

U.S. Department of Education's Race to the Top
Assessment Program Public Meeting.

June 10, 2011

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Introduction

Parents United for Responsible Education (“PURE”) is a non-profit membership organization based in Chicago and dedicated to improving public education for all children. While there are many groups working on school reform in Chicago, PURE has a special role in focusing on issues from the parents' point of view. PURE's membership is multiracial, multi-cultural and economically diverse.

Parents Across America (PAA) is a non-partisan, non-profit grassroots organization that connects parents and activists from across the U.S. to share ideas and work together on improving our nation's public schools. PAA is committed to bringing the voice of public school parents – and common sense – to local, state, and national education debates.

PURE and Parents Across America believe that a high-quality assessment and accountability system is essential to a high-quality public education for all children. We support assessment and accountability systems which are built on high-quality learning standards, incorporate multiple measures of student progress over time, value local assessment, are transparent to the public, and demonstrably support improved teaching and learning.

Standardized testing madness

All over the city of Chicago this week, parents are receiving letters from the school telling them that their child will not graduate from eighth grade or move on from third or sixth grade. In the case of the eighth grader, he or she is also suddenly barred from eighth grade graduation activities including luncheons, trips, and the ceremony itself.

These letters have come as a surprise to many parents because it is the first time they are hearing that their student was in danger of flunking. One parent wrote, “I have not received any notices from her teacher indicating her failing status throughout the year.” Another said, “So far the only answers we were told by the teacher is because she did not exceed in a particular Math test.”

Unfortunately, I have to tell these parents that this is indeed the policy of the Chicago Public Schools – students can receive passing grades all year and still be banned from graduation and flunked if either their math or reading score falls below an arbitrary cut off point on the Illinois Standards Achievement Test (ISAT).

PURE has fought this policy since Paul Vallas started it in 1996. We filed a discrimination complaint with the USDE's Office for Civil Rights in 1999 which led to the addition of a parent right to challenge the non-promotion decision and what CPS calls multiple measures. We recently filed an updated complaint¹ because we found that CPS simply uses the multiple measures as multiple barriers, and parents feel that their concerns and challenges are being ignored.

Research has also shown that the policy does not work and actually harms retained students.² Meanwhile it costs between \$50 and \$100 million per year.³ As we detailed in our 2010 OCR complaint, we have been told by ISBE officials that the ISAT is not designed to be used as a promotion gate,⁴ but no one has stopped CPS from improperly using the test this way.

Here's what the Consortium on Chicago School Research had to say about Chicago's retention policy:

“Did retaining these low-achieving students help? *The answer to this question is decidedly no....If an expensive policy is simply not working, as concluded in this report, it would make little sense to invest more money in it rather than to redirect that money toward alternatives.*”⁵

And here's what we told OCR: “Although on notice that the Policy undermines academic achievement, increases by 26% the likelihood that a retained student will drop out by age 17, and has a severe disparate impact against African-American and Latino students, CPS has willfully persisted, imposing this injurious, discriminatory Policy on a mass scale.”

I detail this situation because this is just one of the many inevitable results of the misuse and overemphasis on standardized tests in the United States. As a co-founder of Parents Across America, I know that there are similar situations everywhere, such as the recent institution of 52 new standardized tests in the Charlotte-Mecklenburg school system.⁶

It's insanity. Yet here we are talking about national standardized tests. If we think things are bad for our children now, just wait until standardized testing goes national AND those test scores are used to decide teachers' salaries and jobs and which schools will be closed. ***Parents are saying no to more testing.***

Better tests? Not likely.

We are being told by President Obama and US Education Secretary Arne Duncan that we don't need to worry about more testing because these new tests are going to be "better tests."⁷

I simply don't believe that. And I'm not alone in my skepticism.

Here's what I read in the 2011 Guide prepared by the Educational Testing Service called "Coming Together to Raise Achievement: New Assessment for the Common Core State Standards."⁸ The guide offers detailed information from the two multi-state consortia about their emerging proposals for national assessments and their challenges in creating this "new generation" of tests.

The thing that jumped out at me from the pages of this report was that *they really don't know how to do what they plan to do*. Here are some direct quotes (emphasis added):

PARCC (one of the consortia) *plans to press for advances* in automated scoring, including the use of artificial intelligence (p. 9).

Studies will need to be carried out to gain deeper understanding than we currently have to support these decisions (p. 15).

Designing these components such that they can be placed onto a common scale and equated from year to year *may require new approaches* (p. 16).

