

August 6, 2025

Dear Superintendent Underly and Members of the Report Card Standard Setting Group,

As the Department of Public Instruction and the Report Card Standard Setting Group undertakes the important work of revising Wisconsin's school report card standards, we write to offer recommendations to help strengthen the state's accountability framework and ensure it more accurately reflects student achievement.

We are aligned in the sincere desire to improve the educational outcomes of Wisconsin's students. But as you are aware, what we're facing isn't a sudden decline in achievement—it's the result of a slow and persistent stagnation. For years, Wisconsin has languished in mediocrity, falling behind states like Florida and Mississippi in reading proficiency—even though those states contend with far more difficult student demographic challenges. This standard setting process offers an opportunity for DPI to reset their course. In particular, we recommend that the committee consider the following changes:

- 1. Establish more rigorous cut points when determining school performance, and**
- 2. Mitigate the effects of the economic status sliding scale.**

We are hopeful that this standard setting process adopts a more rigorous approach than previous efforts—one that better reflects the reality of academic achievement and provides parents with the clear, honest information they need to make informed decisions for their child's future. We urge the committee to move forward with rigor in mind.

To assist the committee's work, we analyzed how DPI's school report card ratings compare to those from GreatSchools, an independent platform widely used by parents evaluating school quality. While no rating system is perfect, GreatSchools is incentivized to present transparent, comparative data for families, making it a useful benchmark. Our goal was to assess whether DPI's current standards accurately reflect the academic performance families care about most.

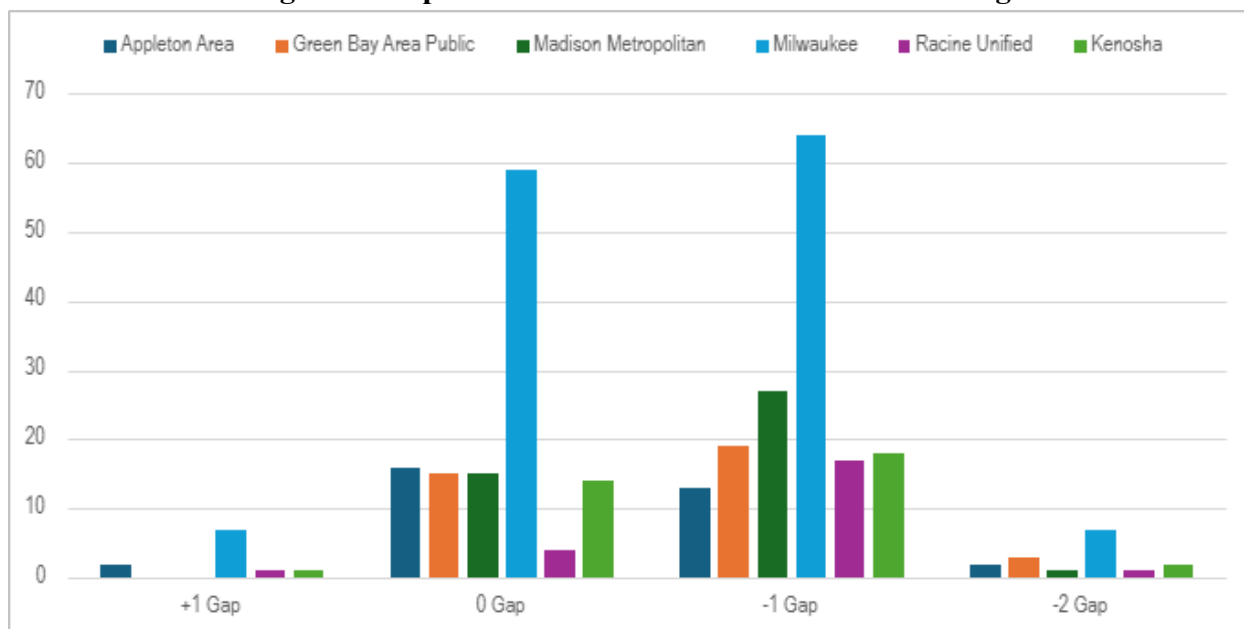
To conduct this analysis, we compared all schools across the state's six largest districts for which ratings were available from both DPI and GreatSchools and compared the ratings to evaluate the different approaches.¹

To assess the extent of the gap between DPI and GreatSchools, we converted GreatSchools 10-point scale to a 5-star rating that's comparable to the state's ratings. In Figure 1 below, a positive

¹ Milwaukee Public Schools, Madison Metropolitan School District, Green Bay Area Public School District, Kenosha Public Schools, Racine Unified School District, and Appleton Area School District

gap indicates that GreatSchools ranked the school higher than DPI, while a negative gap indicates that a school was ranked lower by GreatSchools than by DPI.

