

# LEGISLATIVE BUDGET AND FINANCE COMMITTEE

A JOINT COMMITTEE OF THE PENNSYLVANIA GENERAL ASSEMBLY

## Standardized Tests in Public Education

June 2019



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# REPORT SUMMARY



## Objectives and Scope

*Our objectives for this report on standardized tests in public schools were as follows:*

- ❖ *Identify the number, type, and purpose of mandated standardized tests.*
- ❖ *Review the intended use of Pennsylvania state standardized tests.*
- ❖ *Evaluate effectiveness of using standardized tests as indicators for student achievement, school building performance, and teacher evaluation.*
- ❖ *Identify the cost and time spent on standardized tests.*
- ❖ *Compare the types of standardized tests required by other states and the use of the testing for teacher evaluations.*
- ❖ *Identify whether realignment is necessary with ACT or SAT.*
- ❖ *Determine whether Pennsylvania can obtain a continuous longitude growth measure based on ACT or SAT performance.*
- ❖ *Compare universal design principles and accommodations, and determine the impact on the validity of the tests.*
- ❖ *Measure the impact of expanding opt-out options on compliance with federally required tests and accountability measures.*

## Standardized Tests in Public Education

Our report, generated in response to Senate Resolution 2018-322 (SR 322), defines the term “standardized test” and identifies the number and types of state and local mandated standardized tests/assessments used in Pennsylvania public schools. SR 322 highlights that in recent years, officials have debated whether there is an over-reliance on standardized testing in schools at the potential expense of a broader, well-rounded education.

**Section II** of our report defines “standardized test” as “any form of test that requires all test takers to answer the same questions, or selection of questions from a common bank of questions, in the same way, and that is scored in a standard or consistent manner, which makes it possible to compare the relative performance of individual students or groups of students.” Standardized testing in America dates back to 1845 and was predicated on the goal of replicating the best teaching methods to ensure all children had equal opportunities.

The modern standardized testing movement in the United States began with the enactment of the Elementary and Secondary Education Act of 1965 (ESEA), which included mandated standardized testing and accountability provisions, subject to strict federal oversight, for the purpose of raising standards and to make education more equitable. ESEA was followed by the No Child Left Behind Act of 2001 (NCLB) that reauthorized and amended ESEA by mandating annual testing in reading, math and science subject to strict federal oversight. Most recently in 2015, the Every Student Succeeds Act (ESSA) repealed NCLB and reauthorized and amended ESEA by shifting power back to states and local school districts to determine how to improve public schools with performance issues. ESSA represents a continuing movement of education policy away from being strictly focused on compliance, and instead shifts the focus to the establishment of rigorous expectations/standards for students and assisting schools to help students meet the standards. The ESEA legislation timeline is highlighted in the following as shown below:

### ESEA Timeline



Source: Pennsylvania Department of Education.

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Written standardized tests have come to be viewed as a potentially inexpensive and effective means of assessing teacher, student, and school building performance. Proponents of standardized tests argue such testing fairly and objectively measure student ability, ensure the accountability of teachers and schools to taxpayers, and is supported by students and parents. Opponents argue standardized tests are unfair and lack objectivity, encourage the practice of “teaching to the test,” resulting in a more limited curriculum and undermine a student’s ability to be an innovator or to think critically.

In 1999, the foundation of Pennsylvania’s modern assessment system was laid when the State Board adopted Chapter 4 Academic Standards and Assessment regulations. These changes ultimately resulted in Pennsylvania school districts being required to administer the Pennsylvania System of School Assessment (PSSA) in grades 3 through 8 and grade 11 PSSA being replaced by the Keystone Exams (state developed end-of-year course exams) in grades 9 through 12. Keystone Exams (e.g., algebra I, biology, and literature) became operational in spring 2011, although they were not administered to replace grade 11 PSSA until the 2012-13 school year.

Keystone Exams have been the focus of numerous pieces of Pennsylvania legislation and regulations that originally mandated ten Keystone Exams to be developed and implemented no later than the 2020-21 school year. Subsequent legislation has limited the Keystone Exams to three (vs. ten) subject matters, postponed the Keystone Exams as a graduation requirement until the 2021-22 school year, and implemented four alternative graduation/proficiency paths to the Keystone graduation requirement.

**Section III** identifies the number, type, and purposes of standardized tests in Pennsylvania. We surveyed the superintendents from all 500 public school districts to determine which tests schools administered in the

2017-18 school year, in addition to the standardized assessments that are state and federally mandated in Pennsylvania (i.e., PSSA, Keystone Exams, PASA, ACCESS for ELLS, and NAEP).

We found that, of the 23 specific standardized tests included on our survey, 21 are administered in Pennsylvania school districts. The most frequently administered tests are the AP and ACCESS for ELLs tests, followed closely by the DIBELS, ASVAB, and PSAT 10. School districts also administered a variety of other tests that we did not specifically identify in our survey. With the exception of the ACCESS for ELLs and NAEP, (which are both state and federally mandated) the other exams are either voluntarily or mandatorily administered at the discretion of the local school districts.

We also asked the superintendents to identify the grades in which each type of test was administered. Superintendents indicated that more tests are given as students reach higher grades, largely beginning in grade 8.

The two main reasons the superintendents cited for administering such tests were readiness for college or career and shaping instruction by assessing student progress.

**Section IV** provides an overview of the intended uses of Pennsylvania's standardized tests (assessments), along with the intended uses of the ACT and SAT. Pennsylvania's current assessment system consists of various assessment tools, including six standardized tests that students throughout the Commonwealth may be subject pursuant to federal and/or state law depending on their grade levels and cognitive abilities:

- 1) Pennsylvania System of School Assessment (PSSA).
- 2) Pennsylvania Alternative System of Assessments (PASA).
- 3) Keystone Exams.
- 4) Accessing Communication and Comprehension in English State-to-State for ELLs English Language Proficiency Test (ACCESS for ELL).
- 5) Classroom Diagnostic Tools (CDT).
- 6) National Assessment of Educational Progress (NAEP).

These standardized tests are part of an overall assessment system through which PDE seeks to ensure rigorous requirements for Pennsylvania's students, while also equipping them to be 21<sup>st</sup> century college and career ready.

PDE indicated that overall Pennsylvania state standardized tests meet their intended use to assess whether students are learning the required curricula. However, the assessment has been used at times for additional purposes beyond their original intent (e.g., graduation requirements,

measuring teacher effectiveness, school building performance) with varied levels of success.

Some states have embraced the use of the ACT and SAT tests to satisfy the federal assessment and accountability requirements. One of the benefits of utilizing the ACT and SAT is that these tests allow school districts to avoid the issue of excessive standardized testing as many students are already preparing for and taking these tests for college entrance purposes. Given the focus of this report, it is prudent to recognize both the ACT and SAT tests were originally designed as college entrance assessments that generated college reportable scores. Both the ACT and SAT continue to be used for college entrance purposes, but the tests are now being utilized both as a high school assessment and accountability tools, and to determine college and career readiness. This shift to multiple functions was driven by amendments to the federal ESEA, which initially mandated statewide assessments and subsequently specified states may utilize nationally recognized assessments in lieu of state-determined academic assessments.

**Section V** provides an evaluation of the effectiveness of standardized tests as indicators of student achievement, teacher evaluations, and school building performance. In order to determine standardized tests' effectiveness, we surveyed principals and teachers throughout Pennsylvania to solicit their views on the effectiveness of both PSSA exams and Keystone Exams, based on the 2017-18 school year.

- **PSSA Exams.** A majority of principals, 67 percent, and teachers, 76 percent, indicated they disagree or strongly disagree that PSSA exams are effective indicators of student achievement.

Regarding the tests as effective indicators for teacher evaluations, 77 percent of principals and 93 percent of teachers indicated that they disagree or strongly disagree.

Seventy-eight percent of principals and 86 percent of teachers disagree or disagree strongly that the PSSAs are effective indicators of school building performance.

- **Keystone Exams.** Although 45 percent of principals disagree or disagree strongly that the Keystone Exams are effective indicators of student achievement, 27 percent agree or strongly agree that they are. Sixty percent of teachers disagree or strongly disagree.

A majority of principals, 56 percent, and teachers, 78 percent, indicated that they disagree or strongly disagree that the Keystone Exams are effective indicators for teacher evaluation.



Regarding the Keystone Exams as effective indicators of school building performance, 59 percent of principals and 75 percent of teachers disagree or strongly disagree.

**Section VI** provides an overview of the costs and time schools spend teaching test-taking skills, as well as administering both practice tests and standardized tests. We surveyed both principals and teachers regarding reduced curricula, and the costs and time associated with preparing for and administering PSSA exams and Keystone Exams.

- **PSSA Exams:** Both principals and teachers indicated their curricula scope has been narrowed to prepare students for PSSA exams.

A majority of principals indicated that students are taught test-taking skills, and their schools administered practice tests, benchmark tests, and/or diagnostic tests to prepare students for the PSSA exams, 82 percent and 89 percent, respectively. Eighty-eight percent of teachers responded that they teach test-taking skills and administer practice tests.

Principals indicated a range from 5.7 days to 7.8 days to administer the PSSAs, across grades 3 through 8. Teachers' responses varied so greatly that we were unable to calculate an average time spent teaching test-taking skills and administering practice tests.

Finally, we asked principals if there were additional costs associated with PSSA test preparation, and they indicated amounts from \$200 to more than \$100,000.

- **Keystone Exams.** Both principals and teachers indicated that the scope of their curricula has been narrowed to prepare students for Keystone Exams.

A majority of principals indicated that students are taught test-taking skills, and their schools administered practice tests, benchmark tests, and/or diagnostic tests to prepare students for the Keystone Exams, 64 percent and 90 percent, respectively. Eighty-four percent of teachers responded that they teach test-taking skills and 81 percent administer practice tests.

Principals indicated that their schools spend an average of eight days to administer the Keystone Exams. Teachers' responses varied so greatly that we were unable to calculate an average time spent teaching test-taking skills and administering practice tests.

We asked principals if there were additional costs associated with Key-stone Exams preparation, and they indicated amounts from \$200 to \$35,000.

**Section VII** provides an overview of the types of standardized tests required by other states, and the use of standardized testing for teacher evaluations. Under ESSA states have the option of utilizing “nationally recognized tests” such as ACT, SAT, PARCC, and Smarter Balanced to meet the federal high school assessment, provided there is evidence of alignment with state academic standards.

The Education Commission of the States (ECS) identified and described each state’s assessment tools which we present in Exhibit 27, titled *50-State Comparison of Statewide Assessment Tools May 2018*. The assessment tools used are typically determined after consultation with policy-makers and stakeholders.

Each state has five potential assessment tool decision points (i.e., distinct points in time): one for grades 3 through 8 Math/ELA, one for grades 9 through 12 Math/ELA, one for grades 9 through 12 Math/ELA, one for grades 3 through 5 science, one for grades 6 through 9 science, and then one for grades 10 through 12 science, for a total of 255 assessment tool decision points for the fifty states and the District of Columbia. The vast majority of these decision points do not make use of any of the nationally recognized assessment tools. For example, 196 (77 percent) of the 255 assessment tool decision points utilize state-specific assessment tools, including all five decision points in Pennsylvania and 19 other states. At least 30 states plus the District of Columbia use, however, a recognized national assessment test for at least one testing area.

Prompted by research suggesting that student test scores on standardized tests were related to teacher quality, states were incentivized to incorporate student growth measures in the process of teacher evaluations. The Race to the Top grant program, as well as ESEA Flexibility Waivers under NCLB, provided for states to develop evaluation systems that included measures of student growth for teachers in all grades and subjects as a significant factor in teacher evaluations.

In 2015, ESSA, changed the federal requirements and states are now given full discretion as to whether and how to evaluate teachers. Given the new ESSA flexibilities regarding teacher evaluations, some states are reexamining, limiting, or altogether eliminating student growth as a component of teachers’ evaluation process. While the number of states requiring student growth as a component of teacher evaluations had risen to 43 during the incentivization period prior to ESSA, ECS reports that by 2017—two years after the changes brought about by ESSA—the number of states using student growth in teacher evaluations has fallen to 39.

**Section VIII** addresses whether a realignment of state academic standards, Pennsylvania voluntary curriculum, and individual public school entities curriculum would be necessary if Pennsylvania required students to take the ACT or SAT in replace of the Keystone Exams for purposes of satisfying the federal high school assessment and accountability requirements. It is unlikely a transition to a nationally recognized high school assessment would require or result in the need for realignment as each individual state is authorized to establish its own academic standards and administer assessments, subject to United States Department of Education (USDE) “peer review,” that can be adequately measured for comparison purposes.

A number of states using either the ACT or SAT tests to meet federal high school assessment requirements have submitted for USDE peer review and are in various stages of the review process, some states have been designated “partially meets” and some “substantially meets,” although none has been designated “meets” to date. All the ACT and SAT states indicated that they did not realign their academic standards when they decided to use these tests for federal assessment purposes. ACT and College Board (SAT) representatives have indicated and acknowledged their respective tests do not align to any one specific state’s assessment and in fact were never designed to do so.

Data we collected shows that five states use the ACT to satisfy the federal assessment requirements for reading/language arts and math and three of those states also use the ACT for science. The data also shows that ten states use the SAT to satisfy federal requirements for reading/language arts and math, while only one of the states is additionally using the SAT for the science component.

In the event Pennsylvania decides to utilize the ACT or SAT, or other nationally recognized high school assessment, PDE would be required to submit the assessment to the USDE for a “peer review” that includes the following six critical elements necessary for approval:

- 1) Statewide System of Standards & Assessments – Align to and address the depth and breadth of state standards.
- 2) Assessment System Operations – Be equivalent in its content coverage, difficulty and quality to the state assessments.
- 3) Technical Quality (validity) – Provide comparable valid and reliable academic achievement data, as compared to the state assessments, for all high school students and for each subgroup.
- 4) Technical Quality (other) – Express achievement results in terms consistent with the state’s achievement standards.
- 5) Inclusion of All Students Meets – ESSA’s requirement that all students in a state take the same assessment.

- 6) Academic Achievement and Standards Reporting – Provide unbiased, rational and consistent differentiation between and among schools in the state.

These six critical elements indicate a nationally recognized assessment must meet the breadth of a state's existing state standards and be equivalent to existing state assessments. In other words, the assessment should test and measure what is currently in place.

It is anticipated that there would be significant initial costs and logistics associated with any transition, including ensuring the statewide data collection system syncs with the numerous different data systems used by various Pennsylvania school districts. PDE asserts that any costs would be driven by the transition itself due to the fact all assessments considered should be aligned to the state's standards of curriculum.

The development of Keystone Exams began in 2009, with the initial implementation of the Keystone Exams occurring in fiscal year 2012-13 subsequent to a now expired contract between PDE and Data Recognition Corporation (DRC). The initial contract provided for overall costs, but did not delineate the costs of the individual contract elements (e.g., CDT, Keystone Exams, and PSSA). Subsequently, PDE rebid the contract and included the requirement that the vendor break out the costs related to the individual contract elements (including CDT, Keystone Exams and PSSA). The current contract began in January 2016 (FY 2015-16) and ends June 2021 (FY 2020-21). Under the current contract, PDE indicated an overall assessment contract cost of \$42.17 million for fiscal year 2017-18, which included \$12.84 million for Keystone Exams.

**Section IX** addresses the Pennsylvania Value-Added Assessment System (PVAAS) and its tracking of longitudinal student growth, especially in the context of the possibility of changing statewide assessment tools and moving to the use of a nationally recognized tool, such as ACT or SAT. Value-added assessment is a statistical process that measures students' improvement from one year to the next.

PVAAS is Pennsylvania's value-added assessment system and is a statistical analysis used to quantify the yearly academic progress rates of student groups by school district, school, or teacher. To calculate the growth measure, the students' current achievements compared to all prior achievement and achievement is measured by existing student assessment data such as the PSSA and Keystone Exams. It measures whether students made the expected growth based on their prior testing history, thereby measuring the change in student achievement over time. When the state's assessment tool is changed and even when the assessment is given for the first time, academic growth as measured by PVAAS can still be calculated.

A senior director overseeing the SAS EVAAS format through SAS Institute, Inc. likewise assured that PVAS can provide growth measures using ACT or SAT at the district and school levels using prior PSSA tests to set the expected scores of students. Teacher growth measurements, however, cannot be provided using ACT or SAT. This is because individual teachers are typically connected to specific courses like algebra I or geometry, while the ACT and SAT are general achievement tests that cover multiple courses and years.

**Section X** addresses the comparison of universal design principles and accommodations available to students with disabilities for state standardized tests, and whether the availability of accommodations impact the validity of the test as a growth measure. Accommodations are tools and procedures that provide equal access to instruction and assessment for students with disabilities to ensure such students are able to access adequate grade level instruction and have every opportunity to demonstrate their knowledge in state and local assessments. Accommodations do not reduce expectations for learning.

There are four groups of students who may receive accommodations on assessments:

- 1) Students with disabilities who have an Individualized Education Plan (IEP).
- 2) Students with a Section 504 plan.
- 3) Students who are English Learners (ELs).
- 4) Students who are ELs with disabilities who have an IEP or 504 plan.

Federal laws like ESEA as amended by ESSA, IDEA, Section 504 of the Rehabilitation Act of 1973 (reauthorized in 2008), and the Americans with Disabilities Act of 1990 (ADA) are all meant to ensure individuals with disabilities have an opportunity to fairly compete and pursue opportunities as individuals. The protections offered by these four federal laws complement each other and overlap to some extent. In regards to public school students, these laws require the participation of students with disabilities in standards-based instruction and assessment initiatives.

When discussing assessments and accommodations it is necessary to discuss the concept of "universal design" (design for everyone) in relation to assessments in that such ensures accurate assessments and that all students are provided with equal opportunities to demonstrate what they have learned.

Universal design builds flexibility into assessments at the development stage that acknowledges differences exist among individual students and allows for flexible adjustments for a broad range of students. However,

universally designed assessments are not intended to replace accommodations or the need for alternative assessments for those students in need of such.

Accommodations do not impact the validity of assessments or the validity of the test as a growth measure as long as the state adheres to the recommended processes for developing the assessment and developing the state's accommodation policies. Accommodations are considered necessary for certain students to ensure the validity of test results and the growth results based on them.

Until recently, the ACT and the College Board (SAT) limited the types of accommodations they allowed in that a student was required to submit documentation to the ACT or College Board entities to get their approval for using an accommodation.

LBFC reviewed the types of accommodations currently being offered to students with disabilities by Pennsylvania and the adjacent states of Delaware (DE), Maryland (MD), New Jersey (NJ), New York (NY), Ohio (OH), and West Virginia (W. VA). The types of accommodations available to students has continued to become more common and uniform among states. The report contains an exhibit that consists of four tables, and provides a comparison of the types of accommodations available in the Commonwealth of Pennsylvania and the surrounding states.

**Section XI** assesses the impact on compliance with federally required tests and accountability measures (such as school building performance and educator effectiveness) in the event Pennsylvania expanded the options for opting-out from its statewide assessments (e.g., PSSA and Keystone Exams) to include objections based on philosophical grounds or due to health issues. Federal law that established the federal assessment and accountability requirements also specifies that state and local laws are not preempted from allowing parents to have their children opt-out of assessments.

Many states allowing opt-outs do so in cases of a physical disability, medical reasons, or emergencies, a couple of states allow opt-outs based on religious objection, and other states allow opt-outs for any reason.

While the religious opt-out is specifically provided for in Pennsylvania Chapter 4 regulations, PDE indicates the participation rate is primarily impacted by the following six factors:

- 1) Religious Opt-out (by parental request pursuant to Pennsylvania Chapter 4 regulations).
- 2) Other Parental Request ("Refusal" - represents every other instance of parent refusal).

- 3) No Attempt and No Exclusion Marked (a student was issued a test booklet, but did not answer enough questions to receive a score).
- 4) No Test (no test record on file and reason unknown).
- 5) Extended Absence (a student missed the testing window due to absence).
- 6) Other (does not fit any of the other categories).

Federal law requires states to incorporate student participation as a factor in a state's accountability system and to address schools with participation rates below 95 percent; conversely it allows for up to five percent non-participation. All students that do not participate in Pennsylvania's federally required state assessments (e.g., PSSA and Keystone Exams) pursuant to the Pennsylvania religious opt-out ultimately have a negative impact on a school's participation rate (along with other reasons such as parental refusal, extended absence due to illness, etc.), which can also ultimately result in a reduced achievement/proficiency measure. The federal statute is explicit in regards to how states must calculate and report federally required statewide assessment participation rates and states are required, in their accountability systems, to address schools with participation rates below ninety-five percent.

The existence of opt-outs (religious or otherwise) has the potential to negatively impact a state's participation rates and may potentially impact a state's LEAs and schools achievement/proficiency rate along with ultimately the ability of a state to be in compliance with federally required assessments and accountability measures.

Schools throughout the country are experiencing and grappling with an increase in the number of parents seeking to have their children opt-out of standardized testing now that new state assessments have been implemented pursuant to the federal requirements. Pennsylvania is no exception to this trend in that it also is experiencing an increase in the number of parents utilizing its religious opt-out.

The impact of adding opt-out categories may be minimal. For example, not all parents utilizing the Pennsylvania religious opt-out may be doing so based on religious reasons. Additionally, some of the Pennsylvania religious opt-out students, along with some of those Pennsylvanian students listed among the other five factors (e.g., parental refusal, etc.) may simply elect to make use of the additional proposed exclusion categories based on philosophical grounds or due to health concerns. It is also possible, however, that the inclusion of the two additional exclusion categories may lead to an increase in the overall number of Pennsylvania students opting out of federally required statewide assessments, which would consequently reduce Pennsylvania's participation rate.

PDE indicates the vast majority of Pennsylvania school districts exceed 95 percent participation in all subject areas and participation issues are relatively uncommon.



# SECTION I

## OBJECTIVES, SCOPE, AND METHODOLOGY



### ***Why we conducted this study...***

Senate Resolution 2018-322 directed the Legislative Budget and Finance Committee (LBFC) to conduct a study and provide a report on standardized tests in public schools.

On June 6, 2018, the LBFC Officers adopted this study pursuant to Senate Resolution 2018-322.

### **Objectives**

Specifically, the project (study) will:

1. Identify the number, type, and purpose of state and local mandated standardized tests administered for each grade level in Pennsylvania's public school districts.
2. Review the intended use of Pennsylvania's State standardized tests (SSTs) when originally authorized under Federal or State law compared to how the tests are used today.
3. Evaluate the effectiveness of using standardized tests as indicators for student achievement, school building performance, and teacher evaluations.
4. Identify the cost and amount of time spent teaching test-taking skills, and administering practice tests and standardized tests.
5. Conduct a comparison of the types of standardized tests required by other states, the states' rationale for each test's use in a State plan, and the use of standardized testing for teacher evaluations.
6. Identify whether a realignment of State academic standards, Pennsylvania's voluntary model curriculum, and individual public school entities' curriculum would be necessary if Pennsylvania required each student to take the SAT, (formerly known as Careers Scholastic Aptitude Test) instead of the Keystone Exams, along with the associated costs of new curricular materials, new benchmarks, Statewide instructional supports, redesigned Statewide instructional supports, and staff realigning local curriculum plans.
7. Determine whether Pennsylvania can obtain a continuous long-tude growth measure for public school entities and teachers in math, science, and English language arts based on student performance on the SAT compared to the Pennsylvania value-added assessment system (PVAAS) established under Section 221 of the Public School of 1949.
8. Conduct a comparison of universal design principles and accommodations available to students with disabilities for all SSTs, and determine whether the availability of instructional accommodations impact the validity of the tests as a growth measure.

9. Measure the impact on compliance with federally required tests and accountability measures, such as school building performance and educator effectiveness, if Pennsylvania expanded the options to be excused from State assessments to include objections on philosophical grounds or due to health concerns of the child.

## Scope

Senate Resolution 2018-322 (SR 322) directs the Legislative Budget and Finance Committee to study standardized tests in public education for the purposes of obtaining useful information to evaluate the cost, impact, time spent and value of standardized testing in relation to student, educator and school building assessments. See Appendix A for a copy of SR 322.

## Methodology

To understand the federal and state requirements for standardized testing and the intended use of Pennsylvania's state standardized tests, we reviewed the law and communicated with the staff of the United States Department of Education (USDE) and the Pennsylvania Department of Education (PDE). We reviewed testimony from Senate and House Education Committee hearings held from 2015 to 2018 on the Keystone Exams, the exams' use as a graduation requirement, and use as a tool for evaluation and accountability.

To identify the number, type, and purpose of state and local standardized tests administered in Pennsylvania's school districts, the cost and amount of time spent teaching test-taking skills, and administering practice tests and standardized tests, and evaluate the effectiveness of using standardized tests as indicators for student achievement, school building performance, and teacher evaluations, we distributed three separate surveys to Pennsylvania's superintendents, principals, and teachers.<sup>1</sup> We also met and communicated with the PDE, various stakeholder groups represent-

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<sup>1</sup> The response format parameters in the initial Superintendent Survey prevented Superintendents from selecting more than one grade level for purposes of indicating in which grade levels the ACCESS for ELLs exam was administered, and from selecting more than one grade level and/or subject in relation to the administration of AP exams related survey questions. LBFC distributed a supplemental Superintendent Survey to those superintendents who responded to the initial Superintendent Survey to allow them to select multiple grade levels and/or subjects as appropriate.

ing Pennsylvania's education professionals, and experts within the education field. We also analyzed data provided by the PDE on student performance, teacher evaluations, and school building performance.<sup>2</sup>

To conduct a comparison of other states' use of standardized testing, we reviewed data collected by the Education Commission of the States, and Achieve Inc., as well as our own internal review of other states' standardized testing policies.

To identify if replacing the Keystone Exams with an alternative assessments, such as the ACT or SAT, would require a realignment of State academic standards and curriculum, as well as the costs associated with the realignment, we met and communicated with the USDE, the PDE, stakeholder groups representing Pennsylvania's education professionals, experts within the education field, the leaders within the standardized testing industry (e.g., ACT and College Board [SAT]), and the various states administering either the ACT or SAT to satisfy the Federal requirement regarding administering a statewide high school assessment for all of each state's students.

To conduct a comparison of accommodations available to students with disabilities for all SSTs and to consider how the incorporation of the concept of universal design ensures accurate assessments that minimize the need for individual design or accommodations, and to determine if those accommodations impact the validity of the tests as a growth measure, we met with the USDE, the PDE, stakeholder groups representing Pennsylvania's education professionals, experts within the education field, and several leaders within the standardized testing industry. We also reviewed accommodation data for all 50 states, and also accumulated accommodation data for Pennsylvania and the adjacent states of Delaware, Maryland, New Jersey, New York, Ohio, and West Virginia.<sup>3</sup>

To measure the impact of expanding the options to be excused from state assessments, we met with the PDE, and analyzed data provided by the PDE on student SST participation rates.

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<sup>2</sup> The Teacher Survey was initially distributed by the Pennsylvania State Education Association (PSEA and NEA affiliate) to its member teachers; however, the survey was also subsequently distributed by the American Federation of Teachers of Pennsylvania (AFT-PA an AFT affiliate) to its member teachers to ensure the widest possible distribution of the Teacher Survey.

<sup>3</sup> Portions of the 2011 report containing 2009 data listing the type of accommodations for students with disabilities provided by the 50 states is included in the appendix of this report and provides a comprehensive overview of the various types of accommodations provided by states. However, as data in the 2011 report was somewhat dated, a comparison of the various accommodation provided by Pennsylvania compared to its six adjacent states was also compiled and included as an exhibit.

## Frequently Used Abbreviations and Definitions

Throughout this report, we use a number of abbreviations for government-related agencies, terms, and functions. These abbreviations are as follows:

Abbreviation	Name
ADA	Americans with Disabilities Act of 1990
EL	English Learner
ELP	English Language Proficiency
ESEA	Elementary and Secondary Education Act of 1965 (signed into law in 1965)
ESSA	Every Student Succeeds Act (signed into law in 2015)
GCA	Graduation Competency Assessments
IEP	Individual Education Plan
IDEA	Individual with Disabilities Education Act
LEA	Local Education Agency
PA Core Standards	PA Common Core Standards
PARCC	Partnership for Assessment of Readiness for College and Careers
PVASS	Pennsylvania Value-Added Assessment System
PDE	Pennsylvania Department of Education
NCEO	National Center on Educational Outcomes
NCLB	No Child Left Behind Act of 2001 (signed into law in 2002)
Section 504 Plan/504 Plan	Section 504 of the Rehabilitation Act of 1973 (reauthorized in 2008)
Smarter Balanced/SBCA	Smarter Balanced Assessment Consortium
USDE	United States Department of Education

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## **Important Note**

This report was developed by the staff of the Legislative Budget and Finance Committee, including project manager, Jason R. Brehouse, Esq., counsel, Rick K. Jones, Esq., staff analyst Anne Witkonis, and former staff analyst Louis Day. The release of this report should not be construed as an indication that the Committee as a whole, or its individual members, necessarily concur with the report's findings, conclusions or recommendations.

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## SECTION II BACKGROUND INFORMATION



### ***Fast Facts...***

- ❖ *A Standardized test is any form of test that requires all test takers to answer the same questions, in the same way, and scored in a consistent manner.*
- ❖ *The modern standardized testing movement in the United States began with the enactment of the Elementary and Secondary Education Act of 1965.*
- ❖ *The origins of Pennsylvania standardized testing and state assessments can be traced back to the enactment in 1963 of the School District Reorganization Act.*
- ❖ *In 1999, the foundation of Pennsylvania's modern assessment system was laid when Chapter 4 Regulations were adopted.*

### **General Background and History of Standardized Tests**

*Standardized test* is defined as “any form of test that requires all test takers to answer the same questions, or selection of questions from a common bank of questions, in the same way, and that is scored in a standard or consistent manner, which makes it possible to compare the relative performance of individual students or groups of students.”<sup>4</sup> The most common forms of standardized tests include the following: achievement tests (measure knowledge and skills learned by a student to determine academic progress), aptitude tests (attempt to predict a student’s ability to succeed), college-admissions tests (used as indicators of intellectual and academic potential in the collegiate program admittance process), international-comparison test (administered periodically to a representative sample in a number of countries for the purpose of monitoring achievement trends in individual countries and comparing educational performance across countries), and psychological tests (including IQ tests, used to measure a person’s cognitive abilities and mental, emotional, development and social characteristics).

The first documentation of standardized testing dates back to 7<sup>th</sup> Century China, where such tests continued to be used until 1898, to test job applicants’ rote-learned knowledge of Confucian philosophy and poetry using an essay format. Meanwhile, standardized tests were initially developed and utilized in the Western world as an efficient and quick way to test the growing body of students ushered in by the Industrial Revolution that began in England and eventually spread to other parts of Europe and the United States.<sup>5</sup>

As shown in Exhibit 1, standardized testing in America dates back to 1845 when the first standardized test was given to a select group of 530 students attending public schools in Boston, Massachusetts.<sup>6</sup>

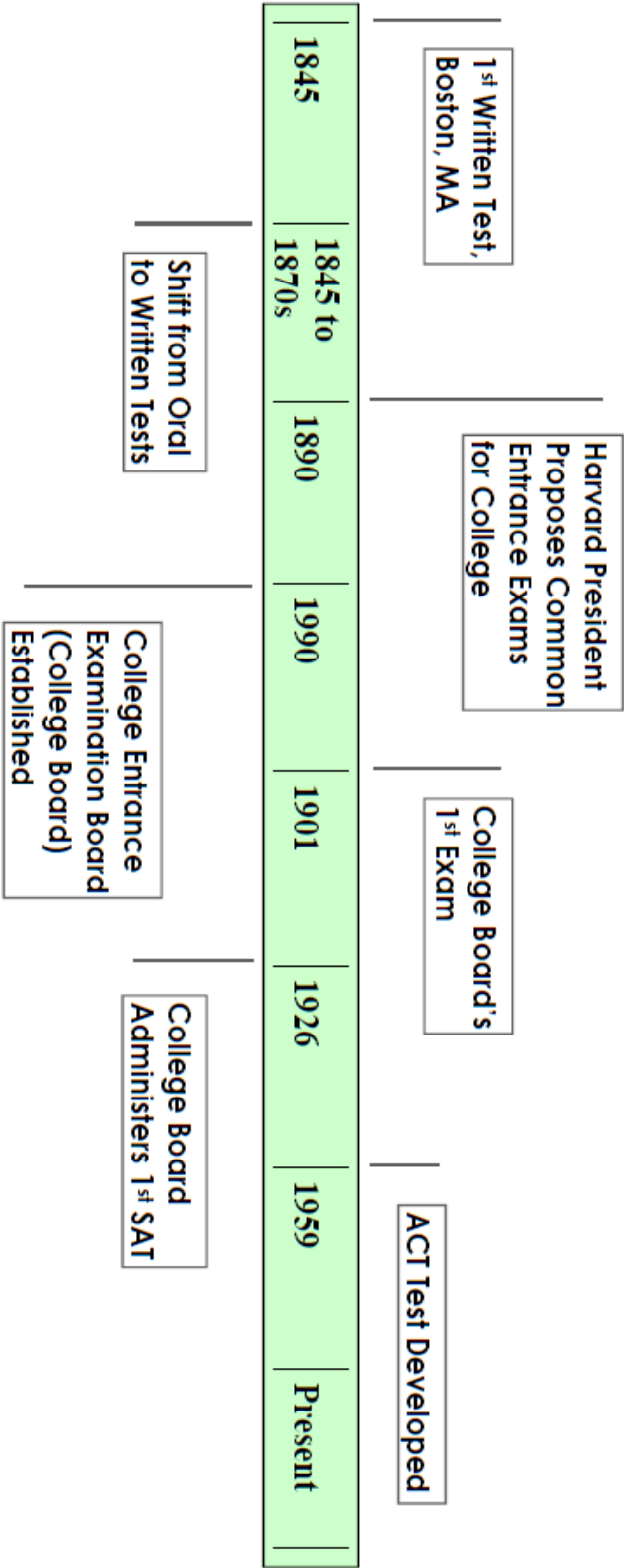
<sup>4</sup> Greaterschoolspartnership.org. “The Glossary of Education Reform” Edglossary.org. Last Modified on December 5, 2014, Accessed on July 25, 2018. <https://www.edglossary.org/standized-test/>.

<sup>5</sup> The First Industrial Revolution lasted from about 1760 and ended by 1840, while the Second Industrial Revolution period ran from around 1870 to 1914 (beginning of World War I).

<sup>6</sup> There were nineteen grammar schools in Boston in 1845 with a total enrollment of 8,115 pupils (each school had approximately 430 pupils).

Exhibit 1

# Standardized Testing History in America



Source: Developed by LBFC Staff from data contained in this report.



Previously, an examination committee would conduct periodic oral exams of some pupils to measure educational attainment in American Schools. Boston school reformers Horace Mann (a lawyer and legislator who was the secretary of the newly created State Board of Education from 1837 to 48), and Samuel Gridley Howe (who was elected to the School Committee in 1844) in 1845, developed and administered their written standardized test based on information Mann had gleaned from his 1843 European school tour.

School masters were angered in that they had not previously seen the preprinted questions, students were terrified and most flunked the test. Parents felt the students had been deliberately embarrassed by the examiners and subsequently rejected Howe in the next cycle of School Committee elections. Test results were used by examiners to criticize teachers and the quality of education and resulted in some teachers being fired. Critics hit back at the examiners and accused them of injecting politics into schools, while demeaning students and teachers.

Notably, Mann's goal was to replicate the best teaching methods to ensure all children had equal opportunities.<sup>7</sup> Meanwhile, the examiners themselves explained that they sought "positive information, in black and white," to reveal what students knew.

Regardless of the virtues touted by the various stakeholders at the time in terms of ensuring a quality education for all pupils, one thing certain about the 1845 written test is that it sparked an on-going debate about the politics, meaning, and virtues of testing that continues today.<sup>8</sup> Boston school reformer Horace Mann even warned that statistics alone cannot measure the absolute worth of a school or its pupils, but rather many factors shape a school's achievement.

Author and Professor William J. Reese wrote in a New York Times op-ed: "What transpired then still sounds eerily familiar [today]: cheating scandals, poor performance by minority groups, the narrowing of curriculum, the public shaming of teachers, the appeal of more sophisticated measures of assessment, the superior scores of other nations, all amounting to a constant drumbeat about school failure." Reese goes on to say: "Testing yields essential, valuable knowledge about school performance, but its exaggerated use distorts teaching and ignores the broader purpose of education."

In 1900, the "College Entrance Examination Board" (a nonprofit group of universities and other educational organizations now simply known as

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<sup>7</sup> JSTOR Daily, "A Short History of Standardized Tests – The origins of standardized tests" [Dail.jstor.org](https://daily.jstor.org/short-history-standardized-tests/). May 12, 2015. <https://daily.jstor.org/short-history-standardized-tests/>.

<sup>8</sup> William J. Reese, *Testing Wars in the Public Schools: Forgotten History* (Cambridge, MA: Harvard University Press, 2013), p. 101.

the “College Board”) was established, and in 1901, the first examinations were administered around the country in nine subjects. The exam was administered in essay form as that multiple choice test format was an invention still more than a decade away. In 1926, they administered the first SAT tests, and in 1959, ACT was developed as a competitor to the SAT.<sup>9</sup>

**Federal Requirements.** The modern standardized testing movement in the United States began with the enactment of the Elementary and Secondary Education Act of 1965 (ESEA), which included mandated standardized testing and accountability provisions, subject to strict federal oversight, for the purpose of raising standards and to make education more equitable.<sup>10</sup> ESEA’s stated purpose in its most current form “is to provide all children significant opportunity to receive a fair, equitable, and high-quality education, and to close educational achievement gaps.” This was followed by the No Child Left Behind Act of 2001 (NCLB) that was signed into law in 2002. The NCLB reauthorized and amended ESEA by mandating annual testing in reading, math and science subjected to strict federal oversight.<sup>11</sup> Most recently in 2015, the Every Student Succeeds Act (ESSA) repealed NCLB and reauthorized and amended ESEA by shifting power back to states and local school districts to determine how to improve troubled public schools.<sup>12</sup> ESSA represents a continuing movement of education policy away from being strictly focused on compliance, and instead shifts the focus to the establishment of rigorous expectations/standards for students and assisting schools to help students meet the standards.<sup>13</sup> ESSA preserves federally mandated standardized testing, but eliminates the punitive consequence for states and school districts that perform poorly and specifically bars the federal government from imposing academic requirements like the Common Core State Standards discussed below.<sup>14</sup> As state assessments are designed to measure students’ mastery of content specified by the state’s standards,

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<sup>9</sup> Originally SAT and ACT were acronyms respectively for Scholastic Aptitude Test (and subsequently Scholastic Assessment Test among other things briefly) and American College Testing, although today the tests are simply known as SAT and ACT. Historically, the SAT was more geared toward testing logic, while the ACT was more focused on testing accumulated knowledge. Also of note, the SAT was more commonly accepted by colleges on the East Coast, while the ACT was more commonly accepted by colleges in the Midwest and South.