New advances are needed to produce reliable sub-scores for both writing and the content area constructs assessed (p. 16).

A number of technical and psychometric challenges will be investigated during the development phase to determine *if and how* the scores from these multiple components can be aggregated to yield valid, reliable and legally defensible scores (p. 9).

I shared some of these quotes with a group of visiting assessment professionals from the Ukraine a few months ago. They told me that they would be fired if they knew so little about what they were doing, yet they were in the US to learn from *us* about assessment.

It's pretty clear that lots of people, possibly from the President on down, don't really know that the "new generation of tests" doesn't exist, nor it is likely ever to exist.

Meanwhile, plans are being made state by state and district by district for more and higher stakes to be attached to tests because they are going to be "better" under the new federal education law.

The test developers say that there are "unresolved challenges" in creating these tests. I say that we -- and our children -- can't afford to risk so much on those promises of "better tests."

Other concerns about standardized testing

PURE and PAA have many other concerns about standardized tests and their use for a variety of high-stakes purposes.

1) We believe that excessive reliance on standardized exams ***narrows the curriculum and promotes teaching to the test***. Will the “better tests” avoid that? Here's a red flag from the 2011 ETS Guide: “The introductions to grades K – 8 identify two to four critical areas for each grade level, setting priorities for teachers, professional developers, and assessment writers... Faithful assessments will focus most of their time on these critical areas...” (p. 4).

In the past, PURE has raised concerns about the way Illinois identified certain of its state standards as “suitable for testing,” and developed a state assessment framework around those items. The state said that districts shouldn't use that framework as the curriculum, but really – teaching to the test was never made so easy.⁹

2) ***Too many districts falsely claim that they are using “multiple measures” when they are doing no such thing***. For example, in Chicago's elementary promotion policy, “multiple measures” actually means multiple barriers. It is critical to understand the difference. Under multiple barriers, the student must meet all of several listed criteria. Under true multiple measures, also called multiple sources of evidence, the various measures are not used separately, but are combined, and a decision is based on the evidence in its totality, not used separately. True multiple measures may, for example, use a weighting system to reflect the proportionate usefulness of different assessments. Alternatively, results may be added together using a point system to come up with a total number, or one or more positive results may compensate for, or “outweigh,” a less positive outcome.

However, in the current CPS promotion policy, each measure operates as a single deciding factor, each of which on its own can be used to retain the student. In other words, CPS students must meet the cut score on the state test and meet grade standards and attendance requirements in order to be promoted without attending summer school.

Similarly, officials have begun to refer to certain quarterly or other regular standards-based tests as “formative” assessments, when in fact they are nothing more than practice tests for an annual summative standardized test.

3) Standardized tests may be ***biased***. They definitely have a ***disparate impact*** on students of color, especially male students of color. In Chicago, where flunking is based on state standardized tests scores, African-American students were retained at a rate five times that of white students, and Latino students were retained at a rate 2.2 times higher in 2008.

While African-Americans constituted 48% of the CPS student population in 3rd, 6th and 8th grades, they were 68% of those required to attend summer school, and 74% of those retained. 40% of all CPS 3rd, 6th, and 8th grade African-American students were required to attend summer school, compared with only 7% of Asian and 12% of White students. 16% of all African-American 3rd, 6th and 8th grade students were retained, compared with only 2% of Asian students and 4% of white students. Latino students were sent to summer school at a rate of 1.46 to 1 as compared with white students, and were retained at a rate of 1.37 to the rate of retained white students.

And, according to 2008 State of Illinois school report cards, African-American students in Chicago were 1.3 times more likely to drop out than white students, and Hispanic students were 1.35 times more likely to drop out.

4) ***The research on linking teacher performance evaluation and jobs to student test scores is overwhelmingly negative.*** As we lay out in a PAA fact sheet,¹⁰ an authoritative study conducted at Vanderbilt University showed, for example, that teachers who were offered bonuses for improving student test results produced no more improvement than the control group. Similar studies of teacher merit pay have shown null results in New York City and Chicago. Because of the lack of positive results, a number of pay for performance programs have been abandoned, including programs in California.

The PAA fact sheet also explains that methods that use test scores to evaluate teachers, including the currently popular “value added” calculations, have also proved highly unreliable. The National Academy of Science and experts assembled by the Economic Policy Institute have warned of the potentially damaging consequences of implementing test-based evaluation systems or merit pay based on test scores.

5) Implementing this “next generation” of tests is no doubt going to be ***hugely expensive***, at a time when schools are already facing severe cutbacks of educational necessities and raising class sizes to unworkable numbers.

