



STATE DEPARTMENT OF EDUCATION

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STATE SUPERINTENDENT
PUBLIC INSTRUCTION

December 20, 2013

Dear Southern Idaho Conference Superintendents,

Thank you for meeting with my staff and me today to discuss your concerns regarding the field test of the Smarter Balanced assessment in Spring 2014. I appreciate the open dialogue, and I hope it will continue in the coming weeks, months and years as we transition to a better assessment based on higher academic standards.

I am committed to finding solutions to the concerns you brought to our attention to find the best assessment that gets the information we need in the most effective and efficient way. As a result of the meeting today, I have outlined actions we at the Department will consider to help address your concerns. We at the Department will explore:

- How the state might minimize the current requirement to field test students in 9th and 10th grades;
- Whether the state is able to reduce the length of the field test in any way and still collect the necessary information to meet the goals of the field test; and
- If a school's Star Rating could remain the same even if the 95% participation requirement is not met for certain reasons.

My staff and I will be in touch with you and all superintendents across the state as we work to find these solutions. In the meantime, we have prepared the following written response to your written white paper to help clarify our position on the state's transition to the Smarter Balanced assessment.

Thank you again for the productive and positive meeting today. I look forward to our future discussions.

Sincerely,

Tom Luna
Idaho Superintendent of Public Instruction

Measuring Student Understanding of the Idaho Core Standards An Alternate Proposal

The Superintendents of the Southern Idaho Conference

Vallivue, Nampa, Mountain Home, Middleton, Meridian, Kuna, Emmett, Caldwell, Bishop Kelly, Boise

The Value of the Idaho Core Standards

The Idaho Core Standards (adopted from the Common Core State Standards) are a set of high-quality, rigorous academic standards that will help us to achieve the Idaho State Board of Education's goal that 60% of Idaho high school graduates have a college degree or certificate of value by 2020.

As our students have increased access to rigorous standards and content, their chances of succeeding after high school improve. By their very nature, the Idaho Core standards paired with locally-written curricula prepare Idaho students for the challenges of accelerated coursework, Advanced Placement, International Baccalaureate and Dual-Credit courses and college entrance exams such as the Scholastic Aptitude Test (SAT). We support the implementation of Idaho's Core Standards.

Idaho's Participation in the Smarter Balanced Assessment Consortium

To facilitate measurement of students' understanding of the Idaho Core Standards, the State of Idaho joined the Smarter Balanced Assessment Consortium (SBAC) as one of 23 governing states. SBAC is a federally-sanctioned organization charged with developing tests in line with the requirements of the Common Core standards. SBAC is temporarily federally-funded with minimal strings attached. In September 2014, SBAC will be fully funded by states that opt to use the assessment system, with no federal oversight of consortium activities or decisions. Even today, the U.S. Department of Education has no involvement in decisions made by SBAC states related to the test development process. The only federal requirement is that the final assessment system be aligned to college and career-ready standards, which is also the desire of the states in the consortium.

In 2010, Idaho was given a seat on the Governing Board of SBAC, provided it adheres to the most comprehensive implementation of the assessment - testing at grades 3 – 8 and 11. Even though no current federal or state laws require implementation of the SBAC, the Idaho State Department of Education has mandated the expansion of SBAC testing to include grades 3 -11.

Idaho currently administers an end-of-the-year assessment to grades 3-10, including grades 9 and 10 because federal No Child Left Behind law requires a standardized assessment be given at least once a year in grades 3-8 and once in high school. The state did at one time remove the 9th grade test because it is not required under No Child Left Behind. However, the State Board received so much pushback from educators that the state quickly reinstated it. Based on this past history and in working with educators throughout the implementation of the Smarter Balanced assessment, the state chose to offer the assessment in grades 3-11, including grades 9 and 10, so parents and teachers could receive data back on student performance every year.

Prior to the adoption and implementation of the Common Core State Standards as Idaho's Core

Standards, Idaho did not have college- or career-ready standards. Now, under these new standards and a test aligned to these standards, we can make sure that 11th grade students who pass the 11th grade Smarter Balanced test will be deemed college- and career-ready and will not be required to take remedial courses at Idaho public institutions of higher education. Colleges and universities have already agreed to this in working with the Smarter Balanced Assessment Consortium.