<sup>10</sup> ESEA – Elementary and Secondary Education Act of 1965, P.L. 89-10, (1965), 20 U.S.C. §§ 6301 et seq.

<sup>11</sup> NCLB – No Child Left Behind Act of 2001, P.L. 107-110, (2002), which was mainly codified in Chapter 70 of Title 20, 20 U.S.C. §§ 6301 et seq.

<sup>12</sup> ESSA – Every Student Succeeds Act, P.L. 114-95, (2015), which was mainly codified in Chapter 70 of Title 20, 20 U.S.C. §§ 6301 et seq.

<sup>13</sup> “Every Student Succeeds Act: Pennsylvania Consolidated State Plan,” by the Pennsylvania Department of Education (January 12, 2018), p. 1.

<sup>14</sup> While ESSA continues to require states to establish challenging standards in math, reading and science, it also gave states greater flexibility in regards to setting their own goals and consequences for schools not obtaining those goals, it emphasizes student academic growth (vs. just looking at whether the student is on grade level), and it allows states to alternatively utilize nationally recognized tests (e.g., ACT, SAT, etc.).

states needed (under NCLB), and will continue to need (under ESSA) to, revise and/or replace their tests to make these assessments.

Exhibit 2 highlights the timeline reflecting the enactment of ESEA and its subsequent reauthorization and amendment by NCLB and ESSA.

Exhibit 2

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**ESEA Timeline**

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Source: Pennsylvania Department of Education.

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Although some states had standardized testing assessment systems in place for decades, others implemented them in response to state accountability laws (passed in the 1990s), while the remaining states followed suit to comply with the requirements of NCLB. The enactment of NCLB (and the subsequent enactment of ESSA) expanded the number of students taking standardized tests in most states (e.g., Pennsylvania) by requiring the administration of math and reading tests in grades 3 through 8, and once in grades 9 through 12, and science tests in at least three grades (grade spans 3 through 5, 6 through 8, and 10 through 12). The year prior to the enactment of NCLB, no more than 13 states met this requirement (according to data collected by the Pew Center on the States).

**Common Core.** NCLB mandated states adopt state academic standards and state testing systems that met federal requirements in relation to core academic subjects. NCLB defines core academic subjects as including English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history and geography.<sup>15</sup>

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<sup>15</sup> NCLB and subsequently ESSA only require standards and testing with regard to the “core academic subjects” of reading, math and sciences, although both allow states to adopt standards in other subjects. However, while NCLB

NCLB was a precursor to Common Core State Standards (Common Core), which was an effort to provide a clearer, more specific and consistent national education standard (set of guidelines) for states to adopt for each grade level to help schools improve and as such can be viewed as a natural extension of NCLB.<sup>16</sup> Common Core, although not mandated by federal law, was supported by the federal government via Race to the Top grants. In June 2009, the National Governors Association (NGA) Center for Best Practices and the Council of Chief State School Officers (CCSSO) launched the Common Core State Standards Initiative (Common Core Initiative) that consisted of 48 states (including Pennsylvania), two territories, and the District of Columbia. The objective of the Common Core Initiative was to identify and develop common core knowledge and skills mastery with regards to English language arts (ELA) and mathematics that every student needs to master in all grades (K-12) to enter college or a career prepared to succeed.<sup>17</sup> Common Core standards promote equity by ensuring all students are well prepared, while ensuring states have the flexibility to make changes of up to 15 percent and still say they are using Common Core. By the end of 2011, 45 states (including Pennsylvania in 2010), two territories, and the District of Columbia have adopted a variation of the National Common Core State Standards.

States generally banded into two groups/consortiums to develop Common Core assessment tests (to be used to assess both students and teachers), although there were some smaller alternative consortia and in some instances states participated in more than one consortia: 1) Smarter Balanced Assessment Consortium (Smarter Balanced/SBCA); and 2) Partnership for Assessment for Readiness for College and Careers (PARCC). Common Core based student testing began in the 2014-15 school year.<sup>18</sup> However, since adopting Common Core State Standards a number of states have opted out in whole or part due to questions over testing and associated costs. While Pennsylvania adopted the National Common Core State Standards in 2010, and continues to maintain similarly aligned standards, it developed, established, and implemented the PA Keystone

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merely references “state standards,” ESSA would subsequently require states adopt challenging academic content standards in reading, math and sciences. ESSA specifically prohibits the Secretary of the U.S. Department of Education from having any authority over a state’s academic standards. By restoring state control over academic standards, states are now responsible for choosing what academic standards to adopt or develop to ensure that they are aligned with college entrance requirements and relevant State career and technical education standards.

<sup>16</sup> FindLaw a part of Thomson Reuters, “No Child Left Behind vs. Common Core,” findlaw.com. Accessed on August 8, 2018, p. 1. <http://www.education.findlaw.com/curriculum-standards-school-funding/no-child-left-behind-vs-common-core.html>.

<sup>17</sup> The actual implementation of Common Core (in relation to English language arts and math), including how the standards taught and curriculum developed, is left entirely to the state and local levels. English language arts and math were the subjects chosen for Common Core, because students build skill sets based on these two areas that used in the other subjects.

<sup>18</sup> Supporters of Common Core tests site one of the advantages of these tests versus standardized exams initially developed under NCLB, which some critics argue can encourage “teaching to the test,” is that Common Core tests involve short answer and essay questions to measure logic and reasoning skills.

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Exams via its own procurement process and did not utilize the Common Core tests developed by the related consortia of PARCC and Smarter Balanced.<sup>19</sup> In 2013, Pennsylvania ultimately replaced the National Common Core Standards with the similarly aligned PA Common Core State Standards (PA Core Standards) adopted by the State Board of Education, which reflect both a name change for the purpose of better identifying the standards for the Commonwealth, and a few adjustments to better fit the needs of Pennsylvania students in ELA and math along with addressing concerns about adverse impacts for special needs and English Language students.<sup>20</sup> The adoption of PA Core Standards also reflected a desire to maintain local control versus the appearance of federal control.

**Individuals with Disabilities Education Act.** Another body of federal law that warrants mention for the purposes of this study is the Individuals with Disabilities Education Act (IDEA), which was originally enacted in 1970 (known at the time as the Education of the Handicapped Act).<sup>21</sup> IDEA was most recently reauthorized and underwent extensive revision in 2004. The general purpose of IDEA is to ensure that all children with disabilities have available to them a free appropriate public education that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment and independent living. Part B of IDEA in section 1412 (a)(16)(A) specifies “All children with disabilities are included in all general State and district-wide assessment programs with appropriate accommodations and alternative assessments where necessary and as indicated in their respective individualized education programs [IEP].” The United States Department of Education (USDE) finds no conflict between IDEA and ESEA, as amended by ESSA, with regard to students who qualify for an IEP and meet the criteria for taking an alternative assessment versus students who need more tailored classroom instruction that would allow the IEP student to pass the regular assessment test.

IEP students who meet the criteria for taking an alternative assessment, ESEA, as amended by ESSA, requires states to limit the total number of students with the most severe cognitive disabilities (with an IEP) being

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<sup>19</sup> In 2009, Pennsylvania Department of Education contracted with Data Recognition Corporation to develop Keystone Exams as the Common Core initiative was only going to produce exams in ELA and math that would not be ready for several years, whereas the Keystone Exams were originally slated to cover a total of ten core academic subjects that include ELA, math and science. Implementing the Common Core Standards in Pennsylvania (State Board of Education White Paper, 2012), p. 3.

<sup>20</sup> The State Board of Education noted in its white paper that Pennsylvania had pre-existing standards in ELA and math adopted in 1999 that matched with over 87 percent of the National Common Core State Standards, and that the greatest difference when compared to the Common Core was a matter of organization in that Pennsylvania’s pre-existing standards were situated in grades 3, 5, 8, and 11, while the Common Core was situated in grades K-12 (a staircase leading to college and career readiness).

<sup>21</sup> IDEA – Individuals with Disabilities Education Act, P.L. 108-446, (2004), which was codified in Chapter 33 of Title 20, 20 U.S.C. §§ 1400 et seq.

assessed by alternative assessments to no more than one percent of the total number of all students in the State who are assessed in each subject area.<sup>22</sup> However, ESEA, as amended by ESSA, also precludes states from imposing a cap on Local Education Agencies (LEA) related to the percentage of students who are administered the state's alternative assessment, although an LEA that exceeds the one percent threshold (in grades 3 through 8 and 11<sup>th</sup> grade) are required to submit justification to its state education agency.<sup>23</sup>

**Change and Growth of Standardized Tests.** Written standardized tests have come to be viewed as a potentially inexpensive and effective means of assessing performance. Proponents of standardized tests argue such testing fairly and objectively measures student abilities, ensures the accountability of teachers and schools to taxpayers, and is supported by students and parents. Opponents alternatively argue standardized tests are unfair and lack objectivity, encourage the practice of "teaching to the test" resulting in a more limited curriculum, and undermine a student's ability to be an innovator or to think critically. However, even after considering the pros and cons related to standardized testing, one must be cognizant of the limits of standardized testing and the fact that test results differ, and may be reflective of various factors such as: socioeconomic privilege (e.g., private test preparation, etc.) and the different backgrounds of pupils and the issues attributed to such (e.g., early childhood malnutrition, resources available at the local school, etc.).

Standardized tests and test preparation have subsequently become big business and that multibillion dollar business continued to grow since the enactment of NCLB and the subsequent enactment of ESSA. According to the Pew Center on the States, annual state spending on standardized tests increased from \$423 million before the NCLB (enacted in 2002) to upwards of \$1.1 billion in 2008 (to put this in perspective this reflects a 160 percent increase compared to a 19.22 percent increase in inflation during the same time period). A more recent study by the Brown Center on Education Policy at Brookings put the cost at upwards of \$1.7 billion in 2011 related to state spending on standardized tests. The study further notes that this represents only one-quarter of one percent of annual K through 12 education spending.

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<sup>22</sup> IDEA consists of four parts: Part A [General Provisions - §§ 1400 to 1409], Part B [Assistance for Education of All Children (ages 3 to 21) with Disabilities - §§ 1411 to 1419], Part C [Infants and Toddlers (birth to age 2) with Disabilities - §§ 1431 to 1444] and Part D [National Activities to Improve Education of Children with Disabilities - §§ 1450 to 1482].

<sup>23</sup> Over 450 of Pennsylvania LEAs have more than one percent (1%) of their student population taking the Pennsylvania Alternative System of Assessment (PASA).

## Pennsylvania Standardized Tests Origins and History

The origins of Pennsylvania standardized testing and state assessments can be traced back to the enactment in 1963 of the School District Reorganization Act (Act 1963-299), which established and required the State Board of Education to develop an evaluation procedure designed to objectively measure the adequacy and efficiency of the educational programs offered by Pennsylvania public schools. This legislative mandate resulted in the State Board contracting with Educational Testing Service of Princeton, New Jersey, to engage in a two year process to ascertain what constituted a quality education. In 1965, the State Board adopted The Goals of Quality Education and in 1967, the Pennsylvania Department of Education (PDE) formed an organizational unit that began to develop and field test appropriate measures during the 1967-68 and 1968-69 school years.

**Educational Quality Assessment.** In the 1969-70 school year, the first state assessment of Pennsylvania students was conducted via the Educational Quality Assessment (EQA) program (a voluntary school-based assessment). Initially, the EQA program results were limited to grades 5 and 11 that included ten goal areas with the program being mandated, and additionally adding grade 8 in 1974. Ultimately, the EQA program would evolve into one that used a matrix sampling design to measure school results in reading, language arts, mathematics, science, health, social studies and analytical thinking.

**Test for Essential Learning and Literacy Skills.** The EQA program continued to operate until 1988; meanwhile, the program lead to the initiation, in the 1984-85 school year, of the state's first mandated student competency testing program, known as Testing for Essential Learning and Literacy Skills (TELLS) established by Act 1984-93. TELLs required all public school students in grades 3, 5 and 8 to be given criteria-referenced tests in reading and writing. The act further required remedial instruction programs to be provided by school districts for students identified in need of remedial instruction by the TELLs testing program.

**Pennsylvania System of School Assessment (PSSA).** The TELLs testing program continued to be administered until spring 1991 and was subsequently replaced by the Pennsylvania System of School Assessment (PSSA) in 1992, this marked a return to a school assessment model with reporting only at the school level. School district participation was every three years with testing conducted in February/March. Reading and math were assessed in grades 5, 8, and 11 and school districts had the option to participate in grades 6 and 9 writing assessment testing.

State Board revisions to the Pennsylvania regulations implementing PSSA in 1994, resulted in the following major changes to PSSA in spring 1995: 1) reading and math testing became annual for all schools; 2) grades 6 and 9 writing assessments became mandatory (on the 3 year cycle); and 3) student level reports (assessments) were generated in addition to school level reports.

In 1999, the foundation of Pennsylvania's modern assessment system was laid when the State Board adopted Chapter 4 Academic Standards and Assessment regulations that replaced previously adopted Chapters 3 and 5 regulations. These regulations represented a major structural change to PSSA test content as it became standards based, and the entire test was aligned with "Pennsylvania Academic Standards" for reading, writing, speaking and listening, and mathematics.<sup>24</sup> The regulations also provided that the PSSA results were to be broadly disseminated to students, parents, educators, citizens, school districts, and state policy makers (e.g., Pennsylvania General Assembly and State Board).

Ensuing years have resulted in further modifications to the PSSAs, including following the enactment of NCLB and the subsequent enactment of ESSA that required the administration of math and reading tests in grades 3 through 8 and once in high school, and science tests in at least three grades (grade spans 3 through 5, 6 through 8 and 10 through 12). This resulted in Pennsylvania school districts being required to administer PSSAs in grades 3 through 8 and grade 11 with PSSAs being replaced by the Keystone Exams in grades 9 through 12.<sup>25</sup>

**Keystone Exams.** In 2006, the Governor's Commission on College and Career Success issued its final report and found that the PSSA exam was a valid predictor of a student's likelihood to succeed at college or entry-level jobs. Students scoring at proficient or above on their grade 11 PSSA were found to have a 90 percent likelihood of placing directly into college-level courses with no need for remediation. The Governor's Commission report went on to recommend that proficiency can be demonstrated either by scoring proficient or better on the grade 11 PSSA or passing a series of Graduation Competency Assessments (GCA) within four major content areas (math thru algebra II; English/language arts [reading and writing]; laboratory science; and American history, economics and government).<sup>26</sup> At the time of the report there were two existing pathways to demonstrate proficiency on Pennsylvania standards prior to graduation: 1) performing proficient or better on grade 11 PSSAs; or 2)

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<sup>24</sup> The Pennsylvania Academic Standards detailed what a student should know (knowledge) and be able to do (skill) at various grade levels.

<sup>25</sup> Keystone Exams may be taken earlier if the student has taken the subject matter in an earlier grade.

<sup>26</sup> The Graduation Competency Assessments were the precursor for what would ultimately come to be established and known as the Keystone Exams.

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demonstrating proficient on an equivalent local assessment. The Governor’s Commission recommended maintaining two pathways by keeping the grade 11 PSSAs, while replacing the local assessment with the GCA (a common statewide assessment) that could be taken as soon as the content area was mastered.

In 2008, the Commonwealth initiated a comprehensive GCA program and in 2009, the Commonwealth initiated the development of test designs for Keystone Exams under the GCA program based on Pennsylvania Keystone Course Standards.<sup>27</sup> Keystone Exams were envisioned to ultimately assess proficiency in ten subjects (i.e., algebra I, algebra II, geometry, biology, chemistry, civics and government, English composition, literature, U.S. history and world history), although to date only three subjects are being tested and assessed via Keystone Exams. It was originally envisioned that the Keystone Exams full slate of subject matters would be phased in beginning with algebra I, biology and literature. The first three Keystone Exams (i.e., algebra I, biology, and literature) were field tested in fall 2010 and became operational in spring 2011, although they were not administered as a replacement for the grade 11 PSSA until the 2012-13 school year. Meanwhile, the seven remaining subject matters have not been implemented to date.

Exhibit 3 presents how far PDE proceeded in terms of implementing Keystone Exams before re-evaluating the implementation plans (as of September 2017).

### Exhibit 3

#### Keystone Exams Wave Implementation Plan

Wave	Exams	Initial Field Test	First Operational
1	Algebra I, Biology, Literature	Fall 2010	Spring 2011
2	English Composition	Spring 2011	TBD
2	Algebra II, Geometry	Spring 2011	Not Scheduled
3	Civics and Government	TBD	Not Scheduled
4	Chemistry, U.S. History, World History	TBD	Not Scheduled

Source: Developed by LBFC staff from Data Recognition Corporation Table 1-1. *Keystone Exams Wave Implementation Plan*.

Act 2012-82 amended the Public School Code of 1949, by adding, among other things, a new section 121 (Keystone Exams) that statutorily mandated all ten Keystone Exams be developed and implemented not later

<sup>27</sup> Keystone Exams were just one piece of the GCA program and Pennsylvania’s graduation requirements as students must also earn state-specific credits, fulfill the state’s service learning and attendance requirements, and complete any additional local school system requirements to receive their high school diploma.

than the 2020-21 school year for assessment purposes and also mandated the State Board of Education promulgate regulations.<sup>28</sup> The subsequently adopted regulations defined the term “Keystone Exams” as follows:<sup>29</sup>

- *Keystone Exams – State-developed end-of-year course exams. Designated exams will be used to determine, in part, a student’s eligibility for high school graduation.*

The regulations further specified that the passage of Keystone Exams in the subject areas of English language arts (ELA), mathematics, and science constitute a graduation requirement beginning in the 2016-17 school year.<sup>30</sup>

Act 2016-1 further amended section 121 (Keystone Exams) of the Public School Code of 1949, as follows:

- Postponed the Keystone Exams as a graduation requirement until the 2018-19 school year.
- Directed PDE to investigate and issue a report on alternative methods for students to demonstrate proficiency for graduation.

The PDE made the following recommendations in its Act 1 report (pursuant to Act 2016-1) in relation to the Keystone Exams:

- Adopt and implement four options/alternatives for students to demonstrate postsecondary readiness:
  - **Option 1** – Achieve a proficient composite score across all three Keystone Exams (algebra I, biology and literature).
  - **Option 2** – Achieve equivalent scores in standards-based subject matter content areas on one of the alternative assessments approved by PDE.
  - **Option 3** – Demonstrate competency in standards-based subject matter content through course grades or assessments plus, for students identified as Career and Technical Education (CTE) Concentrators, demonstrate evidence of postsecondary readiness through National Occupancy Competency Testing Institute (NOCTI)/National Institute for Metalworking Skills (NIMS) skills assessments or competency certificates.

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<sup>28</sup> Act 2012-82 (Public School Code) - 24 P.S. § 121.

<sup>29</sup> State Board of Education Regulations - 22 Pa. Code § 4.3 (Definitions) - Ch. 4 (Academic Standards and Assessments).

<sup>30</sup> State Board of Education Regulations - 22 Pa. Code § 4.24 (Highs school graduation requirements) - Ch. 4 (Academic Standards and Assessments).

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- **Option 4** – Demonstrate competency in standards-based subject matter content through course grades or assessments plus evidence related to postsecondary plans that also demonstrate readiness.
- Discontinue the use of Project Based Assessments (PBAs) as a mandated graduation requirement alternative if a student does not score proficient or better on any of the Keystone Exams.
- Allow local education agencies (LEAs) to determine whether or not to include Keystone Exam scores on student transcripts.

Act 2017-6 amended section 121 of the Public School Code of 1949, in two ways:

- Statutorily limited Keystone Exams to the existing three (vs. ten) subject matters of algebra I, biology and literature.
- Implemented one of the PDE Act 1 Report recommended alternatives to Keystone Exams by providing a Career Technology Education (CTE) Concentrator (a student who has completed at least 50 percent of the minimum required technical instructional hours) with an alternative pathway to proficiency for purposes of high school graduation requirements. A CTE Concentrator will be deemed proficient if the student meets all of the following:
  - Completes locally established grade-based requirement for the applicable Keystone Exam content area in which the student was not deemed proficient.
  - Either attains an industry-based competency certification related to the area of study or demonstrates a high likelihood of success on an approved industry-based competency assessment (e.g., National Occupancy Competency Testing Institute (NOCTI), National Institute for Metalworking Skills (NIMS), or other industry based assessment identified by the PDE Secretary).

Act 2017-55 amended section 121 (Keystone Exams) of the Public School Code of 1949, by postponing the Keystone Exams as a graduation requirement until the 2019-20 school year.

Act 2018-39 amended (among other things) section 121 (Keystone Exams) of the Public School Code of 1949, by postponing the Keystone Exams as a graduation requirement until the 2020-21 school year.

Act 2018-158 amended section 121 (Keystone Exams) of the Public School Code of 1949, by postponing the Keystone Exams as a graduation requirement until the 2021-22 school year and implementing variations of the remaining Act 2016-1 report recommendations as shown in Exhibit 4.

## Exhibit 4

### Act 2018-158 Implementation of Act 2016-1 Report Recommendations

Act 2018-158 implemented the following Act 2016-1 Report Recommendations:

- Four alternative graduation/proficiency paths to the Keystone Exams graduation requirement:
  - **Option 1: Composite Score on Keystone Exams:** This requires a student to score proficient on at least one of the three Keystone Exams and no less than basic on the remaining two exams.
  - **Option 2: Alternative Assessments/Alternative Indicators:** This requires a student to complete the locally established grade-based requirements in the associated academic content areas of the Keystone Exams. The completion of grade-based requirements in any science, technology, environmental or ecology course shall satisfy the biology Keystone Exam requirement.
    - Additionally, the student must satisfy one of the following:
      - Attain an approved score on the SAT, ACT, Armed Services Vocational Aptitude Battery Test or PSAT.
      - Attain at least the Gold Level on the ACT WorkKeys assessment.
      - Attain the recommended score on an Advance Placement (AP) Program exam or International Baccalaureate (IB) Diploma Program exam in the associated Keystone Exam content area.
      - Successfully complete a concurrent enrollment course in an academic content area associated with each Keystone Exam in which the student did not achieve at least a proficient score.
      - Successfully complete a pre-apprenticeship program.
      - Acceptance to an accredited four-year nonprofit institution of higher education and evidence of the ability to enroll in college-level, credit based coursework.
  - **Option 3: Career and Technology Education (CTE) Concentrator** (which was previously implemented under Act 2017-16 is maintained under the provisions of Act 2018-158).
  - **Option 4: Alternative Evidence:** The student successfully completes a locally established, grade-based requirement for academic content areas associated with each Keystone Exam on which the student did not achieve at least a proficient score and provides three pieces of evidence (as described in the law) that demonstrate readiness for meaningful postsecondary engagement with the student's

Exhibit 4 Continued

goals and career plans. The completion of grade-based requirements in any science, technology, environmental or ecology course will satisfy the biology Keystone Exam requirement.

- Waiver – A chief school administrator may grant a waiver of the statewide graduation requirement options for a student in grade 12 or to accommodate a student with extenuating circumstances. The student must still complete locally-established, grade-based requirements for the academic content areas associated with each Keystone Exam.
  - Note: If waivers exceed five percent of students in a graduating class, PDE may require the school entity to submit an improvement plan.
- Supplemental Instruction – A student may be offered (but not be required to participate in) supplemental instruction in a Keystone Exam subject area.
- Special Education Students with an IEP – A student with a disability that satisfactorily completes a special education program developed by an individualized education program (IEP) team shall be granted a regular high school diploma regardless of whether the student otherwise meets Pennsylvania statewide graduation requirements.
- Project-Based Assessments (PBA) – It is specified that no school entity may be required to offer project-based assessments (PBA), nor may any student be required to participate in or complete a PBA.
- School Option – Allows each school entity to determine whether or not to include the performance level demonstrated by a student in each of the State academic standards, including the Keystone Exam scores, on the student's transcript.

Source: Developed by LBFC staff from Act 2018-158

Act 2018-35, amended the Public School Code of 1949 by adding a new section 1605.1 that requires, starting in the 2020-21 school year, locally developed assessment of civic knowledge (i.e., U.S. History, Government and Civics) tests be given in grades 7 through 12. LEAs have the option of using the U.S. Citizenship and Immigration Services Test in lieu of developing their own tests. Keystone Exams were originally envisioned to address a similar subject matter, but given there are no plans currently to expand Keystone Exams beyond the existing three subject areas, this alternative legislation was enacted to ensure that Pennsylvania students are versed and assessed at the local level in this subject matter.

**Other Standardized Tests.** Other standardized tests currently provided for under Pennsylvania's state assessment system include:

- *Pennsylvania Alternative System of Assessment (PASA)* is an alternative assessment test designed for students with the most significant cognitive disabilities and is available to certain students with an individual education plan (IEP). Federal law allows for the development of alternative academic achievement standards and

allows for up to one percent of a state's student population being assessed to take these alternative tests.

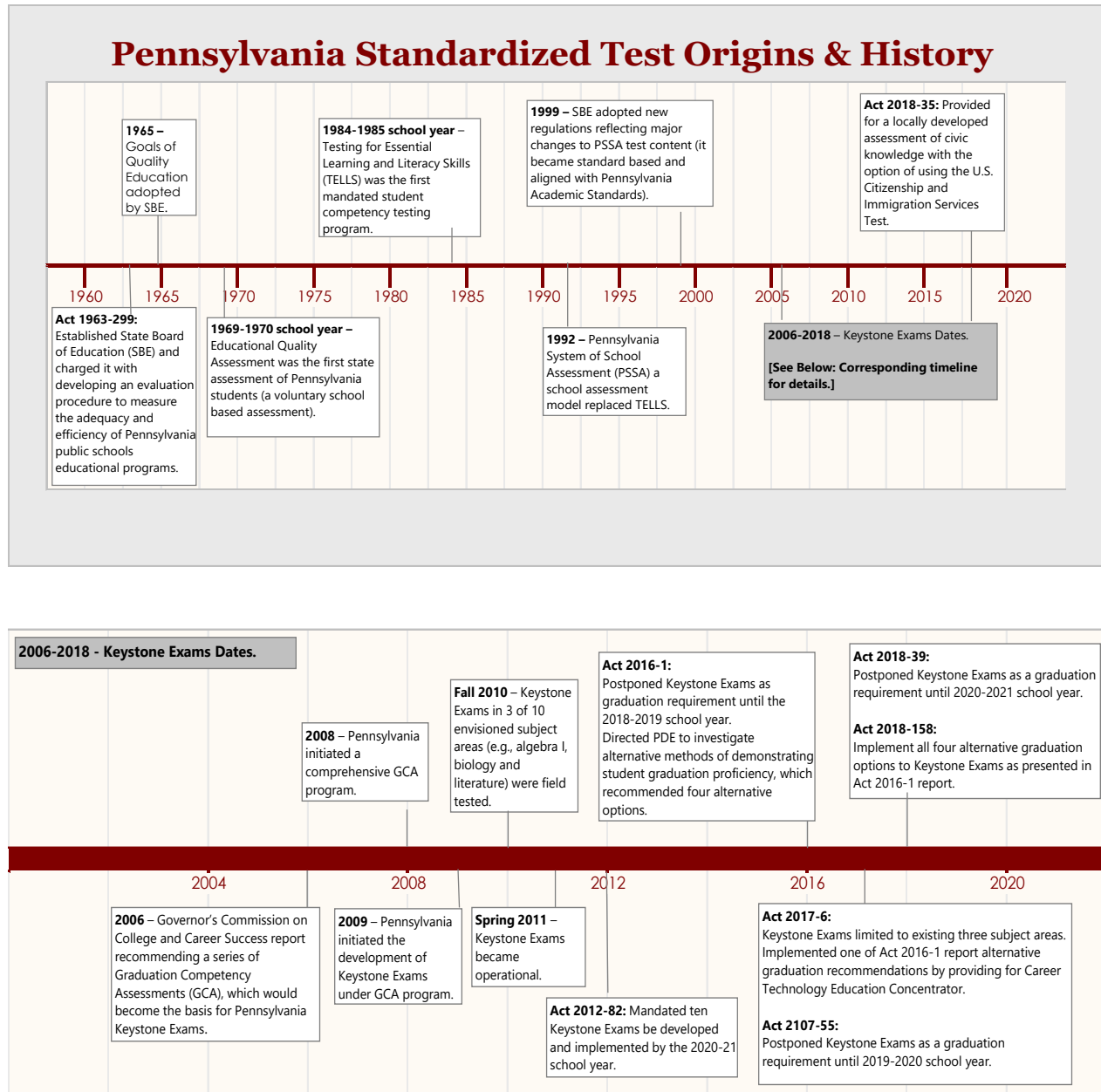
- *Assessing Communication and Comprehension in English State to State (ACCESS) for English Language Learners (ELLs)* was developed by the multi-state World Class Instruction Design and Assessment (WIDA) Consortium. PDE is a member of the WIDA Consortium and uses ACCESS as the federally required instrument to annually assess ELLs English language proficiency. ACCESS is standards-based and aligns with PA Core Standards and the federal English language proficiency standards. It assesses social and instructional English as well as progress in relation to each language domain (i.e., listening, writing, speaking and reading) in association with language arts, mathematics, science and social studies. All English Learners (ELs) grades K through 12 are required, pursuant to federal and state laws, to take ACCESS for ELLs English Language Proficiency Test, and ELs who meet the eligibility criteria to take the PASA are required to take the Alternative ACCESS for ELLs.
- *Pennsylvania Classroom Diagnostic Tools (CDT)* is a set of online assessments divided by content area (i.e., literacy, mathematics, and science) and designed to provide real time diagnostic information (rather than an on-grade summative test) in order to guide instruction and remediation. Thus, some of the more challenging questions presented are targeted to Eligible Content standards beyond those assessed in the student's current course or grade level. It assists educators in identifying a student's academic strengths and areas in need of improvement along with providing links to classroom resources. It also provides a snapshot of how and why a student may be struggling or extending beyond the grade and/or course Eligible Content. CDT is offered to students in grades 3 through 12, throughout the school year on a voluntary basis and each CDT assessment can be administered up to five times in a school year (with three being the recommended maximum number of times for a student to take a given test). CDT is an online computer adaptive test (CAT), meaning that the test adjusts to each student's ability, and depends on how the student responds to the first few questions the test will adjust subsequent questions to the student's indicated instructional level. CDTs are untimed tests (each test typically takes between 50 to 90 minutes) that can be scheduled over multiple days and each test consists of up to 50 to 60 multiple choice questions and evidenced-based selected responses depending on the student's response pattern. Questions were developed to specifically align to PA Core Standards and/or Pennsylvania Assessment Anchors and Eligible Content. The content assessed on a given CDT is similar to what is assessed on the PSSA and Keystone Exams, although CDTs are not held out as

predictors of a student's future performance on the PSSA or Keystone Exams. The CDT is available to Pennsylvania school districts at no cost.

- *National Assessment of Education Progress (NAEP)* is a national representative assessment involving grades 4, 8, and 12 that assesses a representative sample of what America's students know and can do in core subjects (i.e., arts, civics, economics, geography, mathematics, reading, writing, science, technology and engineering literacy, U.S. history, and writing) that has been administered pursuant to federal law by NAEP field staff since 1969. NAEP results are reported in the "The Nation's Report Card" and used by teachers, administrators, parents, policy makers, and researchers to assess progress and develop ways to improve education in America. Participation is required by the federal government in grades 4 and 8 in reading and mathematics. Participation in other content areas involving grades 4, 8, and 12 for selected schools is voluntary. Reports disclose state, regional and national results (and since 2002, results for several large urban districts) versus individual student or school results and includes information about performance reported by group of students (e.g., by total, by gender, by racial and ethnic groups, by participation in special programs such as those serving special needs and limited English proficiency). A state's participating public and nonpublic schools are selected through scientific random sampling and then individual students (including students with disabilities and limited-English proficiency) are randomly selected from each of the schools selected and tested. NAEP is the only assessment that allows a comparison of results from one state to another, or with results nationwide.

Exhibit 5 provides a timeline of key actions regarding Pennsylvania standardized test origins and history as just discussed.

## Exhibit 5



Source: Developed by LBFC Staff from data contained in this report.



## **International Comparisons**

Given the limited scope of this study we did not compare Pennsylvania's assessment system to assessments undertaken by the international education community. However, there may be some benefit to reviewing what other countries are doing in terms of assessments. When making international comparisons one must be sure to consider the social, economic, and cultural contexts in which the country in question functions (e.g., some countries are homogeneous, while others are highly diverse; some are large in geographical size, and others have large populations; some are developed and others are undeveloped, etc.).<sup>31</sup> Therefore, the approaches and developments in education and the uses of standardized tests in other countries are worth considering so long as the societal factors that may influence the results are taken into account.

## **Pennsylvania Education System Numbers**

Pennsylvania's education policy ultimately impacts an education system consisting of 500 school districts (ranging in size from approximately 200 students to more than 140,000 students) that employ 119,369 classroom teachers and serve more than 1.7 million students.

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<sup>31</sup> The Iceberg Effect report reflects upon six major dimensions that were studied: 1) economic equity, 2) social stress, 3) support for young families, 4) support for schools, 5) student outcomes, and 6) system outcomes. Summary – School Performance in Context: The Iceberg Effect - An International Look at Often-Overlooked Education Indicators (Horace Mann League of the U.S.A. and National Superintendents Roundtable, January 2015), p. 1.

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## SECTION III NUMBER, TYPE, AND PURPOSE OF STATE AND LOCAL MANDATED STANDARDIZED TESTS



### ***Fast Facts...***

- ❖ *School districts in Pennsylvania administer a variety of standardized tests in addition to the PSSA, PASA, and Keystone Exams.*
- ❖ *Standardized tests are administered to all grade levels for an array of reasons.*

### **Overview**

To identify the number, type, and purposes of standardized tests in Pennsylvania, we surveyed the superintendents of all 500 public school districts. We asked superintendents to identify the tests schools administer, in addition to the required Pennsylvania System of School Assessment (PSSA), Pennsylvania Alternative System of Assessment (PASA), and Keystone Exams.<sup>32</sup> We also asked to which grades each type of test is administered, and, for some tests, the purpose(s) of administering a particular test.

We received responses to our survey from 401 Pennsylvania superintendents, although not every respondent answered every question. The response format parameters in the initial Superintendent Survey prevented superintendents from selecting more than one grade level for purposes of indicating in which grade levels the Assessing Comprehension and Communication in English State-to-State for ELLs English Language Proficiency Test (ACCESS for ELLs) was administered, and from selecting more than one grade level and/or subject in relation to the administration of Advanced Placement (AP) exams survey questions. We sent a supplemental survey to assist respondents to effectively answer those questions. Data regarding both the ACCESS for ELLs and AP exams was derived from the supplemental survey.

### **A. Types of Tests**

We asked superintendents whether their school districts administer any of the 23 other selected standardized tests, in addition to PSSA, PASA, and Keystone Exams, our survey identified. In addition, we asked them to identify other tests they administer that we did not explicitly cite in our survey. Appendix B includes an explanation of these tests and what they are each specifically intended to measure.

<sup>32</sup> There are six standardized tests in Pennsylvania's state assessment system; these are the PSSA, PASA, Keystone Exams, and ACCESS for ELLs, Classroom Diagnostic Tools and NAEP. The PSSA, PASA, Keystone Exams, ACCESS for ELLs, and NAEP are both state and federally mandated. Pennsylvania regulations, 22 PA Code § 4.4, require PDE to have a test like the CDT, but does not require any district to administer it.

Exhibit 6 shows the acronyms for the standardized tests discussed in this section.

Exhibit 6

**Acronyms and Abbreviations for Standardized Tests  
Administered in Public Schools**

Test	Acronym
ACT	No Acronym
ACT Aspire Classroom Assessments	ACT AC
ACT Aspire Interim Assessments	ACT AI
Advanced Placement Exams	AP
Armed Services Vocational Aptitude Battery Test	ASVAB
Assessing Comprehension and Communication in English State-to-State for ELLs English Language Proficiency Test	ACCESS for ELLs
Classroom Diagnostic Tools	CDT
Dynamic Indicators of Basic Early Literacy	DIBELS
International Baccalaureate	IB
Iowa Test of Basic Skills	ITBS
Iowa Test of Educational Development	ITED
Measures of Academic Progress from the Northwest Evaluation Association	MAP
Metropolitan Achievement Test	MAT 8
National Assessment of Educational Progress	NAEP
National Occupational Competency Testing Institute	NOCTI
PreACT	No Acronym
Preliminary SAT 8/9	PSAT 8/9
Preliminary SAT 10	PSAT 10
Preliminary SAT/National Merit Scholarship Qualifying Test	PSAT/NMSQT
Program for International Student Assessment	PISA
SAT	No Acronym
Stanford Achievement Test, 10 Edition	SAT-10
Terra Nova/CAT	TN/CAT
U.S. Civics Test / U.S. Citizenship Test	USCT

Source: Developed by LBFC Staff.

Exhibit 7 shows, in descending order of frequency, the percentage of responding districts that administer each type of test. The most frequently administered tests are the AP and ACCESS for ELLs tests, followed closely by the DIBELS, ASVAB, and PSAT 10. No school district that responded administered the MAT 8 exam. With the exception of the ACCESS for ELLs and NAEP, which are both state and federally mandated, other exams are either voluntarily or mandatorily administered at the discretion of local school districts. For example 96 percent of the 174 respondents indicated that the DIBELS exam was mandatory; for the NOCTI exam, 59 percent of the 111 respondents indicated it was mandatory. Whereas, only three percent of the respondents answered that the ACTs and SATs were given on a mandatory basis in their districts, 95 percent of the 177 respondents, respectively.

