

CCSESA

California County Superintendents Educational Services Association

February 19, 2021

Dr. Miguel Cardona Secretary of Education U.S. Department of Education 400 Maryland Avenue, SW Washington, D.C. 20202

Dear Dr. Cardona,

On behalf of the Association of California School Administrators, California School Boards Association, and California County Superintendents Educational Services Association, we write to explain why it is so important that the U.S. Department of Education offers States the option of assessment and accountability waivers for the 2020-21 school year.

We remain committed to supporting our staff and students and welcome the chance to have more of them returning to in-person instruction as soon as we can safely do so. As we navigate the myriad considerations and decisions that go into that work, we must reiterate the importance of prioritizing instructional time and a focus on learning. When we look at the 100-day timeline being supported by the Biden Administration, it is important for you to understand how that timeline coincides with the spring testing window in California.

In California, schools are working toward a return to school this spring, however our testing window has already opened and schools are faced with a variety of challenges including the administration of standardized testing. As we seek to safely reopen schools, testing will lead to lost opportunities for learning when our students need it most. It is hard to imagine the resulting pressure and continued drain on mental health if students and teachers must go from blended or virtual instructional models right into standardized test administration. And for our students whose parents have opted for remote learning or schools where in-person learning is not possible due to rates of transmission, they will not have the option of taking state assessments in an equitable environment. Parents may be unwilling to send their student to school for the assessments; and if the students do come in person, it adds to the challenge of social distancing. Home based administration of standardized testing creates substantial challenges related to equity, access and support.

If staff and students return to schools only to pivot to standardized testing within days or weeks, it will compound many of the complications of addressing very real learning loss, limit opportunities for targeted learning acceleration and exacerbate the negative

mental health and social emotional challenges of learning during a pandemic and engaging in statewide assessments. In a year where the mental health of our students is being jeopardized on a daily basis and strategic support for learning acceleration is most critical, we must seek ways to alleviate, not exacerbate, the issue.

The data that stands to be collected from any assessment this year will be unreliable and invalid in comparison to other testing years, a reality we cannot accept when we know that data will absolutely be used to compare schools while providing no instructionally useful information that can positively impact teaching and curriculum decisions.

Public education thrives on certainty and the ability to plan. In any scenario, the physical and mental health of students, staff and families should outweigh any benefits standardized tests offer. We strongly support federal flexibility allowing state and local education agencies discretion in selecting and administering the tests they need to reliably, efficiently, and quickly evaluate student learning progress, needs and gaps. We urge the U.S. Education Department to offers states assessment/accountability waivers for the 2020-21 school year.

Thank you for your leadership as it relates to the federal response to and support for our nation's public schools and students as we continue to navigate the ongoing COVID-19 pandemic.

Sincerely,

Dr. Wesley Smith
Chief Executive Officer

Association of California School

**Administrators** 

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cc: Ian Rosenblum, Deputy Assistant Secretary for Policy Programs, OESE