The first red flag here is the opening comment about the Common Core and the associated assessments in the ETS Guide, by the organization's head, Pascal D. Forgione, who wrote, “This is a fundamental shift in the ***education marketplace***” (emphasis added).

In response to Mr. Forgione, I'll simply use these words from Todd Farley, a guest essayist on the Washington Post Answer Sheet blog¹¹:

(T)he United States seems to be heading towards taking the decisions about American education out of the hands of American educators and instead placing that sacred trust in the welcoming arms of an industry run entirely without oversight and populated completely with for-profit companies chasing billions of dollars in business. When next some standardized test scores are

found to be incorrect or fraudulent (because they will), or some standardized testing company commits or tries to cover up another egregious error (because they will), perhaps then we can admit large-scale assessment isn't the panacea it's often been touted to be. Perhaps then we can concede that an educational philosophy based on a system of national standardized tests isn't any Brave New World of American education; it's just a bad idea that even the Chinese are already turning away from as being too inefficient and antiquated.

What a vision for a high-quality public education for every child should include

Instead of the test-driven strategies favored (and heavily promoted) by non-educators, we need to look towards a vision of education reform that is strongly rooted in democratic principles and supported by ample research. *Our children deserve no less.* This inclusive vision includes:

Meaningful Parent Involvement: Parents must have a significant voice in all policy making at school, district, state and national levels. We are not just "consumers" or "customers" but knowledgeable, necessary partners in any effective decision-making process. Chicago's local school councils offer a proven model which has been shown to be more effective than top-down interventions.¹²

Sufficient and Equitable Funding: Resources do matter, especially when invested in programs that have been proven to work.

Effective Education Reforms: We support the expansion of proven reforms, such as small classes, parent involvement, a well-rounded curriculum that connects learning to children's own lives, evaluation systems with high-quality, multiple assessments, and experienced teachers. Specifically,

- Create new state assessments before any new teacher evaluation system is developed. The new system must be designed in an open and collaborative way – including parents from a variety of communities – and then, once we know what our tools will be, create the teacher evaluation system in a similarly open, collaborate way.
- Assure that we develop a high-quality, balanced state assessment system that includes true multiple measures of student progress over time and uses a variety of instruments.
- Stop school privatization (using contract, charters, or whatever else they are called) until systems are in place to assure open access to all children (open, neighborhood boundaries) and public accountability for student enrollment procedures and transfers, and financial operations.
- Replace school closings and turnarounds with wholistic, community-based processes of school improvement which research shows are the best means of fixing schools including improved school probation legislation for Chicago.

Specifically, regarding state assessment systems, we recommend that they:

- **Specify that state test scores may not to be used alone to make important educational decisions about children.**
- **Require that other measures of student progress beyond standardized tests be included in student and school assessment, and that any assessment system provide multiple opportunities and approaches for students to demonstrate their learning .**
- **Require publication of significant portions of any annual state standardized tests.**
- **Require that states allow parents to opt their children out of any state or local standardized test.**
- **Specify regular public review and revision of state learning standards and related assessment.**
- **Locate the key elements of school evaluation at the local school community level.**

- 1 <http://pureparents.org/data/files/complaintfinal12-06-10.pdf>
- 2 Nagaoka, Jenny, and Melisa Roderick. 2004. *Ending Social Promotion: The Effects of Retention*. Chicago: The Consortium on Chicago School Research.
- 3 <http://pureparents.org/wp-content/uploads/2011/01/promotionpol09.pdf>
- 4 <http://pureparents.org/data/files/complaintfinal12-06-10.pdf>, p. 9
- 5 Nagaoka, pp. 52,53
- 6 <http://parentsacrossamerica.org/2011/05/testing-madness-charlotte-today-your-schools-tomorrow/>
- 7 <http://www.shalldownation.com/2011/03/28/president-obama-univision-town-hall-video-march-28-2010-speech-at-bell-multicultural-high-school/>
- 8 http://www.k12center.org/rsc/pdf/Assessments_for_the_Common_Core_Standards.pdf
- 9 http://pureparents.org/?attachment_id=17009
- 10 <http://www.parentsacrossamerica.org/performancepay/>
- 11 http://www.washingtonpost.com/blogs/answer-sheet/post/why-faith-in-standardized-testing-industry-is-misplaced/2011/04/10/AFXIkSHD_blog.html
- 12 <http://pureparents.org/data/files/LSCsimproveschools.pdf>