### Exhibit 7

#### Tests Administered by Pennsylvania Public Schools

Test	Test is Given	Test is Not Given	No. Respondents
AP	77%	23%	177
ACCESS	70	30	362
DIBELS	64	36	274
ASVAB	64	36	264
PSAT 10	63	37	302
SAT <sup>a</sup>	61	39	297
PSAT/NMSQT	59	41	292
NOCTI	41	59	269
ACT <sup>a</sup>	35	65	278
PSAT8/9	26	74	311
NAEP	17	83	319
MAP	13	87	274
ACT AI	12	88	290
TN/CAT	4	96	278
USCT	3	97	266
ACT AC	2	98	281
PreACT	2	98	278
ITBS	2	98	276
SAT-10	1	99	270
PISA	1	99	319
IB	1	99	318
MAT 8	0	100	270
ITED	0	100	276

<sup>a</sup> The ACT and SAT are given at the local level on voluntary, and in some cases, mandatory, bases in many school districts throughout Pennsylvania, however, neither test is given for the purpose of satisfying federal high school assessment requirements.

Source: Developed by LBFC Staff from Superintendent Survey.

We also asked superintendents to identify other tests they administer in addition to those cited in our survey. They listed a variety of other standardized tests, including Diagnostic Reading Assessment, Imagine Math, Cognitive Abilities Test, OHS Benchmark Assessments, Orleans-Hanna, STAR Math and Reading; and AIMSweb, among others.

## B. Grades in Which Other Standardized Tests are Administered

We asked superintendents to indicate in which grades each additional standardized test was administered. Exhibit 8 shows the grade and percentage of respondents for each type of AP test with only one superintendent reporting administration of AP tests in grades seven and eight. Exhibit 9 shows the percentage of respondents for each other test, listed by grade level. Our survey results indicate that other tests are more likely administered to students beginning in eighth grade.

Exhibit 8

### AP Tests<sup>a</sup> Administered by Pennsylvania Public Schools, By Grade

	7	No. Resp.	8	No. Resp.	9	No. Resp.	10	No. Resp.	11	No. Resp.	12	No. Resp.
English	100%	1	100%	1	35%	6	38%	28	75%	93	88%	119
Math	100	1	100	1	53	9	51	37	79	98	89	120
Science	100	1	100	1	59	10	63	46	85	106	88	119
History	100	1	100	1	65	11	86	63	88	109	87	117
Reading					24	4	12	9	26	32	27	37
Writing					24	4	22	16	40	50	38	51

<sup>a</sup> AP tests are not mandated in Pennsylvania.

Source: Developed by LBFC Staff from Superintendent Survey.

Exhibit 9

Tests Administered by Pennsylvania Public Schools By Test and Grade Level

	K	1	2	3	4	5	6	7	8	9	10	11	12	Other <sup>a</sup>	No. Re-spondents
ACCESS	65%	74%	78%	75%	74%	72%	66%	65%	66%	62%	63%	64%	57%	0	144
ACT	0	0	0	0	0	0	0	0	0	0	40	90	90	3	94
ACT Aspire Classroom	0	0	0	0	0	0	0	0	40	0	0	0	0	60	5
ACT Aspire Interim	0	0	0	0	0	0	0	0	0	17	74	0	0	26	35
ASVAB	0	0	0	0	0	0	0	0	0	0	45	72	50	3	168
DIBELS	94	97	90	69	50	39	20	2	2	1	1	1	1	0	173
IB	0	0	0	0	0	0	0	0	0	50	50	100	100	0	2
ITBS/ITED	0	0	17	0	0	0	33	17	33	0	0	0	0	17	6
MAP	53	76	85	76	76	79	74	68	68	32	24	15	12	0	34
NAEP	0	0	0	0	41	0	0	0	65	0		0	33	1	51
NOCTI	0	0	0	0	0	0	0	0	0	0	15	36	94	7	110
PISA	0	0	0	0	0	0	0	0	100	100	100	0	0	1	1
PreACT	0	0	0	0	0	0	0	0	0	0	83	0	0	17	6
PSAT 8/9	0	0	0	0	0	0	0	3	19	65	60	0	0	11	77
PSAT 10	0	0	0	0	0	0	0	0	0	8	98	40	2	7	192
PSAT/NMST	0	0	0	0	0	0	0	0	0	11	64	80	9	5	171
SAT	0	0	0	0	0	0	0	0	0	0	53	97	96	7	171
SAT-10	0	0	67	33	33	33	33	33	33	33	67	67	67	0	3
TN/CAT	25	75	92	8	8	8	8	8	8	25	17	8	8	0	12
USCT	0	0	0	0	0	0	0	0	0	0	10	20	30	40	10

<sup>a</sup> This column represents the number of respondents answering 'Other.' Answers included respondents who were uncertain, explaining their answers, or whose school districts administered tests in grades we did not have as answers for a particular test.

Source: Developed by LBFC Staff from Superintendent Survey.

## **C. Districts' Purposes for Administering Other Standardized Tests**

In our survey, we asked superintendents to identify the purposes their school districts administered other standardized tests from the following list:

- Assess student learning at the end of instruction (summative assessment).
- Shape instruction by establishing baseline levels of knowledge and periodically assess student progress toward learning content standards (formative assessment).
- Determine program placement (e.g., magnet schools, gifted, and talented programs).
- Serve as a graduation requirement.
- Provide information for teacher and principal evaluations through student learning objectives.
- Hold school system, schools, and educators accountable for student learning.
- Measure a student's readiness for college or career.
- To meet qualification requirements for a college scholarship.
- Prepare students for the PSSA exam.
- Prepare students for a Keystone exam.
- Prepare students for ACT and/or SAT exam.
- Other.

Their responses are shown in Exhibit 10. Readiness for college or career and shaping instruction by assessing student progress are two main reasons that superintendents cited frequently when reporting the reasons a particular standardized test was administered in a school district.



Exhibit 10

School Districts' Purposes for Administering other Standardized Tests

	Assess Learning at End of Instruction	Shape Instruction by Assessing Student Progress	Determining Program Placement	Graduation Requirement	Provide Information for Evaluations	School System Accountability	Readiness for College or Career
ACT	5%	11%	2%	0%	4%	8%	89%
ACT Aspire Classroom	0	20	0	0	0	0	80
ACT Aspire Interim	3	9	3	0	3	9	68
ASVAB	10	8	5	2	4	5	77
DIBELS	49	96	32	1	26	29	1
ITBS	33	17	83	0	17	0	0
MAP	53	94	38	0	32	59	12
NOCTI	74	22	2	16	21	36	69
PreACT	0	60	0	0	20	20	60
PSAT 8/9	15	24	9	3	11	10	78
PSAT 10	13	19	10	2	10	11	79
PSAT/NMST	7	14	6	0	6	6	75
SAT	6	10	3	0	5	8	85
SAT-10	0	33	67	0	0	0	33
TN/CAT	75	67	25	0	17	33	8
USCT	60	50	0	0	10	10	0

Exhibit 10 continued

	Qualifications for College Scholarship	Prepare Students for PSSA	Prepare Students for Keystone Exam	Prepare Students for ACT or SAT	Other	Number of Respondents
ACT	70%	3%	2%	35%	5%	93
ACT Aspire Classroom	40	20	20	40	20	5
ACT Aspire Interim	35	3	3	50	12	34
ASVAB	15	1	0	2	26	164
DIBELS	0	12	1	1	5	171
ITBS	0	0	0	0	17	6
MAP	0	56	26	9	9	34
NOCTI	22	1	1	1	7	107
PreACT	40	0	0	80	20	5
PSAT 8/9	30	6	4	86	3	80
PSAT 10	38	6	9	85	5	193
PSAT/NMST	63	5	6	82	5	171
SAT	67	3	3	42	8	172
SAT-10	0	0	0	0	0	3
TN/CAT	0	33	8	0	8	12
USCT	0	0	0	0	10	10

Source: Developed by LBFC Staff from Superintendent Survey.

## SECTION IV INTENDED USES OF PENNSYLVANIA STANDARDIZED TESTS



### **Fast Facts...**

- ❖ *Pennsylvania's State Assessment System consists of six standardized tests (i.e., PSSA, PASA, Keystone Exams, ACCESS for ELLs, CDT, and NAEP).*
- ❖ *Pennsylvania's standardized tests are part of an overall assessment system that seeks to ensure rigorous requirements for students, while also equipping them to be 21<sup>st</sup> century college and career ready.*
- ❖ *Broad purpose of assessments is to document student mastery of skills and content and to inform ongoing instruction.*

## **Overview**

This section provides an overview of the intended uses of Pennsylvania's state standardized tests (assessments) when they were originally authorized (under federal and/or state law) in comparison to how the assessments are currently being used. While the various Pennsylvania state standardized tests are presented and described in some detail in the background and history section of this report, the same state standardized tests are considered here for the purpose of identifying how (if at all) the intended uses of the tests have changed. Additionally, this section also provides an overview of the intended uses of the ACT and SAT, which are also referenced in the background and history section of this report.

### **A. Intended Uses of Pennsylvania State Standardized Tests**

Pennsylvania's current assessment system consists of various assessment tools, including six standardized tests that students throughout the Commonwealth may be subject pursuant to federal and/or state law depending on their grade level and cognitive abilities:

- 1) Pennsylvania System of School Assessment (PSSA).
- 2) Pennsylvania Alternative System of Assessments (PASA).
- 3) Keystone Exams.
- 4) Accessing Communication and Comprehension in English State-to-State for ELLs English Language Proficiency Test (ACCESS for ELLs).
- 5) Classroom Diagnostic Tools (CDT).
- 6) National Assessment of Educational Progress (NAEP).

These standardized tests are part of an overall assessment system through which the PDE seeks to ensure rigorous requirements for Pennsylvania's students, while also equipping them to be 21<sup>st</sup> century college and career ready. The driving force behind Pennsylvania's assessments is the needs of its children and as such the State's assessments are designed to fulfill those diverse needs. Testing has always played a part in the classroom experience of students and the learning process; however, the utilization of annual standardized assessments, particularly those

linked to federal accountability standards, is reflective of a more recent trend in education. In addition, PDE recognizes Pennsylvania also needs to ensure it continues to incentivize instruction that addresses all the skills a student needs, and not just those skills that are measured.

According to the testimony presented by a PDE official during a Pennsylvania House Education Committee hearing: “The broad purpose of ‘assessments’ is to document student mastery of skills and content and to use assessment outcomes to inform ongoing instruction.” It was further noted that assessments are designed for specific purposes with some assessments designed to measure point in time skills, while others highlight ongoing progress.

Pennsylvania’s Academic Standards and Assessment regulations specify the Pennsylvania state assessment system was designed to serve the following purposes:

- 1) Provide students, parents, educators and citizens with an understanding of student and school performance consistent with federal law.
- 2) Determine the degree to which school programs enable students to attain proficiency in academic standards.
- 3) Provide information to state policy makers (e.g., General Assembly, and the State Board of Education) on how effective schools are promoting and demonstrating student proficiency of academic standards.
- 4) Provide information to the general public on school performance.
- 5) Provide results to school entities based on aggregate performance of all students.
- 6) Assess student proficiency in the Academic Standards (i.e., English Language Arts, Mathematics, and Science and Technology) for the purpose of determining, in part, student eligibility for high school graduation.<sup>33</sup>

Pennsylvania’s state assessment system also provides an opportunity to compare the academic achievement of Pennsylvania students with the achievements of students in other states through the participation of its students in the national representative assessment (i.e., NAEP).

PDE indicated that overall Pennsylvania state standardized tests meet their intended use to assess whether students are learning required content. However, the assessments has been used at time for additional purpose beyond their original intent (e.g., graduation requirements,

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<sup>33</sup> While Act 2018-158 implemented four alternative graduation/proficiency paths to the Keystone Exams graduation requirement (as detailed in the background and history section of this report), Act 158 does not alter the purpose presented here.

measuring teacher effectiveness, school building performance) with varied levels of success. As such, the decision to use assessments for purposes other than what the tests were originally designed for must be made in a cautious and judicious manner. Assessments are one of many tools utilized as part of the education process and similarly other tools need to be considered in evaluating student learning and measuring the success of the education process, and the educators and administrators that oversee that process.

See Exhibit 11 for an overview of the various Pennsylvania state standardized tests and their intended uses.

## Exhibit 11

### Intended Use of Pennsylvania State Standardized Tests

**Pennsylvania System of School Assessment (PSSA)** – PSSA is a statewide assessment that consists of assessments in English Language Arts (ELA) and Mathematics taken by students in grades 3, 4, 5, 6, 7, and 8. Students in grades 4 and 8 are also administered the Science PSSA. ELA and Mathematics PSSA questions are consistent with content aligned with the PA Common Core Standards (PA Core Standards). Science PSSA questions are consistent with content included in the Pennsylvania Academic Standards for Science, Technology, Environment and Ecology.

- Intended Use and Its Progression:
  - Designed as a statewide grade-level achievement test within the Pennsylvania system of assessments, and was found to be a valid predictor of a student's likelihood to succeed at college or entry-level jobs.
  - 1992 – First year PSSAs administered in various elementary grades and grade 11.
  - 1999 – Pennsylvania adopted regulations that laid the roots for the State's modern assessment system, which resulted in the PSSAs becoming standard-based and called for statewide assessments in grades 5, 8, and 11 (in the subject areas of reading, math, and science) aligned with Pennsylvania academic standards. Pennsylvania regulations also include a writing test in three grade levels.
    - The regulations specified among the various purposes outlined that assessments should assess student proficiency in academic standards in the applicable subjects, while also measuring school performance and the effectiveness of school programs.
  - 2015 - PSSA tests reflect for the first time alignment with the PA Core Standards adopted in 2013 that replaced the similarly aligned National Common Core Standards Pennsylvania had previously adopted in 2010. PSSA equates to the first round of assessing PA Core Standards that define what a student should know, and ensures they will graduate high school ready to succeed in college and career.
- Current Use:
  - Continues to be used as a grade-level achievement tests in grades 3 through 8, but Keystone Exams now used to determine college and career readiness at the high school level.
    - PSSAs in grades 3 through 8 also continue to equate to being the first round of assessing PA Core Standards that define what a student should know related to being ready to succeed in college and career.

Exhibit 11 Continued

- Subsequent to ESEA being amended by NCLB (2002) and ESSA (2015), which subjected all states to the federal requirements regarding developing statewide assessments in grades 3 through 8 and at least one assessment in grades 9 through 12 for ELA, and math and science tests in at least three grades (grade spans 3 through 5, 6 through 8 and 10 through 12), the PSSAs were expanded to grades 3 through 8, and 11 in ELA and math, and grades 5, 8, and 11 in science (but grade 11 PSSAs have since subsequently been replaced with the Keystone Exams).
  - While Federal law does not require a writing assessment, Pennsylvania regulations initially continued to maintain a separate writing test, although in 2005 the writing tests were shifted from grades 6, 9, and 11 to grades 5, 8, and 11. However, Pennsylvania no longer administers a separate writing test, but instead maintains writing skills as an element of scoring in the ELA text dependent analysis essay.
- Under federal and state law, scores for PSSA and Keystone Exams are now also linked to teacher evaluations and school building performance.

**Pennsylvania Alternative System of Assessment (PASA)** – PASA is a statewide alternative assessment designed to be administered to students with the most significant cognitive disabilities. It is and was intended for students with cognitive disabilities who are unable to participate meaningfully in the PSSA (even with accommodations).

- Intended Use:
  - PASA was designed as an alternative statewide grade-level achievement test within the Pennsylvania assessment system and was designed to fulfill the same purposes as the PSSA pursuant to Pennsylvania regulations and federal laws requiring all students, including those with the most significant disabilities, participate in the statewide accountability process (see Section 504 of The Rehabilitation Act [reauthorized in 2008], Title II of the Americans with Disabilities Act of 1990, Title I of ESEA, and IDEA Amendments of 1997).
  - PASA initially satisfied Pennsylvania and existing federal law requirements by introducing PASA Reading and Math during the 2000-01 school year for grades 5, 8, and 11.
- Current Use:
  - PASA continue to fulfill the same purpose of PSSA for those students with the most significant cognitive disabilities.
  - However, in addition to satisfying the Pennsylvania requirements and the previous referenced federal laws, PASAs now also used to satisfy ESEA as amended by NCLB (2002) and ESSA (2015), and as such PASA Reading and Math include grades 3 through 8, and 11 and PASA Science includes grades 4, 8, and 11.
    - ESEA provisions further stipulate that no more than one percent (1%) of a state's student testing population may participate in an alternative assessment like the PASA.

**Keystone Exams** – Keystone Exams are end-of-course assessments that cover three core subject areas: literature, algebra I, and biology. Literature and Algebra I Keystone Exams are aligned with PA Core Standards, and the Biology Keystone Exam is connected to the enhanced Pennsylvania Academic Standards for Science.

- Intended Use:
  - Keystone Exams serve two purposes: 1) high school accountability assessments for federal purposes, pursuant to ESEA as amended by NCLB (2002) and ESSA (2015), that require an assessment at least once in grades 9 through 12 in ELA, math, and science; and 2) high school graduation requirement for state purposes that was originally to apply to the 2016-17 school year.
    - The Keystone Exams were developed to replace grade 11 PSSA for federal assessment and accountability purposes and in fact did so during the 2012-13 school year.
- Current Use:
  - Keystone Exams continue to serve as Pennsylvania's federal high school accountability assessment and as a State high school graduation requirement. However, the use of the Keystone Exams as a Pennsylvania graduation requirement has been postponed

Exhibit 11 Continued

until the 2021-22 school year and four alternative graduation pathways have been established by Pennsylvania law.

- Under federal and state law, scores for PSSA and Keystone Exams are now also linked to teacher evaluations and school building performance despite these academic assessments not being primarily designed for such performance measurement functions.

**English Language Proficiency Assessment (ACCESS for ELLs and Alternative ACCESS for ELLs)** – All English Learners (ELs) grades K through 12 are required by federal and state laws to take annually the Access Communication and Comprehension in English State-to-State (ACCESS) for ELLs English Language Proficiency Test, and ELs who meet the eligibility criteria to take the PASA are required to take the Alternative ACCESS for ELLs, (ELs in their first 12 months of enrollment in U.S. schools are not required to take the Reading/ELA/Literature statewide assessments [e.g., PSSA, PASA, or Literature Keystone Exam]).

- Intended Use and Current Use:
  - English Language Proficiency assessments are standard-based and align with PA Core Standards, and measure progress and/or attainment of the student's English language proficiency for each language domain (i.e., reading, writing, speaking and listening/understanding).

**Pennsylvania Classroom Diagnostic Tools (CDT)** – CDT is a set of Pennsylvania online assessments, divided by content area (i.e., literacy, mathematics, and science) designed to provide real time diagnostic information (versus on-grade summative test) in order to guide instruction and remediation. CDTs were developed and rolled out between 2010 and 2014 for the purpose of assisting educators in identifying a student's academic strengths and areas in need of improvement. CDT is offered to students in grades 3 through 12 throughout the school year on a voluntary basis and each CDT assessment can be administered up to five times in a school year (with three being the recommended maximum number of times for a student to take a given test).

- Intended Use and Current Use:
  - CDT reports are designed to provide a snapshot into how students are performing in relation to the Pennsylvania Assessment Anchors and Eligible Content and Keystone Assessment Anchors and Eligible Content with ELA and math aligned with PA Core Standards and science aligned with Pennsylvania Assessment Anchors and Eligible Content.

**National Assessment of Educational Progress (NAEP)** – NAEP is a national representative assessment involving grades 4, 8, and 12 that assesses a representative sample of what America's students know and can do in core subjects (i.e., arts, civics, economics, geography, mathematics, reading, writing, science, technology and engineering literacy, U.S. history, and writing) that has been administered pursuant to federal law by NAEP field staff since 1969. NAEP state, regional, and national results (and since 2002, results for several large urban school districts) are reported in the "The Nation's Report Card" and used by teachers, administrators, parents, policy makers and researchers to assess progress and develop ways to improve education in America. Participation is required by the federal government in grades 4 and 8 in reading and mathematics. Participation in other content areas involving grades 4, 8, and 12 for selected schools is voluntary. The National Center for Educational Statistics (NCES) in the U.S. Department of Education is responsible under federal law for the NAEP project. A state's participating public and nonpublic schools are selected through scientific random sampling and then individual students (including students with disabilities and limited-English proficiency) are randomly selected from each of the schools selected to be tested.

- Intended Use and Current Use:
  - NAEP is the only assessment that allows a comparison of results from one state to another, or with results nationwide.

Source: Developed by LBFC staff from data provided by the Pennsylvania Department of Education.

## **B. Intended Uses of ACT and SAT**

Several states have embraced the use of the ACT and SAT tests to satisfy the federal assessment and accountability requirements. Among the purported benefits of utilizing the ACT and SAT is that these tests allow school districts to avoid the issue of excessive standardized testing as many students are already preparing for and taking these tests for college entrance purposes. The issue of excessive standardized testing is a concern that has been raised by numerous education experts and parents.

Neither the ACT nor SAT are presently administered during the school day by Pennsylvania schools for purposes of satisfying the federal high school assessment requirement pursuant to ESEA. Thus, neither the ACT nor SAT are currently categorized as a Pennsylvania state standardized test. However, this report is reflective of the interest in exploring the educational merit and viability of utilizing either the ACT or SAT to satisfy the federal high school assessment and accountability requirements.

Given the focus of this report, it is prudent to recognize both the ACT and SAT tests were originally designed as college entrance assessments that generated college reportable scores.<sup>34</sup> In later years, the scores from these tests were also used to award merit-based scholarships. Both the ACT and SAT continue to be used for college entrance purposes, but the tests are now being utilized both as a high school assessment and accountability tool, and to determine college and career readiness. This shift to multiple functions was driven by amendments to the federal ESEA, which initially mandated statewide assessments and subsequently specified states may utilize nationally recognized assessments in lieu of state-determined academic assessments. The subject of nationally recognized assessments is addressed in greater detail in the section of this report that addresses alignment and cost issues.

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<sup>34</sup> The College Board was originally established in 1900 to create a more uniform standard for determining what skills and knowledge were necessary for admission to college, and administered its first series of uniform exams (known as College Boards) in 1901. However, the College Board eventually began to focus on comprehensive exams testing a student's intelligence and reasoning, rather than their knowledge of specific subjects. This resulted in the creation of the SAT (known at the time as the Scholastic Aptitude Test, later known as the Scholastic Assessment Test following a redesign in 1990 along with some other names briefly, and finally in 1997 known just as SAT), which was administered for the first time in 1926 and measured a student's ability to learn and apply knowledge to different situations (versus measuring achievement in specific subjects in terms of a student's ability to memorize facts). The original SAT included mathematics and paragraph reading components that still exist in some form in the test today, although the analogy and logic questions are no longer part of the SAT test. The ACT (known at the time as American College Testing, and now as just ACT) was developed in 1959 as a competitor to the SAT and focused on testing accumulated knowledge, which it continues to do today. Both tests have undergone numerous redesigns over the years.



## SECTION V STANDARDIZED TESTS AS INDICATORS OF EFFECTIVENESS



### ***Fast Facts...***

- ❖ *Teachers and principals do not consider the PSSA exams, or the Keystone Exams indicative of student achievement, school building performance, or effective for teacher evaluation.*

### **Overview**<sup>35</sup>

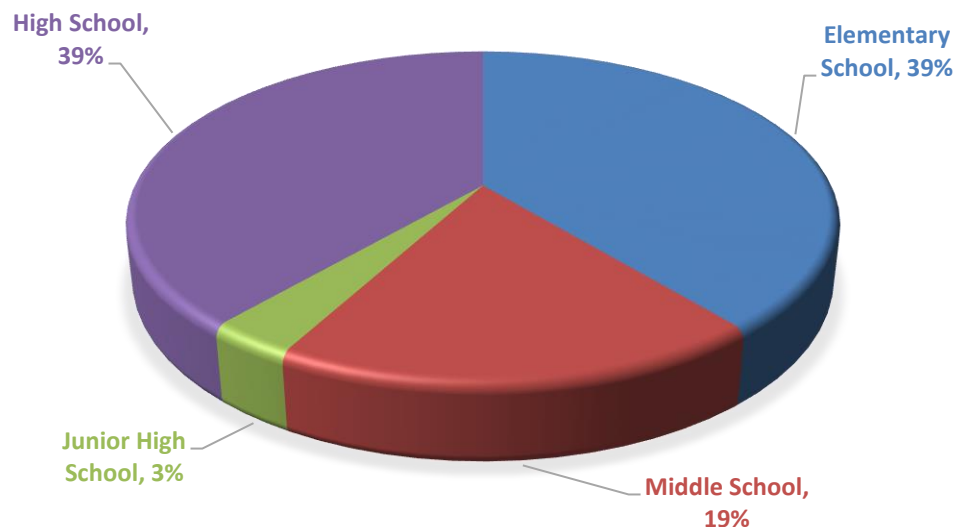
SR 322 asked us to evaluate the effectiveness of standardized tests as indicators for:

- Student achievement.
- Teacher evaluations.
- School building performance.

In order to determine standardized test effectiveness we sent surveys to principals and teachers throughout Pennsylvania to solicit their views on the effectiveness of both the PSSA exams and the Keystone Exams, based on the 2017-18 school year. Two-hundred sixty-nine principals and 2,345 teachers responded to their respective surveys. Exhibits 12 and 13 show the types of schools of both the principals and teachers.

Exhibit 12

### **Types of Schools of Principals Responding to Our Survey**



Source: Developed by LBFC Staff from Principal Survey.

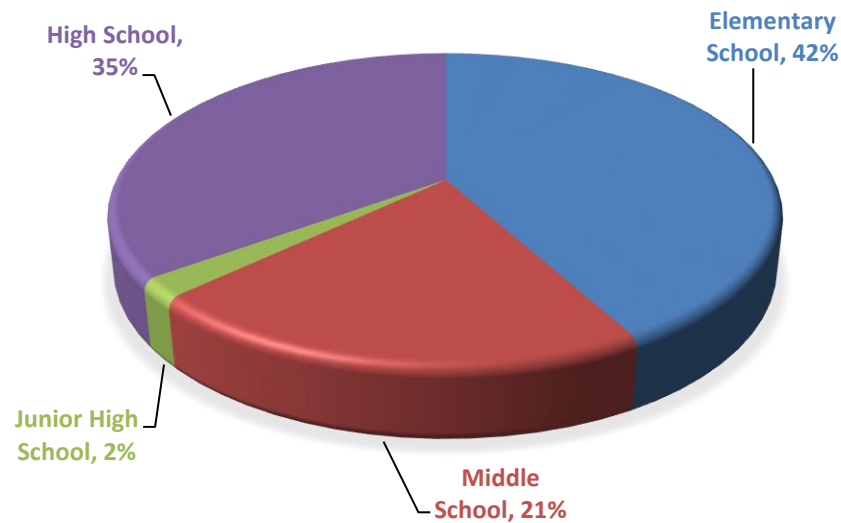
<sup>35</sup> Percentages in pie charts may not add to 100 percent due to rounding.

Exhibit 13

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**Types of Schools of Teachers Responding to Our Survey**

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Source: Developed by LBFC Staff with data from Teacher Survey.

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The majority of both principals and teachers responding to our survey clearly indicated that they do not consider either standardized test to be an effective indicator of student achievement, school building performance, or teacher evaluation.

## **A. PSSA Exam Effectiveness**

Ninety-eight percent of principals responding to our survey indicated that PSSA exams are administered in their schools. Sixty-five percent of teachers responding to our survey indicated that they teach at the elementary, middle school, or junior high level, and therefore are teaching students to whom the PSSA exams are administered.

## Student Achievement

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A majority of both principals and teachers indicated that PSSAs are not a good indicator of student achievement.

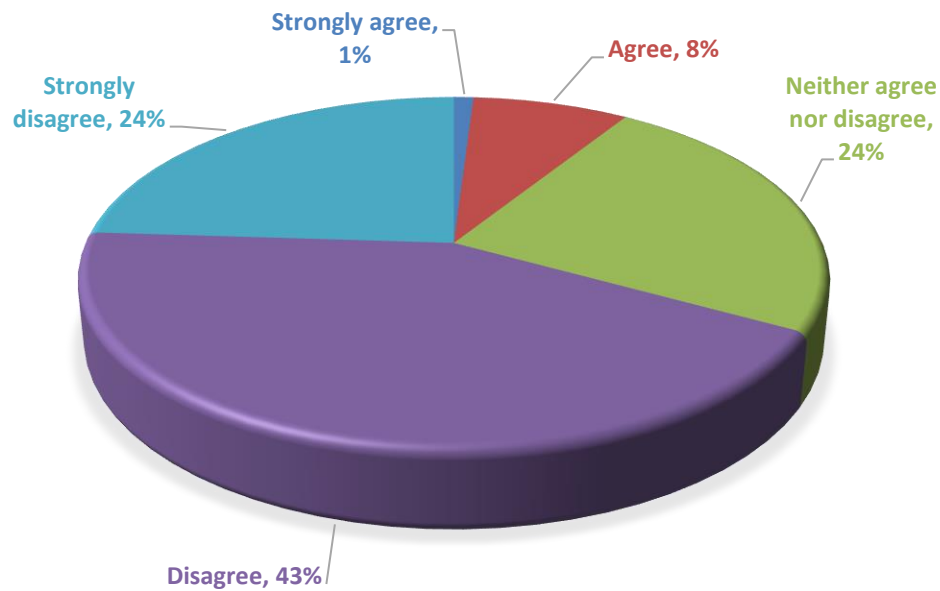
**Principals.** In our survey, we asked principals to indicate how strongly they agreed or disagreed with the following statement: The PSSA exams are effective indicators for individual student achievement. Sixty-seven percent of the 127 principals who answered this question disagree or strongly disagree with this statement. Exhibit 14 shows all answers to this question.

Exhibit 14

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### Percent of Principal Respondents Who Agree or Disagree That the PSSA Exams Are Effective Indicators of Student Achievement

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Source: Developed by LBFC Staff with data from Principal Survey.

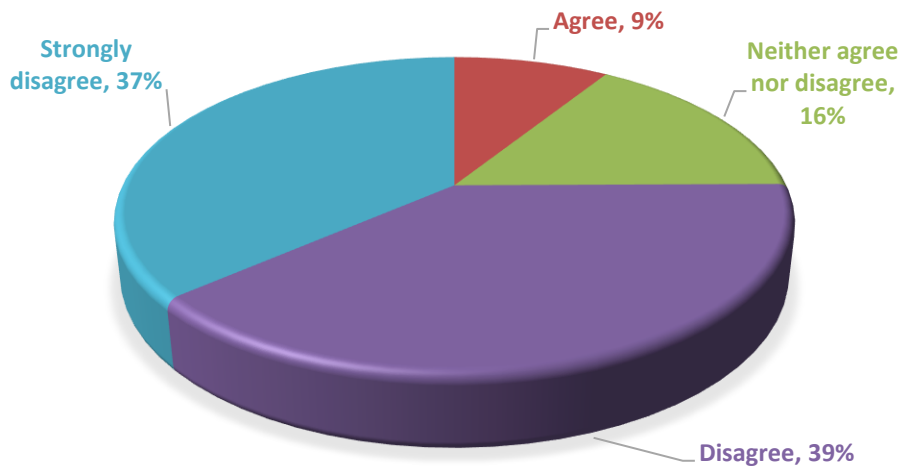
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**Teachers.** In our survey, we asked teachers to indicate how strongly they agreed or disagreed with the following statement: The PSSA exams are effective indicators for individual student achievement. Seventy-six percent of the 2,065 teachers who answered this question disagree or strongly disagree with this statement. No respondent strongly agreed with the statement. Exhibit 15 shows all answers to this question.

Exhibit 15

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**Percent of Teacher Respondents Who Agree or Disagree That the PSSA Exams Are Effective Indicators of Student Achievement**



Source: Developed by LBFC Staff from Teacher Survey.

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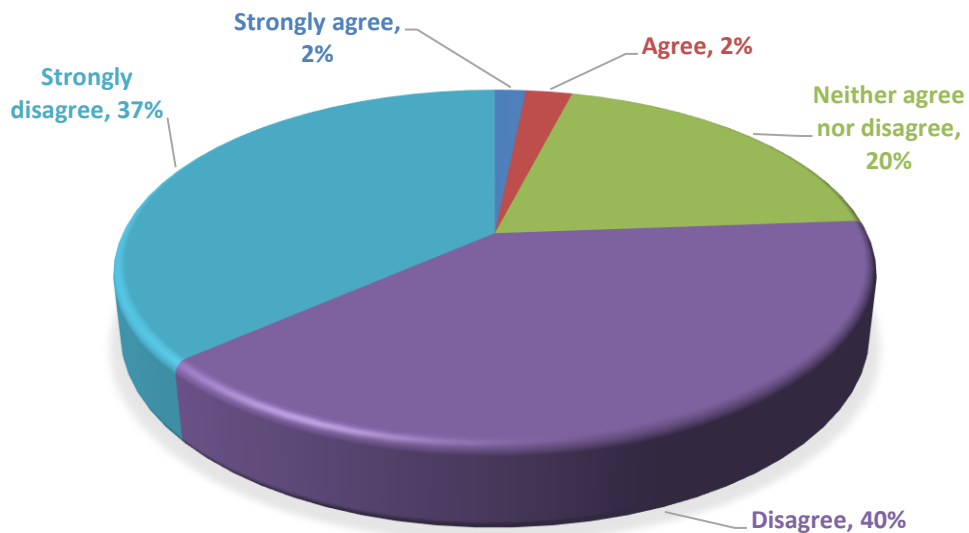
## Teacher Evaluation

Of those responding to our survey, a majority of principals, and a larger majority of teachers, responded that the PSSA exams are not a good indicator for teacher evaluation.

**Principals.** We asked principals how strongly they agreed or disagreed with the following statement: The PSSA exams are effective indicators for teacher evaluation. Of the 126 principals who answered this question, 77 percent either disagreed or strongly disagreed that the PSSAs are effective for teacher evaluation. Exhibit 16 shows all answers to this question.

Exhibit 16

### Percent of Principal Respondents Who Agree or Disagree That the PSSA Exams Are Effective Indicators for Teacher Evaluation



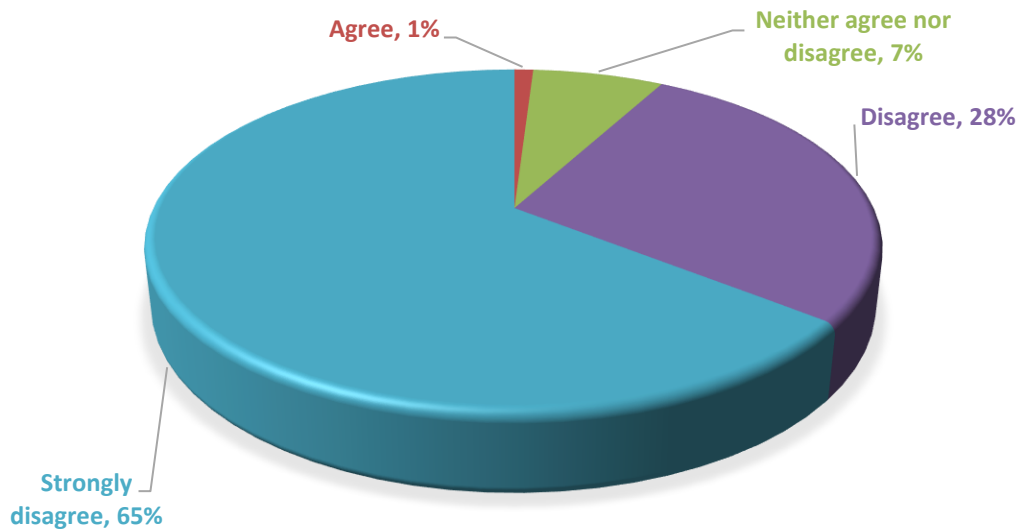
Source: Developed by LBFC Staff from Principal Survey.

**Teachers.** We asked teachers how strongly they agreed or disagreed with the following statement: The PSSA exams are effective indicators for teacher evaluation. Of the 2,063 teachers who answered this question, 93 percent either disagreed or strongly disagreed that the PSSAs are effective for teacher evaluation. No respondent strongly agreed to the statement. Exhibit 17 shows all answers to this question.

Exhibit 17

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**Percent of Teacher Respondents Who Agree or Disagree That the PSSA Exams Are Effective Indicators for Teacher Evaluation**



Source: Developed by LBFC Staff from Teacher Survey.

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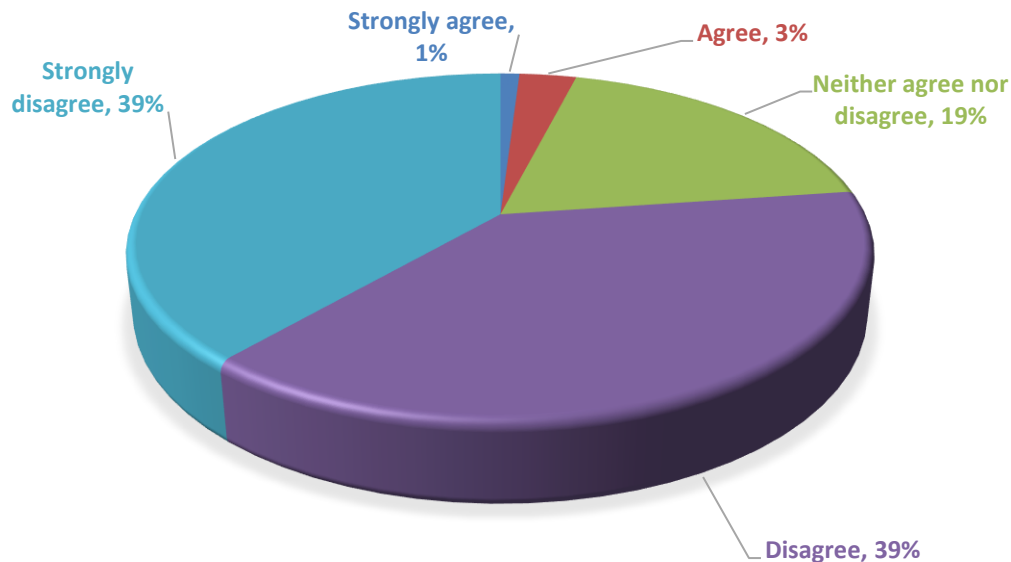
## School Building Performance

A majority of both principals and teachers indicated that the PSSA exams are not an effective indicator of school building performance.

