

John R. Kasich, Governor
Paolo DeMaria, Superintendent of Public Instruction

DATE: June 10, 2017

TO: Members of the State Board of Education

FROM: Paolo DeMaria, State Superintendent

RE: Recommendations for Modifications to Ohio's Assessment Structure

I am extremely grateful to the members of the Superintendent's Advisory Committee on Assessments (under the guidance of Deputy Superintendent John Richard) for their work in examining state and local assessments, and making recommendations to move toward a smarter and streamlined assessment system. I appreciate the thoughtfulness of their discussion, and their approach to creating their recommendations. Once again, this process has illustrated the value of collaborative and inclusive dialog on key education policy issues. We all emerged with a better understanding and respect for the complexities of the issue and the interactions between assessments and other foundational state policies.

The work done by the Committee is only the first step. As we go deeper into Strategic Planning, I expect that we will continue to have robust discussions about ways for students to demonstrate what they know and are able to do beyond the use of standardized testing. We will also have discussions about the purpose and role of assessments in meeting the state's interest to understand how well its education system is performing, whether the system is addressing issues of equity, and for exercising accountability. There continues to be great interest in this topic, and I believe there are meaningful approaches that Ohio can adopt. I look forward to this ongoing work.

It is now my responsibility to make recommendations to you. My recommendations deviate from those made by the committee. They are described below with their respective rationales. I should note that for none of these do I provide the rationale that "this test is not required by the federal government." As I have expressed before, Ohio has assessed students for purposes of gauging the performance of the state's education system long before the federal government has ever required states to have assessments in order to qualify for federal funding. Ohio can, and should decide for itself how it wants to measure the performance of its education system. If we want to assess students in a particular subject, we should do so because we think it is right. So simply identifying a test as "not required" by the federal government is not sufficient reasoning to eliminate it from my point of view.

For ease of the Board's consideration, I have limited each recommendation to one item. Later in this document, I explain the rationale behind the deviations of my recommendations from those presented by the committee.

1. Eliminate the 4th grade social studies assessment

Social studies is an important content area for which students should have appropriate instruction and a solid knowledge base. I believe that eliminating the 4th grade social studies assessment will not trigger any substantial change in the provision of instruction in this area. Testing social studies in 6th grade (see the discussion below) will provide the necessary feedback to the state related to how well the system is addressing this important content area without the need to also assess in 4th grade.

2. Eliminate the English language arts I high school end-of-course assessment

Mastery of the English language is a skill set that enables virtually all other learning. Students expected to succeed in our ever-changing world need a strong grounding in this vital subject area. There are currently two English language arts (ELA) high school end-of-course exams. The content for ELA II builds on the content of ELA I, and so by maintaining ELA II (see the discussion below) we can continue to ensure appropriate attention to, and student proficiency with this important subject.

3. Eliminate the American Government high school end-of-course assessment

Currently Ohio prescribes two high school end-of-course social studies exams, one in American History and one in American Government. In many respects the American History standards and model curriculum promote student acquisition of substantial knowledge about American Government. The American History standards also largely include the founding documents of our state and nation which are required to be studied pursuant to Ohio Revised Code section 3313.603(M). Eliminating the American Government assessment in favor of American History (see the discussion below) will allow the state to understand the extent to which students are acquiring knowledge that the state has determined to be important.

4. Eliminate the requirement to have a nationally recognized jobs skills assessment component as part of the industry-recognized credential based diploma option (currently WorkKeys)

WorkKeys was selected as the nationally recognized jobs skills assessment for students who pursue a career-technical education program and in-demand industry credential. In the end, however, its purpose in the state's testing system is to assess student language, mathematics and reasoning skills. These skills can be assessed through high school end-of course tests which students are otherwise required to take. In recommending the elimination of the need for a nationally recognized jobs skills assessment, statute would need to be changed to allow the State Board to set appropriate scores on the ELA II and Algebra I end-of-course exams to accompany the credential-based graduation requirement.

Explanations for Deviations from the Committee Report

Each of the following items represent Committee recommendations which I am not recommending at this time. I've provided a rationale for my position on each.

1. Fall administration of 3rd grade ELA assessment

The committee recommendation to remove this test was contingent on the removal of the state's retention policy. Since the retention policy is still current law, it would be inappropriate to eliminate it at this time.

2. 6th grade social studies assessment

Ohio has a long history of testing in social studies. This dates back to the first proficiency test in "Citizenship" and continues to the present day. These tests have never been required by the federal government – Ohio has adopted them because of a recognition of the importance of this content area. Maintaining the 6th grade social studies test allows Ohio to gauge the extent to which the education system is facilitating student acquisition of key knowledge and skills in this important subject.

