

December 23, 2013



Secretary Arne Duncan  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202



**RE: CA Elementary and Secondary Education Act (ESEA) Testing Waiver**



Dear Secretary Duncan:



While many of us have already sent letters sharing concerns about California's most recent request for a waiver from federal testing requirements, we thought it was important to highlight a shared concern at the forefront for our communities: California's teachers need information on student achievement to help improve their instruction.



The implementation of the Common Core State Standards (CCSS) and the Smarter Balanced Assessment Consortium (SBAC) tests offer a tremendous opportunity for California to bring to scale a stronger educational program for all children. But the California Department of Education's plan expands the number of students participating in a scaled-down field test beyond the sample size necessary to meet quality standards without supplying any data on student or subgroup achievement to parents or schools. Keeping people in the dark won't help California make the promise of CCSS and SBAC a reality.



The teachers, principals and superintendents with whom we work have been very clear: they need to know how their students are doing. This is not only essential in assessing how schools are adapting their curriculum and instruction to meet the CCSS, but critical to teachers in their own professional development and continuous improvement to meet the needs of their students. For districts, having data on student achievement and growth is critical to support high-functioning, data-driven professional learning communities for all teachers and leaders in all schools.

And Californian voters overwhelmingly believe that having information from state assessments on how students are doing is important, as found in two recent statewide polls. In a PACE/USC Rossier School of Education Poll released in August 2013, nearly two-thirds of California voters said students should be tested in every grade level to ensure they are progressing; a December 2013 poll conducted by Goodwin Simon Strategic Research found that 68 percent of California voters favor testing of students in public schools each year to determine how well schools are educating students. Moreover, in the Goodwin Simon poll, 88 percent of Californian voters believe that teachers, principals and school district

administrators should be able to see the state academic test results for the children in their classrooms. 95 percent believe that parents should be able to see the state academic test results for their child.

It is clear that parents, teachers, principals, superintendents and voters in California believe it is important to test students and provide that data to help schools improve. But some say that this is not possible during the transition to the SBAC assessments. We believe that not only is it possible, it is required for successful implementation of both CCSS and SBAC. Any waiver should require a commitment from the State Board of Education, as the SEA, to provide useful data on student progress back to the districts.

Approaches are available to California consistent with the intent of ESEA that would acknowledge known parameters and LEA capacity constraints, while helping to ease the transition to SBAC assessments. For example, one option would be to offer, in addition to the field test to the necessary sample, the fixed form version of the practice test with a common set of items to all students. SBAC is already producing these practice tests and California could fund the administration and scoring of them. The state could then provide at least some data on individual student performance to schools, teachers, and even parents, with the necessary caveats. This data would only be used for professional development and instructional modifications and not for accountability purposes.

Moreover, there has been no demonstration from the waiver request or backup, or any publicly available information that California intends to provide any meaningful information to districts or schools on student or subgroup performance from the field tests. Even if it is determined that it is not appropriate to report individual student level data from field testing, it's unclear why the massive expansion of the field test sample would preclude the state from generating useful subgroup, grade, school-level, district-level and statewide reports on aggregate assessment results. Accordingly, at a minimum, we believe the waiver should include a plan to provide reports back to district and school leaders, including school, grade and or class level information to inform any changes to curriculum, technology, instructional materials, professional development and supports to struggling students.

We know that you share our desire to foster a system of continuous improvement and California can do better than this proposal. We believe that a transition plan that includes useful data is needed to meet the spirit of ESEA Title I in providing essential information on student achievement to parents, educators and policymakers – particularly educators. We believe that there are clear ways to provide information to educators in the interim and we hope to work with you and the California State Board of Education to make this happen.

Sincerely,



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