**Principals.** We asked principals how strongly they agreed or disagreed with the following statement: The PSSA exams are effective indicators of school building performance. Of the 127 principals who answered this question, 78 percent either disagreed or strongly disagreed that the PSSAs are effective for teacher evaluation. Exhibit 18 shows all answers to this question.

Exhibit 18

### Percent of Principal Respondents Who Agree or Disagree That the PSSA Exams Are Effective Indicators for School Building Performance



Source: Developed by LBFC Staff from Principal Survey.

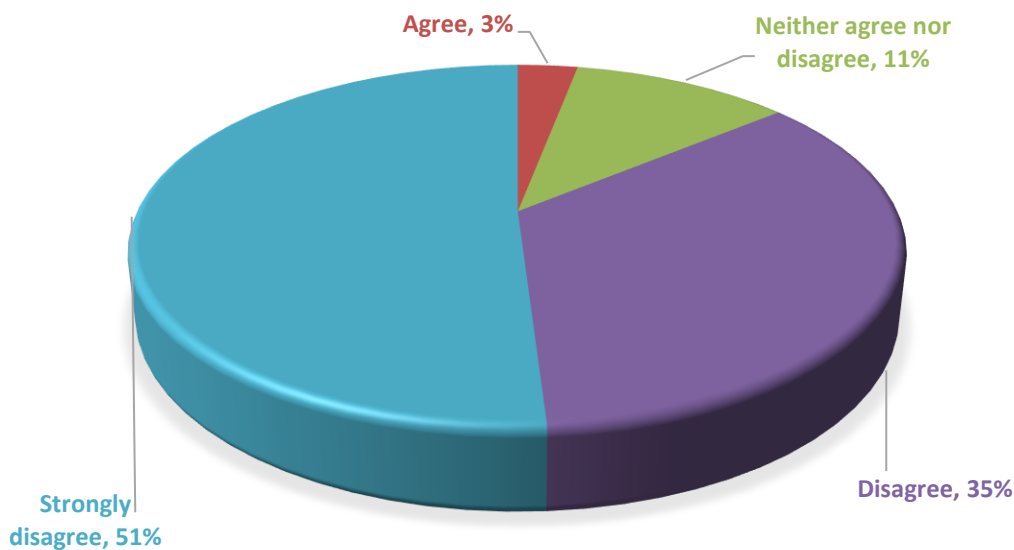
**Teachers.** We asked teachers how strongly they agreed or disagreed with the following statement: The PSSA exams are effective indicators of school building performance. Of the 2,064 teachers who answered this question, 86 percent either disagreed or strongly disagreed that the PSSAs are effective for teacher evaluation. No respondent strongly agreed with the statement. Exhibit 19 shows all answers to this question.

Exhibit 19

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**Percent of Teacher Respondents Who Agree or Disagree That the PSSA Exams Are Effective Indicators for School Building Performance**

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Source: Developed by LBFC Staff from Teacher Survey.

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## **B. Keystone Exams Effectiveness**

Sixty-five percent of principals indicated that their schools administered the Keystone Exams during the 2017-18 school year. We asked principals and teachers the same questions for the Keystone Exams, as to whether they are effective indicators for student achievement, teacher evaluation, and school building performance.

Only 17 percent of teachers indicated that they taught any of the subjects covered by the Keystone Exams in the 2017-18 school year, which include English/language arts, mathematics, and science.



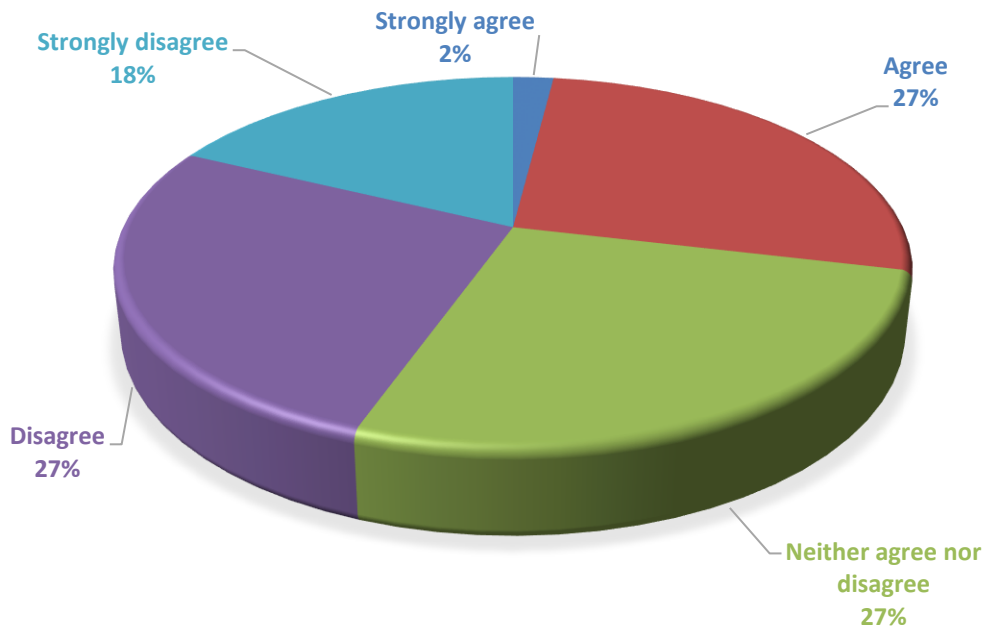
## Student Achievement

Although principals' opinions on whether the Keystone Exams are an effective indicator of student achievement are more balanced, a majority of teachers indicated that they are not.

**Principals.** In our survey, we asked principals to indicate how strongly they agreed or disagreed with the following statement: The Keystone Exams are effective indicators for individual student achievement. Unlike the PSSA exams, for which principals generally agreed that they are not an effective indicator of student achievement, the opinions of the 128 principals who answered this question were not as negative and 27 percent of them neither agreed nor disagreed with the question. Exhibit 20 shows all answers to this question.

Exhibit 20

### Percent of Principal Respondents Who Agree or Disagree That the Keystone Exams Are Effective Indicators of Student Achievement



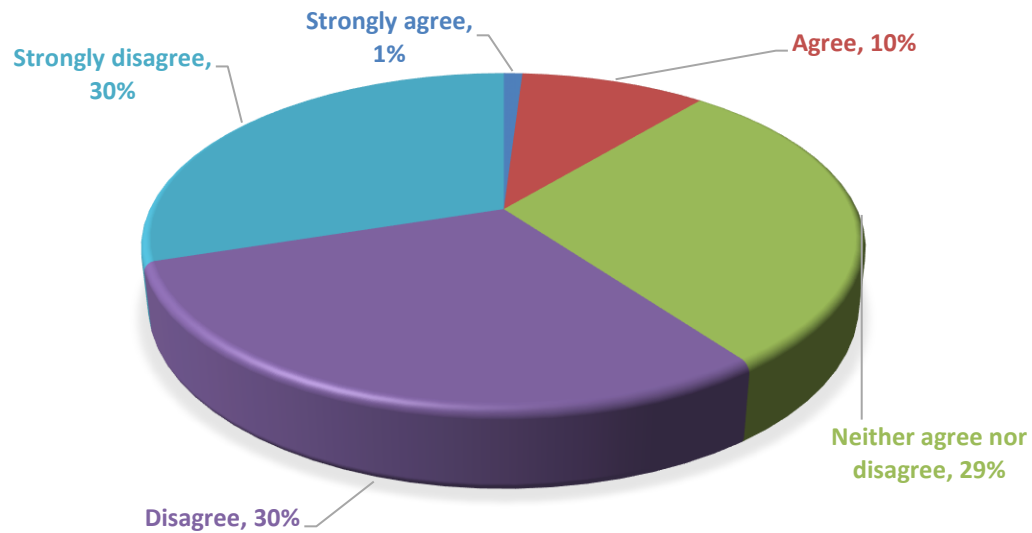
Source: Developed by LBFC Staff from Principal Survey.

**Teachers.** We asked teachers to indicate how strongly they agreed or disagreed with the following statement: The Keystone exams are effective indicators for individual student achievement. Sixty percent of the 1,990 teachers who answered this question disagree or strongly disagree with this statement, and 27 percent neither agreed nor disagreed. Exhibit 21 shows all answers to this question.

Exhibit 21

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**Percent of Teacher Respondents Who Agree or Disagree That the Keystone Exams Are Effective Indicators of Student Achievement**



Source: Developed by LBFC Staff from Teacher Survey.

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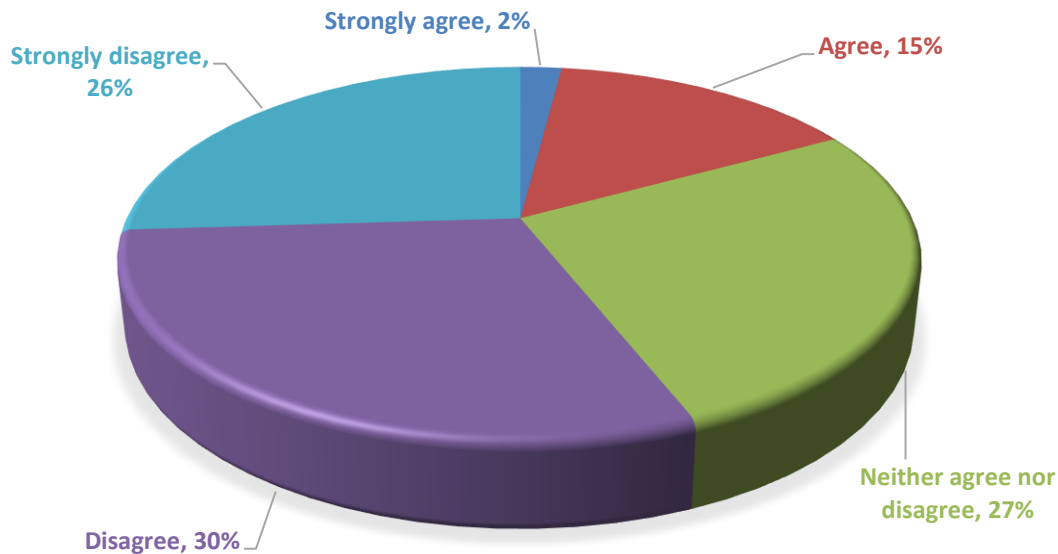
## Teacher Evaluation

A majority of principals and teachers indicated that the Keystone Exams are not effective indicators for teacher evaluation.

**Principals.** We asked principals how strongly they agreed or disagreed with the following statement: The Keystone Exams are effective indicators for teacher evaluation. Of the 128 principals who answered this question, the majority, 56 percent, either disagreed or strongly disagreed that the keystones are effective for teacher evaluation; 27 percent neither agreed nor disagreed. Exhibit 22 shows all answers to this question.

Exhibit 22

### Percent of Principal Respondents Who Agree or Disagree That the Keystone Exams Are Effective Indicators for Teacher Evaluation



Source: Developed by LBFC Staff from Principal Survey.

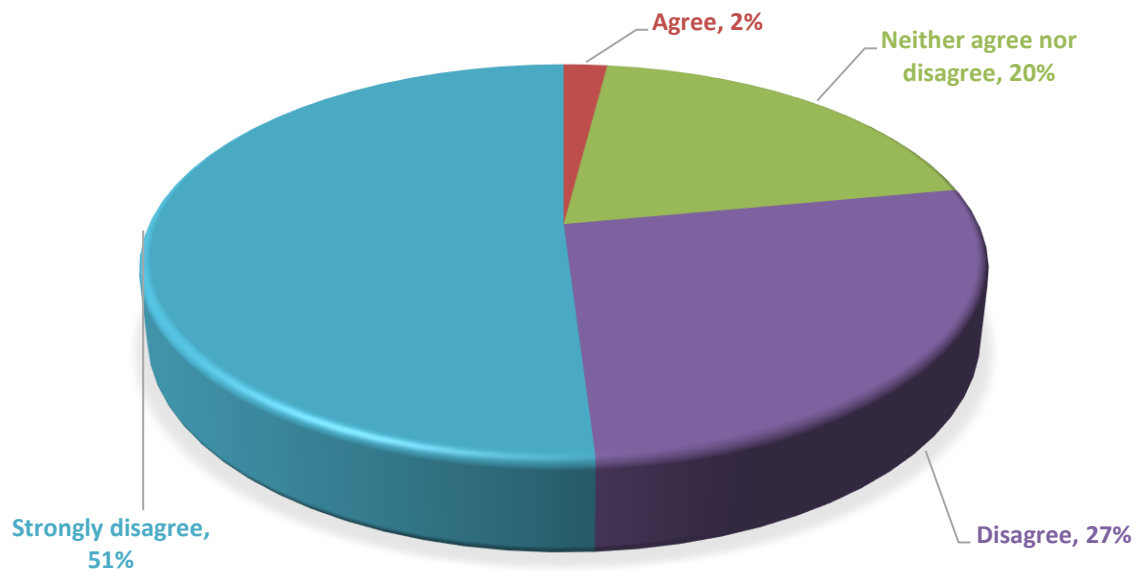
**Teachers.** We asked teachers how strongly they agreed or disagreed with the following statement: The Keystone Exams are effective indicators for teacher evaluation. Of the 1,990 teachers who answered this question, the majority, 78 percent, either disagreed or strongly disagreed that the keystones are effective for teacher evaluation. No respondent strongly agreed with the statement. Exhibit 23 shows all answers to this question.

Exhibit 23

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**Percent of Teacher Respondents Who Agree or Disagree That the Keystone Exams Are Effective Indicators for Teacher Evaluation**

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Source: Developed by LBFC Staff from Teacher Survey.

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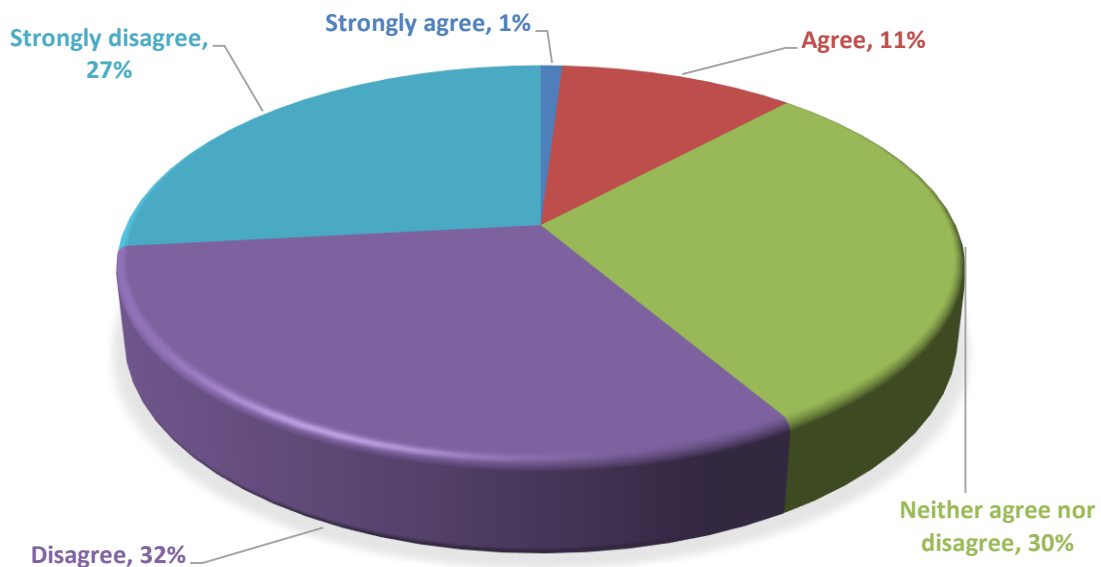
## School Building Performance

A majority of both principals and teachers indicated that the Keystone Exams are not an effective indicator of school building performance.

**Principals.** We asked principals how strongly they agreed or disagreed with the following statement: The Keystone Exams are effective indicators of school building performance. Of the 128 principals who answered this question, 59 percent either disagreed or strongly disagreed that the keystones are effective for school building performance and 30 percent neither agreed nor disagreed. Exhibit 24 shows all answers to this question.

Exhibit 24

### Percent of Principal Respondents Who Agree or Disagree That the Keystone Exams Are Effective Indicators for School Building Performance



Source: Developed by LBFC Staff from Principal Survey.

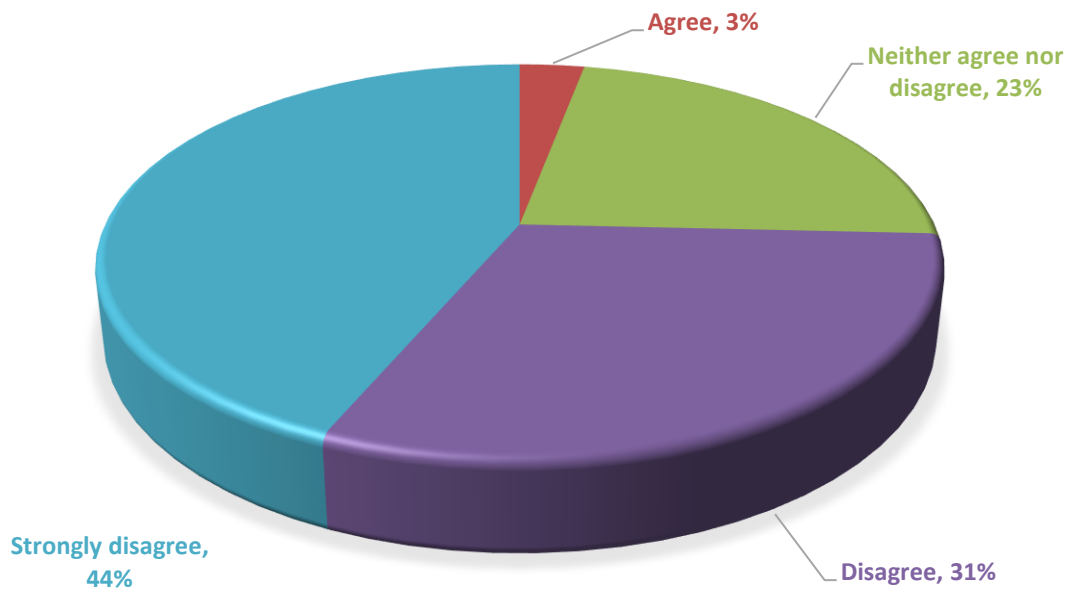
**Teachers.** We asked teachers how strongly they agreed or disagreed with the following statement: The Keystone Exams are effective indicators of school building performance. Of the 1,995 teachers who answered this question, 75 percent either disagreed or strongly disagreed that the keystones are effective indicators of school building performance. No respondent strongly agreed with the statement. Exhibit 25 shows all answers to this question.

Exhibit 25

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**Percent of Teacher Respondents Who Agree or Disagree That the Keystone Exams Are Effective Indicators for School Building Performance**

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Source: Developed by LBFC Staff from Teacher Survey.

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## SECTION VI COSTS AND TIME SPENT TEACHING TEST-TAKING SKILLS AND ADMINISTERING PRACTICE AND STANDARDIZED TESTS



### ***Fast Facts...***

- ❖ *Principals and teachers report curricula reductions to accommodate both the PSSAs and Keystone Exams.*
- ❖ *Most schools and teachers have taught test-taking skills and have administered practice tests.*
- ❖ *Teachers report spending classroom time preparing their students for the exams.*

## **Overview**

SR 322 asked us to identify the costs and amount of time schools spend teaching test-taking skills as well as administering both practice tests and standardized tests. To determine these factors, we surveyed both principals and teachers throughout Pennsylvania to solicit their input, based on the 2017-18 school year.

### **A. PSSA Exams**

Ninety-eight percent of principals responding to our survey indicated that their schools administered the PSSA exams during the 2017-18 school year.

Sixty-five percent of the teachers who responded to our survey indicated they teach at the elementary, middle school, or junior high level, and therefore are teaching students to whom the PSSAs are administered. Sixty-eight percent of teachers responding to our survey indicated that they taught the content covered by the PSSAs in the 2017-18 school year.

### **Reduced Curricula**

Both principals and teachers indicated in their responses to our surveys that the scope of their curricula has been narrowed to prepare students for the PSSA exams.

***Principals.*** Fifty percent of responding principals indicated that their schools have reduced the scope of curricula to prepare students for the PSSA exams. Reducing the scope of a curriculum could include measures such as dropping courses or narrowing the scope of education plans. In our survey, many principals responded that they have reduced instructional time in both science and social studies to increase time spent on math and English/language arts. Some of the other specific comments from principals include:

- Removed some novel(s) across grade levels to provide some additional instruction on tested area content.

- PA Core Standards are adhered to over other curricula that can enhance student learning (ex: projects, hands on activities).
- There has been less focus on targeting specific student needs because the focus is on the needs the PSSAs identify as important.
- World language in grade 7 was dropped and reading was added in order to increase scores on PSSA tests.
- When the common core state standards were implemented, the curriculum was revised, which narrowed what was taught at each grade level.
- Subjects that are not tested receive far less instruction.
- A technology education unified arts class was eliminated in favor of an academic lab class to assist students with necessary academic skills.
- Timelines were incorporated to ensure only eligible content is taught in preparation for the PSSA tests.
- Electives were removed to allow for remediation time.

**Teachers.** Eighty-eight percent of teachers responding to our survey indicated that they have narrowed the scope of the curricula taught in their classes to more closely align with the PSSA exams.

### **Teaching Test-Taking Skills, Administering Practice Tests, and Time to Administer Test-Taking Activities**

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**Principals.** Of those principals whose schools administered the test, 82 percent indicated that students are taught test-taking skills to prepare for the PSSA Exams, and 89 percent said their schools administered practice tests, benchmark tests, and/or diagnostic tests to prepare students for the PSSA exams.

Principals indicated the total number of school days by grade level their schools spent administering PSSAs. Exhibit 26 shows the percent of the 135 principals responding to this question, and the average number of days per grade spent on administering the PSSA. The averages in Exhibit 26 may be skewed because some principals included make-up days for testing and some did not.



Exhibit 26

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**Average Days to Administer the PSSA**

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	Avg. Days for Testing	Percent Responding Principals
Grade 3	5.7	61%
Grade 4	7.4	50
Grade 5	5.7	50
Grade 6	6.3	48
Grade 7	6.2	43
Grade 8	7.8	44

Source: Developed by LBFC Staff from Principal Survey.

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**Teachers.** Eighty-eight percent of teachers indicated that they also teach test-taking skills to prepare students for the PSSA Exams. We asked teachers the number of hours students in their classes spent learning test-taking skills to prepare for the PSSAs. Teachers answers varied to this question and due to the differences, we were unable to calculate average hours. For example, teachers responded by total number of hours, hours per week, hours per month, or hours per marking period. Some answered without numbers at all, stating answers such as, "Too much time," "Takes away from real instruction," "Frequently," "TOO MANY," and some were unsure. The numbers they gave ranged from zero hours to 300 hours.

Eighty-eight percent of teachers also indicated that they administer practice tests, benchmark tests, and/or diagnostic tests to prepare students for the PSSA exams. As with the prior time-related question, teachers answered the number of hours students spent at practice tests in a variety of ways, so we were again unable to calculate an average number of hours. However, answers ranged from zero hours to 900 hours. Several teachers stated teaching test skills is ongoing and there are always teachable moments throughout the school year.

**Costs Related to Administering PSSA Exams**

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Forty-two percent of principals who indicated that they teach test-taking skills and administer practice tests to their students, responded they have incurred additional costs related to test preparation activities. Although some were uncertain about specific additional costs, others cited dollar amounts from \$1,000 to more than \$100,000.

When asked whether their schools incurred any additional costs in administering the PSSA exams that would not have occurred otherwise, 56 percent of principals responded in the affirmative. Of those principals

indicating that there were additional costs, some were unsure of exact amounts, but others cited amounts from \$200 to \$6,000.

Principals cited a variety of reasons for additional costs. The need for substitute teachers to proctor exams and cover classes for staff monitoring the exams was the most frequently cited reason for incurring additional costs. Other costs noted were:

- Additional staff to help monitor students not taking the exam and provide monitoring of accommodations.
- After school tutoring/positive reinforcement.
- Supplies such as extra pencils and paper, copies, calculators, food for snacks before each day of the PSSA, highlighters, storage and locks.
- Programs for PSSA preparation, and purchased benchmark testing, practice books.

## B. Keystone Exams

Sixty-five percent of principals indicated that their schools administered the Keystone Exams during the 2017-18 school year.

Only 17 percent of teachers indicated that they taught any of the subjects covered by the Keystone Exams in the 2017-18 school year.

### Reduced Curricula

---

Both principals and teachers indicated in their survey responses that the scope of their curricula has been narrowed to prepare students for the Keystone Exams.

**Principals.** Forty-two percent of responding principals indicated that their schools reduced the scope of curricula to prepare students for the Keystone Exams. Reducing the scope of a curriculum could include measures such as dropping courses or narrowing the scope of education plans. In our survey, principals frequently responded that courses relevant to the Keystone Exams have been altered to teach more of the requirements of the exams. Some of other specific answers given by principals include:

- Eligible content and standards are weighted and consist of the majority of the instruction.

- More of a focus in the Keystone Exams subject areas to prepare for the test, thus limiting the scope of the curricula. Also students miss out on other opportunities because of remediation and retesting.
- Only half a year of geometry is taught so algebra concepts for the keystones can be reviewed.
- Added remedial courses to the schedule which takes away from offering other courses.
- Eliminated some content and some courses that do not address the Keystone requirements. Students are being forced into academic courses regardless of potential career choices.
- The amount of days for prep work and testing has reduced the scope of our Literature 9 and Literature 10 courses.
- An environmental science course was eliminated to allow extra time for the biology Keystone Exam. Elective math courses were also eliminated or will be eliminated in the future to allow for Keystone Exam algebra remediation.
- Keystone Exams triggers teachers to focus on test taking strategies and at the expense of curriculum.

**Teachers.** Eighty-four percent of teachers responding to our survey answered that they have narrowed the scope of the curricula taught in their classes to more closely align with the Keystone Exams.

### **Teaching Test-Taking Skills, Administering Practice Tests, and Time to Administer Test-Taking Activities**

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**Principals.** Sixty-four percent of respondents indicated that their schools teach test-taking skills to prepare students for the Keystone Exams and ninety percent responded that their schools administer practice tests, benchmark tests, and/or diagnostic tests.

Principals also indicated the number of school days their schools spent administering Keystone Exams. Of the 128 principals responding to this question, their answers yielded an average of eight days to administer the keystones. The average may be skewed because some principals included make-up test days and some did not.

**Teachers.** Eighty-four percent of those teachers responding indicated that they teach test-taking skills to prepare students for Keystone Exams. We asked teachers the number of hours students in their classrooms spent learning test-taking skills to prepare for the Keystone Exams. Teachers' answers varied to this question so we were unable to calculate average hours. Teachers answered, for example, in ranges of hours, hours per week, or hours per month. Some answered without numbers at all, stating answers such as, "Many," "Daily," or "Mostly a

week of preparing before the exam,” and some were unsure. The numbers they gave ranged from 0.5 hours to 450 hours.

Eighty-one percent of teachers also indicated that they administer practice tests benchmark tests, and/or diagnostic tests. We surveyed teachers about how many hours students in their classes spent taking these preparatory tests for the Keystone Exams. As above, teachers’ answers varied, and the range of responses to this question were from one hour to 45 hours.

### **Costs Related to Administering Keystone Exams**

Of the principals indicating that their schools teach test-taking skills and administer practice tests to their students, 49 percent said that they have incurred additional costs associated with these activities. Although some did not know or were uncertain about specific additional costs, others cited dollar amounts that ranged from \$200 to \$35,000.

When asked whether their schools incurred any additional costs in administering the Keystone Exams that they would not have occurred otherwise, 54 percent of principals answered in the affirmative. Of those principals indicating that there were additional costs, some were unsure of exact amounts, but others cited amounts that ranged from \$200 to \$20,000.

Principals cited a variety of reasons for additional costs. Just as with the PSSA exams, the need for substitute teachers to cover classes for staff monitoring the exams and to proctor exams was the most frequently cited reason for additional costs. Other costs mentioned were:

- Mailing costs and purchasing of vendor provided practice/diagnostic assessments.
- Special transportation for non-testing students who arrive on a 3-hour delay and additional bus runs for modified testing schedules.
- Materials: pencils, paper, highlighters, Chromebooks, snacks before testing.
- Man hours spent preparing, organizing, administering and collecting.

## SECTION VII STANDARDIZED TESTS USED BY OTHER STATES



### ***Fast Facts...***

- ❖ *States have the option under ESSA to use “nationally recognized tests” such as ACT, SAT, PARCC, and Smarter Balanced to meet the high school assessment requirement, provided there is evidence of alignment with state standards.*
- ❖ *The trend among the states since ESSA provided more flexibility regarding teacher evaluations is to reduce the weight given to student growth as a component of teacher evaluations.*

## **Overview**

This section provides an overview of the types of standardized tests required by other states, and the use of standardized testing for teacher evaluations. As a condition of receiving federal funds, ESSA requires state education agencies to use statewide assessments in mathematics and English language arts every year in grade 3 through 8 grade and once in grade 9 through 12. ESSA also calls for a science assessment once in each of three grade spans: grades 3 through 5, grades 6 through 9, and grades 10 through 12.

### **A. A 50-State Comparison**

#### **National Tests**

While various assessment requirements under ESSA did not change from those in NCLB, ESSA provides states with some flexibility in meeting them. For example, states may choose to administer assessments as one summative assessment or multiple statewide interim assessments that result in a single summative score. States may also use “nationally recognized tests” to meet the high school assessment requirement, provided there is evidence of alignment with state standards. SR 322 asked that we identify the source of state standardized tests used by all states for federal accountability. These types of national tests are ACT, SAT, Partnership for Assessment of Readiness for College and Careers (PARCC), and Smarter Balanced Assessment Consortium (Smarter Balanced).

We reviewed information compiled by the Education Commission of the States (ECS) identifying and describing each state’s assessment tools as of April 2018, and information from Achieve, Inc. identifying and describing science assessment tools as of September 2018 which are set forth in Exhibit 27. Highlights from that comparison are listed below. According to ECS there are a variety of reasons states choose a specific assessment tool and assessment tools used are typically determined after consultation with policymakers and stakeholders. While SR 322 referenced providing an overview of the state rationale for each tests’ use in a state plan, the specific reasons for assessment choices are not included in the states’ plans to meet federal requirements under ESSA.

Exhibit 27

**50-State Comparison of Statewide Assessment Tools**  
**May 2018**

State	Math/ELA (3-8)	Math/ELA (9-12)	Science (3-5)	Science (6-9)	Science (10-12)
Alabama	Scanton Performance Series (Selecting a new assessment; using Scanton Performance Series in the interim)	ACT	Scanton (5)	Scanton (7)	ACT plus Writing (11)
Alaska	Performance Evaluation for Alaska's Schools	Performance Evaluation for Alaska's Schools (9)	Alaska Science Assessment (4)	Alaska Science Assessment (8)	Alaska Science Assessment (10)
Arizona	AZMERIT (AIR)	EOCs; ELA (9, 10, 11) & Alg. I, Geom., Alg. II (AIR)	Arizona's Instrument to Measure Standards (4)	Arizona's Instrument to Measure Standards (8)	Arizona's Instrument to Measure Standards (AIMS) Science (10, but may be taken by grade 9 students who are enrolled in a life sciences course.)
Arkansas	ACT Aspire	ACT Aspire (9 & 10)	ACT Aspire	ACT Aspire Early High School Grades (9)	ACT Aspire Early High School Grades (10)
California	Smarter Balanced	Smarter Balanced (11)	California Science Test (5)	California Science Test (8)	California Standards Test (12)
Colorado	Colorado Measures of Academic Success (Pearson) (state/PARCC)	PSAT (9 & 10); SAT	Colorado Measures of Academic Success (CMAS) Science assessment (5)	Colorado Measures of Academic Success (CMAS) Science assessment (8)	Colorado Measures of Academic Success (CMAS) for science (11)
Connecticut	Smarter Balanced	SAT	Connecticut Next Generation Science Standards Assessment (5)	Connecticut Next Generation Science Standards Assessment (8)	Connecticut Next Generation Science Standards Assessment (11)
Delaware	Smarter Balanced	SAT	Delaware Comprehensive Assessment System (DCAS) Science (5)	Delaware Comprehensive Assessment System (DCAS) Science (8)	Delaware Comprehensive Assessment System (DCAS) for science (10)
DC	PARCC	PARCC; SAT (11)	DC Science Assessment	DC Science Assessment	DC Next Generation Science Assessment (EOC)

Exhibit 27 Continued

<b>State</b>	<b>Math/ELA (3-8)</b>	<b>Math/ELA (9-12)</b>	<b>Science (3-5)</b>	<b>Science (6-9)</b>	<b>Science (10-12)</b>
Florida	Florida Standards Assessment (AIR); reading (3-8); writing (4-8); math (3-8)	Florida Standards Assessments (AIR); reading (9-10); writing (9-10); math EOCS: Alg. I, Geom.	Statewide Science Assessment (5)	Statewide Science Assessment (8)	Biology I EOC (EOC)
Georgia	Georgia Milestones Assessment System	EOCS	Georgia Milestones Assessment System (5)	Georgia Milestones Assessment System (8)	Georgia Milestones Biology (EOC) Georgia Milestones Physical Science (EOC)
Hawaii	Smarter Balanced	Smarter Balanced (11)	Hawaii State Assessment (HSA) in science (4)	Hawaii State Assessment (HSA) in science (8)	Biology I (EOC)
Idaho	Smarter Balanced (AIR)	Smarter Balanced (10)	Idaho Standards Achievement Tests (ISAT) Science (5)	Idaho Standards Achievement Tests (ISAT) Science (7)	Biology (EOC) Chemistry EOC
Illinois	PARCC	SAT	Illinois Science Assessment (ISA) (5)	Illinois Science Assessment (ISA) (7)	Illinois State Science Assessment (content aligned to Biology)(EOC)
Indiana	ISTEP + (state/AIR)	ISTEP + (10)	Indiana Statewide Testing for Educational Progress Plus (ISTEP+) Science (4)	Indiana Statewide Testing for Educational Progress Plus (ISTEP+) Science (7)	Indiana Statewide Testing for Educational Progress Plus (ISTEP+) End of Course Assessments in Biology I (Administered in Grade 10)
Iowa	Iowa Assessments (University of Iowa) (2018-19 new exam)	Iowa Assessment (10 & 11) (University of Iowa)	A Iowa Assessments (5)	A Iowa Assessments (8)	Iowa Assessments (Grade 11)
Kansas	Kansas Assessment Program (Achievement and Assessment Institute at University of Kansas)	Kansas Assessment Program (10) (Achievement and Assessment Institute at University of Kansas)	Kansas Assessment Program (5)	Kansas Assessment Program (8)	Kansas Assessment Program – Science (Grade 11)
Kentucky	K-PREP math & reading (3-8); writing (5 & 8) (Pearson)	K-Prep writing (11) (Pearson); EOCS: Eng. 10, Alg. II (EOC field test)	Kentucky Performance Rating for Educational Progress (K---PREP) for Science (4)	Kentucky Performance Rating for Educational Progress (K---PREP) for Science (7)	Kentucky End-of-Course Field Test – Biology (EOC)

Exhibit 27 Continued

<b>State</b>	<b>Math/ELA (3-8)</b>	<b>Math/ELA (9-12)</b>	<b>Science (3-5)</b>	<b>Science (6-9)</b>	<b>Science (10-12)</b>
Louisiana	LEAP 2025 (state/ <b>PARCC</b> )	LEAP 2025 (Eng. I, II Alg. I, & Geom.); EOC: Eng. III (See the High School Assessment Fact Sheet for transition information) Link: <a href="https://www.louisianabelieves.com/docs/default-source/assessment/high-school-assessments-fact-sheet.pdf?sfvrsn=4">https://www.louisianabelieves.com/docs/default-source/assessment/high-school-assessments-fact-sheet.pdf?sfvrsn=4</a>	Louisiana Educational Assessment Program (LEAP) 2025 Science (3, 4, 5 Administered as a field test in 2017-18)	Louisiana Educational Assessment Program (LEAP) 2025 Science (6, 7, 8 Administered as a field test in 2017-18)	Biology (EOC)
Maine	Maine Education Assessments (eMPower) (Measured Progress)	SAT	Maine Educational Assessment (MEA) for science (5)	Maine Educational Assessment (MEA) for science (8)	Maine Educational Assessment (MEA)(Grade 11)
Maryland	<b>PARCC</b>	<b>PARCC</b>	Maryland Integrated Science Assessment (MISA) (5)	Maryland Integrated Science Assessment (MISA) (8)	Maryland Integrated Science Assessment (MISA) (EOC (Grade 9, 10, or 11 depending on course sequence))
Massachusetts	Next Generation MCAS ( <b>PARCC</b> /Measured Progress)	Next Generation MCAS (10) (Measured Progress)	Massachusetts Comprehensive Assessment System (MCAS) for Science and Technology/Engineering (5)	Massachusetts Comprehensive Assessment System (MCAS) for Science and Technology/Engineering (8)	Massachusetts Comprehensive Assessment System (MCAS) Technology/Engineering (EOC)  MCAS Biology (EOC)  MCAS Chemistry (EOC)  MCAS Introductory Physics (EOC)
Michigan	M-STEP (state/ <b>Smarter Balanced</b> (Pearson))	Michigan Merit Exam ( <b>SAT</b> & <b>ACT</b> Workkeys)*	Michigan Student Test of Educational Progress (M-STEP) (4)	Michigan Student Test of Educational Progress (M-STEP) (7)	Michigan Student Test of Educational Progress (Grade 11)
Minnesota	Minnesota Comprehensive Assessments (Pearson)	Minnesota Comprehensive Assessments: reading (10), math (11) (Pearson)	Minnesota Comprehensive Assessments (MCAs) (5)	Minnesota Comprehensive Assessments (MCAs) (8)	Minnesota Comprehensive Assessments (MCA-III): Science (EOC in life science or biology)