After working with school administrators across Idaho, the state chose to administer the field test to all students in grades 3-11 in Spring 2014 to give every student, teacher and school the opportunity to experience the assessment before it becomes fully operational in Spring 2015. This plan did go out for public comment in Fall 2013 and was approved by the Idaho State Board of Education on November 20, 2013.

Costs of ISDE Mandated SBAC Implementation

Three primary costs are associated with the current ISDE plan for SBAC implementation: Monetary, Instructional Time and Computer Access.

1. Monetary: State Department of Education officials indicate that the SBAC will cost no more than the administration of the ISAT. However, if grades 9-11 are not tested with the SBAC, as recommended by the SIC Superintendents, the state will save over \$1 million.

These figures have not been validated by the Idaho State Department of Education. According to the most recent estimates, the Smarter Balanced end-of-the-year assessment would cost approximately \$4.5 million. Idaho currently spends and estimated \$5.06 million a year on the ISAT Math, Reading and Language Usage tests. Even when Idaho includes the tests in 9th and 10th grade, transitioning to Smarter Balanced will be cost neutral or may even cost the state less.

However, the superintendents are correct in their assumption that the state could save money if it chose not to administer an end-of-the-year test in two grade levels. As mentioned before, the state did attempt this before by removing the administration of the ISAT in 9th grade. However, the state received pushback from educators across the state who said removing one year of testing would have a negative impact on students. Therefore, we believe this is a worthwhile investment.

2. Instructional Time: ISDE officials and SBAC representatives estimate that it will take each student 7 - 8 hours to complete the test. Over one million hours of instructional time at grades 3-11 will be lost each year in the state of Idaho just for the SBAC. This is over twice as much time as was taken for the ISAT.

Idaho currently tests students in three subject areas on the ISAT: reading, mathematics, language usage. The current ISAT measures students' ability to write with multiple choice questions. In addition to the ISAT, Idaho used to require the Direct Writing and Direct Math Assessments to measure skills that multiple choice tests could not measure, such as writing and problem-solving. The state removed these tests several years ago with the goal to redesign the ISAT to add these type of assessments to Idaho's end-of-the-year test. Idaho has now done that through the Smarter Balanced Assessment Consortium.

Idaho will now transition to a better assessment at the end of the year that consolidates these tests into one. The Smarter Balanced Assessment tests just two subject areas – English language arts and mathematics – but includes multiple question types – multiple choice, performance tasks, writing prompts – to provide a better assessment of what students really know and are able to do at the end of each grade level.

The Idaho State Department of Education recognizes this test will take the average student longer to complete than the ISAT. Quality assessments take time. However, local school districts have the flexibility to break up the testing over multiple days to help students, teachers, and schools. The computer portion of the assessment will take approximately the same amount of time as the ISAT. The performance tasks that measure problem solving, critical thinking, and writing ability take more time, but also give students, parents and teachers a better measure of how a child is performing.

In the end, the estimated time using Smarter Balanced is less than 1 percent of a student's annual instructional time. We strongly believe delivering a high-quality assessment for Idaho students is worth it. Because the state has not been able to deliver this type of assessment in the past, local school districts, including Meridian, have had to use local resources to administer these types of assessments in addition to the ISAT at the end of the school year. With Smarter Balanced, all districts will have the opportunity to know how their students perform in relation to the Idaho Core Standards, not just districts that can afford to give additional tests.

It is also important to note that the required SBAC testing window will conflict with established college-preparatory coursework testing in Advanced Placement, International Baccalaureate and dual-credit programs. In fact, every day of the final 9 weeks of the 2013-14 11th grade school year will be consumed by testing with the SBAC, SAT, and college preparatory testing such as AP and IB.

Additionally, teachers will receive little valuable feedback from administration of the SBAC. SBAC data will provide broad indicators of student strengths and deficits, not the detailed information that is needed to improve student learning.

This is not true. Smarter Balanced will provide more detailed information than the current ISAT, and test items will be released on a regular basis to help teachers guide instruction in the future. This is not something the state has been able to afford with the current ISAT.

