



December 1, 2015

Mrs. Marva Johnson
Chair
State Board of Education
325 W. Gaines Street, Suite 1520
Tallahassee, Florida 32399

Dear Chair Johnson:

Composed of more than 100 companies with over 600,000 employees, the Florida Council of 100 is a private, nonprofit, nonpartisan organization of business and civic leaders, which exists to improve the quality of life and economic well-being of all Floridians through the relentless pursuit of better, business-driven public policy. Formed in 1961, the Council was the first of its kind in the United States, and we work with the Governor and the state agencies, the Legislature, the judicial branch, and other private organizations, to further our mission.

For the Council, education is a key, if not the key, issue when it comes to spurring the prosperity of the state's economy. We have always fervently held that Florida needs a world-class workforce infrastructure if our citizens are to have the career tools they need to compete and prosper in the ever-changing economy of the 21st century.

At the core of the Council's education policies is the need for high standards, rigorous assessments, and strong accountability. Florida has made great strides in these areas, and improvement in student performance over the past 15 years demonstrates it.

That said, we are now at a pivotal time in Florida's history when it comes to setting high bars for standards, assessments, and accountability. As Susan Pareigis, our President & CEO, testified at the October 28 State Board of Education meeting, we either need to demand superior performance from our students now, or employers will be forced to tell them that they are unqualified later, when they apply for work.

So how do we do that? Simply put, it starts with benchmarking Florida students against the best in the nation. The National Assessment of Educational Progress (NAEP) is known as the "Nation's Report Card" because it is widely thought of as the gold standard for assessing student performance and thus is used as a tool for comparing states.

These functions are vital to Florida's business community because higher standards and rigorous assessment lead to higher-performing students and workers. Furthermore, we cannot over-emphasize the importance of being able to compare Florida's students with those of other high-performing states. It is only through such comparisons that Florida employers can ensure that its future workforce is being trained at the same level as the best and brightest in the country. Florida-based companies, existing or future, need to be assured that hiring Floridians is a better option than recruiting workers from other states.

It is unsurprising, then, that the Florida Department of Education agrees, describing the NAEP as the "largest nationally representative and continuing assessment of what America's students



know and can do in various subject areas. NAEP results serve as a common metric for all states and selected urban districts and permit a clear picture of student academic progress over time.”

In fact, in its recent federal ESEA filings, FDOE has already declared NAEP comparisons to be a driving force for assessing state performance. For example, in its 2015 waiver request, Florida declared that one of its annually measurable objectives should be the benchmarking of Florida’s student performance to that of the highest-performing states and nations.

[Florida’s statewide target is] to attain the same achievement levels as the top five states on NAEP and to outperform the United States and increase its ranking on TIMSS, PIRLS, and PISA. This AMO is designed to keep Florida moving forward toward national and international competitiveness. This will make sure that Florida is benchmarking its progress not only within the state but externally to achieve the highest levels of performance and increase Florida’s competitiveness nationally and internationally.

However, notwithstanding this objective, Florida’s current and proposed “proficiency gaps” (the difference between the percentage of students scoring proficient on the NAEP and the Florida Standards Assessment) are higher than this target (i.e., it is easier for students to score highly on the Florida test than on the NAEP). Currently, these gaps are an average of 23 percentage points – and would still be an average of 19 percentage points under the FSA cut scores recommended by Commissioner Stewart. Meanwhile, states such as Georgia (60-point gap) are almost eliminating their proficiency gaps.

From a business perspective, FDOE’s top-five NAEP objective is appropriate. However, for Florida students to be pushed to top-five status, they need honest feedback about their performance as compared with the top-five states. This means eliminating the NAEP proficiency gap. Furthermore, because this annually measurable objective has been submitted by FDOE to the federal government, it is incumbent on FDOE to conduct the analysis regarding the cut scores necessary to meet the objective.

So what would this mean for Florida’s students? In the short term, students, including those impacted by technical problems while taking the FSA, always have additional options to the state assessment. Florida has never used the state test as the sole determinant of promotion or graduation decisions. Moreover, in the long term, Florida students have always risen to the occasion when faced with a higher achievement bar.

Conversely, students will be hurt if Florida’s achievement standards aren’t immediately raised enough to make the state top in the nation. In order to improve, students need a realistic idea of the quality of their performance, and every year the raising of achievement standards is delayed, another cohort of students falls behind its national counterparts.



In short, the time to act is now. Revisiting cut scores occurs only infrequently, and, thus, failure to raise standards now will only compound the damage done to future students in an increasingly demanding workplace and economy.

As always, the Council of 100 pledges its assistance in this vital educational matter. Please do not hesitate to contact me or Ms. Pareigis with any thoughts or questions.

Sincerely,

Rhea F. Law
Chair

cc: Mr. John R. Padget, Vice Chair, State Board of Education
Mr. Gary Chartrand, Member, State Board of Education
Mrs. Rebecca Fishman Lipsey, Member, State Board of Education
Mr. Tom Grady, Member, State Board of Education
Mr. Michael Olenick, Member, State Board of Education
Mr. Andy Tuck, Member, State Board of Education
The Honorable Rick Scott, Governor
Mrs. Pam Stewart, Commissioner, Florida Department of Education
The Honorable John Legg, Chair, Senate Education PreK-12 Committee
The Honorable Marlene O'Toole, Chair, House Education Committee
The Honorable Janet Adkins, Chair, House K-12 Education Subcommittee