Exhibit 27 Continued

<b>State</b>	<b>Math/ELA (3-8)</b>	<b>Math/ELA (9-12)</b>	<b>Science (3-5)</b>	<b>Science (6-9)</b>	<b>Science (10-12)</b>
Mississippi	Mississippi Academic Assessment Program (Questar)	EOCs: Alg. I & Eng. II (Questar)	Mississippi Academic Assessment Program, Science (MAAP-SCI) (5)	Mississippi Academic Assessment Program, Science (MAAP-SCI) (9)	Subject Area Testing Program, 2nd Edition (SATP2) in Biology (typically Grade 9)
Missouri	Missouri Assessment Program	EOCs: Eng II & Alg I (Questar)	Missouri Assessment Program (MAP) Grade--Level Assessment in Science (5)	Missouri Assessment Program (MAP) Grade---Level Assessment in Science (8)	Biology (EOC) Physical Science (EOC)
Montana	Smarter Balanced	ACT	Criterion---Referenced Test (CRT) in Science (4)	Criterion---Referenced Test (CRT) in Science (8)	Criterion-Referenced Test (CRT) in Science
Nebraska	Nebraska Student-Centered Assessment System (NWEA)	ACT	Nebraska Student-Centered Assessment System (NSCAS) – Science(5)	Nebraska Student-Centered Assessment System (NSCAS) – Science(8)	Nebraska State Accountability Tests (NeSA) Science (ACT)
Nevada	Smarter Balanced	EOCs: ELA I & II; math I & II*	Criterion---Referenced Tests (CRT) for Science (5)	Criterion---Referenced Tests (CRT) for Science (8)	Nevada High School Science Assessment (EOC)
New Hampshire	New Hampshire Statewide Assessment System (AIR) (Districts can apply to participate in the Performance Assessment for Competency Education (PACE) program in grades 3-11)	SAT (Districts can apply to participate in the Performance Assessment for Competency Education (PACE) program in grades 3-11)	New Hampshire Statewide Assessment System (SAS) in Science (5)	New Hampshire Statewide Assessment System (SAS) in Science (8)	New Hampshire Statewide Assessment System (SAS) for Science (Grade 11)
New Jersey	PARCC	PARCC	New Jersey Student Learning Assessment – Science (NJSLA-S) - (Field Test) (5)	New Jersey Student Learning Assessment – Science (NJSLA-S) - (Field Test) (8)	New Jersey Student Learning Assessment – Science (NJSLAS) (Grade 11)
New Mexico	PARCC	PARCC	Standards Based Assessment (SBA) in science (4)	Standards Based Assessment (SBA) in science (7)	New Mexico Standards Based Assessment (SBA) in science (Grade 11)

Exhibit 27 Continued

<b>State</b>	<b>Math/ELA (3-8)</b>	<b>Math/ELA (9-12)</b>	<b>Science (3-5)</b>	<b>Science (6-9)</b>	<b>Science (10-12)</b>
New York	NY State Testing Program (Questar)	EOCs	New York State Elementary---Level Science Test and New York State Intermediate---Level Science Test (4)	New York State Elementary---Level Science Test and New York State Intermediate---Level Science Test (8)	New York State Regents Exam in Chemistry (EOC)  New York State Regents Exam in Earth Science (EOC)  New York State Regents Exam in Living Environment (EOC)  New York State Regents Competency Tests in Physics (EOC)
North Carolina	NC End-of-Grade Tests (state)	EOCs: Eng II & Math I (state)	North Carolina READY End---of---Grade Tests of Science in grades 5 and 8 North Carolina Final Exams (NCFEs) in grades 4, 6, and 7 (not used for school and district accountability)	North Carolina READY End---of---Grade Tests of Science in grades 5 and 8 North Carolina Final Exams (NCFEs) in grades 4, 6, and 7 (not used for school and district accountability)	North Carolina READY EOC in Biology (EOC)
North Dakota	North Dakota State Assessment (AIR)	North Dakota State Assessment (AIR) (10) (LEA option to administer ACT in grade 11 instead)	North Dakota State Assessment (NDSA) for science (4)	North Dakota State Assessment (NDSA) for science (8)	North Dakota State Assessment (NDSA) for science (Grade 11)
Ohio	Ohio State Tests (AIR)	EOCs: ELA I & II, Alg. I, Geom. (AIR)	Ohio State Test (OST) (5)	Ohio State Test (OST) (8)	Biology Ohio State Test (OST) (EOC)
Oklahoma	Oklahoma School Testing Program (Measured Progress)	ACT or SAT	Oklahoma Core Curriculum Tests in Science (5)	Oklahoma Core Curriculum Tests in Science (8)	Oklahoma School Testing Program (OSTP) Grade 10 assessment in science (Grade 10)
Oregon	Smarter Balanced	Smarter Balanced (11)	Oregon Assessment of Knowledge and Skills (OAKS) Science (5)	Oregon Assessment of Knowledge and Skills (OAKS) Science (8)	Oregon Assessment of Knowledge and Skills (OAKS) for Science (Grade 11)
Pennsylvania	Pennsylvania System of School Assessments	EOCs: Alg. I & Lit.	Pennsylvania System of School Assessment (PSSA) Science (4)	Pennsylvania System of School Assessment (PSSA) Science (8)	Keystone Exam in Biology (EOC)



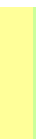




Exhibit 27 Continued

<b>State</b>	<b>Math/ELA (3-8)</b>	<b>Math/ELA (9-12)</b>	<b>Science (3-5)</b>	<b>Science (6-9)</b>	<b>Science (10-12)</b>
Rhode Island	RI Comprehensive Assessment System (Measured Progress)	PSAT (10), SAT	Rhode Island Next Generation Science Assessment (NGSA) (4, 8 Administered as a field test in 2017-18)	Rhode Island Next Generation Science Assessment (NGSA) (4, 8 Administered as a field test in 2017-18)	Rhode Island Next Generation Science Assessment (NGSA) (Grade 11)
South Carolina	SC READY	EOCs: Alg. I, & Eng. I	South Carolina Palmetto Assessment of State Standards (SCPASS) science (4,5)	South Carolina Palmetto Assessment of State Standards (SCPASS) science (6,7,8)	End-of-Course Examination Program (EOCEP) in Biology (EOC)
South Dakota	Smarter Balanced	Smarter Balanced (11)	South Dakota Science (5)	South Dakota Science (8)	South Dakota Science (Grade 11)
Tennessee	TN Ready (Questar)	EOCs (Questar)	TNReady (3,4,5)	TNReady (6,7,8)	Biology I (EOC)
Texas	STAAR: reading & math (3-8), writing (4 & 7) (ETS)	EOCs: Eng. I & II, Alg. I (ETS)	State of Texas Assessments of Academic Readiness (STAAR) Science (5)	State of Texas Assessments of Academic Readiness (STAAR) Science (8)	Chemistry (EOC)
Utah	Student Assessment of Growth and Excellence (AIR)	Student Assessment of Growth and Excellence (9-10) (AIR)	Student Assessment of Growth and Excellence (SAGE) Science (4,5)	Student Assessment of Growth and Excellence (SAGE) Science (6,7,8)	State of Texas Assessments of Academic Readiness (STAAR) EOC in Biology (EOC)
Vermont	Smarter Balanced	Smarter Balanced (9)	Vermont Science Assessment (4, 8 Administered as a field test in 2017-18.)	Vermont Science Assessment (4, 8 Administered as a field test in 2017-18.)	Student Assessment of Growth and Excellence (SAGE) EOC in Biology (EOC)
					SAGE EOC in Earth Science (EOC)
					SAGE EOC Chemistry (EOC)
					SAGE EOC Physics (EOC)
					Vermont Science (Grade 11)

Exhibit 27 Continued

State	Math/ELA (3-8)	Math/ELA (9-12)	Science (3-5)	Science (6-9)	Science (10-12)
Virginia	Virginia Standards of Learning: reading & math (3-8), writing (8)(Pearson)	EOCs (Pearson)	Standards of Learning (SOL) for scienceiii (5)	Standards of Learning (SOL) for scienceiii (8)	Earth Science Standards of Learning (SOL)(EOC) Biology SOL (EOC) Chemistry SOL (EOC)
Washington	Smarter Balanced (AIR)	Smarter Balanced (AIR) (10) (Math EOC for Spring 2018 (12). This is the last administration)	Washington Comprehensive Assessment of Science (5)	Washington Comprehensive Assessment of Science (8)	A Washington Comprehensive Assessment of Science (Grade 11)
West Virginia	WV General Summative Assessment (AIR)	SAT	West Virginia General Summative Assessment (WVGSA) of Science (4)	West Virginia General Summative Assessment (WVGSA) of Science (6)	SAT (Grade 11)
Wisconsin	Wisconsin Forward Exam	ACT Aspire (9 & 10)	Wisconsin Forward Exam (4)	Wisconsin Forward Exam (8)	ACT Aspire (Grades 9-10)
Wyoming	Wyoming Test of Proficiency and Progress (WY-TOPP) (AIR)	WY-TOPP (9 & 10) (AIR) & ACT*	Wyoming Test of Proficiency and Progress (WY-TOPP) science (4)	Wyoming Test of Proficiency and Progress (WY-TOPP) science (8)	The Wyoming Test of Proficiency and Progress (WYTOPP)(Grade 10)

**Exhibit 27 Key:**

	The ACT Test system of assessments		Partnership for Assessment of Readiness for College and Careers (PARCC)
	The SAT system of assessments		State-specific assessment
	Smarter Balanced Assessment Consortium		Other
	A block that remains white but has highlighted words represents a state that utilizes a mix of assessment tools for that particular decision point.		

\* Indicates that LBFC staff is aware the information reported in the particular decision point block has changed from what was provided by the source documents from ECS and Achieve. These changes do not substantially alter the overall representation of what other states are doing presented by this table.

Source: Prepared by LBFC staff based on data provided from Education Commission of the States (April 2018) and Achieve, Inc. (September 4, 2018)

## Decision Points

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For each state there are five potential assessment tool decision points (i.e., distinct points in time): one for grades 3-8 Math/ELA, one for grades 9 through 12 Math/ELA, one for grades 3 through 5 science, one for grades 6 through 9 science, and then one for grades 10 through 12 science. That is a total of 255 assessment tool decisions points<sup>36</sup> for the fifty states and the District of Columbia. The vast majority of these decision points do not make use of any of the nationally recognized assessment tools. For example, 196 (77 percent) of the 255 assessment tool decision points utilize state-specific assessment tools, including all five decision points in Pennsylvania and 19 other states. The majority of states (30 plus the District of Columbia) do use, however, a recognized national assessment test for at least one testing area. The remaining 23 percent of assessment tool decision points break down as follows:

- The ACT test products (e.g., ACT, ACT plus Writing, and ACT Aspire, among others) are used in nine states for 15 decision points, mostly in upper grade testing. Five of those 15 are in the state of Arkansas, which uses an ACT test product for all five of its decision points, and is the only state to use tests from the same nationally recognized source for all of its testing in elementary and high school. In addition to Arkansas, states using an ACT test for some part of its assessment requirements are Alabama, Michigan, Montana, Nebraska, Nevada, North Dakota, Oklahoma, Wisconsin, and Wyoming.
- The SAT test is used in 11 states for 12 decision points, 11 of which are for high school Math/ELA testing (grades 9-12) and in one state for high school science testing. Those using SAT testing are Colorado, Connecticut, Delaware, District of Columbia (for 9-12 grade Math/ELA along with PARCC), Illinois, Maine, Michigan (for 9-12 grade Math/ELA along with ACT Workkeys), New Hampshire, Oklahoma (for 9-12 grade Math/ELA but ACT can be used instead) Rhode Island, and West Virginia.
- The PARCC test is used in seven states plus the District of Columbia for 12 decision points, eight elementary level testing and four high school level testing both for Math/ELA. States that use PARCC tests are Colorado, District of Columbia, Illinois, Louisiana, Maryland, Massachusetts, New Jersey, and New Mexico.

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*Of the 255 total decision points that exist among the fifty states and District of Columbia where nationally recognized testing could be used to meet federal accountability requirements, 77 percent of those decision points use state-specific tests instead of nationally recognized ones.*

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<sup>36</sup> For purposes of this report, we took the five distinct points in time at which assessment is required by federal law—that being 1) for grades 3-8 Math/ELA, 2) for grades 9-12 Math/ELA, 3) for grades 3-5 science, 4) for grades 6-9 science, and then 5) for grades 10-12 science and considered that each state (along with the District of Columbia) has to comply with providing assessments at each one of these points of assessment. Therefore, the five required points of assessment multiplied by the fifty-one states (including DC) results in a total of 255 points at which the states must decide what assessment tool is to be used to meet federal assessment requirements.

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- The Smarter Balanced test is used in 12 states for 19 decision points, 12 elementary level math/ELA testing and seven high school level Math/ELA. Seven states use Smarter Balanced for both their elementary and high school level testing in Math/ELA, including California, Hawaii, Idaho, Oregon, South Dakota, Vermont, and Washington. Remaining Smarter Balanced states are Connecticut, Delaware, Montana, and Nevada.
- There are ten instances where a particular decision point utilizes a mix of testing tools.
- Finally, there are nine decision points in which some other testing tool is used.

While most decision points regarding the use of standardized testing are using state-specific tools, less than half of the states (20)—including Pennsylvania—use no nationally recognized assessment tool for any part of their testing requirements. The majority of states (30 plus the District of Columbia), therefore, use at least one nationally recognized assessment test for at least one area of testing.

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*A survey of state Teachers of the Year demonstrated that they are least confident in the fairness of standardized test scores and school-wide averages based on those scores as components of teacher evaluations.*

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## **B. Use of Standardized Testing for Teacher Evaluations**

### **Incorporating Student Growth Measures**

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Historically, nearly all teachers were rated either good or great, with less than one percent receiving unsatisfactory ratings, making it difficult to identify outstanding teachers and to differentiate between the good and the less than good. A report by The New Teacher Project found 99 percent of teachers are rated good or great, confirming that teacher evaluation systems are not meaningfully differentiating teachers or providing useful feedback.

Prompted by research suggesting that student test scores on standardized tests were related to teacher quality, states were incentivized to incorporate student growth measures in the process of teacher evaluations. The Race to the Top<sup>37</sup> grant program as well as ESEA Flexibility Waivers<sup>38</sup> provided for states to develop evaluation systems that included measurements of student

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<sup>37</sup> Under the Race to the Top (RTT) grants, the federal government encouraged states and districts to revamp outdated evaluation systems. RTT priorities included annual evaluations, multiple measures (including student growth), multiple performance rating categories, and pay and advancement that is based on evaluation results.

<sup>38</sup>Waivers under the No Child Left Behind Act required states to adopt education-redesign priorities, including: develop evaluation systems with continuing educator input; provide clear, timely and useful feedback; improve instruction; use multiple measures, including student growth; differentiate performance; and inform personnel decisions.

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growth for teachers in all grades and subjects as a significant factor in teacher evaluations.

ECS research demonstrated the efforts of the states under this period focusing on student growth, as follows:

- 43 states (including Pennsylvania) required objective measures of student achievement to be included in teacher evaluations.
- 16 states (including Pennsylvania) included student achievement and growth as the 'preponderant criterion' in teacher evaluations.
- 19 states included growth measures as a 'significant criterion' in teacher evaluations.
- Eight states required objective evidence of student learning in teacher evaluations.
- Seven states required that schoolwide achievement data be used in individual teacher performance ratings, while 11 other states explicitly allowed the practice.

## **New Flexibility**

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In spite of these state efforts to increasingly use student growth as a measurement for teacher evaluations, the National Council on Teacher Quality reported that most states had barely begun to implement these new systems. This was to allow for adequate phase-in time of new student learning objectives and standards or to reexamine the system currently in place.

In 2015, ESSA, however, changed the system. It provided new flexibility to states to revise and reform their teacher evaluation systems and removed federal incentives to create prescribed evaluation systems giving states full discretion over whether and how to evaluate teachers. States are no longer required to consider student outcomes in teacher evaluation.<sup>39</sup> ESSA, however, does provide states with funding to help develop "rigorous, transparent, and fair evaluation and support systems that are "based in part on evidence of student achievement, which may include student growth" along with other indicators of teacher performance.

In 2017, the Education Testing Service (ETS) in conjunction with the National Network of State Teachers of the Year published a report based on a survey of State Teachers of the Year (STOYs) and finalists from around the nation. In addressing the components of teacher evaluation processes, while most state teacher evaluation processes included measures of student learning, the use

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<sup>39</sup> Replacing the federal waiver process under NCLB, see p. 70, footnote 38.

of standardized test scores for purposes of evaluating teacher performance was found to be an area of concern to most teachers. The ETS report found that among the nation's excellent teachers, when viewing the evaluation of teacher performance in the context of multiple components (such as through parent/guardian feedback, evidence of student growth from learning objectives, student feedback, measures of student social-emotional development, classroom observation, measures of teacher professionalism, and state accountability assessment scores) teachers were least confident in the fairness of standardized test scores and school-wide averages based on those scores.<sup>40</sup> Teachers were most significantly confident in evaluation information based on classroom observations and measurement of teacher professionalism.<sup>41</sup>

## **Trends since ESSA**

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Given the new ESSA flexibilities regarding teacher evaluations, some states are reexamining, limiting, or altogether eliminating student growth as a component of teacher evaluation processes. While the number of states requiring student growth as a component of teacher evaluations had risen to 43 during the incentivization period prior to ESSA, ECS reports that by 2017—two years after the changes brought about by ESSA—the number of states using student growth in teacher evaluations has fallen to 39, and many bills continue to be introduced in state legislatures to address the weight to be given to student growth information in regards to teacher evaluations. ECS reported that in 2017, at least 10 states enacted legislation or adopted resolutions impacting the use of student growth in teacher evaluations. See Exhibit 28.

Similarly, a 2018 report by ACT Research and Policy stated that 84 bills in 33 states were introduced that addressed the weight of student growth in teacher evaluations from the time period immediately following passage of ESSA in December 2015 through May 2018. Forty-one of these bills sought to reduce or potentially reduce the weight given to student growth information. Highlights of this legislative activity are:

- Three bills sought to increase the weight given (Arizona, California, and New York) to student growth.
- Thirteen bills would make no change to the weight given, but did include data from various other types of student achievement.
- Twenty-eight bills would potentially reduce the weight given by eliminating the state from determining the weight to be given to student growth and allowing the individual school districts to determine how much weight to give to student growth assessments. Doing this would mean

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<sup>40</sup> Of the STOEY teachers surveyed, 71 percent and 77 percent were not confident in the fairness of using state accountability assessment scores or schoolwide averages of those results, respectively, in evaluating teacher performance.

<sup>41</sup> The survey showed 63 percent and 67 percent of the STOEY teachers were confident in the fairness of looking to classroom observations and measures of teacher professionalism, respectively.

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that individual school districts would be permitted to determine that no weight would be given to student growth data. Some bills would allow districts to establish their own evaluation systems, which could include student growth.

- Twenty bills would reduce the weight given to student growth. The bills that would reduce the weight of student growth in the evaluation sought to reduce it from 35 percent to as little as five percent.
- Twenty bills sought to eliminate the use of student growth in evaluations.

### Exhibit 28

#### 2017 Enacted Legislation Addressing Weight of Student Growth

State	Legislation	Status	Details
Arkansas	H.B. 1424	Enacted	Removes student growth requirement, provides district flexibility
Florida	H.B. 7069	Enacted	Changes growth measure, provides district flexibility, requires study
Indiana	H.B. 1003	Enacted	Provides district flexibility, requires study
	S.B. 108	Enacted	Requires study
Kentucky	S.B. 1	Enacted	Removes student growth requirement, provides district flexibility
Louisiana	H.R. 158	Adopted	Requires study
Michigan	S.B. 133	Enacted	Removes student growth requirement, provides district flexibility
New Mexico	H.B. 125	Vetoed	Reduces student growth impact, requires study
Nevada	A.B. 320	Enacted	Temporarily reduces student growth impact, changes growth measure
South Carolina	H 3969	Enacted	District flexibility, changes growth measure
Tennessee	H.B. 309	Enacted	Temporarily reduces student growth impact

Source: Education Commission of the States, Policy Snapshot: Teacher Evaluations, March 2018.

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## SECTION VIII REALIGNMENT AND COSTS ASSOCIATED WITH ACT OR SAT



### Fast Facts...

- ❖ *The use of a nationally recognized high school assessment instead of the Keystone Exams is unlikely to require or result in realignment of state academic standards, voluntary model curriculum, or individual public school curriculum.*
- ❖ *Each state determines the feasibility and practicality of pursuing the use of a nationally recognized high school assessment for purposes of meeting federal assessment requirements and the state's own educational goals.*
- ❖ *Statewide assessments must be submitted for an evidence based federal peer review to confirm they satisfy federal requirements and do what the state says they are doing.*

## Overview

This Section addresses whether a realignment of State academic standards, Pennsylvania voluntary curriculum, and individual public school entities' curricula would be necessary if Pennsylvania required students to take the ACT or SAT instead of the Keystone Exams for purposes of satisfying the federal high school assessment requirement. Specifically, this section looks at applicable Pennsylvania law, alignment issues in general and in relation to the science component, federal peer review requirements, costs and other challenges, and Keystone Exams costs.

### A. Alignment

**Pennsylvania Law.** There are numerous issues (e.g., alignment, costs, etc.) that need to be considered before deciding to include a national assessment as part of Pennsylvania's state assessment system. Among those issues, one should be aware that Pennsylvania's Academic Standards and Assessment regulations specify the following in regards to national assessment and students with disabilities:<sup>42</sup>

*The Board [State Board of Education] will not include National assessments as part of the State assessment system unless, upon consultation with teachers, counselors and parents representing students who have been identified under Chapter 14 (relating to special education services and programs), the Board determines the assessment is an appropriate means of assessing the academic progress of students identified under Chapter 14 or unless the General Assembly authorizes the use of a National assessment.*

This regulatory provision is not a barrier to Pennsylvania utilizing a national assessment to assess the academic progress of students identified under Chapter 14 (related to special education services and programs), but is another important criteria that must be considered when weighing the value of utilizing a national assessment as part of Pennsylvania's state assessment system.

<sup>42</sup> State Board of Education Regulations - 22 Pa. Code § 4.51(h)(1) (State Assessment System) - Ch. 4 (Academic Standards and Assessments).

**Generally (E/LA & Math Components).** The use of a nationally recognized high school assessment (e.g., ACT, SAT, etc.) instead of the Keystone Exams to satisfy the federal assessment and accountability requirements under ESEA, as amended by ESSA section 1111(b)(2)(H) (20 U.S.C. § 6311); 34 CFR § 200.3, is unlikely to require or result in a realignment of State academic standards, PA voluntary model curriculum, or individual public school entities' curricula as each individual state is authorized to establish its own academic standards and employ assessments, subject to United States Department of Education (USDE) "peer review," that can be adequately measured for comparison purposes.<sup>43</sup> As one state put it, "We require tests to be aligned to our COS [course of study/academic standards], not the other way around." The PDE indicated that it would be hesitant to change Pennsylvania's state standards to align/match with an alternative assessment (e.g., ACT, SAT, etc.) and indicated that any assessment should be aligned to the state's standards and curricula.

Ultimately, it is up to each state to individually determine the feasibility and practicality of pursuing the use of a nationally recognized high school assessment like the ACT or SAT in lieu of an alternative statewide assessment for purposes of meeting federal assessment requirements and the state's own educational goals. Utilizing the ACT or SAT for statewide assessment purposes has the potential to reduce the time spent by students taking standardized tests in that many students are already taking the ACT or SAT for college admission purposes. A number of states using either the ACT or SAT tests for high school assessment purposes have submitted such for USDE peer review and are in various stages of the review process with some states having been designated "partially meets" and some "substantially meets," although none has been designated "meets" to date. Although the ACT or SAT may not align point for point with a state's specific academic standards, the states using these tests maintain that these tests are reasonably aligned for federal assessment purposes.<sup>44</sup> In fact, all the ACT and SAT states indicated that they did not realign their academic standards when they decided to use these test for federal assessment purposes. ACT and SAT states are waiting to see how the USDE peer review process plays out and are optimistic that they will ultimately be able to obtain the USDE "meets" designation.<sup>45</sup> The majority of the states

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<sup>43</sup> ESSA allows states to utilize nationally recognized assessments in lieu of state-determined academic assessments. While ESSA does not define the term "nationally recognized," the proposed USDE regulations define the term as "an assessment of high school students' knowledge and skills that is administered in multiple states and is recognized by institutions of higher education in those or other states for the purpose of entrance or placement into credit-bearing courses in postsecondary education or training programs." Most education experts and the USDE indicated that the SAT, ACT, PARCC and Smarter Balanced assessments are likely candidates, which has proven true in that each type of assessment has been submitted for USDE peer review by at least one state.

<sup>44</sup> While there is significant overlap among state academic standards, it would be impossible for the ACT and SAT tests to be aligned point for point with each states individual academic standards in that the same version of these standardized tests are taken by all students regardless of the state in which the test may be administered. Neither the ACT nor SAT was designed to match any single state's academic standards, nor do these tests make state specific modifications, although both have undergone significant revisions subsequent to ESEA being amended by ESSA.

<sup>45</sup> States in general are not inclined to expand or incorporate additional assessment testing. Thus, states utilizing the ACT and SAT tests for federal assessment purposes would likely push for further modifications to those tests if unable to obtain the USDE "meets" designation in their current form.

utilizing either the ACT or SAT standardized tests for federal assessment purposes are doing so with the subject areas of reading/language arts and math, while utilizing another test for purposes of assessing science.<sup>46</sup> For those states electing to utilize the ACT Science Test component for federal assessment purposes, it appears that they will need to augment the test. Meanwhile, the one state electing to utilize the SAT Science Analysis Cross-test Score component has yet to submit such for a USDE peer review and, as a result, the USDE has no position in terms of whether it would be able to meet federal assessment requirements. However, a number of states have expressed the opinion that SAT would need to be augmented with regard to the science subject area to satisfy federal assessment requirements.

Although several states use either the ACT or SAT to satisfy federal assessment requirements in lieu of their own statewide assessment, other states have chosen not to pursue such testing options at this time as they concluded that the ACT and SAT do not fully align to their specific state standards.<sup>47</sup> Florida came to this conclusion pursuant to a 2018 independent report on the feasibility of using the ACT or SAT in lieu of the Florida Statewide Assessments (FSA) prepared by the Assessment Solutions Group (ASG) on its behalf.<sup>48</sup> Although the ASG Florida report acknowledged it is possible to augment the ACT or SAT to gain an acceptable level of alignment with the FSA, it was further noted augmentation adds cost and complexity to the administration of the tests as such augmentations need to be developed annually and administered separately. Additionally, the ASG Florida report noted that without such augmentation, the ACT and SAT tests might not meet the USDE peer review criteria for aligned tests.

USDE requires states to designate one statewide high school assessment, although it allows states to authorize more than one assessment option that can be utilized by its local education agencies (LEAs).<sup>49</sup> ESEA requires academic content assessments be aligned with the State's academic content standards and address the depth and breadth of those standards; be valid, reliable, and of adequate technical quality for the purpose for which they are used; express student results in the state's academic achievement standards; and provide

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<sup>46</sup> Regardless of whether or not a state is utilizing the ACT or SAT science component for federal assessment purposes, the entire ACT or SAT is taken by the student as the tests were designed to be administered in their entirety in a prescribed order for their results to be deemed valid for purposes of determining college and career readiness.

<sup>47</sup> ACT and College Board (SAT) representatives have themselves indicated and acknowledged their respective tests do not align to any one specific state's assessment and in fact were never designed to do so. It is contended by the respective representatives, however, that the tests do significantly correlate with state curriculums in general and as such are capable of satisfying federal assessment requirements.

<sup>48</sup> Roeber, E., Olson, J., & Topol, B. (2018), *Feasibility of the Use of the ACT and SAT in Lieu of Florida Statewide Assessments: Volume 1: Final Report*. Assessment Solutions Group, p. 5.

<sup>49</sup> "Local Education Agency" is defined in ESEA as, "a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or for the combination of school districts or counties that is recognized in a State as an administrative agency for its public elementary schools or secondary schools."

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coherent information about student achievement.<sup>50</sup> PDE and other stakeholders have overall indicated a willingness to look into whether utilizing a nationally recognized high school assessment (e.g., ACT, SAT, etc.) instead of the Keystone Exams would be beneficial, but it was emphasized that any consideration of such would have to involve a well-thought-out, thorough, and informed process with no guaranteed outcome.<sup>51</sup> In the meantime PDE noted the Keystone Exams (along with PSSA and PASA) were put in place in part to satisfy the assessment and accountability requirements under federal law, although the department remains open to considering other options to satisfy the federal requirements.

See Exhibit 29 for an overview and comparison of the content and format of the ACT and SAT.

The SAT was redesigned in 2016, in part to address the federal high school assessment requirements under ESEA, as amended by ESSA, and as part of the ongoing evolution of the SAT since its inception. The College Board (SAT Suite of Assessments: SAT, PSAT/NMQT, PSAT 10, and PSAT 8/9) report, *The College Board + Pennsylvania SAT Suite of Assessments: Alignment to Pennsylvania Standards* asserts the redesigned SAT Suite of Assessments SAT Suite strongly aligns with Pennsylvania's academic standards and supports its students' progress toward education and workplace success.<sup>52</sup>

See Exhibit 30 for highlights of the key features of the redesigned SAT Suite's English language arts and math related assessment as presented in the College Board report.

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<sup>50</sup> The USDE peer review process requires (among numerous other pieces of evidence) states submit an independent alignment study.

<sup>51</sup> While other stakeholders generally indicated a willingness to consider alternatives to the Keystone Exams, not all the stakeholders are necessarily equally supportive or open to such. It was also noted by one of the other stakeholders that a significant amount of time and money had been spent by Pennsylvania to develop the Keystone Exams, and by school districts implementing the Keystone Exams. Any change itself might also be viewed as contributing to what some have referred to as a lack of consistency in education policy, which has experienced frequent changes over the years at all levels of government (i.e., federal, state, and local government).

<sup>52</sup> The College Board report specifically states, "There is a very strong alignment between the Pennsylvania state standards in reading, writing and language and the Reading Test, the Writing and Language Test, and the SAT Essay in the SAT Suite. In Math, the alignment of the Pennsylvania state standards and the SAT Suite is strong." The College Board indicated the report can be updated (if necessary) within 6 to 8 weeks to correlate to Pennsylvania's latest version of academic standards. College Board acknowledged the SAT and Pennsylvania Keystone Exams themselves are not specifically aligned, however, its position is that both sets of tests align with Pennsylvania Core Standards.

Exhibit 29

Test Comparison: ACT and SAT		
	ACT	SAT
<b>Test Fee<sup>a</sup></b>	\$50.50 \$67.50 (with optional essay test)	\$47.50 \$64.50 (with optional essay test)
<b>Test Time</b>	3 hours and 15 minutes (plus 40 minutes for optional essay)	3 hours (plus 50 minutes for optional essay)
<b>Number of Questions</b>	215 ( <i>Time per question: 49 sec.</i> )	154 ( <i>Time per question: 1 min., 10 sec.</i> )
<b>Basic Test Structure</b>	4 tests (+ optional essay)	3 tests (+ optional essay)
<b>Specific Test Components</b>	Reading Test (40 questions, 35 mins.) English Test (75 questions, 45 mins.) Math Test (60 questions, 60 mins.) Science Test (40 questions, 35 mins.) {Optional} Essay (1 prompt, 40 mins.)	Reading Test (52 questions, 65 mins.) Writing and Language Test (44 questions, 35 mins.) Math Test (58 questions, 80 mins.) Analysis Science Cross-Test Score. <sup>b</sup> {Optional} Essay (1 prompt 50 mins.)
<b>Scoring</b>	Composite 1-36 (average of the four test scores, which each have their own composite score of 1-36)  {Optional} Essay - score 2-12	Composite 400-1600 (consisting of 200-800 for reading and writing/language and 200-800 for math)  {Optional} Essay – score 2-8 on each of three dimensions

Note: Federal high school assessment requirements (ESEA as amended by ESSA) do not require an essay component, nor does Pennsylvania.

<sup>a</sup> These dollar amounts are reflective of the fees posted for individual students on the ACT and SAT respective websites for the 2018-2019 school year. The actual cost per student may be less if the ACT or SAT is given pursuant to an agreement with a state or a school district (i.e., the ACT or SAT is being used by a state as its statewide federal assessment).

<sup>b</sup> SAT (unlike the ACT) does not have a separate science test. Although, the SAT does provide what the College Board terms as an Analysis Science Cross-test Score. The Analysis Science Cross-test Score is based on responses to science reasoning questions contained within the SAT Reading Test, Writing & Language Test, and Math Test.

Source: Developed by LBFC staff from data provided by ACT and the College Board (SAT).

## Exhibit 30

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### Key Features of Redesigned SAT Suite of Assessments (ELA & Math)

Key features of redesigned SAT Suite's English language arts/literacy (ELA) assessments:

- Use of a specified range of text complexity consistent with college and workforce training requirements.
- Emphasis on source analysis and use of evidence.
- Inclusion of data and informational graphics, which students must analyze in conjunction with text.
- Focus on words in context and on word choice for rhetorical effect.
- Attention to core set of important English language conventions and to effective writing expression.
- Requirement that students work with texts across a wide range of disciplines.

Key Features of the redesigned SAT Suite's math assessment:

- Strong focus on content that matters most for college and career readiness.
- Emphasis on applied problems in real-life settings.
- Balance of fluency, conceptual understanding, and application items within and across all content topics.
- Emphasis on problem solving and data analysis.
- Inclusion of both calculator and no-calculator portions as well as strategic attention to the use of calculator as a tool.

Source: Developed by LBFC staff from data provided by the College Board (SAT Suite of Assessments).

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The report further noted that while the SAT Suite of Assessments was not specifically designed to align with any single set of state academic standards, the SAT Suite provides states and schools with a longitudinal, evidence-based assessment system that measures growth in relation to essential college and career readiness and success outcomes from grade 8 through grade 12.<sup>53</sup>

Similarly, the ACT suite of assessments (ACT, Pre-ACT, Act Aspire Interim, and ACT Aspire Classroom) has been redesigned and modified to ultimately measure both what a student has learned in high school and determine the pupil's academic readiness for college and career.<sup>54</sup> Accordingly, ACT proffered the ACT aligns with state academic curriculum as it has made modifications and

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<sup>53</sup> Connecticut was the first state to receive USDE "peer review" results in relation to the SAT (or ACT for that matter) being used as its federally required high school assessment (in relation to reading/language arts and math) and received a "partially meets" designation as the Department determined more evidence was needed to determine how well the SAT meets Connecticut's academic standards and whether students with disabilities and those learning English will get adequate accommodations on the test. Connecticut commissioned an independent study in 2016 that found SAT adequately aligned with Connecticut's academic standards (Common Core) for the purpose for which Connecticut uses it: to get efficient and reliable estimate of a student's overall achievement (71 percent solid alignment in English, but only 43 percent alignment in Math).

<sup>54</sup> ACT further touts its ACT Aspire product as the first computer-based longitude assessment system for college and career readiness that connects student progress from elementary grades through high school.

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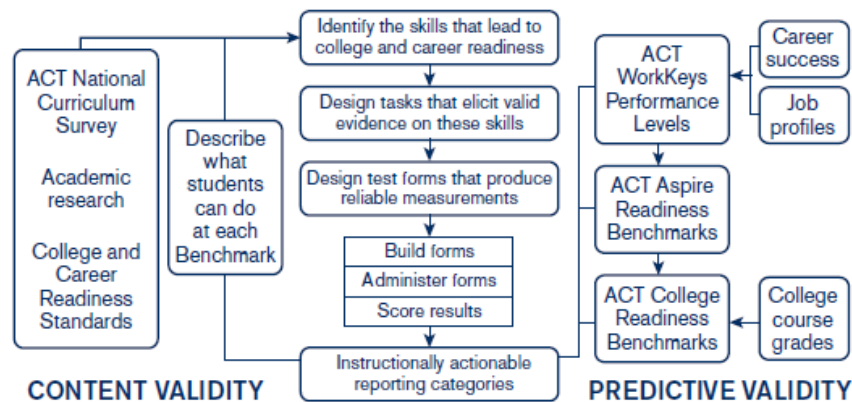


plans on additional modifications. It was noted that the ACT is constantly being reviewed and analyzed to determine whether additional modifications are necessary to ensure the high school assessment aligns with state academic standards as required by federal law and properly reflects the subject matters being taught in high schools and colleges. Additionally, every few years ACT conducts the ACT National Curriculum Survey to ask educators about what they teach (or do not teach), and to garner their perspectives on academic standards and college readiness (among other things). The survey allows ACT to ensure the entire suite of ACT assessments are valid and relevant on an on-going basis, and is a crucial step in ensuring its assessments are empirically aligned to college and career readiness that is reflective of a mastery of high school curriculum.<sup>55</sup> ACT also provided information about college and career readiness to the Common Core development effort.

See Exhibit 31 for a diagram that shows how the ACT survey directly informs the test blueprint used for the development of ACT assessments.

Exhibit 31

### ACT National Curriculum Survey Diagram



Source: ACT.

Wisconsin is one of the states that has elected to use the ACT as its designated statewide high school assessment and received a substantially meets designation from the USDE with regard to reading/language arts and math.<sup>56</sup> This is viewed as being significant in that Wisconsin is a 100 percent Common Core-based state, and among the required evidence the state submitted for

<sup>55</sup> The ACT National Curriculum Survey is distributed to high school teachers and college professors throughout the United States. For the first time the ACT National Curriculum Survey 2016 also included a sampling of workforce supervisors and employees, to provide a snapshot of how well educator priorities match those of the workforce upon a student obtaining a high school diploma or college certificate.

