



September 3, 2021

Dr. Linda Darling-Hammond, President
California State Board of Education
1430 N Street, Suite 5111
Sacramento, CA 95814

Via email only (sbe@cde.ca.gov)

RE: Item 2 – Request for Approval of the Smarter Balanced Summative Assessments

Dear President Darling-Hammond and State Board Members:

We represent organizations that advocate on behalf of students, parents, community members, and educators in our state’s public schools. We are united by a common belief that all schools and districts must address long-standing inequities of opportunity and should offer every student an excellent education that prepares them for college, career, and civic life. Below we provide feedback on the proposal to use the shortened blueprint for statewide summative assessments in 2022 (Item #2) and urge the Board to provide parents and educators with more information on student performance – not less.

We recommend that the Board reject the proposed action to use the shortened math and English language arts assessments for the following reasons:

- 1. Students, Parents/Guardians and Educators Need Accurate and Detailed Results.**
Summative state assessments provide a check point for schools and families on how students are performing. A shorter test would reduce overall reliability and accuracy of an individual student’s test results, reduce the sub-scores students receive and provide less actionable data. For example, sub-scores (referred to as “claim” categories) in the ELA

test would be reduced from reading, writing, listening, and research/inquiry down to two (“reading and listening” and “writing and research”) sub-scores that would combine performance on two different skills and abilities. As a result, a student who has poor reading skills, but excellent listening skills may not be identified for additional monitoring and supports in the ensuing school year because their combined “reading and listening” sub-score could be within a range that would not trigger a deeper look.

Another implication of relying on an assessment with less accurate results would be more difficulty in measuring inequities because of a reduced ability to accurately calculate and report on achievement gaps across student sub-groups.

2. **May Not Result in Less Testing Time If Districts Need to Backfill with Local Assessments.** If the summative statewide assessment does not provide sufficient and accurate information to districts, then districts may likely end up backfilling the information not collected by administering additional local assessments, thereby negating the impact on overall instructional time, and possibly actually resulting in more total testing time and duplicative summative testing at the end of the year during the window educators are often most frustrated about the possible loss of instructional time.
3. **Impact on the Implementation of the Growth Model is Unknown, and Continuing with a Shortened Blueprint May Delay Growth Scores Being Reported Until 2025.** What is certain if the Board takes action to shorten assessments is that individual assessment results will be less accurate. It is unclear how this change in the accuracy will affect the calculation of a “residual gain” score that is used in the recently adopted student growth model. It is also unclear how the calculation of growth will work from a short-form result (in Spring 2022) to a full-form result (in Spring 2023 and Spring 2024).

Indeed, detailed score reports and analysis of student performance in districts that administered the short-form statewide summative assessment in the Spring of 2021 has not been made public or publicly transmitted and discussed by the Board. Additional analysis needs to be conducted and understood to ensure that the proposal does not negatively impact the implementation of the student growth model and have other negative unknown impacts on calculating achievement gaps and inequities. For example, the Board could ask staff to analyze residual gain results from the Spring 2021 results (short form) and prior Smarter Balanced Spring 2019 results (long form) to see if the growth calculation seems viable across assessment forms.

Because of these concerns and potential consequences, we do not believe that the Board should pursue the shortened form of the assessments at this time, particularly without more study and additional information for the Board to make a fully-informed decision.

Sincerely,

Katie Braude
Executive Director
Speak UP

Sarah Lillis
Executive Director
Teach Plus – California

Bill Lucia
President
EdVoice

Rob Manwaring
Senior Policy & Fiscal Advisor, Education
Children Now

Sarina Sande
Interim Deputy Director
Educators for Excellence – Los Angeles

Darcel Sanders
Chief Executive Officer
GO Public Schools

Natalie Wheatfall-Lum
Director of P-16 Policy
The Education Trust–West

cc:

Brooks Allen, Executive Director, State Board of Education (SBE)

Patricia de Cos, Deputy Executive Director, SBE

Debra Brown, Senior Policy Advisor, SBE

Sara Pietrowski, Policy Consultant, SBE

Lindsay Tornatore, Student Achievement and Support Division, CDE

Joshua Strong, Education Administrator, Local Agency Systems Support Office, CDE

Cindy Kazanis, Measurement & Accountability Reporting Division, CDE

Jonathan Isler, Measurement & Accountability Reporting Division, CDE

Mao Vang, Assessment Development & Administration Division, CDE