



**S E A C**  
**Special Education Advisory Council**

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Advisory Council**

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Student Achievement Committee  
Hawaii State Board of Education  
P. O. Box 2360  
Honolulu, HI 96804

RE: IV. A. Committee Action on Every Student Succeeds Act  
("ESSA") impacts on school accountability

Dear Chair Cox and Members of the Committee,

The Special Education Advisory Council (SEAC) welcomes another opportunity to weigh in on the Department's proposed ESSA accountability system, Strive HI 3.0. We appreciate the Department's thoughtful discussion regarding perceived arguments against the current draft proposal, including a reference to SEAC's positions on the use of the High Needs achievement gap as an accountability measure and the selection of an "n" size for reporting subgroup performance.

SEAC stands firm on our earlier recommendations as related below, and we add a third related to our concern regarding the use of the School Quality Survey as the sole metric for School Climate:

**Recommendation #1: Remove the high needs students vs. non-high needs students achievement gap as an accountability measure or display the gap by listing separate achievement scores for its three component groups--economically disadvantaged students, English learners and students with disabilities.**

It remains SEAC's understanding that ESSA has determined that states are no longer able to combine groups of students into "super-subgroups" for accountability purposes. ESSA also requires that states demonstrate that a school with a consistently under performing subgroup of students receives a lower summative determination than it would otherwise receive without the under-performing subgroup. The proposed use of the old "high-needs" super-subgroup fails to transparently reflect the performance of the distinct subgroups within.



**Recommendation #2: Utilize an “n” size of 10 students rather than 20 students as the minimum number of students in each subgroup for accountability purposes.**

Lowering the “n” size to 10 ensures that more academically vulnerable students are identified and provided supports. The Individuals with Disabilities Act monitoring system has long utilized 10 as an “n” size that protects the confidentiality of students with disabilities. Eight states--Alaska, Florida, Iowa, Maine, Maryland, Mississippi, Nebraska, North Dakota, Oklahoma, South Dakota, Utah, West Virginia, and Wyoming--use an “n” size of 10 and another 13 have “n” sizes between 10 and 20 for federal accountability and improvement purposes.

**Recommendation #3: Identify additional metrics to measure school climate and/or add categorical data to the School Quality Survey (SQS) to help identify which student groups are responding to the survey.**

As with other Strive HI 3.0 accountability measures, SEAC is concerned about equity for students with disabilities. National statistics have consistently shown that students with disabilities are 2-3 times more likely to be bullied at school than students without disabilities, which has a negative impact on their sense of safety on the school campus. In the 2016 SQS Statewide Summary Report, roughly 77,000 surveys were distributed in SY 15-16 to public school students in elementary through high school--about 40% of the overall school population. The return rate varied from 56.9% at combined middle-high schools to 85% in elementary schools. Because no data is available indicating how individual student subgroups responded and in what percentages, it is not possible to guarantee that the SQS measure is reflective of students with disabilities or any other subgroup.

Thank you for the opportunity to provide input. We look forward to your deliberation of these recommendations. Should you have any questions or concerns please do not hesitate to contact us.

Respectfully,

  
Martha Guinan  
SEAC Chair

  
Ivalee Sinclair  
Legislative Committee Chair