

## HOUSE EDUCATION COMMITTEE TESTIMONY OF JOHN PELLETIER (4/05/2018)

1. **A Mandatory Move to Proficiency Based Learning (PBL) and Grading (PBG) is the Largest Change to Vermont's K-12 Educational System in Decades.** When schools transition to a proficiency-based system, it entails significant changes in how a school operates and how it teaches students, affecting everything from the school's educational philosophy and culture to its methods of instruction, testing, grading, honors, reporting, promotion, and graduation. All Vermont school districts are being mandated to radically reinvent how they educate students by 2020.
2. **This Dramatic Education Change is Based on Research & Theory Not Proof.** There is no proof that this works on a state-wide grades K-12 basis when implemented in the way that Vermont has chosen. There is no proof from another state that this change will increase: (1) performance assessment results (2) high school graduation rates; and/or (3) post-secondary education attendance and completion. Right now, proficiency based learning is merely promising research without any long-term statewide proof that it works (e.g. 5 years of data).
3. **Proficiency Based Learning Is Increasing School District Expenses.** This new education system requires a material increase in the customization of student education. Businesses are unable to increase client customization and reduce costs—why should we expect this to be done successfully in education? Implementing this system is increasing costs in supervisory unions—in the town/SU where I live, the recently approved budget included the addition of an FTE and consulting dollars for proficiency based learning (\$200k per SU equals \$12 million in spending).
4. **Why is Vermont Rushing this Implementation?** Only two other states have implemented proficiency based learning in a manner similar to Vermont: (a) **New Hampshire**, took **11 years** to implement this change 2016; (b) **Maine**, held out to Vermonters as the leader in this area when Vermont changed its regulations, will be implementing this change at least one year after Vermont 2021 or 2022 (after **9 or 10 years** of implementation—assuming it is repealed or dramatically modified by the legislature this session). The timeline for **Vermont** is **6 years**.
5. **A Change of this Magnitude Did Not Have Substantive Legislative or Citizen Involvement.** This change was made by regulation, in revisions to the Education Quality Standards by the unelected State Board of Education. *This enormous change was done with 271 vaguely phrased regulatory words.* To be clear, Act 77, the Flexible Pathways never required these changes. Act 77 allows for high school students to graduate by proficiencies as an alternative to the historic credit hours based graduation. *A law allowing for graduation by proficiencies is very different from a regulation mandating that all Vermont students must graduate and be graded ONLY by proficiencies by 2020.*
6. **This Education Change is Already Reducing Student Performance on SBAC Math and English Scores.** SBAC exam data indicates that proficiency based learning doesn't work in the three SBAC states pursuing this educational change. Three of the fifteen SBAC testing states (Vermont, New Hampshire & Oregon; 3 of the 4 worst SBAC states) had significant overall score reductions in both math and English over the past two tests. This is not happening in most SBAC states. What do these three states share in common? All are "advanced" proficiency based learning states according to the Agency of Education. If Vermont's SBAC scores drop again this year, is the legislature ready to respond quickly to stop this material reduction in student performance?
7. **School Grading Systems are Changing Radically.** Report cards and high school transcripts need to be entirely redesigned, and Vermont schools are using many different grading scales and

systems. Vermont schools are using 1-5 whole number systems; 1-4 number system with no, few or many additional gradations; A, B, C, Incomplete grading system; 1-11 grading system, no numerical grades or GPA only words, etc. Typical A-F and 0-100 grading scales are being replaced with brief descriptive statements (and some with numbers as well)—e.g., phrases such as does not meet, partially meets, meets the standard, and exceeds the standard. Each school district is also creating its own unique list of proficiencies that student must demonstrate competency in prior to graduation. Thus, there may be as many as 60+ different grading, proficiency definitions and high school transcript systems in the tiny (by population) state of Vermont.

