



April 18, 2023

Dear Virginia Board of Education members,

We submit this public comment on behalf of the Virginia Public Education Coalition (VPEC), a coalition of the major school stakeholder associations in Virginia, to offer perspective on proposed revisions to the state accreditation system. As you go about deciding on what indicators to modify and add, we encourage you to think through and articulate what you believe to be the central purpose of a strong state accreditation and accountability system.

We offer that an assessment, accountability, and accreditation system in Virginia should be comprehensive in measure; aligned with values, purpose, and intended outcomes; and, optimized for effectiveness to improve student outcomes and well-being. The ultimate purpose of the system should be to drive achievement, graduation, and good citizenship of students.

Functionally, the system should inform resource distribution and transparency. Accreditation indicators should be tied to the Standards of Quality to clearly identify which specific resources are needed in each school to ensure every student in Virginia is working toward the intended outcomes outlined in the written, taught, and assessed standards. The accreditation system should also inform the Office of School Quality to design a system to meaningfully support improvement plans in as many high-need schools as their capacity allows at a given time. Lastly, these results should provide transparent reporting for students, parents and the community. In linking our accreditation system to resource deployment and transparency, schools will be prepared to deliver on student outcomes in the areas of academic achievement,

5 Cs, durable skills, and health and wellness. To best measure performance of the anticipated outcomes, indicators must be aligned to them and monitored through data points from all K-12 grade levels. Variables such as a school's adequacy of funding, poverty level, share of English Learners and students with disabilities, and history of state sanctioned segregation could be taken into account and controlled for in measures of performance.

Below, we offer recommended questions to consider in making revisions to the accreditation system:

- 1. How will this modification to our accreditation system ultimately contribute to better student outcomes?** It's easy to get lost in the process around accurate assessments of our schools and transparent information, but at the end of the day, we all want these changes to ensure our students are more prepared for their future. We ask that VBOE members spell out their theory of change when it comes to reform of our accreditation system. This will help advocates better assist with providing additional context, research, and suggestions when we understand the underlying objectives of the proposed reform.
- 2. How will the accreditation system contribute to improved parent transparency and productive engagement in student learning?** Do you expect your changes to the accreditation system to be reflected in changes to the School Quality Profiles? If so, does this board plan to advocate for additional resources in the budget for better design, advertising, and training on how parents can functionally use the website?
- 3. Given the [limited capacity](#) of the Office of School Quality right now to provide meaningful support to our schools without full accreditation, how does the proposed reform recognize these constraints and position workers in the office to offer the best support and monitoring?** It is unfortunate that the office is both understaffed and the General Assembly has not funded their full requests for more positions, but VBOE should recognize this reality when reforming the accreditation system and scale its expectations so that its reforms can be successfully implemented. Does it make sense to design a system that scales down the number of schools that are not fully accredited so that the Office of School Quality can offer meaningful support to our highest-need schools?
- 4. Pre-Assessment:** Since the state already collects all of the data for the proposed changes to the accreditation system, it may be helpful to have VDOE run an audit to see how many and which schools would be fully accredited or not with a new system. With this information, it could be worth asking staff in the Office of School Quality to gauge what level of support they would be able to provide to *not fully accredited* schools.
- 5. If pass rates for math and reading becomes a stand-alone measure, will you have multiple indicator levels or just L1 and L3?**
- 6. Will you control for student demographics in a pass rate measure since it's likely that student poverty rates will be a strong predictor of school's score, or are you looking for this indicator to reflect the demographics of the school population?**

7. **Impact of Summative Rating:** There is [growing evidence](#) that summative school ratings are contributing to increased racial segregation in schools across the country. If you are planning to move forward with a summative school grade or rating, how will you mitigate against worsening school segregation in Virginia and how do you envision this information improving student outcomes?

The individual members of VPEC offer our services to assist with development and effective implementation of Virginia's system of accreditation and accountability, and we welcome outreach from Board members and the VDOE staff.

Signing Virginia Public Education Coalition Organizations

Virginia Association of School Superintendents

Virginia Association of Elementary School Principals

Virginia Association of Colleges & Teacher Educators

Virginia Professors of Educational Leadership

Virginia Counselors Association

Virginia Parent Teacher Association

Virginia Education Association

Virginia Association of Secondary School Principals

Virginia Middle School Association

Virginia School Counselor Association

*Virginia Association for Supervision and Curriculum
Development*