

**The following is the Idaho State Department of Education's response to Sen. Thayne's press release on the Smarter Balanced Assessment. The Department responses are in red.**

SBAC is a form of extreme testing requiring up to 8 hours (7 hours for 3<sup>rd</sup> graders). The Idaho Department of Education says Idaho needs to have a nationwide test to be able to compare Idaho students with students across the nation. This comparison can be done by testing a random sample of 1,000 students in grades 4 and 8 at much less cost and time requirements.

A better form of measurement does take additional time. For years, educators and parents have demanded more than a multiple choice test. In order to administer that, it takes additional time. The actual estimates of time are about 6 hours for students in grades 3-8 and 7 hours for students in high school. This time still represents less than 1% of a student's instructional time during the school year. Students will not be spending this time choosing a, b, or c. Instead, they will be solving complex problems, writing essays and showing their work.

As State Superintendent, I do not believe it is enough for us to know if a random sample of our students are succeeding and getting the education they deserve. We owe it to our students and parents to know how every student is doing. If they are struggling, we need to get them immediate assistance. If they are excelling, we should provide advanced opportunities.

The SBAC test does not provide immediate feedback needed to help the classroom teacher formulate instruction. The main purpose of the test is to give data to statisticians. The main purpose of tests should be to help teachers and parents. SBAC seems to be a tool for policy makers to monitor, control, and manipulate teachers, students, and parents. Test should have immediate feedback. SBAC does not. Idaho will gain immediate feedback from the Smarter Balanced Assessment Consortium, something we do not currently get from the ISAT. Other states have already signed contracts to have results returned within 5 days of the end of testing. Idaho could do the same with the vendor it chooses to administer Smarter Balanced. In partnering with other states, we are not only gaining an end-of-the-year assessment to replace the ISAT, but Idaho's teachers are also helping develop what we call formative and interim assessments. These are assessment tools teachers can use in the classroom to monitor students' progress throughout the school year and provide immediate feedback to students and parents. In addition, the end-of-the-year test will provide more information at the end of the year about how our students are performing than we, as policymakers or parents, received in the past. We will receive better reports, and since our students are finally being measured against college- and career-ready standards, we will truly know if they are on a path to be ready for college or career.

The Idaho State Department of Education is not able to guarantee that pornographic passages or agenda-driven questions will not be on the SBAC.

Idaho will be able to guard against this. First, Idaho educators are involved in the development of Smarter Balanced items. To date, more than 50 Idaho teachers are involved in writing test questions. Second, the Idaho State Department of Education can request to review the entire item pool at any time to ensure we are comfortable with the test questions. Idaho has the same ability to review all questions and assessment items as we did with the ISAT. Third, this is why Idaho conducted a pilot of the Smarter Balanced assessment in Spring 2013 and is conducting a field test in Spring 2014. We are testing the test questions before they become fully operational. Some of the other states who have decided to not be part of Smarter Balanced or PARCC are purchasing off-the-shelf tests, like ACT and SAT, over which these states have no control over the test development process or content of test questions.

SBAC has no process to lodge a complaint or modify the test. When this issue has been brought up to the Idaho Department of Education, the Department indicates that we can get out at any time. I suggest that this is the time. The American people have long enjoyed due process and checks and balances in their public institutions. SBAC has no due process procedures in place.

As a governing state in a state-led consortium, Idaho is a voting member and helps create policies and processes just like this. If someone has a concern with a question on the assessment, they can lodge that complaint with the Idaho State Department of Education. The Department can take that complaint to the full Consortium and work with other states to address it. This is actually more control than Idaho has over most of the other tests it administers, such as the SAT, which is fully developed and controlled by the College Board.

SBAC creates a multi-state testing system. SBAC shifts decisions from state level to a multi-state level and will further alienate parents and make it harder for legislators, teachers, and parents to impact public policy threatening state control over a wide range of education issues.

The test process has two unacceptable and dangerous characteristics.

SBAC using a technique called 'close reading.' Close Reading means that a passage is given as a prompt for writing. The student can only use the information in the prompt in the writing. No outside information can be used. This could be potentially harmful and discriminatory to young and vulnerable students, especially, those students who do not agree with the assumptions of the prompt. The prompt may be asking a student to defend a belief that they morally or politically do not agree with. This could be used to identify student with certain acceptable or non-acceptable belief systems.