8. **Educators, Administrators, School Boards, and Parents are Being Misled by the Agency of Education Either Intentionally or Through Omission.** Superintendents, principals and school boards have been led to believe that they must change to a proficiency based grading mechanism. Parents are being told by Superintendents and Principals that Proficiency Based Learning requires that abandonment of standard grading policies. Yet, the AOE in Senate testimony in January said that grading is entirely up to local control. Nowhere on the AOE's website will you find this statement that proficiency based grading is a local control decision.
9. **Not Supported by Many Educators.** Many educators in Vermont are against this change but are afraid to speak up due to concerns about retribution from administration. Only the funding of a truly confidential survey of educators, done by a trusted third party survey company, would show whether most middle and high school educators share the concerns that educators are sharing confidentially with parents.
10. **Risks to Vermont Students from Proficiency Based Learning:**
  - a. **It is Likely to Reduce High School Graduation Rates**—particularly students with special needs. If you are not proficient in a single graduation requirement, regardless of how minor, you will not get a diploma. In the old days you could get a grade D and still pass—that is no longer possible. A graduation requirement applies to all equally—even if you have a learning disability.
  - b. **Reduction in Student Motivation by Lumping Good and Excellent Students in the Same Grading Category.** This everyone wins a prize approach to grading will reduce student motivation and effort. Why work very hard when hard and average effort result in the same grade of 3? How is this system motivating students to do their best when it appears to be motivating them to do well enough to be proficient? Quote from college admissions officer: “We are looking for excellent, not proficient.”
  - c. **May Violate Federal Law.** Maine is being threatened with lawsuits because proficiency based grading appears to violate federal law—specifically the Individuals with Disabilities Education Act. Maine is currently rethinking its approach to proficiencies.
  - d. **Will Hurt Students Applying to Competitive Colleges Out of State.** Many Vermont parents are expressing concerns that the abandonment of traditional letter grades, report cards, transcripts, and other familiar academic-reporting strategies will disadvantage students who are applying to colleges and universities (because the reporting strategies will be unfamiliar to college-admissions professionals, or because proficiency-based systems may eliminate many of the competitive dimensions of academic achievement, such as GPAs, class rank and honors that tend to favor high-achieving students). The new system is supposed to lessen the focus on high stakes

exams like SBAC. Yet, when applying to college, particularly out of state, given the unique nature of Vermont's new grading system and transcripts, college admissions offices are likely to put even greater weight on the toughest of the high stakes test--the SAT and ACT. While PBL advocates highlight the small list of postsecondary schools that have said that students applying with proficiency based transcripts will be not be disadvantaged, *there is no statement from any school that the proficiency based transcript is beneficial or works in favor of an applicant*

- e. **Elite Colleges Spend 8 Minutes Reviewing a College Application—This Will Put Vermont Students at a Grave Disadvantage.** According to a [January 18, 2018 Wall Street Journal article](#), college admissions officers review a student's common application, high school transcript, essays and supporting letters in 8 minutes or less. The grading and transcripts must be easily convertible into a GPA, have clear gradations between students and must be easy to understand. It is not discrimination for a college admissions office to refuse to spend an hour trying to comprehend a school district's grading system. Vermont sends less than 2,400 students to colleges out of state each year—there are more colleges in the U.S. than that. Vermont students are a fraction of 1% of students going to college in the US. It is hubris to assume that college admissions offices will spend the time necessary to make sense of our unique grading system.
- f. **System Could Materially Reduce Merit Scholarship Opportunities at Colleges.** Some high schools are abandoning numerical grades and GPAs. How will students from these school districts apply for scholarships with minimum GPA requirements?
- g. **This System will Not Prepare Our Children to be College Ready.** Vermont's everyone wins a medal attitude toward grading will not prepare kids for the competitive real world Vermont students will face in college. This may ultimately result in a reduction in college completion rates for Vermont students as they are forced to compete in an alien competitive grading system environment.

#### 11. What Can the Vermont Legislature Do?

- a. **Slow Down the Implementation, Make Voluntary Not Mandatory or Repeal.** Force the AOE to provide data from a state (or states) that this actually works on a state-wide K-12 basis. Why should Vermont be a lab rat for The Great Schools Partnership, the Nellie Mae Foundation and other groups' education policy desires and theories?
- b. **Find Out Why the Maine Legislature is Considering Delaying Implementation or Repealing Proficiency Based Learning.** They have been doing this two years longer than Vermont. What do they know that we do not? Please reach out to the legislative leaders of the education committees in Maine.
- c. **At a Minimum, Provide Material Oversight Over the Implementation.** AOE must report to you on a regular basis data that either supports or rejects the underlying theory behind this massive change: graduation rates by school district, SBAC and other relevant assessment test scores (NEAP, AP, ACT, SAT), college enrollment data (are less students getting into out of state competitive schools than before the change?), six year college completion rates, etc. Force the AOE to provide data that will show citizens whether this new system works or is failing.
- d. **Hold People Accountable if this Massive & Expensive Education Reform is a Failure.**