3. Mathematics high school end-of-course assessments

This is the recommendation with which I struggled the most. Mathematical and computational knowledge and skills are becoming an increasingly important element of most careers. More and more jobs require the ability to understand, analyze and make sense of numbers and data. While some of this mathematical knowledge most

needed relates to geometry, more of it is focused on the content of Algebra I.¹ If it did not create complications, I would recommend the elimination of Geometry in favor of focusing attention on Algebra I.

Unfortunately, it does create complications.

- If we eliminate the Algebra I assessment, 8th grade students who take the Algebra I course will be required to take the 8th grade math assessment (not aligned to the Algebra I course). It is not optimal to have students take a test that is not aligned with the respective course of instruction.
- If we eliminate the Geometry assessment, 8th grade students who take the Algebra I course will not have a high school assessment to take when they are in high school. This would mean Ohio's testing system is noncompliant with federal law.

Consequently, I am recommending no change to the high school mathematics end-of-course assessments. I believe we should continue to explore this issue in the interest of identifying a way to further streamline the assessment system.

4. American History high school end-of-course assessment

See the discussion of my recommendation to eliminate the American Government high school end-of-course assessment above. I recommend we maintain the assessment in American History. However, I would love to see the state use American History as a content area for piloting a performance based assessment approach.

5. Kindergarten Readiness Assessment (KRA)

I hear loudly and clearly the concerns that have been articulated around the state's Kindergarten Readiness Assessment. It is important to recognize that concerns about the KRA are not about student testing time, since the KRA is based on teacher observations and not student responses. All the same, I acknowledge that the time spent by teachers on the assessment can diminish instructional time spent with children.

We are committed to making improvements to the KRA, and to considering alternatives. We have several improvements already underway, including allowing teachers to receive assessment results instantly, and we are seeking the authority to allow portions of the assessment to be administered in the weeks before kindergarten formally commences. The state needs to have a way to gauge the readiness of students as they enter kindergarten. The current information from the KRA guides policy and resource allocation strategies for the state's preschool initiatives and supports the Step Up to Quality rating system. The need for, and uses of the KRA extend beyond the Department of Education, and its elimination would have broader impact. Eliminating the KRA at this time without any clear idea of how to replace it does not make sense. I am open to other options, including, if feasible, using commercial products that may be preferred by districts and schools, but time is needed to make a workable transition.

6. Single-sitting general content exam including English, math, science and social studies

I respect the intentions behind this recommendation. However, I think a single-sitting general content exam would result in many of the same complaints that were made regarding the 10th grade Ohio Graduation Tests--misalignment with student courses, challenges with retakes and intervention strategies, having to interrupt ongoing instruction to prepare students for the test, etc. I do not think a single-sitting general content exam would represent progress.

¹ My thinking on mathematics is informed by the May 2013 report from the National Center on Education and the Economy: http://ncee.org/wp-content/uploads/2013/05/NCEE_MathReport_May20131.pdf.

7. ACT/SAT Elimination

The experiences of other states – Kentucky, Illinois, etc. – with universal administration of the ACT/SAT have been generally positive. Critics claim that students who are not going to college have no need to take these tests. In fact, many students who may think they don't have what it takes to succeed in college learn that perhaps the college opportunity is not beyond their reach. Other states have seen more students better informed about their academic readiness for college, and have seen growth in college enrollment. The ACT and SAT are highly regarded assessments universally. I do not believe it would be appropriate to eliminate this option at this time.

Local Assessment Recommendations

It is worth noting that the elimination of the various assessments discussed above will probably have an impact on reducing local assessments that may be in place that are used by districts and schools to ascertain how they likely will perform on the state assessments. This is a beneficial impact.

Additionally, I appreciate the three recommendations made by the Committee that relate to local assessments. These are as follows:

1. ODE should create and provide training/guidance to districts to assist with conducting an optional assessment inventory/audit, developing a meaningful assessment plan, and using results for instructional improvement.
2. ODE should create a directory of non-state mandated assessments that may be used to meet state requirements, district needs and multiple purposes.
3. ODE should create a broad-based communication plan using common language and key points about the state's testing system and its purposes.

I would offer **two additional recommendations** regarding local assessments.

