



N.J.A.C. 6A:30 Evaluation of the Performance of School Districts

Public Testimony

before the

State Board of Education

November 6, 2024

The NJSBA believes that the Legislature intended the State to determine the broad goals of education (i.e., goals that are commonly considered essential for all students to achieve in order for them to function politically, socially and economically in a democratic society) and to monitor and evaluate local districts to determine whether they are making sufficient progress toward achieving those goals. Further, the NJSBA believes that the Legislature intended to require local districts to set their own specific goals, consistent with the State goals and with maximum public participation, and to be accountable for achieving those goals.

The New Jersey Quality Single Accountability Continuum establishes a comprehensive single accountability system for monitoring and evaluating school districts. Pursuant to NJQSAC, school districts are evaluated in five key component areas of school district effectiveness -- instruction and program, fiscal management, governance, personnel, and operations -- to determine the extent to which a thorough and efficient education is being provided to students within the school district. The standards and criteria used to evaluate school districts assess both student achievement and progress toward proficiency, as measured by State assessments, school district capacity to operate without State intervention, and the need for State support and assistance. Once a school district is identified pursuant to NJQSAC as requiring assistance in one or more of the five key components of school district effectiveness, the Department and the school district work collaboratively to improve school district performance in the identified targeted area(s). The measures used to achieve this goal include Department evaluations of the school district, collaborative development of a district improvement plan, close monitoring of the plan's implementation, and the provision of technical assistance, as appropriate. If a school district fails to develop or implement an improvement plan as required, or other emergent circumstances warrant, State law allows the Department to seek full or partial intervention in the school district to effect the changes necessary to build local capacity to provide a thorough and efficient education.

With these thoughts in mind, the NJSBA offers the following comments and recommendations for your consideration:

- Overall, the NJSBA supports how the proposal under consideration marks a shift towards a growth-oriented accountability system. The current system can penalize districts that have a more challenging student population to educate, such as those who are economically disadvantaged or are highly diverse. Any state accountability system should factor in incremental progress and consider the special challenges faced by certain students. The proposed “rebalancing” of the QSAC scoring system, namely in the areas of Instruction and Personnel, rightfully recognizes the need to give additional weighting to student academic progress over time, as compared to proficiency and achievement that measure performance at a snapshot in time. This shift is a positive step in the right direction towards equity and will capture a more complete picture of a district’s overall effectiveness.
- Districts must be treated equitably under NJQSAC. Students who are in multiple subgroups get counted multiple times, having a disproportionate effect on a district’s overall NJQSAC score. The subgroup weighting creates an imbalance in the accountability system in that it unfairly discriminates against districts with lower income levels and greater diversity. Districts should not be penalized through NJQSAC merely because they educate some of the most vulnerable students in the state or because they have a diverse student population. NJQSAC should contain a mechanism whereby the District Performance Review considers multiple achievement measures for districts to achieve the required eighty percent needed to be considered high performing.
- K-8 districts should be judged in the same manner as 9-12 and K-12 districts for QSAC purposes. For instance, QSAC gives greater weight to science assessments in the K-8 districts which may be having a disproportionately negative impact on these districts’ QSAC scores.

Thank you for the opportunity to speak to you regarding these important regulatory matters.