<sup>56</sup> Wisconsin also designated the ACT as its science assessment, but did not submit such for USDE peer review until spring of 2018 and is awaiting a designation with regard to that portion (RNC).

its USDE peer review was a 3<sup>rd</sup> party alignment study that showed the ACT was aligned with its academic standards. The USDE has indicated that other Common Core-based states can utilize the Wisconsin 3<sup>rd</sup> party study as long as the state can show overlap.<sup>57</sup>

**Science Component.** Federal assessment requirements in relation to the subject of science are a bit less certain, given the SAT provides an Analysis Science Cross-test Score that is rooted in science reasoning, versus a specific content-based science test. Meanwhile, the ACT does have a designated Science Test component albeit, like the SAT, but it is ultimately based on science reasoning versus science content specific.

While the SAT does not have a separate Science Test, it does provide what the College Board terms an Analysis Science Cross-test Score that is based on responses to science reasoning questions contained within the SAT Reading Test, Writing & Language Test, and Math Test. The College Board further articulates as follows:

*The redesigned SAT, while not focused on assessing the student's knowledge of science content, includes contexts across the major disciplines of science. The contexts provide the student with science content information that they can use to demonstrate their ability to think like a scientist—for example, to determine if particular new evidence supports or undermines a claim.*<sup>58</sup>

More specifically, the SAT Reading Test contains at least two science passages (or one science passage and one passage pair) that examine foundational concepts and developments in Earth science, biology, chemistry, or physics. Essentially students are asked questions that require them to draw on the reading skills needed most to succeed in those subjects. The SAT Writing and Language Test contains one passage that is science-based. Meanwhile, 18 of the SAT Math Test questions are science related.

In the case of the ACT there is, as previously indicated, a separate science test, but this component involves science reasoning versus a science specific content test. Thus, a state electing to utilize the ACT science component may need to either augment itself (e.g., Pennsylvania Science Keystone Exam, etc.) or use an ACT developed augment that assesses specific science content. Alternatively, a state could ignore the ACT science component for federal assessment purposes and just rely on an independently developed science content-based test (e.g., Pennsylvania Science Keystone Exam).

Both the ACT and SAT were designed to be given in their entirety, in a certain order, and within a prescribed period of time. The tests are also intended to

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<sup>57</sup> The ACT National Curriculum Survey 2016 indicated that 76 percent of high school teachers reported that their states had adopted Common Core, and while a number of states have pulled back from Common Core, other states continue to utilize Common Core or have established academic standards based at least in part on Common Core.

<sup>58</sup> "The Redesigned SAT's Analysis in Science Score, College Board, p. 1.

determine college and career readiness. The ACT and SAT each generate a corresponding science score for college entrance purposes even if their respective science components are not utilized to satisfy federal assessment requirements in relation to the subject of science that must be assessed at least once in grades 9 through 12.

Regardless of their formats, both the ACT and SAT focus on science reasoning (versus the recall of specific science content). To put this another way, these tests focus on the interpretation of information. Therefore, it would appear that for state and federal assessment requirements, a state looking to test specific science content would need to utilize a separate test.<sup>59</sup>

**USDE Peer Review.** In the event Pennsylvania decides to utilize the ACT or SAT or other nationally recognized high school assessment, PDE would be required to submit the assessment to the USDE for a “peer review” that includes the following six critical elements necessary for approval:

- 1) Statewide System of Standards & Assessments – Align to and address the depth and breadth of state standards.
- 2) Assessment System Operations – Be equivalent in its content coverage, difficulty and quality to the state assessments.
- 3) Technical Quality (validity) – Provide comparable valid and reliable academic achievement data, as compared to the state assessments, for all high school students and for each subgroup.
- 4) Technical Quality (other) – Express achievement results in terms consistent with the state’s achievement standards.
- 5) Inclusion of All Students Meets – ESSA’s requirement that all students in a state take the same assessment.
- 6) Academic Achievement and Standards Reporting – Provide unbiased, rational and consistent differentiation between and among schools in the state.

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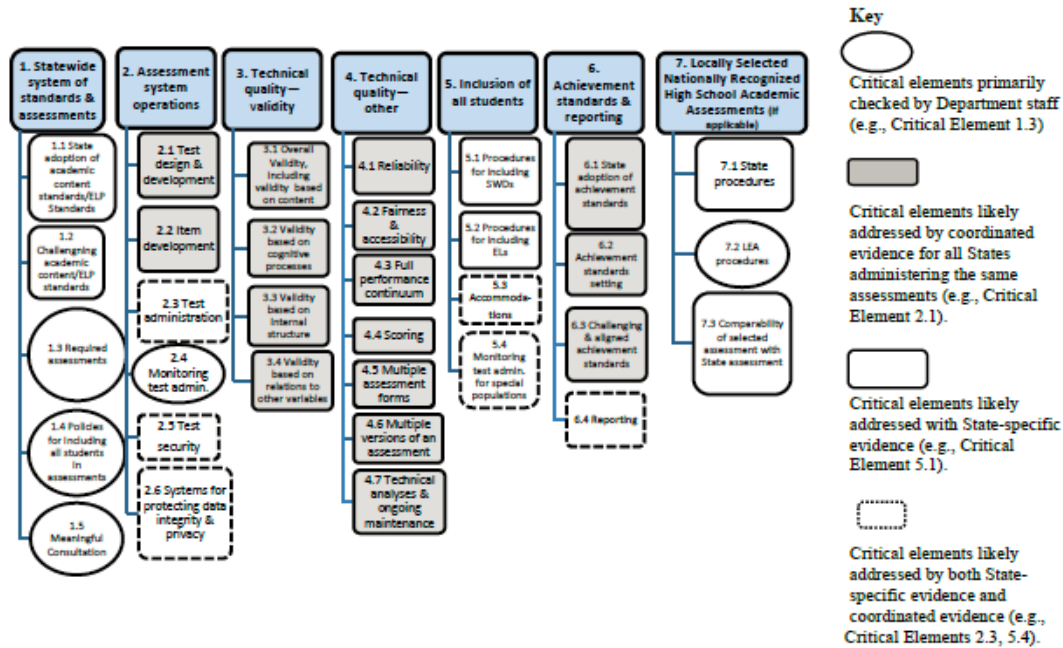
<sup>59</sup> A representative of College Board (SAT) indicated that ultimately it would be up to Pennsylvania educators to evaluate its test specifications against the particular science standards they want to measure at the high school level. The College Board representative went on to comment Pennsylvania most likely would not want to replace a test that covers specific science knowledge, although it was noted Pennsylvania could still use the SAT science test score to satisfy the federal assessment requirement for science.

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See Exhibit 32 for a flow chart that provides an overview of these critical elements for state assessment peer review.

Exhibit 32

## II – CRITICAL ELEMENTS FOR STATE ASSESSMENT PEER REVIEW



Source: United States Department of Education.

This is an evidence-based process that requires states to submit a significant amount of evidence for the purpose of confirming the assessment in question satisfies the federal requirements and does what the state says it's doing.<sup>60</sup>

These six critical elements indicate a nationally recognized assessment must meet the breadth of a state's existing state standards and be equivalent to existing state assessments, which would imply a state should not be faced

<sup>60</sup> USDE guidelines indicate that for assessments administered by multiple states, the department will conduct a single review of the evidence that applies to all states implementing the same assessments for the purpose of reducing the burden on states and to promote consistency in the assessment peer review. USDE has confirmed that it is in fact working to have one review of the common elements when multiple states are administering the same assessment, which has been the case for the SAT (among others), but not the ACT, as the states have generally not coordinated their submissions.

with the realignment of its state academic standards, Pennsylvania voluntary model curriculum, or individual public school entities curricula if it meets these peer review criteria.<sup>61</sup> In other words the assessment should test and measure what is currently in place.<sup>62</sup> Furthermore, the USDE’s guidelines indicate that a state may be able to build its “peer review” submission of a nationally recognized high school assessment upon evidence previously reviewed and approved through the USDE review process, which itself suggests there is some level of continuity.

As shown in Exhibit 33 a number of states have elected to administer either the ACT or SAT as the states’ high school assessment for the purpose of satisfying the Federal assessment requirements under ESSA, although none of the states has been classified as fully “meets” the requirements to date with regard to any of the three subject areas (i.e., reading/language arts, math, or science) subject to federal assessment requirements.

Exhibit 33

<b>States Administering ACT or SAT as High School Assessment (ESSA) 2018-2019 School Year</b>			
<b>State</b>	<b>ACT or SAT<sup>a</sup></b>	<b>Subjects<sup>b</sup></b>	<b>Outcome<sup>c</sup></b>
Alabama	ACT	R/LA, Math & Science	RNS
Colorado	SAT	R/LA & Math	RNS
Connecticut	SAT	R/LA & Math	Partially Meets
Delaware	SAT	R/LA & Math	Partially Meets
Illinois	SAT	R/LA & Math	RNC
Maine	SAT	R/LA & Math	RNC
Michigan	SAT <sup>d</sup>	R/LA & Math	Partially Meets
Montana	ACT	R/LA & Math	RNC
Nebraska	ACT	R/LA, Math, & Science	Substantially Meets
Nevada	ACT	R/LA & Math	RNS
New Hampshire	SAT	R/LA & Math	RNC
Oklahoma	SAT <sup>e</sup>	R/LA & Math	RNS

<sup>61</sup> The USDE assessment “peer review” is a process through which a state submits significant evidence to demonstrate the technical soundness of its assessment system with regard to each of the three subject areas (i.e., reading/language arts, math, and science). Generally, this is a lengthy, multistage process and results in the USDE classifying the assessment being reviewed as follows: does not meet, partially meets, substantially meets or meets. A state is allowed to proceed using the assessment so long as it is not classified as “does not meet.” The review process also requires the assessment be administered at least once before the USDE designates a corresponding classification. Most “peer reviews” do not result in a classification of “does not meet” and there have been no such classifications with regard to nationally recognized assessments since USDE resumed “peer reviews” in 2016 (following a temporary suspension of reviews from 2013-2015). Typically, states will initially receive either a classification of “partially meets” or “substantially meets” and then be required to submit additional information.

<sup>62</sup> The USDE does not look at the actual assessment test themselves, rather it primarily looks at how the assessment is used in the state’s accountability system and how the state gets its results. The “peer review” process is also focused on confirming states are testing what they think they are testing by reviewing how the state developed the test process.

Exhibit 33 Continued

Rhode Island	SAT	R/LA & Math	RNS
West Virginia	SAT	R/LA, Math, & Science	RNS
Wisconsin	ACT	R/LA, Math, & Science	Substantially Meets (R/LA & Math) <sup>f</sup> RNC (Science)
Wyoming <sup>g</sup>	ACT	R/LA & Math	Partially Meets

**Note 1.** The U.S. Department of Education (USDE) requires states to designate only one test as its statewide high school assessment. However, a state may still authorize multiple assessments (also subject to USDE peer review) to be used by its LEAs to satisfy the federal high school assessment requirement, which is what Oklahoma and West Virginia have done as indicated in the corresponding notes contained within this table.

**Note 2.** The USDE confirmed (as of 11/30/18) that no state using the SAT had submitted it for review in relation to science and as such it cannot determine at this time whether the SAT science component would be able to meet the federal assessment requirements (ESEA as amended by ESSA). Although, the College Board indicated the SAT, since its Spring 2016 redesign, includes and reports a science analysis cross-test score based on responses to the Reading Test (with one reading passage that is science-based), Writing and Language Test (with one passage that is science-based), and Math Test (with 18 questions that are science-based). The College Board believes its science analysis cross-test score can meet the federal assessment requirements; although, it acknowledges that SAT science still has not been subjected to a USDE peer review. Furthermore, a state seeking to assess a student's knowledge of science content would need to utilize a science content based test (e.g., PA Keystone Exam in Biology, etc.).

**Note 3.** Those states using ACT science component will need to augment it themselves or use an ACT developed augment in that the ACT involves science reasoning vs. science specific content.

<sup>a</sup> Unless indicated otherwise states either using all ACT or all SAT.

<sup>b</sup> Reading/Language Arts (R/LA).

<sup>c</sup> The status of state's USDE peer review is indicated as follows: 1) Peer Review Not Submitted (RNS) as of 10/31/18, or 2) Peer Review Not Completed (RNC) as of 11/16/2018.

<sup>d</sup> Michigan administered the ACT in the past, but now administers only the SAT.

<sup>e</sup> Oklahoma previously submitted in 2018 ACT for USDE "peer review," which still has not been completed (RNC). However, Oklahoma subsequently changed its designated statewide assessment to the SAT. Although Oklahoma still also authorizes its LEAs to utilize the ACT.

<sup>f</sup> USDE initially issued Wisconsin a peer review letter (1/13/2017) indicating partially meets with regard to R/LA and Math, but it does not apply to the science component as information was not submitted regarding such until spring 2018. Additional evidence was submitted by Wisconsin and the USDE has subsequently issued a peer review letter (11/9/2018) indicating ACT substantially meets with regard to R/LA and Math.

<sup>g</sup> Wyoming had received a partially meets classification with regard to the ACT, but subsequently switched to a different assessment.

Source: Developed by LBFC staff from data provided by the United States Department of Education (USDE), Education Commission of the States (ECS), ACT and College Board (SAT), and Listed States.

LBFC reached out to the states administering the ACT or SAT as the states' high school assessment. Along with confirming the information presented in Exhibit 33, states utilizing the ACT and SAT tests for federal assessment purposes have generally indicated that the tests would be required to align with the respective state's academic standards versus the state(s) undertaking

steps to realign its academic standards or corresponding curricula. As previously indicated, a number of these ACT and SAT states have already undertaken independent alignment studies that have indicated various levels of alignment (e.g., reasonable, significant, and substantial) in the areas of reading/language arts and math, albeit there are still some areas that may need to be addressed further, particularly in terms of additional adjustments to the assessments. Only a handful of states have obtained substantially meets or partially meets designations with regard to the subject areas of reading/language arts and math, subsequent to the USDE peer review process. The peer review process remains ongoing and these states continue to work towards the designation of meets, but this is not unexpected and is typical of the review process. In regards to the subject area of science only a few of the ACT states (i.e., Alabama, Nebraska [substantially meets], and Wisconsin) and SAT states (i.e., West Virginia) are also attempting to use these tests to satisfy the federal assessment requirement; however, all but one have yet to receive a designation in relation to science. The majority of the states are more confident in the ACT being able to satisfy the USDE peer review process given it has a separate science test versus a cross-test score, although states are inclined to expect that the ACT science test still need to be augmented (either by the state itself or in conjunction with ACT).

**Pennsylvania Survey Responses.** The LBFC undertook three separate surveys that involved Pennsylvania public school superintendents, principals, and teachers. In each of these surveys the corresponding target group was asked whether they support or oppose replacing the Keystone Exams with ACT, SAT, or another national assessment (assuming the assessment met federal and state requirements) and to provide an explanation for replacing the Keystone Exams with such. The responses to all three surveys were similar, particularly the superintendent and principle survey responses. Respondents indicated among the various reasons for their support of the ACT and SAT were the tests are nationally accepted exams and reflect what students have learned and need to be successful. Potential time and cost concerns were also indicated as reasons for support of the ACT and SAT.

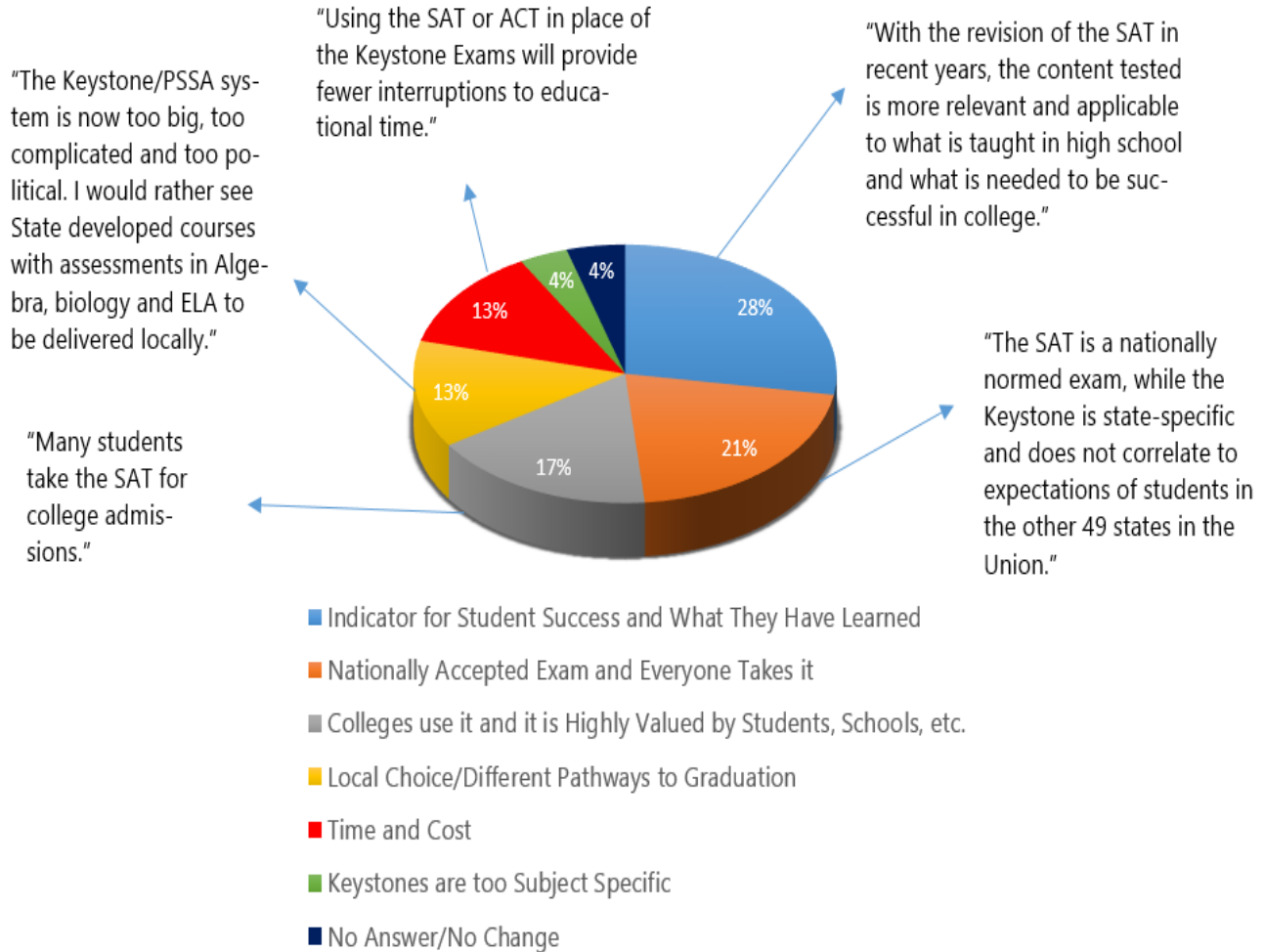
See Exhibit 34 (Superintendent Reasons), Exhibit 35 (Principal Reasons), and Exhibit 36 (Teacher Reasons) for an overview of the insight and perspective provided by these various Pennsylvania education professionals regarding their rationale for supporting the possibility of using the ACT/SAT (or other national assessment) to satisfy the federal statewide high school assessment requirement.<sup>63</sup>

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<sup>63</sup> The results of these surveys are not scientific and are not meant to indicate support or opposition in regards to the ACT/SAT (or other national assessment) versus the Keystone Exams. Rather the purpose of these exhibits is to present the reasoning that various Pennsylvania educational professionals gave for why they support the idea of utilizing the ACT/SAT (or other national assessment) in place of the Keystone Exams.

Exhibit 34

**Superintendents' Reasons for Replacing Keystone Exams with the ACT/SAT or Other National Assessments<sup>a</sup>**



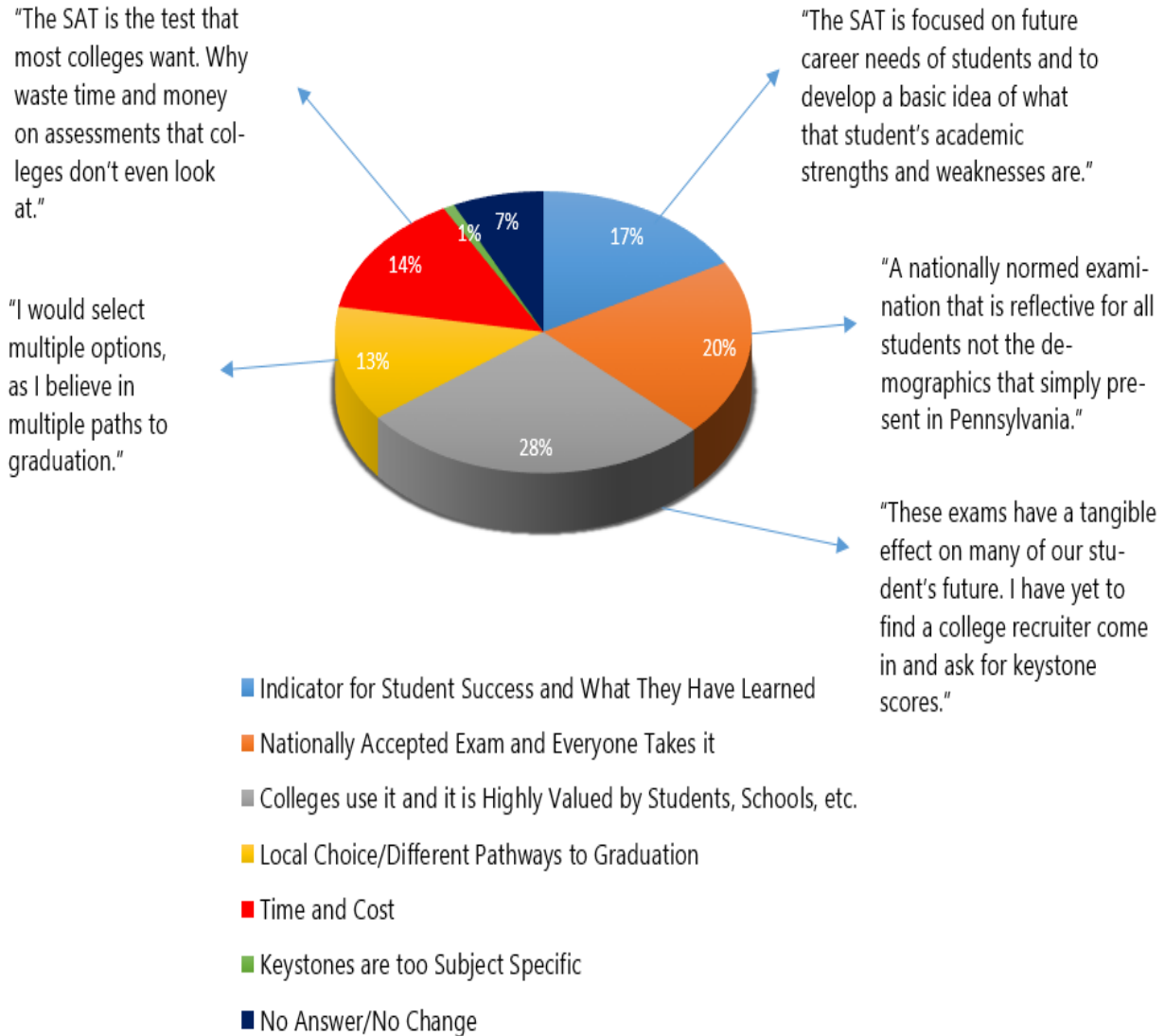
<sup>a</sup> Quotations are from superintendents' responses and are representative of each category.

Source: Developed by LBFC staff from Superintendent Survey.



Exhibit 35

**Principals' Reasons for Replacing Keystone Exams with the  
ACT/SAT or Other National Assessments<sup>a</sup>**

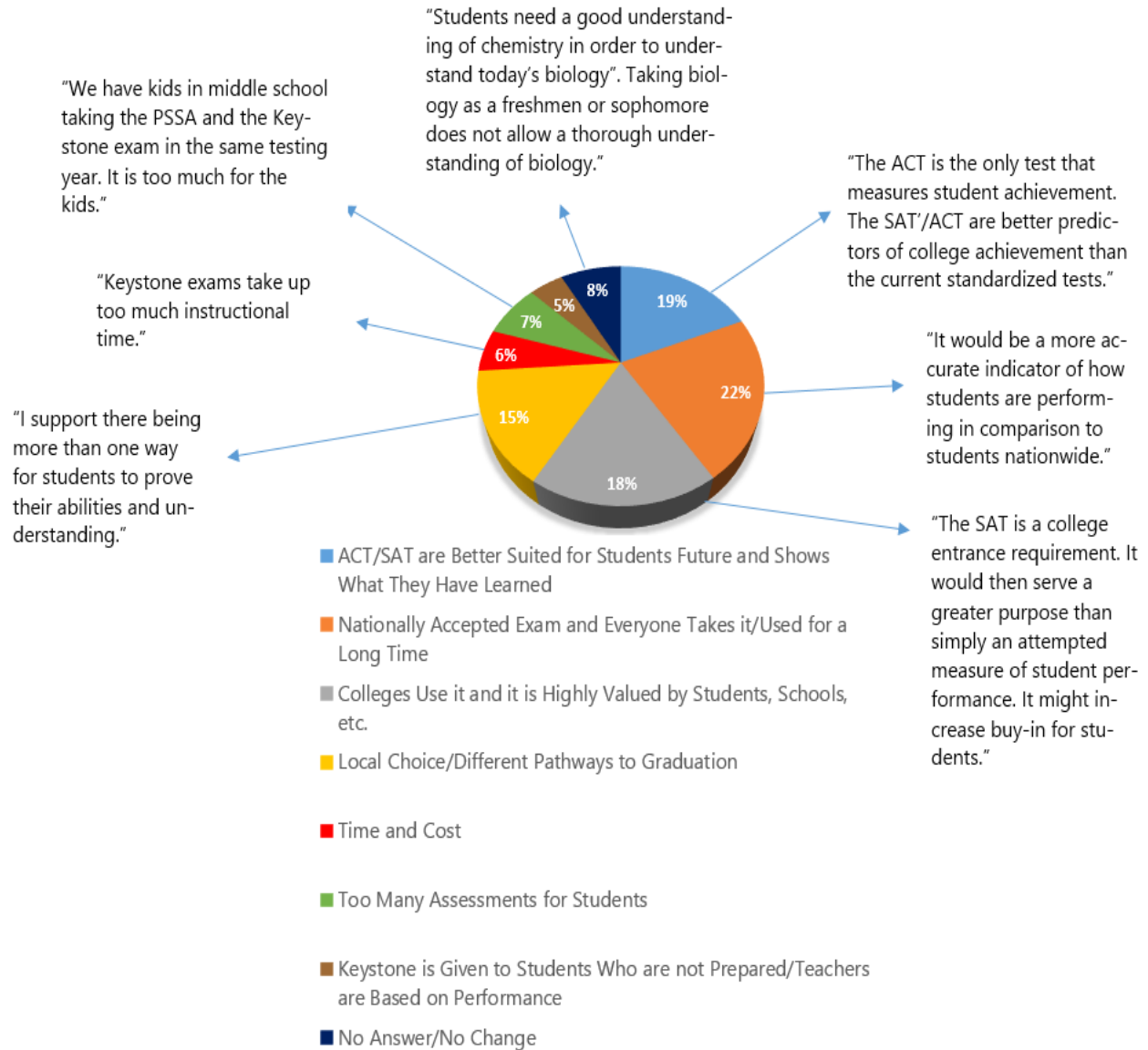


<sup>a</sup> Quotations are from principals’ responses and are representative of each category.

Source: Developed by LBFC staff from Principals Survey.

Exhibit 36

**Teachers' Reasons for Replacing Keystone Exams with the ACT/SAT or Other National Assessments<sup>a</sup>**



<sup>a</sup> Quotations are from Teachers' responses and are representative of each category.

Source: Developed by LBFC staff from Teachers Survey.

## B. Costs and Other Challenges

**Costs and Challenges.** In addition to concerns related to alignment there are numerous other issues, including initial cost concerns that would need to be considered, examined and addressed before Pennsylvania could switch from the existing Keystone Exams to an alternative high school assessment (e.g., ACT, SAT, etc.) to ensure continued compliance with ESSA assessment and accountability requirements. As alluded to earlier in this section, Pennsylvania alternatively could maintain the Keystone Exams as its designated statewide high school assessment, while concurrently authorizing and seeking a peer review for an alternative assessment (e.g., ACT, SAT, etc.) for its LEAs to elect to administer. PDE noted that students would be taking various types of math courses, but would all be taking the same ACT or SAT math test at a point in time and therefore, the student's most recent math classes might not align with the focus of these tests. Any transition from one assessment to another has the potential to be complicated and disruptive. The Pennsylvania Value-Added Assessment System (PVAAS) long-term growth comparisons (meaning, three-year averages) could be disrupted, while the PDE collected the necessary data required to provide a continuous longitude growth measurement.<sup>64</sup> It is anticipated that there would be significant initial costs and logistics associated with any transition, including ensuring the statewide data collection system syncs up with the numerous different data systems used by various Pennsylvania school districts. PDE purports any costs would be driven by the transition itself as any assessment should be aligned to the state's standards of curriculum. PDE does not currently have estimates of the cost or time involved in converting from the Keystone Exams to the ACT or SAT or any other standardized assessment, although PDE noted transition costs are likely to be non-trivial, with annual costs ensuing after the initial transition which would include (among other things) test development, production, grading, along with other potential costs not covered by the vendor contract (e.g., costs of altering data reporting systems such as eMetric, PIMS, PVAAS to allow reporting of the assessment results, training of test administrators, syncing up with the various school district data collection systems, etc.).

States utilizing either the ACT and/or SAT indicated the following in terms of some of the cost and/or challenges experienced when converting to these tests for federal assessment purposes:

### Costs

- Specific costs to convert can be difficult to quantify.
- Request for Proposal (RFP) process.
- Cost of the contract itself.
- Independent alignment study.

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<sup>64</sup> It took PDE three years to collect the necessary data upon the implementation of the Keystone Exams. Although the College Board indicated that given a large number of Pennsylvania students already taking the SAT, it may be able to provide without interruption the necessary data required to provide a continuous longitude growth measurement.

- Updating accountability system.
- Updating reporting system.
- State’s department of education internal staff time to implement and educate its school districts.

### Challenges

- Initial anxiety and cultural adjustments.
- Ensuring a timely conversion to the new assessment.
- SAT not as automated as some other assessment options with regard to the process for handling of test data (although this is an issue being looked at by the College Board).
- Loss of long term trend data.
- Need to ensure strong communications with all parties.
- Ensuring state procedures and policies not in conflict with test provider’s procedures and policies.
- Training stakeholders to administer a new assessment.
- Nuances of establishing a contract and working with a new test provider.

It is also worth mentioning (although the subject is more specifically addressed in Section X of this report dealing with accommodations) that historically it was a more arduous process to obtain approval for the use of accommodations with either the ACT or SAT. Currently, an accommodation that is allowed by a state and is included in a student’s Individual Education Plan (IEP) or 504 Plan is generally allowed with the ACT or SAT and will not impact the use of the test results for college entrance purposes.<sup>65</sup>

**Availability of Test in Other Languages.** The SAT currently only provides SAT instructions in Spanish along with a Spanish version of its math test, whereas Pennsylvania currently provides accommodated assessments in English-Spanish side-by-side for both Algebra I Keystone end-of-course exam and

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<sup>65</sup> The College Board explained it generally allowed accommodations in the past. The difference now is more one of the process by which it is determined if an allowable accommodation is in place at the state level. In the past the process of making this determination took place between the student and the test provider; whereas, now it takes place between the student and the school. Thus a formally documented accommodation that is allowed by the state and does not impact the validity of the assessment will be allowed. In most cases accommodations are not considered to affect the validity of an assessment. An example of one of the few exceptions involves providing a student with extra time to take an assessment (which not all states allow). Research has shown that providing extra time can actually negatively impact a student’s test results and the ultimate validity of the test.

Biology Keystone end-of-course exam.<sup>66</sup> The College Board has no immediate plans to provide the SAT reading test or SAT writing and language test in any other language given these tests involve reading comprehension and it is unlikely the higher education institutions would be supportive as college level course work is generally only offered in English.

## C. Keystone Exams Costs

The development of Keystone Exams began in 2009, with the initial implementation of the Keystone Exams occurring in fiscal year 2012-13 subsequent to a now expired contract between PDE and Data Recognition Corporation (DRC) that contract provided for overall costs, but did not delineate the costs of the individual contract elements (e.g., Classroom Diagnostic Tools [CDTs], Keystone Exams, and Pennsylvania System of School Assessment [PSSA]). Subsequently, PDE rebid the contract and included the requirement that the vendor break out the costs related to the individual contract elements (including CDTs, Keystone Exams and PSSA). The current contract began in January 2016 (FY 2015-16) and ends June 2021 (FY 2020-21).<sup>67</sup>

See Exhibit 37 for an overview of the Keystone Exams contract costs pursuant to the PDE/DRC contracts.<sup>68</sup>

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<sup>66</sup> ESSA requires states to develop assessments that meet the definition of “languages other than English that are present to a significant extent,” which Pennsylvania defines as languages spoken as a first or home language by one-half of one percent of statewide public school enrollment. In 2016-17 school year this equated to approximately 9,000 students. Spanish is currently the only language that meets this criterion with approximately 41,100 speakers statewide. The next most common spoken languages statewide are: Arabic (approx. 3,200), Chinese/Mandarin (approx. 2,500), Nepali (approx. 1,800), and Vietnamese (approx. 1,200).

<sup>67</sup> The Pennsylvania Department of Auditor General’s review of transparency and accountability for state funding of standardized testing was underway at the time this report was released.

<sup>68</sup> PDE indicated the DRC contract costs were higher in some of the earlier years under the previous contract (that ended in Fiscal Year 2015-16) due to costs associated with the initial development of the Keystone Exams. PDE further indicated costs associated with the development of new assessments tend to be more expensive in the years immediately following the initial development.

Exhibit 37

Keystone Exams Costs			
Fiscal Year	Milestone	Overall Assessment Contract Cost	Keystone Exams Costs (if broken out) <sup>a</sup>
2011-12	Final year before Keystone Exams	\$39,732,798	
2012-13	Keystone Exams introduced	\$57,770,476	
2013-14		\$59,171,991	
2014-15 <sup>b</sup>		\$57,503,647	
2015-16	Final year of previous contract	\$45,339,533	
2016-17	First year of re-bid contract	\$40,155,431	\$12,501,569
2017-18		\$42,168,595	\$12,843,658
2018-19	Projected costs	\$41,726,173	\$13,136,940
2019-20	Projected costs	\$42,676,944	\$13,446,699
2020-21	Projected costs	\$41,447,371	\$13,007,906

Note: PDE indicated that they could not break out the contract amounts for fiscal years prior to FY 2016-17 as the initial PDE/DRC contract did not provide such a break out.

<sup>a</sup> Keystone Exams costs were not itemized under the previous PDE/DRC contract that ended in FY 2015-16.

<sup>b</sup> While the PDE/DRC initial contract did not break out the contract amounts for fiscal years prior to 2016-17, the PDE did provide testimony (on 7/29/15) before the Pennsylvania House Committee on Education that provided the following approximate break out for FY 2014-15: \$20 million Keystone Exams, \$5 million CDT, and \$30 million PSSA.

Source: Developed by LBFC staff from data provided by the Pennsylvania Department of Education.

## SECTION IX CONTINUOUS LONGITUDE GROWTH MEASURE



### **Fast Facts...**

- ❖ *Value-added assessment is a statistical process that measures students' improvement from one year to the next.*
- ❖ *When the state's assessment tool is changed, and even when the assessment is being given for the first time, academic growth as measured by PVAAS can still be calculated with a strong relationship between the assessments.*
- ❖ *SAS's EVAAS methodology can make use of a wide range of assessments including state standards referenced tests, national norm referenced tests, college ready assessments, and even some locally developed state- or district-based tests.*

### **Overview**

This section addresses the Pennsylvania Value-Added Assessment System (PVAAS) and its tracking of longitudinal student growth, especially in the context of the possibility of changing statewide assessment tools and moving to the use of a nationally recognized tool, such as ACT or SAT. SR 322 asked "whether Pennsylvania can obtain a continuous longitudinal growth measure for public school entities and teachers in math, science and English language arts based on student performance on the Scholastic Aptitude Test [SAT] compared to the value-added assessment system [VAAS]." As seen below, PVAAS is not a separate test against which the ACT and SAT can be compared, but is a statistical process measuring student progress based, in part, on whatever statewide assessment tool is used. The SAT Suite of Assessments, in particular, has been redesigned to better ensure longitudinal evidence of student growth. A representative of SAS EVAAS, moreover, assured that PVAAS can provide growth measures using ACT or SAT at the district and school levels using prior PSSA tests to set the expected scores of students as long as the ACT and SAT tests continued to meet the general assessment requirements for growth. And, for example, if a subset of districts used SAT and another subset used ACT, the expectation of growth would be based on the average growth in the group of districts administering the particular assessment.

### **A. Value-added Assessment**

Students' growth can vary greatly among districts, schools, and classrooms. To quantify that growth "value-added" assessment methodologies were developed to help focus on student advances in academic achievement over a given year and that can be attributed to a school district, a school, or an individual teacher. The primary idea is that yearly improvement in student performance matters more than individual achievement scores on a particular test.

Value-added assessment is a statistical process that measures students' improvement from one year to the next by following a group of students over time to obtain a gain score.<sup>69</sup> This methodology is the heart of the Tennessee

<sup>69</sup> Gain is generally the difference between test scores obtained for an individual or group of individuals from a measurement instrument, intended to measure the same attribute, trait, concept, construct, or skill, between two or more testing occasions.

Value-Added Assessment System (TVAAS), an early and much-discussed example of a value-added accountability undertaking. Established in the 1990s, TVAAS relied on complex statistical methods to identify patterns in student learning made by specific teachers, schools, and districts.

Overall, the idea behind value-added modeling is to help level the playing field by using statistical procedures that then allow direct comparisons between schools and teachers even though those schools and teachers are working with different and diverse populations of students.

## **B. Overview of PVAAS**

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*The EVAAS methodology has been published since 1997 and has been nationally peer reviewed. Following a pilot from 2002-2005, PVAAS has been implemented statewide in Pennsylvania since 2006.*

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PVAAS is Pennsylvania's value-added assessment system.<sup>70</sup> Like the general concept of value-added modeling, PVAAS is a statistical analysis used to quantify the yearly academic progress rates of student groups by school district, school, or teacher. To calculate the growth measure, the student's current achievement compared to all prior achievement and achievement is measured existing student assessment data such as the PSSA and Keystone Exams.