In addition, SBAC is a complete assessment system that will provide teachers with opportunities to improve their ability to evaluate student learning on a daily basis and change instruction to meet student needs. The SBAC system will also provide districts with a bank of Idaho Core-aligned test items to use on benchmarking tests throughout the school year. The data availability provided by SBAC is significantly greater than that currently provided by ISAT.

3. Computer Access: Across the state of Idaho, every compatible computer will be devoted full time to the SBAC during the testing window. Students will lose access to school computers for any non-testing related activities or assignments. Quality measurement of 21st Century skills is

worth some investment in technology to administer the high quality SBAC assessment system.

Because Idaho has been testing online for more than a decade, Idaho is well positioned to administer the Smarter Balanced Assessment. Districts can schedule tests throughout the day, unlike the current ISAT which can only be given in limited times. Millions of dollars have been appropriated to schools both in state and federal funds to be used for computer hardware and computer labs. These can be used toward the assessment and other classroom technology.

Alternatives to SBAC Assessment

Any test administered to Idaho students must accurately assess preparedness. At this time, the SBAC is an unproven assessment.

More is known about Smarter Balanced than any previous assessment given in Idaho. Idaho is currently in year two of a three-year phase in of this new assessment More than 100 schools administered the pilot test during the 2012-2013 school year, and every school will give the test during the 2013-2014 school year. In addition, Idaho teachers, as well as experts in Idaho's colleges and universities, are currently involved in the development of the assessment, including writing and evaluating test questions. They are helping to make sure this test is a proven assessment.

The good news is that there are solid alternatives.

1. 11th grade SAT

Idaho high school juniors are already required by the state to take a college entrance exam, and cut scores for college readiness have already been established for each of the three subtests of the SAT. In fact, Idaho juniors have twice taken the state-funded SAT, in 2012 and 2013. We already know where we stand in college readiness. We need to move forward in improving our students' preparedness.

Further, the ISDE has also provided funding for the PSAT for 10th graders. This assessment will provide valuable input for teachers as they prepare students for college and career.

The SAT does provide value to Idaho's students and teachers, which is why we provide it to every high school junior currently. However, the SAT serves a different purpose. It is a college aptitude test. It is not aligned to the Idaho Core Standards, nor is it based on any state standards. Therefore, it does not meet the requirements for the Elementary and Secondary Education Act (ESEA; also known as No Child Left Behind). To meet these requirements, the state would have to rewrite its standards to specifically meet the SAT. In Idaho, we work with teachers to write standards to set goals for what Idaho students should know and be able to do, not to meet a specific test.

2. 3rd-8th grade MAP

Also available is Northwest Evaluation Association (NWEA) Measures of Academic Progress (MAP) test. NWEA is a trusted global not-for-profit educational services organization that provides educators with an effective accountability system measuring student learning on the Idaho Core Standards. The MAP tests take approximately 4 hours per student and provide specific feedback and student growth information for teachers, students and families.

NWEA is a vendor that Idaho has used in the past. Idaho was fined by the federal government

because the MAP test did not measure Idaho's academic standards sufficiently. Any testing contract would need to be vetted through an RFP process. No evidence exists that MAP tests are sufficiently aligned to the Idaho Core Standards. In addition, the format of this test is multiple choice. This format does not measure problem solving or critical thinking, which teachers and parents have demanded for years. Finally, unlike SBAC, Idaho educators and administrators have not been involved in the development of the MAP test.

Summary

Superintendents of the Southern Idaho Conference support the Idaho Core Standards, the increased rigor and the emphasis on higher order thinking skills they provide for Idaho's students.

Under the current plan mandated by the ISDE for implementation of the SBAC assessments, Idaho students in grades 3 – 11 will lose countless hours of learning time and opportunities to work with technology. We do not support administration of the SBAC to Idaho's students.

As superintendents of school districts enrolling over one-third ($\frac{1}{3}$) of Idaho's students, we recommend:

- Dropping the SBAC as the measure of attainment of the Idaho Core standards.
- Adopting the NWEA MAP tests in grades 3-8, and the grade 11 SAT as measures of the progress of our students.