- **District Testing Disclosure:** Each district (or school, in the case of a community school or a STEM school) should post on its website an understandable guide (in a form prescribed by the Department and developed in consultation with districts and schools) to the generally administered assessments (i.e., those administered to all students in a particular grade level), and tests that are administered for purposes of supporting teacher evaluation, by content area and by grade level, with an indication of the typical time allotted for each assessment. This guide would be updated annually.
- **Eliminate the state requirement for local assessments that have the sole purpose of providing data on student growth to support teacher evaluations. Meet the need for high-quality data that provides evidence of student learning to inform teacher evaluations through other already available means.** A significant portion of the assessments students take over their academic career are administered for the sole purpose of informing teacher evaluations within the Ohio Teacher Evaluation System (OTES). The need for data to support evaluation has resulted in many teachers developing customized Student Learning Objective assessments which have added significantly to the testing burden impacting students in many subject areas at every grade level. In many cases, these assessments have been added on top of other interim/short cycle assessments that districts have in place to more frequently measure student progress. Yet, it is unclear the extent to which any of this OTES-only assessing has contributed to better evaluations, or contributed to improved student learning, and whether any of the data produced is more meaningful than other readily available data that could be used as evidence of student learning.

The Board's recommendation for revising the Ohio Teacher Evaluation System called for embedding high-quality data reflecting student academic achievement and student growth as evidence in the OTES

rubric. The recommendation also called on the Department to define “high-quality student learning data.” We must ensure that student outcome data and data about student learning are used in the evaluations. However, we should eliminate the additional testing burdens on students that has the sole purpose of creating growth measure data for evaluations. (Eliminating this requirement would not prohibit a district from continuing to use this type of assessment at its own choosing.)

I believe that only the last of these recommendations require legislative action. The additional recommendation I offer regarding District Testing Disclosure could be initiated on a voluntary basis rather than being mandated by statute.

Implications

Changing tests as described above has a number of implications. It is important that these be kept in mind as final decisions are made. These can be generally described as follows.

Accountability System:

The changes described above will result in the following:

- a. Changes to the number of indicators in the “indicators met” measure
- b. Changes in the number of assessments that are included in the performance index (which would also impact the computation of the Gifted Indicator)
- c. Value-added growth measures will include fewer grades and subjects
- d. Reduction in the relative emphasis on high school outcomes in relation to other grade levels on a district’s report card.

Graduation Requirements:

Ohio has long adhered to the principle that the graduation requirements in place when a student begins high school should continue to be made available to the student until he/she has completed high school.² At the same time, students who have not yet earned a diploma are also given the option to earn one using any new requirements that are specified before they graduate. Consequently, the state will still need to offer students the option to take the full range of end-of-course exams for several years longer (and consequently, the state will need to ensure that the tests are developed and available).

Additionally, the changes described above will necessitate the following regarding graduation requirements:

- a. Reconfiguration of the required points needed for graduation under the end-of-course exams option.
- b. Reconfiguration of the subscore requirements for graduation under the end-of-course exams option.
- c. Reconfiguration of the credential graduation pathway to accommodate the elimination of WorkKeys.

Teacher Evaluation

The implications for teacher evaluation are dependent on proposed statutory changes to the evaluation system. If such changes are enacted, the department’s activity to define “high quality student learning data” would be informed by statutory changes that may be made in response to these recommendations. Also, in some grades and subjects the amount of available data would be diminished.

Other Implications

² For example, the old Ohio Graduation Tests will still continue to be offered until 2022 in keeping with this principle.

The elimination of the ELA I high school end of course assessment would result in advanced middle school students who take the 9th grade English course in high school being tested with the 8th grade English assessment.

Conclusion

In 2015, Ohio took the opportunity to review its testing system and make adjustments. Periodic reviews of the structure and composition of the system make sense. This will not be the last time that assessments are examined with a view toward improving efficiency and usefulness. At the same time, we should commit ourselves to exploring options which allow students to demonstrate what they know and are able to do beyond using standardized tests, and which also provide valuable information to the state about the performance of the education system. I look forward to continuing to work on the state's assessment structure through the upcoming Strategic Planning process, and informed by the "Future Considerations" contained in the committee's report. Although my recommendations are different from those made by the committee, I have learned a lot, and am committed to continuing to pursue an agenda toward a smarter approach to assessment going forward.

I am completely respectful and cognizant of the Board's authority and prerogative to shape these recommendations as it sees fit, including pursuing some in the short term and others in the medium- and long-term. I want to assure the Board that whatever its decision, it will have my fullest support, and I and the legislative staff will advocate diligently with the General Assembly for the approved recommendations.

Finally, as we advocate for changes to the testing system, we must understand that some will criticize these actions as likely to result in a diminishment of attention to certain content areas. Criticism may also surface asserting that students will somehow experience a lesser quality education or receive a diploma with lesser meaning. I do not believe these criticisms to be valid. We must be firm in our resolve to ensure that such impacts do not happen, and reaffirm our commitment to offering a broad-ranging, robust educational experience that successfully prepares our students for life, career, citizenship and future learning.