Figure 1. Gap Between Great Schools and DPI Ranking



Across the six districts that were compared, 348 individual schools had ratings available from both DPI and GreatSchools for comparison. Of those, 174 (50%) were rated higher by DPI than GreatSchools, while only 11 schools (3%) received a higher score by GreatSchools. The remaining schools had identical scores under both systems. Figures 2 and 3 show the difference in distributions between GreatSchools and DPI. As you can see, DPI's scale weights schools more heavily in the 3- and 4-star categories than GreatSchools.

Figure 2. Distribution of School Ratings, GreatSchools

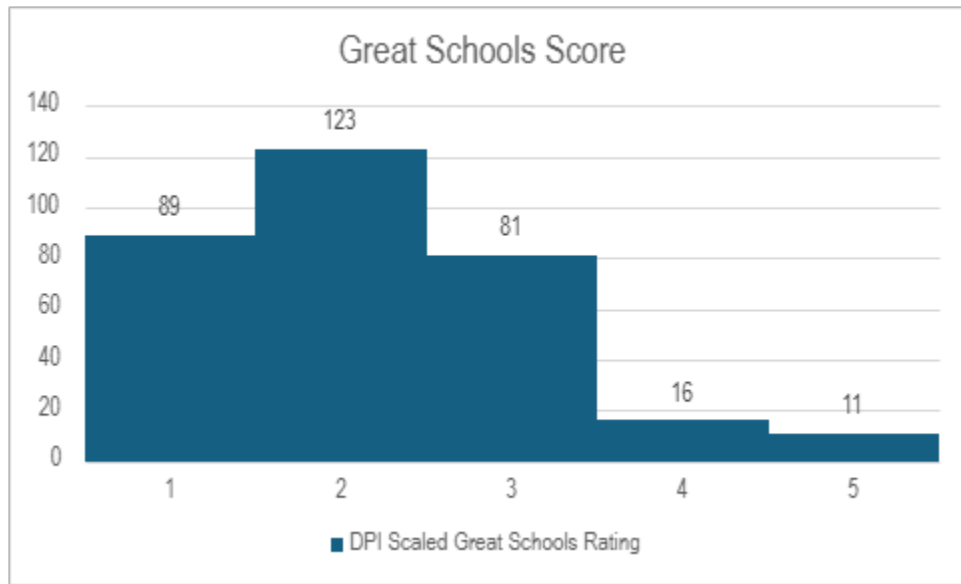
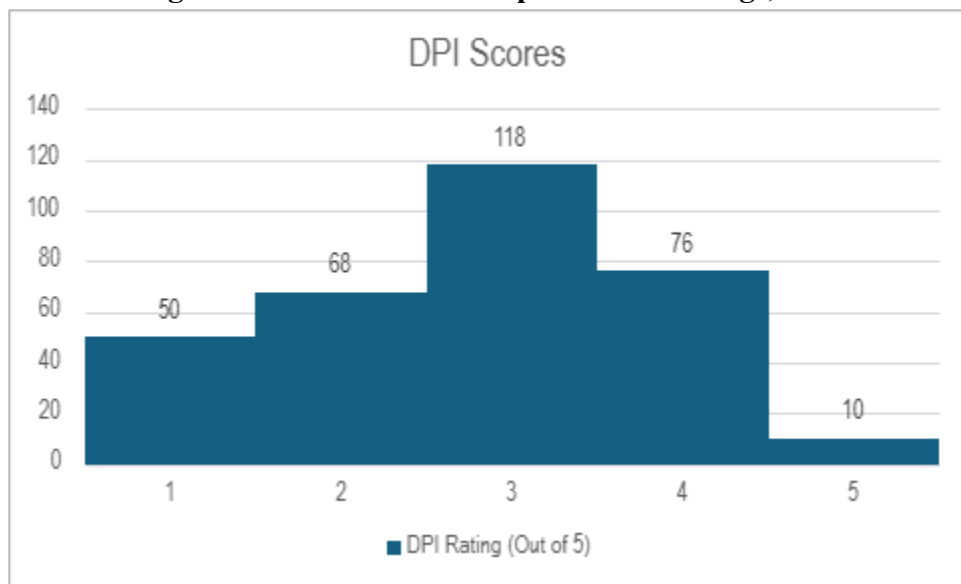


Figure 3. Distribution of Report Card Ratings, DPI



The current system's shortcomings are made even clearer when examining some of the schools rated in the highest performance category. One school that falls into the "Exceeds Expectations" category has a proficiency rate in English/Language Arts (ELA) of 4.1%. Overall, 18 schools "Exceed Expectations" with proficiency rates under 25% in ELA.

