

March 23, 2023

The School Accountability System Merry-Go-Round

Elimination of school grades highlights Michigan's fractured governance structure for public schools

In a Nutshell

- The new partisan legislative majorities are poised to eliminate the state's A-to-F school grading accountability system adopted by Republican lawmakers and the Republican governor in 2018.
- That will leave the state's public schools with the current, federally-compliant school index system as the only accountability system in operation, thus cutting down on the confusion families and the general public face when dealing with two different and conflicting measures of school performance and quality.
- But, the fractured governance structure for public schools created by the state constitution almost guarantees future changes should the political winds shift again.

Emboldened by their new legislative majorities nearly 40-years in the making, Democratic leadership in the House of Representatives and Senate, with the assistance of a friendly Governor, have begun the current legislative session altering and reversing a number of public policies championed by past Republican-controlled legislatures and former Republican Governor Rick Snyder. The policies the new majorities are targeting run the gamut from undoing previous tax law changes to reinstating prevailing wage requirements for publicly-funded state construction jobs to repealing the state's "right-to-work law" law.

You can add to the new legislative majorities' priorities a number of K-12 education policy issues. First out of the gate appears to be the repeal of provisions related to an early literacy law adopted in 2016 requiring schools to retain struggling 3rd grade readers. A bill repealing the retention portion of the state law was presented to Governor Whitmer last week, who has signaled her intention to sign it.

Now Democrats are considering eliminating the state's A-to-F school grading system enacted during the 2018 lame-duck legislative session. This system was designed ostensibly to measure school performance to ensure public school districts are held accountable for, among other things, educating children. Proponents also argued that the new report card-style grades would provide

families with easily understandable measures of school quality. At the time of its adoption, this new system did not replace Michigan's existing federally-approved accountability system, rather it was layered on top of it. As a result, the Michigan Legislature adopted a totally separate state-based accountability regime that has made the challenge of assessing school quality more, not less, confusing for many families with school-age children and the general public.

More broadly, the plan to end letter grading for public schools highlights the complex and overlapping authority created by the state's public K-12 education governance structure. A structure in which it appears that everybody – and therefore nobody – is in charge of setting education policy in the Mitten State. That is because the state constitution entrusts the legislature, the governor, the State Board of Education, and the State Superintendent of Public Instruction with different, but sometimes overlapping, roles and responsibilities.

While this set-up may create some checks and balances, it also can sow confusion and lead to education policy being made in a fragmented, incoherent, and seemingly irrational manner. It also means that when the political winds in the state shift, as they did with the new Democratic legislative majorities, public schools, families, and students should be prepared for major policy changes on multiple fronts.

School Accountability

Few argue the importance of accountability when it comes to public K-12 education. Because public schools receive large amounts of tax dollars, what schools do with these dollars matters. This is especially true when it comes to fulfilling the core mission of public schools – educating young minds for being informed and productive citizens and preparing them for success in college and career.

An accountability system is the set of policies and practices that a state uses to measure and hold schools and districts responsible for raising student achievement for all students, and to prompt and support improvement where necessary. These systems are critical for 1) setting clear expectations that schools must raise achievement for all of their students, not just some; 2) communicating whether schools are meeting those expectations, both for students overall, and for each group of students served; 3) acknowledging schools that are meeting or exceeding expectations for all groups of students, and prompt action in those that are not; and 4) directing additional resources and educational supports to struggling districts and schools to help them improve.

School accountability also plays a key role in transparency. Well-designed and implemented systems, paired with understandable data reporting systems, help illuminate and convey to parents and the general public the complex work being done in public schools. While accountability metrics may be easily understood by school administrators, if families don't have access to, or are unable to interpret, school quality measures then accountability suffers. Families need information to make informed decisions about their children's schools. However, the task of making sense of what an accountability system is telling families is made more difficult when there are multiple and, at times, conflicting messages being conveyed from different systems.

Two Separate Accountability Systems

Michigan public schools have, at times, felt whipsawed by the systems constructed to create performance accountability. At the time of its adoption in 2018, the A-to-F model was the sixth different accountability system adopted in seven years. Leading up to this, accountability measures had been constantly evolving with new systems sometimes replacing old ones and, at other times, being layered on top of the old ones. Sometimes the new systems reinforced the older ones, at other times they have seemed to contradict them.

While the federal government has no constitutional authority over education, it has used fiscal federalism, using financial incentives for states and school districts to adopt certain behaviors, to incentivize states to adopt accountability policy. Most notably, in 2001, Congress passed No Child Left Behind (NCLB) reauthorizing the nation's primary education law. To many observers, NCLB fundamentally altered and expanded the federal government's role in education. The centerpiece of the law was a greater focus on school accountability at the state level; it required states, as a condition of accepting federal funds, to establish academic standards to guide their curricula and adopt testing regimes that were aligned with those standards. The federal law ushered in the current era of "test-based accountability" for public schools.

While some accountability systems adopted by states have been the direct byproduct of federal policy and financial incentives, it is key to understand that their design and implementation is the end result of state-led actions. In Michigan, new accountability systems have resulted from laws passed by legislature, with the approval of the governor, as well as through policies adopted by the independently-elected State Board of Education and the appointed Superintendent of Public Instruction, who heads the Michigan Department of Education (MDE).

In 2015, Congress passed a replacement for NCLB, called the Every Student Succeeds Act (ESSA), asserting new accountability standards for states. Following ESSA implementation guidelines, MDE submitted an accountability application to the U.S. Department of Education in 2017 proposing three different possible accountability regimes. The fact that the MDE proposed three options reflected the disparate views around school accountability held by various K-12 education stakeholder groups at the time.

