the state assessment with graduation rates – the current state assessment started in 2016-17)

I believe the retention piece is the Achilles heel of this entire bill. The evidence provided to exemplify a need for universal preschool and evidence-based interventions is sufficient, but not for retention. Substantial evidence should be used for making the retention decision and one assessment score is inappropriate and insufficient. The reform should be focused on universal preschool and evidence-based interventions and less on the poor evidence of retention. Although requirement of the promotion policy is not preferred, the addition of a “waiver” for parents may be a reasonable compromise between complete school district discretion and a strict on-grade level based promotion for non-exempt students. In other words, the parental waiver to retention may be vital to patching the Achilles heel of this bill.

Senators have asked about local analysis of preschool impacts – I have some for the Fairbanks North Star Borough School District. This analyses mostly pertains to students with disabilities that have access to a preschool program in Fairbanks. I reviewed the graduation rates of students that attended Fairbanks preschool vs. statistically matched students that did not attend Fairbanks preschool. The 2018-2019 graduation rate for preschool attendees (back in 04-05 or 05-06) was 77% as compared to 57% for statistically matched non-attendees! To summarize, “students that do not attend Fairbanks preschool are almost twice as likely not to graduate as students that do attend Fairbanks preschool.”

I believe that universal preschool and evidence-based interventions are exciting opportunities to support our students!

Respectfully,

*Ellis Michael Ott, Ph.D.*

Senior Research Analyst

Fairbanks North Star Borough School District

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