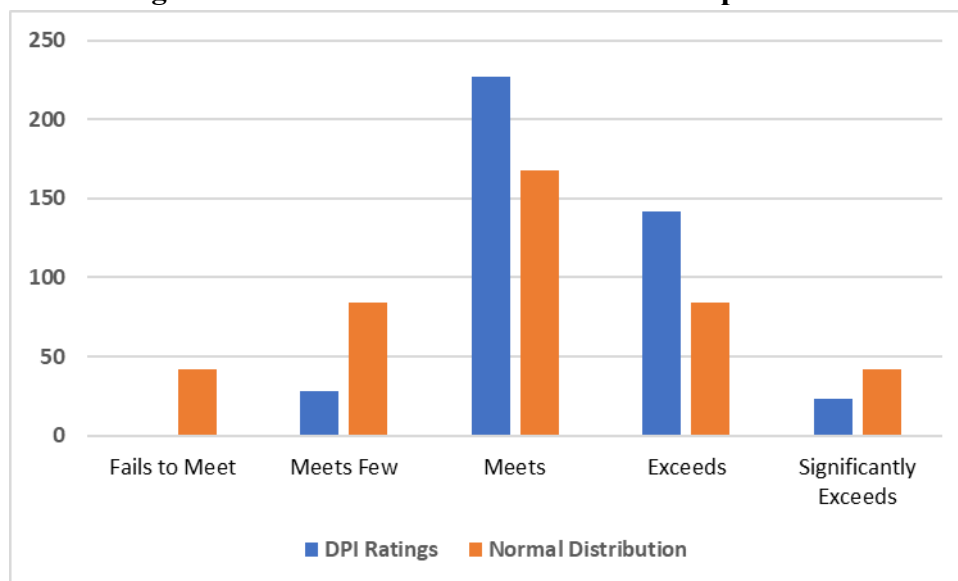
The impact of the current rating system does not provide education leaders, teachers, parents or policymakers with an accountability system that allows for meaningful distinctions between school performance based on actual student outcomes and progress. We recognize that it may be

uncomfortable to have to rate a school or system as “failing.” But your role is one that calls for putting students first, which means providing accurate information on school performance.

As mentioned earlier, we recommend two suggestions for improvement:

- 1. Establish more rigorous cut points.** DPI must establish cut points that accurately reflect the expectations Wisconsin families have for school quality. While the current distribution of report card scores might look somewhat normal, too many schools are categorized as three and four stars. Figure 4 shows the count of districts in each category statewide in our current system compared to expectations under a normal distribution. The "Fails to Meet Expectations" category is completely empty at the district level—an absurd result.

Figure 4. DPI vs. Normal Distribution of Report Card Scores



- 2. Mitigate the effects of the Economic Status Sliding Scale.** Under current state law, DPI is required to use a sliding scale that adjusts the weight of growth and proficiency based on the percentage of low-income students in the school. While the rationale for this approach is understandable, the current weights are too extreme and are the chief driver of some of the distorted results noted earlier in this letter.

However, the effect of this is exacerbated by an overreliance on the Target Group Outcomes measure. This measure also rewards schools for improving performance among low performers—likely to be highly correlated with the growth metric. In effect, this double rewards schools with many low-income students because those schools are

most likely to exhibit both growth and target group improvement because they have many students who are academically behind.

To illustrate this, we conducted a simple regression analysis using Growth and Achievement scores to predict each school's Target Outcome score. As shown in Figure 5, both measures are strongly correlated with the Target Outcome score. Specifically, a one-point increase in Growth Score is associated with a 0.796-point increase in the Target Outcome score, while a one-point increase in Achievement Score corresponds to a 0.662-point increase. These results suggest that the Target Group metric may be largely duplicating information already captured—particularly by the Growth measure—elsewhere in the report card.

Figure 5. Correlation Between Achievement, Growth and Target Group Scores



Families across Wisconsin deserve a report card that is clear, accurate, and consistent. Changes to the Forward Exam last year have cost DPI public trust when it comes to accountability, but the report card standards setting represents an opportunity to restore that trust. We sincerely hope you will seize the opportunity.

We welcome the opportunity to discuss our recommendations and research with you.

Thank you,

Will Flanders

Research Director

Wisconsin Institute for Law & Liberty