

March 10, 2021

Linda Darling-Hammond, President and

Members of the State Board of Education

State Board of Education

1430 N Street

Sacramento, CA 95814

Via email: [SBE@cde.ca.gov](mailto:SBE@cde.ca.gov)

Re: Item #2: The Every Student Succeeds Act: Authorization to Pursue Flexibility on or a Waiver of Assessment, Accountability, and Reporting Requirements

Dear President Darling-Hammond and Members of the State Board of Education:

We respectfully submit this letter on behalf of the Curriculum and Instruction Steering Committee (CISC) of the California County Superintendents Educational Services Association (CCSESA). Given the ongoing health and safety concerns and challenges associated with the administration of statewide annual summative assessments in distance learning, hybrid, and concurrent teaching settings, we support the pursuit of waivers and maximum flexibility related to both the administration and accountability for English Language Arts (ELA) and Mathematics (Math) summative state testing.

We encourage the State Board of Education to pursue the United States Department of Education’s offer to consider additional, maximum flexibilities in order to address California’s individual needs and conditions based on our specific statewide circumstances. This should include:

* Suspension of the requirement for the administration of ELA and Math statewide summative assessments
* Use of local and/or interim ELA and Math assessments to fulfill state requirements to monitor and report student progress

If staff and students return to school only to engage in standardized testing within days or weeks, it will only 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. Additionally, immediately putting students who have been isolated for almost a year into an isolating testing environment just as they are returning to school is counterproductive to the idea of in-person collaborative learning. 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 these issues.

As county offices of education, we remain committed to supporting our districts, staff and students as they return to in-person instruction as soon as safely possible. As we navigate the myriad of considerations and decisions that go into that work, we must reiterate the importance of prioritizing instructional time and focus on learning. Schools are faced with a variety of challenges related to re-opening schools to in-person learning, and the administration of summative assessments is just one of these challenges.

As we work to safely reopen schools, state testing will lead to lost opportunities for learning when our students need it most. It’s hard to imagine the resulting pressure and continued drain on mental health of students and teachers as we transition from blended or virtual instructional models right into standardized test administration. For our students whose parents have opted for remote learning, or schools where in-person learning is not possible due to COVID- 19 transmission rates, it is impossible to establish equitable environments for administration of state assessments. Home based administration of the standardized testing creates substantial challenges related to equity, access, and support. Parents may be unwilling to send their student(s) to school for the assessments; and if the students do come in person, it adds to the challenge of social distancing while providing access to the technology necessary for administration of the assessments.

The data that stands to be collected from any summative assessment this year will be unreliable and invalid in comparison to other testing years. Any results from summative state assessments would not accurately represent student progress, nor provide the critical student level data that would inform instructional decisions based on a Multi-Tiered System of Support. This is a reality we cannot accept when we know that data will be used to compare schools while providing no instructionally useful information that can positively impact teaching and curricular decisions. Instead, as Local Education Agencies (LEAs), we must reimagine assessment and accountability and focus on local measures and the selection and administration of local assessments that will provide reliable, efficient, and time sensitive data related to student learning progress. LEAs have already identified how they are monitoring and reporting student progress in their Learning and Continuity Plans (LCP). Data is available and can be reported locally. It is important to consider the requirements of the LCP and ensure that any data reporting requirements are well aligned with the intent of the LCP and that we avoid any further complexity.

Our commitment to serve historically underserved students, including students of color, English learners, students with disabilities, and students from low-income families, does not end with an assessment and accountability waiver. Instead, it allows schools to focus with laser-like intentionality on the formative assessments that will immediately measure student learning, identify opportunity gaps, and guide plans for the allocation of resources and services that will accelerate learning and ensure that learning disparities are addressed.

Thank you for your leadership and support for California’s public schools and students as we continue to navigate the ongoing COVID-19 pandemic. We appreciate your consideration of our comments and look forward to a continued partnership.

Sincerely,



Jennifer Hicks, Assistant Superintendent Educational Services, Placer County Office of Education

Chair, CISC

Cc:

Brooks Allen, Executive Director, SBE

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Stephanie Gregson, Chief Deputy Superintendent of Public Instruction, California Department of Education (CDE)

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