The specific value-added methodology used by PVAAS is called Education Value-Added Assessment System (EVAAS). The EVAAS methodology has been published since 1997 and has been nationally peer reviewed. Following a pilot from 2002 through 2005, PVAAS has been implemented statewide in Pennsylvania since 2006.

Measuring district and school level growth<sup>71</sup> reliably under PVAAS entails adequate statistical precision to overcome challenges when examining longitudinal data. To achieve this, PVAAS includes students with missing test scores (other models exclude students with missing test scores); uses all available testing history for each student (other models restrict prior testing history); uses all available testing history for each student, even when the historical data are not on the same scale or when tests have changed over time; and reduces the effects of measurement error, which is inherent in all student assessments because the tests themselves are estimates of student knowledge, and not an exact measurement.

Every school district, public school, and charter school has access to PVAAS as a resource to assist with continuous individual school improvement. This par-

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<sup>70</sup> Pennsylvania's Public School Code defines "Value-added assessment system" to mean a statistical analysis of results on the Pennsylvania System of School Assessment test or any other test established by the State Board of Education to meet the requirements of section 2603-B(d)(10)(i) pursuant to 22 Pa. Code § 403.3 (relating to single accountability system) that uses measures of student learning to enable the estimation of school or school district statistical distributions.

<sup>71</sup> See discussion regarding teacher level growth measures later in this section.



ticular perspective of measuring student learning is intended to provide educators with valuable information and insight to ensure they are meeting the academic needs of groups of students.

## C. Impact of a Transition in Assessment System

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*EVAAS methodology can make use of a wide range of assessments.*

*Assessment tools are examined each year to determine if they are appropriate to use in a longitudinally linked analysis.*

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PDE works with SAS Institute, Inc.<sup>72</sup> as modifications may be considered, deliberated, or applied, regarding Pennsylvania's statewide assessment system. The state's assessment data is evaluated by PDE annually to ensure it meets the quality needed to provide value-added reporting at all levels for all students, such as reliability and sufficient stretch<sup>73</sup> to measure the growth of students with higher and lower achievement. When the state's assessment tool is changed or when the assessment is being given for the first time, academic growth, as measured by PVAAS, can still be calculated. To do so requires sufficient evidence regarding the relationships between the assessments, as well as the strength of these relationships. Test scores are not required to be scaled the same in order to measure growth during a test transition. The new test, however, should have a strong relationship to the old version.

SAS's EVAAS methodology can make use of a wide range of assessments including state standards, referenced tests, national norm referenced tests, college ready assessments, and even some locally developed state- or district-based tests, such as career and technical education or vocational tests. Assessment tools are examined each year to determine if they are appropriate to use in a longitudinally linked analysis.

The PVAAS model uses various strong, longitudinal statistical models that are flexible and can accommodate the following: the use of both historical and current assessment data when tests change over time; the use of all of the longitudinal data for each student, even when the historical assessment data is on differing scales; students with missing test scores without introducing major biases that come from either eliminating data from students or by using

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<sup>72</sup> Developer of SAS EVAAS upon which PVAAS is built. According to SAS Institute, Inc. "SAS EVAAS for K-12 builds on the Tennessee Value-Added Assessment System (TVAAS) methodology developed by Dr. William L. Sanders and his colleagues at the University of Tennessee at Knoxville."

<sup>73</sup> According to SAS Institute, Inc., state assessment tools are examined each year to determine if they are appropriate to use in a longitudinally linked analysis. Scales must meet the three requirements described below:

- Stretch - indicates whether the scaling of the test permits student growth to be measured for either very low- or very high-achieving students. A test "ceiling" or "floor" inhibits the ability to assess growth for students who would have otherwise scored higher or lower than the test allowed.
- Relevance - indicates whether the test is aligned with the curriculum. Generally, this is determined by the state or district implementing the assessments.
- Reliability - can be viewed in a few different ways for assessments. Psychometricians view reliability as the idea that a student would receive similar scores if they took the assessment multiple times. Reliability also refers to the assessment's scales across years.

overly simplistic imputation procedures; and data challenges associated with both student and teacher mobility.

## **D. PVAAS, the ACT and SAT**

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*Teacher growth measures cannot be provided using SAT or ACT, according to SAS EVAAS, but district and school level growth can be.*

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SR 322 asked whether Pennsylvania can obtain a continuous longitudinal growth measure for public school entities and teachers in math, science and English language arts based on student performance on the Scholastic Aptitude Test (SAT) compared to the value-added assessment system. We discussed this question with both representatives of the College Board regarding the SAT assessment tool, as well as with ACT. The College Board indicated that in regards to 2018-19 it has modified/redesigned the entire SAT Suite of Assessments (SAT, PSAT/NMSQT, PSAT 10 and PSAT 8/9) to better ensure its suite of assessments provides states and schools with a longitudinal evidence-based assessment system that measures growth in relation to essential college and career readiness and success outcomes in grades 8 through 12. ACT was confident that its testing can provide longitude growth measure related to student achievement and from such can aggregate for teacher evaluation and school building performance. However, it was noted this is a state issue and that USDE peer review process requires evidence be submitted by states to establish such.

A Senior Director overseeing the SAS EVAAS format through SAS Institute, Inc. likewise assured that Pennsylvania's VAAS can provide growth measures using ACT or SAT at the district and school levels using prior PSSA tests to set the expected scores of students. Teacher growth measures, however, cannot be provided using ACT or SAT. This is because individual teachers are typically connected to specific courses like algebra I or geometry, while the ACT and SAT are general achievement tests that cover information ranging over multiple years and courses.

## SECTION X

### AVAILABLE ACCOMMODATIONS AND IMPACT ON VALIDITY OF ASSESSMENT



#### **Fast Facts...**

- ❖ *Accommodations are tools and procedures that provide equal access to instruction and assessment for students with disabilities, which are meant to level the playing field without altering the assessment.*
- ❖ *“Universal design” (design for everyone) ensures accurate assessments and that all students are provided with equal opportunities to demonstrate what they learned.*
- ❖ *Accommodations generally do not impact the validity of assessments or the validity of the tests as a growth measure.*

## **Overview**

This section addresses the request to conduct a comparison of universal design principles and accommodations available to students with disabilities for state standardized tests, and determine whether the availability of accommodations impacts the validity of those tests as a growth measure. Specifically, this section identifies accommodations and the applicable federal laws, the concept of Universal Design, whether accommodations impact the validity of state assessments as a growth measure, and the types of accommodations available in Pennsylvania and the surrounding states.

### **A. Accommodations**

Accommodations are tools and procedures that provide equal access to instruction and assessment for students with disabilities, which are meant to level the playing field to ensure such students are able to access adequate grade level instruction and have every opportunity to demonstrate their knowledge in state and local assessments.<sup>74</sup>

Accommodations are frequently provided to students with disabilities and students with limited English proficiency to ensure fair testing conditions. There are four groups of students who may receive accommodations on assessments:

- 1) Students with disabilities who have an Individualized Education Plan (IEP).
- 2) Students with a Section 504 plan.

<sup>74</sup> The September 2018 USDE A State's – Guide to the U.S. Department of Education's Assessment Peer Review Process defines "accommodations" as follows:

*For purposes of this document, accommodations generally refer to adjustments to an assessment that provide better access for a particular test taker to the assessment and do not alter the assessed construct. These are applied to the presentation, response, setting, and/or timing/scheduling of an assessment for particular test takers. They may be embedded within an assessment or applied after the assessment is designed. In some testing programs, certain adjustments may not be labeled accommodations but are considered accommodations for purposes of peer review because they are allowed only when selected for an individual student. For academic content assessments, accommodations are generally given to ELs as needed, and to students with disabilities. For the ELP [English Language Proficiency] assessment. Accommodations are provided only for students with disabilities. Accommodations provided during assessments must be determined in accordance with 34 CFR § 200.6(a) and (b).*

- 3) Students who are English Learners (ELs).
- 4) Students who are ELs with disabilities who have an IEP or 504 plan.

Accommodations do not reduce expectations for learning (vs. modifications which do reduce the learning experience – e.g., reducing the amount of material learned).

See Exhibit 38 for an overview of the guiding criteria in terms of what accommodations should do (to the extent possible).

### Exhibit 38

<b>Purpose of Accommodations</b>
<p><b>To the extent possible, accommodations should:</b></p> <ul style="list-style-type: none"><li>• Provide equitable access during instruction and assessments.</li><li>• Mitigate the effects of a student’s disability.</li><li>• Not reduce learning or performance expectations.</li><li>• Not change the construct being assessed.</li><li>• Not compromise the integrity or validity of the assessment.</li></ul>

Source: Developed by LBFC staff from PARCC data.

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Test features are generally not considered accommodations in that they are available to all students (e.g., reading aloud of a word, phrase, or test item, the use of a highlighter, etc.); however, a test feature is considered an accommodation when the student’s education team determines it is necessary in relation to the student participating in an assessment.<sup>75</sup> PDE indicates, in conjunction with federal and state statutes and regulations, accommodations consist of practices and procedures meant to ensure educators, along with students and their parents, have a valid measure of what students with disabilities know and are capable of doing. PDE further notes assessment accommodations must also be provided to a student during classroom instruction, classroom assessments, and district assessments. However, not all instructional/classroom accommodations may be appropriate for use on certain statewide assessments. ESEA requires all students, including those with disa-

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<sup>75</sup> The September 2018 USDE state guide in regards to its assessment peer review process defines “accessibility tools and features” as follows:

*This refers to adjustments to an assessment that are available to all test takers and are embedded within an assessment to remove construct-irrelevant barriers to a student’s demonstration of knowledge and skills. In some testing programs, sets of accessibility tools and features have specific labels (e.g., “universal tools” and “accessibility features”).*

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bilities, be subject to state- and-district-wide tests for assessment and accountability purposes. PDE further indicates that all students with disabilities should work toward grade-level academic content standards, and most will be able to meet these standards if the following three conditions are met:

- 1) Instruction is provided by qualified teachers in the content areas covered by state standards.
- 2) Individual Education Programs (IEPs) are developed or 504 plans are put in place to ensure the provision for diverse learners.
- 3) Appropriate accommodations are provided to help student's access grade level content.

**Federal Laws.** Federal laws like ESEA as amended by ESSA, IDEA, Section 504 of the Rehabilitation Act of 1973 (reauthorized in 2008), and the Americans with Disabilities Act of 1990 (ADA) are all meant to ensure individuals with disabilities have equal opportunities to fairly compete and pursue opportunities as individuals.<sup>76</sup> The protections offered by these four federal laws complement each other and overlap to some extent.<sup>77</sup> In regards to public school students, these laws require the participation of students with disabilities in standards-based instruction and assessment initiatives.

See Exhibit 39 for a comparison of these four federal laws (ESEA, IDEA, Section 504, and ADA):

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<sup>76</sup> Section 504 Plan - Section 504 (29 U.S.C. § 794) of the Rehabilitation Act of 1973, P.L. 93-112, (1973), 29 U.S.C. §§ 701 et seq. and ADA - Americans with Disabilities Act of 1990, P.L. 101-336, (1990), 42 U.S.C. §§ 12101 et seq. (reauthorized in 2008).

<sup>77</sup> The primary focus of this report is on the accommodation provisions of ESEA and IDEA (that address children with intellectual disabilities, hearing impairments, hearing impairments [including deafness] speech or language impairments, visual impairments [including blindness], serious emotional disturbance, orthopedic impairments, autism, traumatic brain injury, other health impairments, or specific learning disabilities), although ADA (that addresses physical and mental disabilities) also warrants a mention given college entrance exams (e.g., SAT, ACT, etc.) are among the types of exams subject to the provisions of ADA.

Exhibit 39

<b>Comparison of Key Aspects of ESEA (amended by ESSA), IDEA (IEP), Section 504, and ADA</b>	
<b>ESEA (amended by ESSA) (20 U.S.C. §§ 6301 et seq.)</b>	<p>Purpose: An education act that requires each state to implement academic assessments and that such provide reasonable adaptations and accommodations for students with disabilities (as defined in IDEA).</p> <p>Protected: All K-12 public school students.</p>
<b>IDEA (IEP) (20 U.S.C. §§ 1401 et seq.)</b>	<p>Purpose: An education act that provides for federal financial assistance to state and local education agencies to ensure special education and related services to eligible children with disabilities.</p> <p>Protected: Children ages 3-21 who are determined by the students individual education plan (IEP) team to be eligible within one or more of the identified disability categories [e.g., children with intellectual disabilities, hearing impairments, hearing impairments (including deafness) speech or language impairments, visual impairments (including blindness), serious emotional disturbance, orthopedic impairments, autism, traumatic brain injury, other health impairments, or specific learning disabilities)] who are in need of special education and other related services.</p>
<b>Section 504 (504 Plan) (29 U.S.C. § 794)</b>	<p>Purpose: A civil rights law that prohibits discrimination on the basis of disability in programs and activities (public and private) that receive federal financial assistance. It has two main purposes: 1) Provide free appropriate public education (FAPE) for students with disabilities in K-12 public schools that have a 504 plan, and 2) Prohibit discrimination against people with disabilities in programs and activities that receive federal funding.</p> <p>Protected: Any person who: 1) has a physical or mental impairment that substantially limits one or more major life activities, 2) has a record of such an impairment, or 3) is regarded as having such an impairment. Major life activities include walking, seeing, hearing, speaking, breathing, learning, working, caring for oneself, and performing manual tasks.</p>
<b>ADA (42 U.S.C. §§ 12101 et seq.)</b>	<p>Purpose: A civil rights law that prohibits discrimination solely on the basis of disability in employment, public service and accommodation.</p> <p>Protected: Any individual with a disability whose physical or mental impairment substantially limits one or more life activities. Major life activities include (but are not limited to) caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standings, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. Major life activities also includes the operation of a major bodily function (e.g., functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions).</p>

Source: Developed by LBFC staff from review of ESEA, IDEA, Section 504, and ADA.

ESEA specifically requires each state to implement a set of high-quality, yearly student academic assessments to measure the achievement of all children relative to the state academic content and state student academic achievement standards.<sup>78</sup> It is further required that the assessments required under ESEA provide for reasonable adaptations and accommodations for students with disabilities, a term defined in IDEA.<sup>79</sup>

ESEA, as amended by ESSA, in regards to the requirements for assessment accommodations remain essentially the same as they were under the previous reauthorization of ESEA. The main adjustment in relation to accommodations clarifies that students who participate in alternative assessments based on alternative achievement standards should be provided with accommodations. ESEA also includes provisions for the inclusion and accommodation of ELs (with and without disabilities) in a state's assessment and accountability systems.<sup>80</sup> Federal regulations pursuant to ESEA, as amended by ESSA, clarified that states must develop appropriate accommodations for students with disabilities; disseminate information and resources about accommodations to, at a minimum, LEAs, schools and parents; and promote the use of accommodations to ensure all students with disabilities are able to participate in academic instruction and assessments. The federal regulations also added a provision that specified states were similarly required to develop appropriate accommodations for ELs, disseminate related information and resources, and promote their use.

States are required under ESEA to maintain at least a 95 percent student participation rate in the federally required assessments. The two exceptions to this are:

- 1) ELs in their first year in a United States school are not required to participate in a state's English language arts assessment and do not count towards the state's accountability assessment system for any of the subject areas covered by the federally required assessments.
- 2) Up to one percent of all students otherwise required to take a statewide assessment may take an alternative assessment (based on alternative achievement standards) based on their cognitive abilities.

IDEA generally requires the participation of students with disabilities in state assessments (including district-wide assessments). IDEA specifically states:<sup>81</sup>

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<sup>78</sup> ESEA – 20 U.S.C. § 6311(b)(3)(A) & (C)(i) & (ii).

<sup>79</sup> IDEA – 20 U.S.C. § 1401(3).

<sup>80</sup> The September 2018 USDE state guide regarding its assessment peer review process states the following was among the changes to ESEA by ESSA:

*The requirement that a state ensure that accommodations for all required assessments do not deny students with disabilities or ELs the opportunity to participate in the assessment and any benefits from participation in the assessment (ESEA section 1111(b)(2)(B)(viii); 34 CFR § 200.6(b)(3), (f)(2)(i)).*

<sup>81</sup> IDEA – 20 U.S.C. § 1412(a)(16)(A).

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*All children with disabilities are included in all general State and districtwide assessment programs . . . with appropriate accommodations and alternate assessments where necessary and as indicated in their respective individualized education programs.*

Section 504 of the Rehabilitation Act of 1973 (Rehabilitation Act of 1973) guarantees certain rights to people with disabilities by prohibiting discrimination against individuals seeking access to programs and activities provided by entities that receive funding from the federal government, including USDE funding. Section 504(a) of the Act specifically states:<sup>82</sup>

*No otherwise qualified individual with a disability in the United States, as defined in section 7(20), shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity conducted by any Executive agency. . . .*

In relation to public school students with disabilities, Section 504 guarantees and protects the rights of students with disabilities who do not have an IEP, but are nonetheless identified as an individual with disabilities. These students' disabilities are addressed and documented in what is referred to as a Section 504 plan (504 plan).

## **B. Universal Design**

When discussing assessments and accommodations it is necessary to discuss the concept of "universal design" (design for everyone) in relation to assessments in that it ensures accurate assessments and that all students are provided with equal opportunities to demonstrate what they have learned.<sup>83</sup> Universally designed assessments are designed to provide the most valid assessment possible for the greatest number of students, including ensuring those students with disabilities are afforded access during assessment, and to minimize the need for individualized design or accommodations. Thus a student's need for testing accommodations could be reduced in many instances if universally designed assessments are utilized. Universal design builds flexibility into assessments at the development stage that acknowledges differences exist among individual students and allows for flexible adjustments for a broad range of students. However, universally designed assessments are not intended to replace accommodations or the need for alternative assessments for those students in need of such. Universal design also does not address classroom instructional deficiencies. A student who has not been afforded with an adequate opportunity to learn the material being assessed may still be

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<sup>82</sup> Section 504 Plan – 29 U.S.C. § 794(a).

<sup>83</sup> While the ultimate goal is to be as inclusive as possible, it is recognized that it is nearly impossible to design all things for all people. However, it is also emphasized that this fact is not a weakness of the concept of universal design as the term universal design is most descriptive of the underlying goal.



at a disadvantage during testing regardless of the extent to which universal design principals have been incorporated into the test or whether the student has been afforded with the appropriate test accommodations. The utilization of the principals of universal design help ensure that the assessments themselves do not become barriers to learning. Universal design for assessment is described in *Universal Design Applied to Large Scale Assessments* as follows:

*Universally designed assessments are designed and developed from the beginning to allow the participation of the widest possible range of students, and to result in valid inferences about performance for all students who participate in the assessment.*

\* \* \*

*Universally designed assessments are based on the premise that each child in school is a part of the population to be tested, and that testing results must not be affected by disability, gender, race or English language ability. Universally designed assessments are not intended to eliminate individualism, but they may reduce the need for accommodations and various alternative assessments by eliminating access barriers associated with the tests themselves.*

IDEA defines the term “universal design” as having the same meaning as contained in the Assistive Technology Act of 1998:<sup>84</sup>

*The term “universal design” means a concept or philosophy for designing and delivering products and services that are usable by people with the widest possible range of functional capabilities, which include products and services that are directly usable (without requiring assistive technologies) and products and services that are made usable with assistive technologies.*

The term universal design has even been incorporated to some extent directly into ESEA, as amended by ESSA, by requiring states to describe in their state plans the steps the state has taken to incorporate universal design for learning (to the extent feasible) in alternative assessments for students with the most significant cognitive disabilities.<sup>85</sup>

The origins of the universal design concept date back more than two decades beginning in the architecture field, and has since been expanded to numerous other areas, including education assessments that focus on seven elements:

- 1) Inclusive assessment population.
- 2) Precisely defined constructs.

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<sup>84</sup> IDEA - 20 U.S.C. § 1401(35) (related to definitions. and Assistive Technology Act of 1998, P.L. 105-394, 29 U.S.C. § 3002(19) (related to definitions - “universal design”).

<sup>85</sup> ESEA - 20 U.S.C. § 6311(b)(2)(D)((i)(IV).

- 3) Accessible, non-biased items.
- 4) Amendable to accommodations.
- 5) Simple, clear, and intuitive instructions and procedures.
- 6) Maximum readability and comprehensibility.
- 7) Maximum legibility.

See Exhibit 40 for a further explanation of the seven universal design elements, which is reflective of the National Center on Educational Outcomes (NCEO) review of research relevant to the assessment development process and the principals of universal design.

## Exhibit 40

**Table 2. Elements of Universally Designed Assessments**

Element	Explanation
Inclusive Assessment Population	Tests designed for state, district, or school accountability must include every student except those in the alternate assessment, and this is reflected in assessment design and field testing procedures.
Precisely Defined Concepts	The specific constructs tested must be clearly defined so that all construct irrelevant cognitive, sensory, emotional, and physical barriers can be removed.
Accessible, Non-Biased Items	Accessibility is built into items from the beginning, and bias review procedures ensure that quality is retained in all items.
Amenable to Accommodations	The test design facilitates the use of needed accommodations (e.g., all items can be Brailled).
Simple, Clear, and Intuitive Instructions and Procedures	All instructions and procedures are simple, clear, and presented in understandable language.
Maximum Readability and Comprehensibility	A variety of readability and plain language guidelines are followed (e.g., sentence length and number of difficult words are kept to a minimum) to produce readable and comprehensible text.
Maximum Legibility	Characteristics that ensure easy decipherability are applied to text, to tables, figures, and illustrations, and to response formats.

Source: National Center on Education Outcomes and The Journal of Applied Testing Technology.

In 2015, NCEO's 2014 Survey of States results indicated states reported the following in relation to "universal design":<sup>86</sup>

- 82% (41 states) – "Universal design" elements were considered during test conceptualization and construction.
- 74% (37 states) – "Universal design" was addressed in test development RFPs and in the final reviews conducted with test contractors.
- 72% (36 states) – "Universal design" was addressed during the final review.

<sup>86</sup> The referenced survey information reflects the results of responses from 46 of 50 states.

## C. Validity

**Generally.** Due to the emphasis on testing and including all students, providing accommodations has become more common and yet the policies associated with such have also become more complex and sophisticated. There has also been a great deal of attention focused on the issues of fairness and validity regarding the types of test accommodations made available and which students should have access to those accommodations. Generally speaking, accommodations do not impact the validity of assessments or the validity of the test as a growth measures as long as the state adheres to the recommended processes for developing the assessment and developing the state's accommodation policies. Accommodations are considered necessary for certain students to ensure the validity of both test results and growth of the results. However, it is imperative states ensure students are provided with the appropriate amount and types of accommodations as the principals of universal design can be negatively impacted along with the validity of assessment results, and other measures based on such can also be improperly impacted if a student is not provided the appropriate accommodations. To ensure students are afforded with necessary accommodations, the educational professionals who provide for such through a student's IEP or 504 plan need to be familiar with the state's accommodation policies and have adequate professional development training necessary to ensure they are able to determine the specific needs of each student. The USDE peer review of state standards and assessments requires states to have clear policies for accommodations, to monitor the availability and use of accommodations, and to ensure that the use of accommodations results in a valid and meaningful score.

In the past, accommodations were generally less prevalent and the types of accommodations available to students with disabilities tended to vary greatly from state to state. As of 2001, all 50 states had test accommodation policies and/or guidelines in place. More recent research indicates there is greater attention today to state accommodation policies focused on ensuring available accommodations provide valid scores, and there is greater differentiation among accommodations allowed for different groups of students (e.g., students with IEPs, student with 504 plans, and ELs). The variability across states in their accommodations has greatly lessened over time, although state accommodation policy manuals have become increasingly complex and lengthy at the same time (with some state policies on accommodations being several hundred pages). This is important in that in the past the lack of and the wide variation in the types of accommodations available in states had the potential to compromise the validity of standardized test results. The accountability demands, required by ESEA as amended by NCLB (2001), were among the factors that accelerated the use of accommodations by students on statewide assessments, and this trend has continued pursuant to ESEA, as amended by ESSA (2015). In addition, research indicates other factors also come into play in relation to the validity of test accommodations such as a lack of knowledge

by those making accommodation decisions and a lack of consistent implementation of selected accommodations during testing.

**ACT and SAT.** Until recently, the ACT and the College Board (SAT) limited the types of accommodations they allowed in that a student was required to submit documentation to the ACT or College Board entities to get their approval for using an accommodation; however, now both testing entities have indicated that the policy in place simply requires the accommodation be documented in a student's IPE or 504 plan as indicated by the student's school. Requests for accommodations with the ACT and SAT should be consistent with the accommodations the student uses with other statewide and local assessments, and during classroom instruction.

Various education professionals have indicated; however, that ACT and SAT may still have some issues to resolve in relation to providing students with accommodations without impacting the ability of an assessment to be used as a college reportable score. Pursuant to a recent independent study on behalf of Florida, the ACT and College Board provided an overview and listing of the types of accommodations allowed with the respective ACT and SAT tests and an indication of whether or not such yields a college reportable score.<sup>87</sup>

**Timing of Use and Monitoring Use.** To ensure the validity of accommodations and the use of such for measuring and tracking growth or other purposes, states must ensure both instructional/classroom and test accommodations authorized pursuant to a student's IEP or 504 plan are, in fact, utilized and match with what actually occurred in the classroom and during the administration of assessments. In some instances accommodations used in classroom instruction may not be used on a test as it would invalidate the assessment results as the performance would no longer reflect what the test was designed to measure (e.g., the use of a reader during a reading assessment portion of a test). States must also ensure they are clear about the constructs being measured by the assessment, which should be clearly identified in the state's accommodations policies. If an accommodation does not compromise the construct being measured, then it similarly should not impact the validity of such as a growth measure. PDE confirmed through its PVAAS vendor, SAS EVAAS (Education Value-Added Assessment System) that as long as the assessments are on the same scale and provide the same level of difficulty there are no issues with using the assessments with accommodations. The importance of states monitoring student accommodation usage during classroom instruction and assessments is emphasized by the USDE peer review process push for states to document both the number of students receiving accommodations and the number of students actually utilizing the accommodations assigned to them. PDE monitors accommodations pursuant to the administration of statewide testing through its statewide testing program.

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<sup>87</sup> The overviews and listings were conducted in relation to a 2018 independent report by Assessment Solutions Group (ASG) about the feasibility of the ACT or SAT in lieu of the Florida Statewide Assessment.

PDE explained that Pennsylvania school monitors observe extended time environments, small testing environments, and read aloud environments in schools. It was further noted by PDE that the monitors, during the School Assessment Coordinators (SACs) interviews, ask each SAC to verify that accommodations were appropriately provided to those students identified as needing testing accommodations.<sup>88</sup> Respondent states to the NECO 2014 Survey of States indicated that they monitor accommodations in a numbers of ways with 24 out of 45 states indicating they monitor the provisions of accommodations on test day.

See Exhibit 41 for a table that reflects various ways states indicated that they monitor accommodations:<sup>89</sup>

### Exhibit 41

**Table 3. Ways of Monitoring Accessibility Features and Accommodations**

<b>Ways of Monitoring</b>	<b>Regular States</b>	<b>Unique States</b>
We do not monitor the provision of accessibility features.	7	1
We do not monitor the provision of accommodations.	7	0
We complete online record reviews.	13	2
We conduct desk audits.	19	0
We directly observe test administrations, including the provision of accessibility features and accommodations, on test day.	24	7
We interview students, teachers, and administrators about accessibility features and accommodations.	9	1
On a random basis, we send teams into districts/schools to compare IEPs to what teachers say happens in class and during assessment.	13	3
On a scheduled basis, we send teams into districts/schools to compare IEPs to what teachers say happens in class and during assessment.	9	2
On a targeted basis (using data on accessibility features and accommodations), we send teams into districts/schools to compare IEPs to what teachers say happens in class and during assessment.	10	0
Other	10	1

Note: Forty-five regular and eight unique states responded to this question. State respondents were able to select multiple responses

Source: National Center on Education Outcomes.

Students' disabilities are addressed and documented in a Section 504 plan (504 plan).

<sup>88</sup> SACs are responsible for overseeing all aspects of test administration in a school building and is specifically charged with knowing the required accommodations for each student with an IEP or 504 Plan and for each EL being assessed and communicating this to the appropriate personnel.

<sup>89</sup> The references in Exhibit 41 to regular states means the 50 states and to unique states encompasses 11 entities (i.e., American Samoa, Bureau of Indian Education, Department of Defense, District of Columbia, Guam, Marshall Islands, Micronesia, Northern Marina Islands, Palau, Puerto Rico, and U.S. Virgin Islands).

## D. Types of Accommodations

Most states indicated they used four primary categories of accommodations to ensure students with disabilities are afforded with a full opportunity to demonstrate their knowledge and capabilities. These include:

- 1) Presentation – Allow students to access print information in alternative ways. These alternative modes of access are auditory, multi-sensory, tactile, and visual.
- 2) Response – Allow students to complete activities, assignments, and assessments in different ways or to solve or organize problems using some type of assistive device or organizer.
- 3) Setting – Change the location in which a test or assignment is given or the conditions of the assessment setting.
- 4) Scheduling/Timing Accommodations – Increase the allowable length of time to complete an assessment or assignment and perhaps change the way the time is organized.

This breakdown of accommodations is utilized in that it mirrors how PDE delineate accommodations for Pennsylvania purposes.<sup>90</sup>

NCEO issued a report titled *2009 State Policies on Assessment Participation and Accommodation for Students with Disabilities (Synthesis Report 83)* that provided an analysis of states' 2009 assessment participation and accommodation policies.<sup>91</sup> Although the NCEO report data is somewhat dated, it provides a general sense and starting point for comparing the commonalities and differences between states in terms of the types of accommodations made available to students. Therefore, this accommodation information is presented in the Appendix C of this report.

LBFC reviewed the types of accommodations currently being offered to students with disabilities by Pennsylvania and the adjacent states of Delaware (DE), Maryland (MD), New Jersey (NJ), New York (NY), Ohio (OH), and West Virginia (W. VA).<sup>92</sup>

The types of accommodations available to students has continued to become more common and uniform among states (a point generally

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<sup>90</sup>While federal laws continue to reference only accommodations, many state assessments use a broader accessibility framework to ensure all students, including students with disabilities and ELs, are afforded appropriate access to assessments.

<sup>91</sup> The NCEO 2011 report organized accommodations into five categories documented in five tables (i.e., Table 1. – Presentation Accommodations, Table 2. – Equipment and Materials Accommodations, Table 3. – Presentation Accommodations, Table 4. – Scheduling/Timing Accommodations, and Table 5. – Setting Accommodations), which provided an overview of the types of accommodations allowed by the states at that time. The category of Equipment and Materials Accommodations consists of items that themselves can be classified under one of the other four categories of accommodations (i.e., 1) Presentation, 2) Response, 3) Setting, and 4) Timing/Scheduling).

<sup>92</sup> LBFC started this comparison by listing the categories and types of accommodations indicated by PDE for students with disabilities and then compared that information with what was presented in the accommodations manuals for the adjacent states.

acknowledged by PDE) pursuant to the enhanced emphasis on statewide assessments and the federal requirement that all students, including students with disabilities, be assessed in a fair and equitable manner. States should consider making use of the various resources available when developing manuals/policies and making decisions about student accessibility to assessments.<sup>93</sup>

Exhibit 42 consists of four tables (one for each of the four categories of accommodations), and provides a comparison of the types of accommodations available in the Commonwealth of Pennsylvania and surrounding states.<sup>94</sup>

Exhibit 42

**Accommodations in Pennsylvania and Surrounding States**

Presentation Accommodation	Types of Accommodations used by Pennsylvania & Surrounding States						
	PA <sup>a</sup>	NJ <sup>b</sup>	NY <sup>c</sup>	OH <sup>d</sup>	W. VA <sup>e</sup>	MD <sup>f</sup>	DE <sup>g</sup>
Amplification Device (e.g., hearing aid, personal sound amplifier, classroom sound field FM system)	X				X	X	X
Audio Materials (audio only)	X					X	
Braille	X	X	X	X	X	X	X
Refreshable Braille Display	X	X	X	X	X	X	X
Tactile graphics (raised images to convey non-textual information such as maps, graphs, and diagrams)	X	X	X	X	X	X	X
Color Chooser/Contrast	X		X	X	X		X
Computer Assistive Technology (CAT) (e.g., electronic screen readers, Krzwell, Read & Write Gold)/Text to Speech (TTS) Software for Verbatim Reading of Selections or Entire Test)	X	X	X	X	X	X	X
Cueing System for On Task Behavior (Redirection/Refocusing)	X		X			X	
Enlarged Print	X	X	X	X	X	X	X
Interpret/translate test directions in sign language	X	X		X	X	X	X
Interpret/translate individual word, phrase, sentence or test item in sign language for Math, Science	X			X	X	X	

<sup>93</sup> One example of such a resource used by many states to create their own student accessibility manuals is the Shyyan, V., Thurlow, M., Christensen, L., Lazarus, S., Paul, J., and Touchette, B. (2016), *CCSSO Accessibility Manual: How to Select, Administer, and Evaluate Use of Accessibility Supports for Instruction and Assessment of All Students*, Washington, DC: CCSSO.

<sup>94</sup> It is important to note the four tables contained in Exhibit 42 do not mirror and are not meant to be a direct comparison with 2009 NCEO accommodation tables presented in Appendix C. Rather both of these items are meant to independently provide insight into the type of accommodations provided to students by different states.

Exhibit 42 Continued

Interpret/translate individual word, phrase, sentence or test item in sign language for the Text Dependent Analysis (TDA) prompt	X						
Magnification	X	X	X	X	X	X	X
Reduce Number of Items per Page			X				
Masking (involves blocking off distracting content)					X		X
Interactive Whiteboard			X				X
Dual Monitors (allowable to facilitate human read-aloud and oral translation so that reader, interpreter, or translator does not have to read over the student's shoulder)				X			
Directions read more than standard number of times or Directions simplified			X		X		X
Read Aloud Test Directions	X		X		X	X	
Read Aloud Some Allowable Test Items at Student Request	X		X		X	X	X
Read Aloud of Entire Test (for students with print related disabilities, visually impaired student who has not yet learned Braille, or deaf student severely limited from decoding text due to history of early and prolonged language deprivation)			X	X	X	X	X
Human Reader for Computer-based Test (entire test for where student not able to use text-to-speech)				X			
Reads Test Aloud to Self (Student) (e.g., whisper phone)	X		X				X
Student Reads Listening Script for listening passages (for deaf students not proficient in sign language)			X		X		
Video Sign Language Version (VSL) Mathematics and Science	X	X					X
Text-to-Speech, American Sign Language (ASL) Video and Human Reader/Human Signer for English language/Literacy (for a very small number of students with print related disabilities who would otherwise be unable to participate in the assessment because their disability severely limits their ability to access printed text by decoding)		X		X	X		X
Closed Captioning of Multimedia with English Language Arts/Literacy		X			X	X	X
Visual Organizers (e.g., color overlay, keyboard overlay, index card, reading guide, wiki stix, highlighters, underlining, color stickers, post-it-notes)	X		X		X		X



Exhibit 42 Continued

Notes and Outlines						X	
Paper-Based Edition (e.g., for schools administering a computer-based assessment, a paper-based assessment is available for students with a disability)		X		X			
Print on Demand/Request (with online tests)					X		X
Turn Off Any Universal Tools for Computer-based Assessment					X		X
Unique Accommodations (not specifically mentioned)	X					X	X

Response Accommodation	Types of Accommodations used by Pennsylvania & Surrounding States						
	PA	NJ	NY	OH	W. VA	MD	DE
Augmentative Alternative Communication (AAC Device) (electronic device designed to support or augment communication via gestures, pictures, symbols or words) (responses of student using an AAC must be transcribed into student's regular test booklet)	X					X	X
Braille (writer), Note Taker	X	X	X	X	X	X	
Calculators (including specialized calculation device such as a large key or talking calculator)	X	X	X	X	X	X	X
Computer Assistive Technology (CAT) (e.g., electronic screen readers; speech-to-text, including Kurweil, Read & Write Gold Text Help, Dragon Naturally Speaking; word prediction external device on English language/Literacy) (responses must be transcribed verbatim into student's regular answer booklet)	X	X	X	X			X
Computer Access Tools, Devices & Software/Assistive Technology/Alternative Response (e.g., adaptive keyboard; adaptive mouse; switches; touch screen; keyboard access features such as sticky keys, mouse keys, filter keys; head wand, large keyboards; and large print keyboard labels)			X		X	X	X
Enlarged Print	X			X			
Keyboard or Typing/electronic Word Processor	X		X		X	X	X
Manipulatives/Mathematical Tools	X	X	X	X	X	X	X
Mixed-Mode Response (meant to replace scribing and transcribing for some online testers using paper booklet for constructed responses)	X						
Monitor Test Response (visual-motor disability student who requires a test administrator to monitor placement of their responses on bubble sheet)	X	X		X		X	

Exhibit 42 Continued

Responding/Recording in Test Booklet (transcribed verbatim)	X		X	X		X	
Scribe	X		X	X	X	X	X
Transcribe	X			X			
Visual/Graphic Organizers (e.g., graph paper, scratch paper, line guides) (graphic organizers are visual representations of text or a topic that help students arrange information into patterns in order to stay focused)	X		X	X	X	X	X
Voice-to-text/Recording Devices (student uses a device to record test response rather than writing on paper)	X		X		X	X	X
Writing Tools Implements (for use by students with fine motor difficulties (e.g., adaptive paper, slant board, or other writing tools)						X	
Unique Accommodations (not specifically mentioned)	X					X	X

Setting Accommodation	Types of Accommodations used by Pennsylvania & Surrounding States						
	PA	NJ	NY	OH	W. VA	MD	DE
Hospital/home (for confined students)	X				X		X
Noise Cancelling (Buffers) Headphones or Ear Buds	X			X	X	X	X
One-on-One (separate setting for some students to reduce distractions and/or provide read aloud, signing, or translation)	X	X	X		X	X	
Separate Setting/Specified Area or Seating/Preferential Seating (separate setting for some students to reduce distractions for themselves and others)	X	X	X	X	X	X	X
Small Group (1-5) (separate setting for some students to accommodate read aloud of all allowable test items, adaptive devices, distractibility, and/or other unique needs)	X	X	X	X	X	X	X
Small group (1-12) (separate setting to reduce distractions for some students to provide scheduled extended time, or provide a read aloud to some allowable test items)	X	X	X	X	X	X	X
Familiar Test Administrator				X			
Testing Environment Modifications (modified lighting and specialized equipment & furniture)		X	X	X	X		X
Unique Accommodations (not specifically mentioned)	X					X	X

Exhibit 42 Continued

Timing/Scheduling Accommodation	Types of Accommodations used by Pennsylvania & Surrounding States						
	PA	NJ	NY	OH	W. VA	MD	DE
Changed Test Schedule/Time of Day (over multiple days or within one day)	X	X	X	X	X	X	X
Present Test in Smaller Segments			X				
Extended Time	X	X	X	X	X	X	X
Frequent Breaks (within a regularly scheduled test session)	X	X	X	X	X	X	X
Unique Accommodations (not specifically mentioned)	X					X	X

**Note 1:** This exhibit represents a comparison of the types of accommodations available to students with disabilities in Pennsylvania and the adjacent states of Delaware, Maryland, New Jersey, New York, Ohio and W. Virginia. Generally, accommodations provided to a student are applicable both in the classroom (instructional accommodations) and during assessments; however, not all instructional accommodations may be valid during an assessment. Also not all accommodations may be available in a given state on all assessments administered within that state.

