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On behalf of the Association of California School Administrators (ACSA), the California Association of School Business Officials (CASBO), the California County Superintendents Educational Services Association (CCSESA), the California Federation of Teachers (CFT), the California School Boards Association (CSBA), the California Teachers Association (CTA), and the Riverside County Office of Education (RCOE), our organizations strongly recommend that the following elements be included in a United States Department of Education (USDOE) waiver proposal plan that will be submitted to the State Board of Education (SBE) pursuant to Motion 5 from the February 24th, 2021 SBE meeting:

Motion 5: Delegate authority to the State Board of Education Executive Director, in collaboration with CDE staff, to develop a waiver proposal to bring back to the Board that focuses on a plan for assessments that provide data to parents, educators, and the public which monitors the progress of students in ELA/math and that will propose a means for uniform reporting of that data in both aggregated and disaggregated forms.

The undersigned organizations recommend that a USDOE waiver include the following components:

- Suspension of the requirement for the administration of the statewide annual standardized summative assessments in English Language Arts and Mathematics;
- Use of local and/or interim English Language Arts and Mathematics assessments to fulfill state requirements to monitor student progress and report data to parents, educators and the public; and
- Use of local school climate or other survey data that collects information on student well-being and supports.

Current Status in California

The USDOE’s guidance letter from February 22nd, 2021 clearly states on the bottom of page two and continuing at the top of page three, “We also recognize that individual states may need additional assessment flexibility based on the specific circumstances across or within the state, and we will work with states to address their individual needs and conditions while ensuring the maximum available statewide data to inform the targeting of resource and supports.”

At the SBE meeting on February 24th, 2021, Dr. Darling-Hammond highlighted many of the key circumstances that our state is facing. As of that date, 95% of our students are residing in counties with a purple tier designation that denotes widespread infection rates and 80% of our students are still in some form of remote learning. As of March 2nd, 40 out of 58 California counties are in the Purple Tier-Widespread Risk of COVID, 16 are in the Red Tier-Substantial Risk of COVID and two are in the Orange Tier-Moderate Risk of COVID (Alpine and Sierra). For perspective, just under 35,000,000 people live in the 40 counties with Widespread Risk of COVID, a little over 5,000,000 people live in the 16 counties with Substantial Risk of COVID and just 4,232 people live in the two counties with Moderate Risk of COVID.

Even in normal times, California is as unique a state that there is due to our large size, diverse student population, various language needs, range of socio-economic status, troubling digital divide and vast geographical differences which are very different than smaller, more homogenous states like Connecticut and Delaware in which the proposed flexibilities in the USDOE guidance letter may suffice.

Even with the flexibilities outlined in the letter, assessments in California would be enormously challenging. From the rural stretches of Del Norte county in the northwest of the state, to Modoc county in the northeast, down our eastern border through Mono and Inyo counties and on to the U.S./Mexico border in Imperial and San Diego counties. No two districts, classrooms, students, or educators are alike, and being limited to just the prescribed flexibilities from the USDOE will not meet the needs of California's students.

The state of California must pursue the USDOE's offer to leverage their prescribed flexibilities as well as their invitation to "address their individual needs and conditions" based on the specific circumstances across the state. Based on the action of the Governor and the Legislature to provide significant funding to school districts to target resources and supports, we must take action to maximize their effect by focusing on the holistic needs of our students. The proposed components for the waiver that are outlined in this letter will accomplish this in a way that has meaning for educators and will not sacrifice crucial instructional time as we begin to transition back to in person instruction as safely as possible.

Suspension of Standardized Summative Assessments

Statewide, annual summative assessments can be used for education systems' accountability as long as foundational conditions are met. The valid interpretation and use of summative assessments depend upon a number of conditions which have been disrupted due to the COVID-19 pandemic. In 2020-21, the foundational conditions for summative assessment cannot be met, which means summative test results would not be reliable, comparable, generalizable, or valid for their intended purposes. Without uniform testing conditions and adequate participation, summative assessment results would misrepresent achievement within California and would undermine confidence in the statewide assessment and accountability system. For these reasons, our organizations recommend the suspension of statewide annual standardized summative assessments in English Language Arts and Mathematics.

