

Public Comment 10/14/2020

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For these comments I am working with AIR's sim\_cost\_v8.xlsx

1) In the "Town Cost Simulator" worksheet Column Q is labeled "% of Enrollment in Middle School Grades." The numbers in this column are not correct. As pointed out previously, the underlying data seems to count 6 to 8 grade students only in separate middle schools (e.g., Concord 22%, Keene 23%) or in combined middle/high schools (e.g., Hopkinton 17%, Pittsfield 16%). Students in grades 6-8 as part of K-8 elementary schools are not counted (e.g., Allenstown 0%, Henniker 0%). In other cases students in other grades are evidently counted (e.g., Hampstead 30%, evidently 5<sup>th</sup> grade counted). Jeff McLynch and I pointed this out in a previous submission.

In response, an AIR representative acknowledged the problem and stated that the necessary data was not available. That is incorrect. The NH Department of Education (DoE) has published "School Enrollments by Grade" for many years.

<https://www.education.nh.gov/who-we-are/division-of-educator-and-analytic-resources/bureau-of-education-statistics/enrollments-by-grade>

The worksheet with its current numbers in column Q provides an extra \$8,514.30 for each student in grades 6-8 for some districts but an extra \$0 for each student in other districts. Further, it also seems to provide an extra \$8,514.30 for some 5<sup>th</sup> grade students where a district has included 5<sup>th</sup> grade students in middle school. This really needs to be fixed and the data is available to do so.

2) Many of the basic counts and percentages in the "Town Cost Simulator" worksheet are taken from another worksheet "muni\_export." This includes ADM, FRL, and other basic counts and percentages. "Muni\_export" is not part of the sim\_cost\_v8.xlsx spreadsheet. Therefore it is not possible to ascertain exactly how those numbers were derived. Nor is it possible to quickly update with the new numbers for 2019/20 that will soon be released by the NH Department of Education. The "muni\_export" worksheet should be part of the sim\_cost\_v8.xlsx file or should be provided as a separate file.

3) In the "Town Cost Simulator," column AU contains the "Equalized Property Valuation" of each municipality. Although it is not noted, I believe these figures are from 2018. However, the 237 rows do not include the 23 unincorporated places. The \$85 million plus of equalized property value in those communities escapes any statewide property tax in the calculations made in the simulator. Excluding them from the taxation simply because they have no students gives property owners in those locations unfair advantage over those elsewhere.

4) During the Adequacy workgroup meeting yesterday there were a number of statements made about availability of data that were not correct.

4A) It was pointed out that teacher quality must be related to outcome measures but was not one of the variables in the regression analysis. The discussion was about teacher salaries. Average teacher salaries by district have been available for many years from the DoE. So too have minimum starting salary and teachers' educational attainment.

<https://www.education.nh.gov/who-we-are/division-of-educator-and-analytic-resources/bureau-of-education-statistics/staffing-and-salary-reports>

Evidently AIR chose not to use any teacher related data in its regression analysis but it is not correct to state that the data is not available.

4B) In the "Town Cost Simulator" all special education students are provided an additional \$26,383.50. The inability to distinguish among special education students with comparatively lesser and greater needs was discussed. In fact current data could distinguish between three degrees of severity based on reported costs. There is the count of all special education students by district. In order to distribute the "catastrophic" special education funds, the DoE also has a count of those with costs between 3.5 and 10 times the cost of the state average per pupil cost and it also has a count of those with costs that exceed 10 times the state average per pupil cost.

<https://www.education.nh.gov/who-we-are/division-of-educator-and-analytic-resources/bureau-of-education-statistics/other-state-aid-programs>

By subtracting the latter two counts from the total, one easily derives a count of students with costs less than 3.5 times the state average pupil expenditure. These 3 tiers of special education severity could have been given a separate weight to better match district need with estimated cost. Evidently in the regression analysis only the total number was used and thus only one weight was derived.

4C) There has been some discussion about the lack of granularity in some data. The truth is that the DoE has a database with one record for every student, the "i4see" system. I helped create this database in 2014 for the "No Child Left Behind" data requirements and the need to better track student dropouts and performance. While it may be too late in the Commission's work to try to make use of this data, it is not true that very granular data is not available that could help connect student characteristics with measured outcomes.