The first two systems would adopt a new A-to-F ranking (one with a single, summative letter grade for each school and one without), while the third option was a dashboard-type accountability system containing an index score for each school. Generally, proponents of report card-style letter grades pointed to Florida and the multiple major education reforms spearheaded by former Governor Jeb Bush as a model for Michigan to emulate as it worked to improve on national math and reading tests. Opponents, on the other hand, mostly claimed that assigning letter grades was overly simplistic and relied too heavily on assessment data to the exclusion of other important measures of student progress.

In recognition of the spirited statewide debate taking place, the state's ESSA application included a provision allowing the Michigan Legislature to weigh in on what system to adopt going forward. To meet the ESSA implementation deadlines, lawmakers were asked to approve one of the three proposed accountability systems by June 30, 2017. However, if the legislature did not act by this date, the dashboard/index system would be implemented by default.

Because the legislature did not affirm one of the three options by the deadline, the MDE rolled out its Parent Dashboard for School Transparency and the new Michigan School Index System in early 2018. The accountability index relies on several factors to assess school performance, including student growth, proficiency, graduation rates, English learner progress, attendance rates, advanced coursework completion, postsecondary enrollment, and staffing ratios. For every school evaluated, the system generates an index value (1 to 100) for each performance factor as well as an overall index value.

Schools receiving low index values are identified by one of three low-performing school types required by the federal ESSA law – Comprehensive Support and Improvement (CSI), Additional Targeted Support (ATS), or Targeted Support and Improvement (TSI). Each designation uses different

identification criteria to determine what steps state and local school officials must take to improve schools, including the technical and financial supports that will be made available for this work.

Schools with index values that appear in the bottom five percent of all schools are designated as CSI schools, a requirement of federal law. The index was used to assess school performance and provide assistance for school years 2016-17 through 2018-19 and again in 2021-22. Due to the pandemic, all states received a waiver from federal accountability reporting requirements in 2019-20 and 2020-21.

Discussions about adopting an A-to-F system did not end with implementation of the federally-approved school index. During 2018's lame-duck legislative session, Republican lawmakers, with the approval of former Governor Rick Snyder, narrowly approved a law requiring MDE to develop and implement a new statewide A-to-F grading system to evaluate school performance. Grades were assigned to schools beginning with the 2018-19 school year.

However, early on in its development, it was clear that the new system would not meet the criteria for compliance with federal law and allow the state to receive billions of federal dollars. For this reason, MDE and the State Board of Education opposed the new system. But, faced with no other option, MDE had to follow the new law. This resulted in the current situation where schools are subject to two completely different systems; 1) the school index that is ESSA compliant, and 2) the A-to-F grading that is not ESSA compliant.

And now, with new political leaders at the helm of each legislative chamber, there is a push to scrap letter grading and use the school index as the state's only school performance measure.

Michigan's Fragmented K-12 Education Governance System

While the previous and current policy debates about accountability systems highlight schisms in stakeholders' views about how schools should be evaluated and held to account for student learning, the on-again, off-again policy debate signals a much deeper question facing Michigan public education. That is, who should be responsible for setting education policy in the state? Michigan's K-12 public education system has been governed and structured in fundamentally the same way since the 1960s due largely to the organizational structures established through the state constitution.

Although K-12 education services are delivered by nearly 900 local school districts (including intermediate districts), the 1963 Michigan Constitution entrusts the overall responsibility for education to state government. However, this responsibility is spread across multiple state-level actors, including both elected and appointed officials. The legislature, governor, popularly-elected and partisan State Board of Education, and the Superintendent of Public Instruction (appointed by the State Board of Education) are entrusted with different, but sometimes overlapping, roles and responsibilities. The potential for policy (err, political) disagreement among these actors is extremely high, especially given the heightened political partisanship in a traditionally swing state like Michigan.

And this is exactly what has been playing out when it comes to the policy merry-go-round surrounding Michigan's school accountability system. While it appears the elimination of the state's short-lived A-to-F school grading regime is imminent with the new partisan legislative leadership, this likely won't be the last stop on the merry-go-round. That is because when the political winds shift again, the underlying K-12 governance structures created by the state constitution almost guarantee future changes in policies affecting roughly 1.4 million public school students and the nearly 3,400 schools they attend.

ABOUT THE AUTHOR

Craig Thiel - Research Director



Craig is the Research Council's Research Director and primary researcher of education and school finance issues. Prior to becoming Research Director, Craig served as the Director of State Affairs and as a Senior Research Associate. During his graduate school studies, he worked for the Council as a Lent Upson-Loren Miller Fellow from 1993 to 1995. Before joining the Council in 2006, Craig worked for ten years as a fiscal analyst at both the Senate Fiscal Agency and the House Fiscal Agency. He previously worked for the Michigan Department of State, Office of Policy and Planning and the United States Environmental Protection Agency in Chicago.

Craig holds a B.A. in Economics and Political Science from Kalamazoo College and a Masters in Public Administration from Wayne State University. He holds positions on various professional, nonprofit, and local government boards/associations.

Founded in 1916, the Citizens Research Council of Michigan works to improve government in Michigan. The organization provides factual, unbiased, independent information concerning significant issues of state and local government organization, policy, and finance. By delivery of this information to policymakers and citizens, the Citizens Research Council aims to ensure sound and rational public policy formation in Michigan. For more information, visit www.crcmich.org.

Southeast Michigan

38777 Six Mile Rd. Suite 208, Livonia, MI 48152
(734) 542-8001

Lansing

115 W Allegan St. Suite 480, Lansing, MI 48933
(517) 485-9444



Facebook: [@crcmich](https://www.facebook.com/crcmich)



Instagram: [@crcmich](https://www.instagram.com/crcmich)



LinkedIn: [Citizens Research Council of Michigan](https://www.linkedin.com/company/citizens-research-council-of-michigan)