Furthermore, the CAASPP assessments are not reliable tools for diagnostic purposes and therefore would not be useful or beneficial. The USDOE letter from February 22nd, 2021 specifically highlights that *"the intent of these flexibilities, and the accountability waivers described above, is to focus on assessments to provide information to parents, educators, and the public about student performance and to help target resources and supports."*

Considering that statement, the only route to truly help target resources and supports for the betterment of student performance would be the use of local assessments that can provide diagnostic information.

Use of Local Assessment Data

Our organizations also recommend the use of local assessments to monitor student progress and provide uniform reporting of data to parents, educators and the public. Local Educational Agencies (LEAs) have already identified in their Learning and Continuity Plans how they are assessing, "... pupils to

measure learning status, particularly in the areas of English language arts, English language development, and mathematics.” A recent California Department of Education (CDE) survey of LEAs throughout the state reports that 1,235 LEAs indicated that they had at least one benchmark assessment that they could administer to all their students. This data demonstrates LEAs are equipped to utilize existing local assessments in conjunction with formative assessment practices in assessing student progress. In addition, research demonstrates that formative assessment practices provide one of the strongest (Hattie, 2009) and most cost-effective (Yeh, 2010) levers for improving learning outcomes.

Additionally, page two of the USDOE letter states, *“The intent of these flexibilities, and the accountability waivers described above, is to focus on assessment to provide information to parents, educators, and the public about student performance and to help target resources and support.”* The state has already addressed this concern by requiring each Learning Continuity Plan to include information about local assessments being used by the respective LEA. This translates to data being available locally across our state.

In addition, California LEAs have access to a [robust interim assessment system](#) which is aligned to our content standards. The interim assessment system can be successfully employed during distance learning without the same logistical concerns as the CAASPP system and can be used as a resource to support adherence to the requirement of monitoring student progress and reporting data, in coordination with local measures.

Additional assessment resources have been added to our robust interim assessment system which include a [Tools for Teachers website](#) and [Lexile and Quantile assessment tools](#). As noted on the CDE website:

The Lexile Framework for Reading is a scientific approach to measuring both reading ability and the text complexity of reading materials on the same developmental scale. Similar to the Lexile Framework for Reading, math skills and concepts content, such as math textbooks and online instructional materials, also get a Quantile measure. Using the Quantile assessment tools, parents and teachers can match students with resources that help them connect the dots between different math skills and concepts and build on their learning.

All of these resources provide a plethora of assessment tools and instruments available to LEAs.

Use of School Climate and Conditions Survey Data

Our organizations also recommend that school climate and conditions survey data be used to report uniform data to parents, educators and the public to help augment the local assessment data. The assessment of student progress should include information of student well-being. Our state accountability system currently requires the collection and reporting of this data in [Local Control Funding Formula \(LCFF\) Priority 6](#):

School Climate (LCFF Priority 6)

The LEA administers a local climate survey at least every other year that provides a valid measure of perceptions of school safety and connectedness,

such as the California Healthy Kids Survey, to students in at least one grade within the grade span(s) that the LEA serves (e.g., K-5, 6-8, 9-12), and reports the results to its local governing board at a regularly scheduled meeting of the local governing board and to stakeholders and the public through the Dashboard.

LEAs can utilize existing instruments to collect some of the components measured in the [Healthy Kids Survey](#) such as information on student connectedness, learning engagement, motivation, physical and mental well-being, and social emotional learning. The COVID-19 pandemic has ravaged our communities and instituted varying levels of stress and anxiety. It deems beneficial to collate academic assessment data in addition to social emotional and student well-being data to best support and monitor student progress.

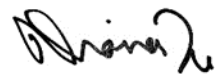
Conclusion

As the front line in education, educators are fully aware of the mental health toll that the pandemic is having on students. The members of our respective organizations are working very hard to meet the many needs of their students as best they can and as safely as possible. We must question how adding stress and losing precious instructional time to administer high-stakes summative assessments that will yield little if any valid or reliable results would be in the best interest of the mental and emotional health of students, educators, parents, and communities.

In closing, our organizations emphatically recommend that the SBE aggressively pursue an assessment waiver from the USDOE for 2020-21 school year and pursue flexibility that will allow the state of California to make the right decision to allow local assessments in lieu of a high stakes summative assessment. Even if accountability is uncoupled from the summative assessment, it is still considered high stakes due to the unnecessary stress of a rushed and uneven administration would have on our students and educators. This will also allow our LEAs to salvage valuable instructional time for both the spring and fall. Otherwise, the state risks perpetuating the vast inequities and mental and emotional stresses already occurring in our state due to the pandemic.



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