Idaho is addressing this in multiple ways to ensure all test questions are fair to students. First, Idaho teachers are involved in the development of test questions and writing prompts. Second, Idaho has the ability to review all test questions before they are administered to Idaho students. Third, Idaho participated in the pilot test in Spring 2013 and will conduct a field test in Spring 2014. Through these opportunities, we are fully vetting all test questions and writing prompts to ensure they are valid, fair and reliable for students in our state. It is important to note that all writing prompts will be aligned to the Idaho Core Standards. The goal of the Idaho Core Standards is to emphasize critical-thinking and problem-solving skills. Through these writing prompts, students will be asked to show evidence to support a position, but not to defend a belief. *(A sample performance task is attached for your information.)*

Anecdotal stories indicate that in doing a math problem, a student may get more credit for working the problem using an approved process but getting the wrong answer while a student that uses a non-approved process to get the correct answer could receive a lower grade than a student that got the wrong answer but used the approved process. This would discriminate against any student who was not taught in an "approved system" such as home schooled children or children taught in private schools.

First, there is no "approved process" for understanding mathematics. Second, the way scoring works is that students will receive some credit for showing mathematical reasoning skills, but most credit will be given for obtaining the correct answer. If home school or private school students choose to take the Smarter Balanced assessment, they will be expected to use mathematical reasoning skills, just like students who attend public schools. However, students who attend home school or private schools are not required to take the Smarter Balanced assessment.

Cost of the test has not been determined. Because there is some hand grading, the cost could be much more than the current system of testing. Costs have not yet been discussed.

The costs of the Smarter Balanced assessment have been discussed for more than a year now. The most recent cost analysis shows that Idaho will spend approximately the same to administer the Smarter

Balanced assessment as it has spent in the past to administer the ISAT, yet we will be gaining much better assessment tools through Smarter Balanced. While Idaho has worked with other states to develop the test questions, we will be going out to bid to determine the vendor that will ultimately administer the test in Idaho. Ultimately, this is Idaho's statewide test. The RFP process will determine the cost (and timeline for returning scores to students and parents), but we anticipate it will be close to the estimates we have seen for more than a year.

Finally, data is a big concern. I have before me a draft of a bill that says data "shall not be transferred to any federal, state, or local agency or other organization/entity outside of the state of Idaho, with the following exceptions." Then exception iii says: "A student registers, for or takes a national or multistate assessment." Translation is if a student takes the SBAC test, the state of Idaho can transmit individual student data to the federal government! I do not think the state of Idaho should store individual student data. The state should only receive aggregate data from school districts. The data should be kept at the district level and the state perform audit to assure accurate record keeping.

In September, the states of the Smarter Balanced Consortium approved a data privacy policy that reaffirms each member state will retain control of student data generated by the assessment system. Student-level data will not be shared with the federal government.

Alternatives should be developed to replace the SBAC for the 2014-2015 school year that could include:

- Limit a longer test to only the 4<sup>th</sup> and 8<sup>th</sup> grades  
This would not collect the data that parents, students and teachers deserve on how their students are performing academically throughout the student's academic career. In addition, reducing the grades tested to 4<sup>th</sup> and 8<sup>th</sup> grades would violate federal law passed in 2001.
- Use the SAT in high school. This would give an indication of how Idaho students compare with other students nationwide.  
SAT is not aligned to Idaho Core Standards. In addition, Idaho has no control over this assessment. The College Board controls the development of this assessment. We believe it is important to administer to Idaho high school students because it remains a critical exam for students to take to go on to postsecondary education; however, for statewide accountability purposes, we prefer to administer an assessment in which teachers have helped develop the assessment questions.
- Consider what other states are using that have already withdrawn from SBAC.  
The states that have withdrawn from Smarter Balanced Assessment Consortium, to date, largely did so because of costs. Those states were spending less money than Idaho on assessments; Smarter Balanced was not a cost neutral solution for them as it is for Idaho. In addition, those states are currently trying to develop or purchase an assessment that is aligned with Common Core State Standards but have yet to come up with a test that is able to provide all the tools we will receive through Smarter Balanced. For example, Utah will now only be able to administer a multiple choice test. Alabama will also be spending nearly double the cost per student for the state's new assessment system than Idaho will be spending. Right now, Smarter Balanced remains the most effective solution for Idaho students and teachers.
- Bring back the ISAT but design it for the new standards and use it only in specific grades.  
This would be the most expensive option for Idaho. If Idaho tries to develop an assessment on its own, we will not realize the economies of scale we have realized through the Smarter Balanced Assessment Consortium. With our resources, we will end up with a multiple choice test that looks the same as the previous ISAT and does not truly measure students' deeper, critical thinking and problem solving skills. In addition, students should be assessed as they

progress through the educational system to ensure academic gaps are addressed and strengths are recognized.