



EmpowerEd Public Comment on OSSE Request for Testing Waiver

March 29, 2021

Today we are issuing this public comment to strongly support the DC Office of the State Superintendent of Education's (OSSE) request for a waiver from statewide testing for school year 2020-2021 for math and reading normally conducted via the PARCC exam. While there is no doubt that a year of largely virtual learning has not been ideal for students and led to an exacerbation of preexisting inequities both in our education and in society at-large, administering these tests this year will do nothing to add to the knowledge we already have around which students need the most support in education recovery, what instructional strategies might address this need and will certainly lead to an increase in student and teacher stress at a time when both stress is high and student and staff mental health needs must take priority. Finally, the proposed waiver from OSSE would actually provide a promising template for a shift that would better serve DC students in years to come.

First, PARCC testing data does not provide either useful or timely data on student progress. Teachers cannot routinely access this data, even in a normal year until July or August. Recovery efforts must begin now, not in the fall, so this data cannot and will not be used to inform the most critical time for school reengagement and education recovery- this summer. Second, the data provides no useful information to guide instructional strategy. Educator after educator has testified that the PARCC exam- by virtue of not being an adaptive test- provides little to no useful information to inform instruction. Many DC educators have testified that using an adaptive test like NWEA/ MAP could be more useful if some tests were to be administered.

Second, testing takes an enormous amount of time away from actual instruction. We know that students have missed material, and we already know which students have been impacted most- so why would we take additional time away from classroom teaching for this purpose? As teacher Gabrielle DuBose stated- "The intrusion of the PARCC mandate aides in the delay of students receiving what they need to move closer to closing the gap." Educators have reported testing itself taking anywhere from two weeks to months away from normal classroom instruction depending on the grade level in DC as it not only disrupts the academic calendar the days the particular group is testing, but disrupts the class schedule during the whole testing window for that students' school. Indeed, administering standardized tests like PARCC this year will almost certainly *exacerbate* loss of academic content time. As teacher Maya Baum testified- "Once testing begins, any other type of learning stops. On testing days, our students are tired, stressed, and bored. Students are testing for around two weeks. However, teachers are used as test administrators and so depending on how big the school is, the PARCC testing window could be up to a month of disrupted schedules and testing. Once PARCC is over, our students are burnt out... Our students have already been through so much this year. What do we gain by forcing them to go through this intensive testing experience?"

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Third, the testing will certainly produce deeply flawed data. As DC teacher Vaughn Merrick testified to the DC State Board of Education- “From my perspective as a special educator, if we cannot standardize the accommodations we are giving to students, and standardize the environment students will have to focus, how can we give out a standardized test?” No doubt that students taking the test at home (as would be necessary given most students are still learning virtually) would have zero data integrity. Some students would receive help at home and others would not- and we know that this would only exacerbate the inequities students face with support at home. Teacher Maya Baum said “In non pandemic years, teachers have to sign serious contracts regarding test procedures and testing environments that if breached could cost thousands of dollars in fines, loss of licensures, or even jail time. How do we ensure those test procedures and learning environments when the majority of our students are virtual?” Teacher Caitlin Early elaborated on why the data would be so flawed. “...for the same reasons I am sure that students have not learned as much as they should during the pandemic, I also know that administering a standardized test during this time is a fool's errand. How will you account for a student who is taking the PARCC test in the same room as their crying younger sibling? How will you account for a kid's internet failing multiple times during the test? Will you still consider these scores valid when you can't know what obstacles the student faced as they were testing?”

Fourth, this data measures only math and reading- with OSSE already having cancelled science testing. Despite its many flaws, the data likely to be used to advance an agenda to use intensive tutoring in reading and math to help students recover academically. We have great concerns with regards to this proposed conclusion. Students have experienced a lot of trauma over the past year and they have also the most impacted students have also become disengaged from school. Students will not re-engage through intensive tutoring. Students will re-engage through the things they love most about school- extracurriculars, arts, music, athletics and social time with peers. If we skip this step, no amount of tutoring will re-engage or help the students most impacted actually recover. Moreover, using this data to advance doubling or tripling reading and math time will likely come at the expense of time normally spent in social studies, science, languages and the arts. This is unacceptable at any time- but particularly so when students need a holistic approach the most. Re-engagement must be priority number one.

Fifth, this testing would compound the traumas of this past year and perpetuate the systemic racism standardized tests were founded upon. As DC teacher Caitlin Earle testified- “Standardized tests were founded in racism and perpetuate it still. They are weaponized against schools that serve low-income students and students of color, serving as an excuse to close or "turnaround" schools, further undermining the position of schools as community institutions that serve ALL stakeholders connected to them, often in ways that cannot be measured quantitatively. The role of a community institution has never been more vital than it is now and we should not be investing time or money in anything that does not support that function.” As DC teacher Armand Cuevas testified to the State Board of Education- ‘Black and brown families are hit the hardest, so to force PARCC on our students, especially in DCPS where the majority are Black and brown, adds another layer of insensitivity and furthers the narrative of the racist system of standardized testing.’ Teacher Vaughn Merrick said “I have referred more students to counseling services this year than in the previous three school years combined. The number of failures does not reflect a poor academic culture at my school, it is instead a serious concern for how students are faring while learning with overwhelming feelings of isolation.”

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Finally, we support the OSSE waiver because they have in fact proposed a solution that is a potential blueprint for the future. OSSE will still be submitting student assessment data. We know that this school-based assessment data is actually more valid and useful than the statewide assessment. Teachers know how to meaningfully assess student learning. High school GPA's, for example (based on teacher grading), have proven [five times more likely to predict](#) college graduation rates than standardized ACT scores. DC is one of the only places left using the assessment of the PARCC consortium, which no longer resembles a consortium of any kind. DC must take the time to consider what assessment makes the most sense locally and, as other states have done, craft an assessment that meets our needs- if any is needed. Taking this year to give students and teachers the break they deserve from testing that will be meaningless in informing recovery is a great opportunity to have the space and time to validate the usefulness of school-based formative and summative assessments in informing instruction and serving as an equity check on student progress.

We should absolutely measure student progress and teachers don't have qualms with being held accountable for delivering quality instruction that addresses students' needs- but we cannot and must not subject students and educators to weeks and weeks of stress, trauma and additional loss of academic time for an assessment that will add no new useful information or help inform recovery efforts. This makes no sense, and the US Department of Education should accept OSSE's common sense waiver application which crafts a solution that better meets our needs in this moment. Thank you.

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