**Note 2:** The nomenclature and type of accommodations may vary from state to state along with the state policies in place that determine when an accommodation is applicable to a student with a disability. This exhibit reflects four categories of accommodations and marks such accordingly regardless of how a given state may categorize its own accommodations. Ultimately, accommodations are made available to students via an IEP or 504 plan as determined by the appropriate persons at the school district level.

**Note 3:** This exhibit does not attempt to reflect accommodations available to English Learners (ELs) or ELs with disabilities. ELs with disabilities are generally afforded the same accommodations available to students with disabilities, although states also tend to provide some additional accommodations (e.g., word-to-word translation dictionary, interpreters/sight translators for native language, native language version of exam), for students simply classified as ELs as their native language is itself viewed as a disability of sorts at least in the early years of the ELs education.

<sup>a</sup> Pennsylvania lists four categories of accommodations: 1) Presentation, 2) Response, 3) Setting, and 4) Timing/Scheduling.

<sup>b</sup> New Jersey links to the PARCC Accessibility Features and Accommodations Manual, Sixth Edition (August 3, 2017) that list three categories of accommodations: 1) Presentation, 2) Response, and 3) Timing/Scheduling. Although it also lists Administrative Considerations that are available to any student and tend to relate to Setting or Timing Scheduling. It should be noted that if a student's IEP or 504 plan provides for such it would then be considered an accommodation with regard to that student. Thus for purposes of this exhibit the Administrative Considerations are marked/listed under either the Setting or Timing/Scheduling headings.

<sup>c</sup> New York lists four categories of accommodations: 1) Presentation, 2) Response, 3) Setting, and 4) Timing/Scheduling.

<sup>d</sup> Ohio lists three categories of accommodations: 1) Presentation, 2) Response, and 3) Timing/Scheduling. Although it also lists Administrative Considerations that are available to any student and tend to relate to Setting or Timing Scheduling. It should be noted that if a student's IEP or 504 plan provides for such it would then be considered an accommodation with regard to that student. Thus for purposes of this exhibit the Administrative Considerations are marked/listed under either the Setting or Timing/Scheduling headings.

<sup>e</sup> West Virginia lists three categories of accommodations: 1) Presentation, 2) Response, and 3) Timing/Setting (which includes Scheduling components).

<sup>f</sup> Maryland lists four categories of accommodations: 1) Presentation, 2) Response, 3) Setting, and 4) Timing/Scheduling.

<sup>g</sup> Delaware lists three categories of designated supports/accommodations: 1) Presentation (which consists of both presentation and response categories), 2) Setting, and 3) Timing/Scheduling.

Source: Developed by LBFC staff from PA, DE, MD, NJ, NY, OH, and W. VA data.

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## SECTION XI

# IMPACT OF EXPANDED OPT-OUT OPTIONS ON FEDERAL COMPLIANCE



### Fast Facts...

- ❖ *Federal law specifically does not preempt that state and local laws from allowing parents to have their children opt-out of assessments.*
- ❖ *Federal law requires states to incorporate student participation as a factor in a state's accountability system and to address schools with participation rates below ninety-five percent (95%).*
- ❖ *PDE notes that every student that does not participate due to the Pennsylvania religious opt-out will have a negative impact on a LEA/school's participation rate and potentially achievement/proficiency rate.*
- ❖ *PDE indicates the vast majority of Pennsylvania school districts exceed ninety-five percent (95%) participation in all subject areas and participation issues are relatively uncommon.*

## Overview

This section assesses the impact on compliance with federally required tests and accountability measures (such as school building performance and educator effectiveness) in the event Pennsylvania expanded the options for opting-out from its statewide assessments (e.g., PSSA and Keystone Exams) to include objections based on philosophical grounds or due to health issues. An explanation of opt-out provisions is important in that federal law requires states to incorporate student participation as a factor in a state's accountability system and to address schools with participation rates below ninety-five percent (95%). Meanwhile, schools throughout the country are experiencing and grappling with an increase in the number of parents seeking to opt their children out of standardized testing now that new state assessments are available pursuant to the federal requirements. These same federal requirements specify that state and local laws are not preempted from allowing parents to have their children opt-out of assessments.

### A. Religious Opt-out (Pennsylvania)

Now that the new generation of mandatory state assessments have been implemented pursuant to federal requirements, schools throughout the country are experiencing and grappling with an increase in the number of parents seeking to opt their children out of standardized testing. The same body of federal law that established the federal assessment and accountability requirements also specifies that state and local laws are not preempted from allowing parents to have their children opt-out of assessments. Prior to 2015, only a few states had established opt-out laws, and they were generally limited to students unable to complete an assessment during a testing window due to a medical or family emergency. States have responded by adopting state policies that either allow or prohibit state assessment opt-outs. Many states allowing opt-outs do so in cases of a physical disability, medical reasons or emergencies; and a few states allow opt-outs based on religious objection; and other states allow opt-outs for any reason.<sup>95</sup> Reportedly, activists objecting to the standardized testing movement in this country are encouraging parents to use the various state exemption provisions even when a

<sup>95</sup> See Appendix D for a general overview of the 50 states and District of Columbia opt-out policies in place in 2015.

student may or may not fit within the allowed exemption category (e.g., the religious opt-out available in Oregon and Pennsylvania).

Parents or guardians currently have the right to opt their children out of Pennsylvania standardized testing for religious reasons.<sup>96</sup> Pennsylvania regulations specifically state:<sup>97</sup>

*§ 4.4. General Policies.*

*(d) School entities shall adopt policies to assure that parents or guardians have the following:*

*\* \* \**

*(3) The right to have their children excused from specific instruction that conflicts with their religious beliefs, upon receipt by the school entity of a written request from the parent or guardians.*

*(4) The right to review a State assessment in the school entity during convenient hours for parents and guardians, at least 2 weeks prior to their administration, to determine whether a State assessment conflicts with their religious belief. To protect the validity and integrity of the State assessments, each school entity shall have in place procedures to be followed when parents or guardians request to view any State assessment. Procedures must be consistent with guidance provided by the Department in its assessment administration instructions. If upon inspection of a State assessment parents or guardians find the assessment to be in conflict with their religious belief and wish their students to be excused from the assessment, the right of the parents or guardians will not be denied upon written request that states the objection to the applicable school district superintendent, charter school chief executive officer or AVTS director.*

For the Pennsylvania religious opt-out to be justified, the assessment must conflict with the parents' or guardians' religious beliefs. However, the term "religious" under the First Amendment does not solely mean traditional organized religion and as such, a belief is considered religious if it occupies the place in a person's life where traditional religion is held (e.g., ideas about life, purpose, and death).

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<sup>96</sup> A student who opts-out of a Keystone Exam for religious reasons will not be precluded from graduation as Act 2018-158 provides for four alternative graduation/proficiency paths and Pennsylvania regulations also allow the chief school administrator to waive the high school graduation requirements on a case-by-case basis for good cause (22 Pa. Code § 4.51(d)).

<sup>97</sup> Pennsylvania's religious opt-out provisions apply to state assessments, and PDE confirmed that the religious opt-out provisions also apply to assessment instruction and preparation, although any such decision is made at the local level.

A school cannot deny a religious opt-out claim as long as the parent or guardian has followed the proper procedure and provided written notification stating their objection.<sup>98</sup> According to the PDE and other stakeholders, some parents or guardians have utilized the religious opt-out to excuse their children from Pennsylvania standardized testing, when in reality their opposition is based on moral objections (or some other secular based reason). It was further noted that when students have opted-out of standardized testing by their parents, it results in a loss of one source of feedback. This loss of feedback can be further exacerbated given that stakeholders have indicated students who have been opted-out tend to be students who would have fared well on the tests, which, if true, can decrease a school's performance numbers. Conversely, if a sufficient number of students who opted out were instead lower performing students, such could also have the opposite effect of artificially increasing a school's performance numbers. Both outcomes are ramifications that policy makers need to be conscious of in that school performance numbers come into play with regard to calculating the effectiveness of schools, teachers and principals.

While the religious opt-out is specifically provided in Pennsylvania Chapter 4 regulations, PDE indicates the participation rate is primarily impacted by the following six factors:

- 1) Religious Opt-out (by parental request pursuant to Pennsylvania Chapter 4 regulations).
- 2) Other Parental Request ("Refusal" - represents every other instance of parent refusal).
- 3) No Attempt and No Exclusion Marked (a student was issued a test booklet, but did not answer enough questions to receive a score).
- 4) No Test (no test record on file and reason unknown).
- 5) Extended Absence (a student missed the testing window due to absence).
- 6) Other (does not fit any of the other categories).

## **B. Ninety-Five Percent Participation and Five Percent Non-Participation (Federal Provision) and the Impact on the Federal Achievement/Proficiency Formula for Accountability Purposes.**

As previously indicated, federal law, ESEA as amended by ESSA, continues to require participation by at least 95 percent of all students (at the state, district, and school levels) in state assessments; however, conversely it

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<sup>98</sup> A specific religion does not need to be identified for purpose of utilizing the Pennsylvania religious opt-out.

allows for up to five percent non-participation. The ESSA provisions require that student participation rates in federally required statewide assessments be incorporated as a factor in each state's accountability system, although federal law now affords states with greater flexibility in determining how to incorporate the participation rates in their accountability systems in that the participation rate is not required to be a separate measure and no longer automatically identified as not meeting Adequate Yearly Progress (AYP).<sup>99</sup>

There is no flexibility in how the state's accountability system accounts for its participation rates. While federal law does not specifically recognize Pennsylvania's religious opt-out provision, the ESSA provisions do allow states to establish their own state and local laws governing opt-outs.<sup>100</sup> This is reflected in the five percent provision that allows Pennsylvania the flexibility necessary to comply with the federal government's assessment and accountability requirements as long as the number of students not participating for religious (or other reasons) does not cause the total number of Pennsylvania students (or subgroup of students) not participating to fall below 95 percent within an LEA/school district within any given school or subgroup.<sup>101</sup> As a school's opt-out numbers increase, the overall participation rate of the school and Pennsylvania as a whole drops.

All students that do not participate in Pennsylvania's federally required state assessments (e.g., PSSA and Keystone Exams) pursuant to the Pennsylvania religious opt-out ultimately have a negative impact on a school's participation rate (along with other reasons such as parental refusal, extended absence due to illness, etc.), which can also ultimately result in a reduced achievement/proficiency measure. The federal statute is explicit in regard to how states must calculate and report federally required statewide assessment participation rates and as such states are required, in their accountability systems, to address schools with participation rates below 95 percent. If the student participation rate falls below 95 percent, states are required to calculate student achievement/proficiency by dividing the number of students scoring proficiently by no less than 95 percent of the total students (which effectively assigns a score of "0" to all nonparticipants once the participation rate has fallen below 95 percent).

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<sup>99</sup> The previous federal provisions (ESEA as amended by NCLB) resulted in a school automatically failing to meet the Adequate Yearly Progress (AYP) if the school or subgroup of students (e.g., English Language Learners, students by race/ethnicity, special education students, and economically disadvantaged students) within a school did not meet the 95 percent participation rate.

<sup>100</sup> ESEA as amended by ESSA requires at the beginning of each school year that a local educational agency (LEA)/school district notify the parents of students that the parent may request information regarding any state or LEA/school district policy regarding student participation in any federally, state, or LEA mandated assessment, which shall include a policy, procedure, or parental right to opt the child out of such assessment.

<sup>101</sup> Failure to meet the federal minimum 95 percent participation could result in an LEA/school district or school's rating in the state's accountability system being lowered, or could lead to the USDE taking enforcement action.

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Pennsylvania’s initial and revised State Plan submissions to USDE sought to achieve a balance between this federal requirement and Pennsylvania’s religious opt-out; however, the USDE determined the State Plan submission did not satisfy the federal law. Thus, Pennsylvania was required to change its achievement/proficiency calculation regarding assessment participation rates to reflect when a school’s student participation has fallen below 95 percent.

See Exhibit 43 that reflects Pennsylvania’s formula, which is based on the formula provided for in federal law (ESEA) and used to calculate school achievement scores that are based on the participation rate for the 2016-17 school year and prior years, versus the 2017-18 school year and future years.<sup>102</sup>

### Exhibit 43

#### Change to Calculation of Achievement Rate Based on Participation Rate

##### 2016-17 School Year and Prior Years Formula:

(Numerator) Number of students among students in the denominator who achieved proficient or advanced on the statewide assessment.

(Denominator) Number of test takers among students enrolled in the school on the last day of the respective testing window who are full academic year.

##### 2017-18 School Year and Future Years Formula:<sup>a</sup>

(Numerator) Number of students among students in the denominator who achieved proficient or advanced on the statewide assessment.

(Denominator) Ninety-five percent of students enrolled in the school on the last day of the respective testing window who are full academic year or Number of test takers among students enrolled in the school on the last day of the respective testing window who are full academic year, (whichever is higher).

<sup>a</sup> Pennsylvania’s 2017-18 school year and future years’ achievement/proficiency rate formula is based on the federal law [formula] provisions contained in ESEA section 1111(c)(4)(E). [20 U.S.C. § 6311(c)(4)(E)].

Source: Developed by LBFC staff from data provided by the Pennsylvania Department of Education.

<sup>102</sup> See Appendix E to view and compare sample calculations based on the past and present achievement/proficiency rate formulas based on a participation rate of 95 percent or greater versus a participation rate less than 95 percent.

## **C. Pennsylvania Participation Rates with Religious Opt-out and the Impact on Compliance with Federally Required Tests and Accountability Measures with Expanded Opt-outs.**

The existence of opt-outs (religious or otherwise) has the potential to negatively impact a state's participation rates and may potentially impact a state's LEAs and schools achievement/proficiency rate and ultimately the ability of a state to be in compliance with federally required assessments and accountability measures. Furthermore, providing opt-outs and giving parents notice of such has the potential to conflict with the message about the importance of standardized testing. Ultimately placing the state departments of education and local school districts in the potentially awkward position of having to explain why it is important for students to participate in testing (given the federal requirements), while also giving and notifying parents of the opt-out options for their children. In 2015, USDE sent out letters to a dozen states flagging their low participation rates (statewide, or at the district or subgroup level) on the 2014-15 school year assessments and indicated that they needed to create a plan to reduce opt-outs due to low participation rates.<sup>103</sup>

Meanwhile, as previously indicated in this section, schools throughout the country are experiencing and grappling with an increase in the number of parents seeking to have their children opt-out of standardized testing now that new state assessments have been implemented pursuant to the federal requirements. Pennsylvania is no exception to this trend and is also experiencing an increase in the number of parents utilizing the religious opt-out.

Exhibits 44 and 45 generally reflect an overall growth in the use of Pennsylvania's existing religious opt-out with regard to the PSSA and Keystone Exams.

Exhibit 44 shows the number of parental religious opt-outs from **PSSA** exams for school years 2013-14 through 2017-18. Total numbers are inclusive of grades three through eight. From school years 2013-14 to 2016-17, opt-outs continued to increase, however, total numbers in school year 2017-18 decreased.

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<sup>103</sup> Pennsylvania was not one of the dozen states to receive a letter in 2015. While the USDE indicated it has not recently provided states with any information related to their participation rate, this remains an important assessment and accountability issue under the federal requirements.

Exhibit 44

**Number of Religious Opt-Outs from PSSA Exams  
School Years 2013-14 to 2017-18**

	2013-14	2014-15	2015-16	2016-17	2017-18
Math	817	2735	6654	8028	7185
Language Arts	821	2729	6572	7930	7131
Science	248	961	2418	3054	2645

Source: Developed by LBFC staff from data provided by PDE.

Exhibit 45 shows the number of parental religious opt-outs from **Keystone Exams** for school years 2013-14 through 2017-18. The number of opt-outs in all three Keystone Exam subject areas has continued to increase. From school year 2013-14 to 2017-18, algebra opt-outs have increased by 273 percent, literature by 430 percent, and biology by 311 percent.

Exhibit 45

**Number of Religious Opt-Outs from Keystone Exams  
School Years 2013-14 to 2017-18**

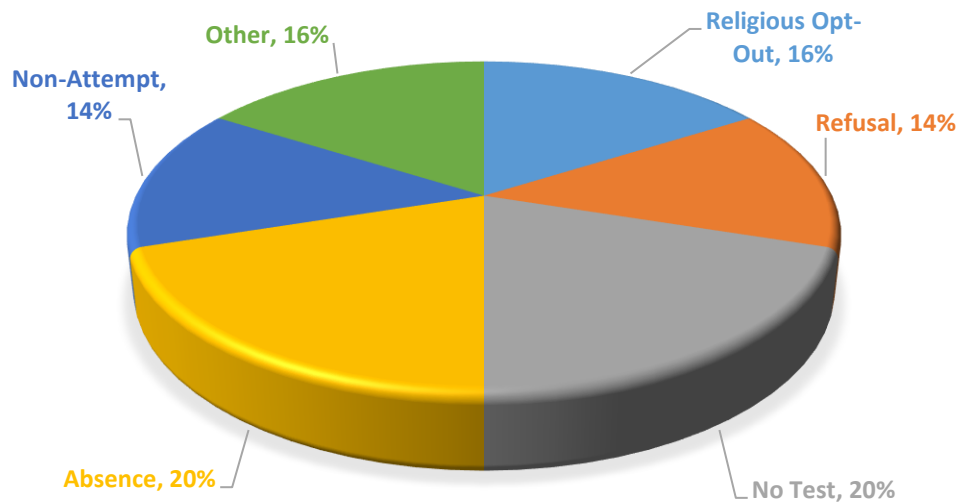
	2013-14	2014-15	2015-16	2016-17	2017-18
Algebra	139	243	353	485	518
Literature	99	176	289	371	524
Biology	144	247	358	457	591

Source: Developed by LBFC staff from data provided by PDE.

Exhibit 46 shows the percentage of each of the six factors that impact student participation rates in ESEA as amended by ESSA required statewide testing (e.g., PSSA and Keystone Exams), overall in Pennsylvania for the 2017-18 school year.

Exhibit 46

**Percentage of Exclusion Factors  
2017-18 School Year<sup>a</sup>**



<sup>a</sup> PDE explained that these numbers are approximate and do not yet meet PDE's quality assurance standards for publication by the department.

Source: Developed by LBFC staff from data provided by PDE.

It is possible that the impact of adding opt-out categories could be minimal. For example, not all parents utilizing the Pennsylvania religious opt-out may be doing so based on religious reasons. Additionally, some of the Pennsylvania religious opt-out students, with some of those Pennsylvania students listed among the other five factors (e.g., parental refusal, etc.) may simply elect to make use of the additional proposed exclusion categories based on philosophical grounds, or due to health concerns. It is also possible, however, that the inclusion of the two additional exclusion categories may lead to an increase in the overall number of Pennsylvania students opting-out of federally required statewide assessments, which would consequently reduce Pennsylvania's participation rate.

In the event Pennsylvania, its LEAs/school districts, or subgroups are already below or close to the federally required minimum of 95 percent

participation, any further decrease in the number of Pennsylvania students participating in tests could ultimately result in it being more difficult for schools to get their participation rate up and could also ultimately lead to more Pennsylvania schools falling below the federal minimum 95 percent participation rate requirement.

Exhibit 47 shows overall participation rates by school districts for school year 2017-18. For the three subject areas of science, English/language arts, and mathematics, we added the totals of students eligible for testing and the total tested, to arrive at overall district participation rates. Only 22, or 4.4 percent, of districts were below the minimum 95 percent participation threshold.

#### Exhibit 47

##### **Overall Participation Rates 2017-18 School Year<sup>a</sup>**

<b>No. Districts under 95%</b>	<b>Percent of Total</b>	<b>No. Districts 95 to 97.9%</b>	<b>Percent of Total</b>	<b>No. Districts 98-100%</b>	<b>Percent of Total</b>
22	4.4%	196	39.4%	280	56.2%

<sup>a</sup> PDE reported on 498 of 500 school districts.

Source: Developed by LBFC staff from data provided by PDE.

The question is whether an increase in opt-out due to existing exemption options coupled with expanded options will impact test-based accountability measures, such as school building performance and educator effectiveness. A 2014 report by Research for Action (RFA) looked at the degree to which student opt-outs in Pennsylvania might influence Pennsylvania's School Performance Profile (SPP) rating system.<sup>104</sup> The RFA report further indicated it made no attempt to analyze whether the SPP rating system was a valid gauge of school performance; but only looked at the issue of the stability of Pennsylvania's SPP rating system regard to one potential external event, student opt-outs (which in Pennsylvania's case was limited to religious opt-outs at the time the RFA report was prepared).

<sup>104</sup> As indicated in this section, the Research of Action report was dated 2014, which was the year after Pennsylvania first unveiled SPP in 2013. It should be noted that the SPP rating system was recently replaced with Pennsylvania's launch in November 2018, of its new Future Ready PA Index rating system. Future Ready PA Index is a more holistic approach to measuring school proficiency. While SPP's six categories of indicators (including an extra credit category) placed greater weight on the still critical PSSA, PASA, and Keystone Exams scores, the Future Ready PA Index built off of several of the SPP indicators and features a wider range of criteria under its three primary categories of indicators to measure school performance. To put it another way, the Future Ready PA Index utilizes a dashboard approach to present data and information in relation to school and student group performance.

The RFA report concluded that a relatively small number of opt-outs can affect the Pennsylvania SPP rating system scores and that such variations could have far-ranging effects, including calculating the effectiveness of schools, teachers, and principals. SPP was comprised of building level data that equaled 15 percent of both a teacher's and principals' effective rating.

The RFA report noted that student opt-outs could have affected SPP scores in two ways: First, by altering the academic achievement levels; and second by changing the PVAAS scores, which are both based on the PSSA and Keystone Exams.<sup>105</sup>

In regards to SPP, it was noted that the relationship between opt-outs and school-level PSSA and Keystone Exams performance metrics is relatively straight forward. It was reported that if the students opting out were high-performing students (scoring proficient or advanced) it would cause the SPP academic achievement score to drop and thus the overall SPP score to drop. Whereas, if the students opting out are lower performing students (scoring basic or below basic) the SPP academic score would increase along with the overall SPP score.<sup>106</sup>

While the RFA report's finding reflected how a relatively small number of opt-outs could affect Pennsylvania's SPP rating system in place at the time of the report, one can extrapolate that a small number of opt-outs could similarly impact Pennsylvania's recently launched Future Ready PA Index rating system. However, the Future Ready Pa Index, given its broader more holistic dashboard approach, is likely to be impacted to a lesser degree than the SPP rating system that was based on fewer criteria and gave more weight to the PSSA, PASA, and Keystone Exams.<sup>107</sup>

The PDE sent correspondence in March 2018 to all Pennsylvania LEAs to remind them about the federal requirements requiring participation of all students in state assessments, although some flexibility is allowed pursuant to the five percent non-participation provision. However, PDE further notes that every student who does not participate due to the Pennsylvania religious opt-out will have a negative impact on a LEAs/schools participation rate and potentially achievement/proficiency rate.

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<sup>105</sup> The RFA report indicates that students who exceed their predicted performance increase their schools' and teachers' PVAAS scores, and those who score lower than predicted decrease the scores. However, the RFA report's simulations refrained from any simulations of the PVAAS factor due to its complexity in that it is not a separate assessment system, but rather a statistical model that uses students' prior assessment results to estimate future performance, which makes it more difficult to predict how PVAAS scores would change when students opt-out.

<sup>106</sup> In regards to determining the effect on PVAAS it was noted that such was more complicated and as such it was not possible to calculate exactly how opt-outs would change PVAAS scores in that PVAAS is not a separate assessment system, but rather a statistical model that uses students' current assessment results to estimate future performance (unlike SPP which is based on performance metrics where the goal of proficiency is the same for all students).

<sup>107</sup> Student performance on state tests was the main driver of SPP scores.

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PDE also indicates (and its school district participation data supports for the school year 2017-18) that the vast majority of Pennsylvania school districts currently exceed 95 percent participation in all three subject areas (English/language arts, mathematics, and science).<sup>108</sup> PDE further indicates that participation issues are relatively uncommon in Pennsylvania and tend to be regional in nature.

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<sup>108</sup> The Pennsylvania school district participation data for the school year 2017-18 did not include data for charter schools, CTCs, or other LEA types as these are considered single-school LEAs and school level data is utilized.

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# APPENDICES



## Appendix A – Senate Resolution 2018-322

PRINTER'S NO. 1671

### THE GENERAL ASSEMBLY OF PENNSYLVANIA

# SENATE RESOLUTION

No. 322 Session of  
2018

INTRODUCED BY AUMENT, KILLION, RAFFERTY, YUDICHAK, VOGEL,  
RESCHENTHALER, BAKER, BARTOLOTTA, WHITE, WARD, MARTIN AND  
MENSCH, APRIL 18, 2018

REFERRED TO EDUCATION, APRIL 18, 2018

#### A RESOLUTION

Directing the Legislative Budget and Finance Committee to study  
standardized tests in public education.

WHEREAS, Standardized tests have been used in the United  
States since the early 1900s by schools, colleges and the  
military to test student achievement as well as mental ability;  
and

WHEREAS, In 2002, amid growing concerns about racial  
education inequity and poor performance of United States  
students on international measures of achievement, the President  
of the United States signed the No Child Left Behind Act of 2001  
into law which required states to test students in math and

reading every year from third to eighth grade and once between tenth grade and graduation; and

WHEREAS, In 2009, a separate effort to create consistent curriculum standards led to the creation of Common Core State Standards, and under the Race To The Top grant program, states were provided incentives to adopt Common Core standards and begin evaluating teachers and principals based on student performance on assessments; and

WHEREAS, According to a 2015 study by the Council of Great City Schools, the typical United States student takes 112 mandatory standardized exams between pre-Kindergarten and high school graduation, roughly eight exams per year; and

WHEREAS, Standardized assessments in this Commonwealth have been used to measure student growth and achievement, to comply with Federal accountability, and are part of the State's teacher evaluation system; and

WHEREAS, In recent years, debates have been waged over whether there is an over-reliance on testing in schools at the expense of a broader, well-rounded education, and this perception of over-testing has led to successful opt-out movements where parents are refusing to allow their children to take standardized exams; and

WHEREAS, As Pennsylvania looks to make changes to standardized testing, it is important for the General Assembly to understand the amount of time spent on standardized testing as well as how the results of those tests are used; therefore be it

RESOLVED, That the Senate direct the Legislative Budget and Finance Committee to study the following:

(1) the intended use of all State standardized tests when they were originally created or authorized under Federal or State law as compared to how they are used today;

(2) the valid and research-based uses of State standardized tests as indicators of student achievement, school building performance and educator effectiveness;

(3) the amount of time devoted to test-taking skills and practice test items for federally required tests;

(4) the amount of time devoted to test-taking skills and practice test items for State required tests;

(5) the amount of time devoted to test-taking skills and practice test items for locally elected tests;

(6) the source of State standardized tests (State-specific, Smarter Balanced, Partnership for Assessment of Readiness for College and Careers, Scholastic Aptitude Test and American College Testing) used by all states for Federal accountability and the states' rationale for each test's use in a State plan, using plans submitted under the Every Student Succeeds Act (Public Law 114-95, 129 Stat. 1802);

(7) a comparison between Pennsylvania and all other states in the use of standardized tests in teacher evaluations, including, but not limited to, current trends and the research basis for the inclusion of standardized test results in the evaluation systems;

(8) whether a realignment of State academic standards,

Pennsylvania's voluntary model curriculum and individual public school entities' curriculum would be necessary if Pennsylvania required each student to take the Scholastic Aptitude Test instead of the Keystone Exams, along with associated costs of new curricular materials, new benchmarks, Statewide instructional supports, redesign of Statewide instructional supports and staff realigning local curriculum plans;

(9) whether Pennsylvania can obtain a continuous longitudinal growth measure for public school entities and teachers in math, science and English language arts based on student performance on the Scholastic Aptitude Test compared to the value-added assessment system established under section 221 of the act of March 10, 1949 (P.L.30, No.14), known as the Public School Code of 1949;

(10) a comparison of universal design principles and accommodations available to students with disabilities for all State standardized tests and a determination of whether the availability of instructional accommodations impact the validity of the tests as a growth measure; and

(11) the impact on compliance with federally required tests and accountability measures such as school building performance and educator effectiveness if Pennsylvania expanded the options to be excused from State assessments to include objections on philosophical grounds or due to health concerns for the child;

and be it further

RESOLVED, That, in conducting the study, the committee consult with education stakeholders, classroom teachers in public school entities and faculty at the State System of Higher Education and State-related higher education institutions with expertise in assessments and psychometrics; and be it further

RESOLVED, That the committee be prohibited from consulting with entities who currently or have the potential to contract with the Commonwealth in any manner related to this study or any private entity that could financially benefit from a policy change that could result from the findings of this study; and be it further

RESOLVED, That the committee prepare and submit a written report to the Senate within one year of the adoption of this resolution.

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## Appendix B – Selected Standardized Tests

### Assessing Comprehension and Communication in English State-to-State for English Language Learners (ACCESS for ELLs)

- PDE is a member of the multi-state World Class Instruction Design and Assessment (WIDA) Consortium that developed the ACCESS for ELLs assessment. PDE uses the ACCESS for ELLs as the required instrument for the annual assessment of English language proficiency. Access for ELLs is a standards-based, criterion referenced English language proficiency test designed to measure English language learners' proficiency in English. It assesses social and instructional English, as well as the language associated with language arts, mathematics, science, and social studies within the school context across the four language domains of listening, speaking, reading, and writing.
- Alternate ACCESS for ELLs is an assessment of English language proficiency (ELP) for students in grades 1-12 who are classified as ELLs and have significant cognitive disabilities that prevent their meaningful participation in the ACCESS for ELLs assessment.

### ACT

- The ACT is an entrance exam used by most colleges and universities to make admissions decisions. It is a multiple-choice, pencil-and-paper test administered by ACT, Inc.
- The purpose of the ACT test is to measure a high school student's readiness for college, and provide colleges with one common data point that can be used to compare all applicants. College admissions officers review standardized test scores, GPAs, classes taken in high school, letters of recommendation from teachers or mentors, extracurricular activities, admissions interviews, and personal essays. The importance of ACT scores in the college application process varies from school to school.
- Overall, the higher scores on the ACT, lead to more options for attending and paying for college.
- <https://www.princetonreview.com/college/act-information>

### ACT Aspire Classroom Assessments

- ACT Aspire Classroom Assessments are designed for implementation between their Interim counterparts described below. The flexible nature of these assessments allows teachers to interpret the best time for administration. Each assessment provides short-term, guiding insights to student progress:
  - Assessments: 10 Classroom Assessments, per grade, and per content area.
  - Format: Fixed-format, computer-based, multiple choice.
  - Grades: 3 through 8.
  - Content Areas: English, math, reading, and science.
  - Duration: 10 to 15 minutes.
  - Available Feedback: Immediate, computer-based analysis and reporting.
  - Configuration: Each five-item Assessment is mapped to 1-2 Standards.
  - Reports: Student/Parent; Teacher/Group; Item Response/Analysis.

- <https://www.discoveractaspire.org/assessments/periodic/>

### **ACT Aspire Interim Assessments**

- Interim Assessments serve as a means for fast, convenient, and accurate measurement and can be implemented at intervals leading up to the ACT Aspire Summative Assessment:
  - Assessments: 4 Interim Assessments, per grade, and per content area.
  - Format: Fixed-format, computer-based, multiple choice.
  - Grades: 3 through 10.
  - Content Areas: English, math, reading, and science.
  - Duration: 45 minutes or less.
  - Available Feedback: Immediate, computer-based analysis and reporting.
  - Reports: Student/Parent; Teacher/Group; School/District; Item Response/Analysis.
- <https://www.discoveractaspire.org/assessments/periodic/>

### **Advanced Placement (AP) Exams (College Board)**

- AP is a program in the United States and Canada created by the College Board which offers college-level curricula and examinations to high school students. American colleges and universities may grant placement and course credit to students who obtain high scores on the examinations.
- Each of the 38 exams has its own unique requirements; however, almost all the exams have several things in common:
  - Exams are approximately two to three hours long.
  - The first part of the exam usually consists of multiple-choice questions.
  - The second part of the exam usually consists of free-response questions that require student generated responses that may be in the form of an essay, a solution to a problem, or a spoken response.
- <https://apstudent.collegeboard.org/takingtheexam/about-exams>

### **Armed Services Vocational Aptitude Battery (ASVAB) Test**

- The ASVAB is a multiple-aptitude battery that measures developed abilities and helps predict future academic and occupational success in the military. It is administered annually to more than one million military applicants, high school, and post-secondary students.
- <http://official-asvab.com/>

### **Pennsylvania Classroom Diagnostic Tools (CDT)**

- CDT is a set of Pennsylvania online assessments divided by content area (i.e., literacy, mathematics, and science) designed to provide real time diagnostic information (versus on-grade summative test) in order to guide instruction and remediation.
- CDT is offered to students in grades 3 through 12 throughout the school year on a voluntary basis and each CDT assessment can be administered up to five times in a school year.



### **Dynamic Indicators of Basic Early Literacy Skills (DIBELS)**

- DIBELS are a set of procedures and measures for assessing the acquisition of early literacy skills from kindergarten through sixth grade. They are designed to be short (one minute) fluency measures used to regularly monitor the development of early literacy and early reading skills.
- DIBELS are comprised of seven measures to function as indicators of phonemic awareness, alphabetic principle, accuracy and fluency with connected text, reading comprehension, and vocabulary and were designed for use in identifying children experiencing difficulty in acquisition of basic early literacy skills in order to provide support early and prevent the occurrence of later reading difficulties.
- DIBELS Next are short (one minute) fluency measures that can be used for universal screening, benchmark assessment, and progress monitoring in Kindergarten - 6th grade.
- DIBELS 6th Edition are short (one minute) fluency measures that can be used for universal screening, benchmark assessment, and progress monitoring in Kindergarten - 6th grade.
- DIBELS 8th Edition is a battery of short (one minute) fluency measures that can be used for universal screening, benchmark assessment, and progress monitoring in Kindergarten - 8th grade.
- DIBELS Math is comprised of measures of early numeracy, computation, and problem solving that function as indicators of the essential skills that every child must master in order to become proficient in mathematics. The measures can be used to quickly and efficiently monitor the development of mathematics skills. DIBELS Math is designed for use in identifying children experiencing difficulty in the acquisition of basic mathematics skills, in order to provide support early and prevent the occurrence of later mathematics difficulties.
- <https://dibels.org/dibels.html>

### **International Baccalaureate (IB)**

- IB offers an education for students from age 3 to 19, comprising of four programs that focus on teaching students to think critically and independently, and how to inquire with care and logic. IB prepares students to succeed in a world where facts and fiction merge in the news, and where asking the right questions is a crucial skill that will allow them to flourish.
- <https://www.ibo.org/about-the-ib/>

### **Iowa Test of Basic Skills (ITBS) & Iowa Test of Educational Development (ITED)**

- ITBS & ITED are nationally normed standardized tests that offer educators a diagnostic picture of how their students are progressing in key academic areas. Available for K-12, the Iowa tests allow educators to trace student achievement growth continuously. These tests can be administered year-round.
- ITBS (Grades K-8)
- ITED (Grades 9-12)
- The IOWA Form A Evaluates:
  - Language Skills
    - Vocabulary
    - Reading
    - Language

- Word Analysis (Grades K-3 only)
  - Listening (Grades K-3 only)
  - Spelling
- Mathematics
  - Math Concepts
  - Math Computation
  - Math Problem Solving
- Science, Social Studies, and Study Skills
  - Social Studies
  - Science Materials
  - Sources of Information
- <http://www.setontesting.com/iowa-tests/>

### **Measures of Academic Progress (MAP) from the Northwest Evaluation Association (NWEA)**

- MAP assessments are computer adaptive, and produce accurate, reliable data that reveal the precise learning level of every student, regardless of the student's ability or grade level. MAP identifies areas of strength and opportunity at the goal level of a subject, as well as overall performance. Educators use MAP data to inform in-the-moment instructional practices, gain insights into college readiness, and view grade independent academic growth.
- MAP is a K – 12 interim assessment designed to provide educators and students within positive and purposeful testing experience. MAP produces data on student academic growth, and detailed information about what each student knows and what they're ready to learn.
- All MAP assessments—including those aligned to the Common Core—are designed to measure growth over time. Every test item is anchored to a vertically-aligned equal-interval scale that covers all grades. <https://www.nwea.org/content/uploads/2014/07/Comprehensive-Guide-to-MAP-K-12-Computer-Adaptive-Interim-Assessment>

### **Metropolitan Achievement Test (MAT 8)**

- MAT 8 is a standardized-test for students in kindergarten through 12th grade. Last updated in 2000, the MAT 8 covers language arts, math, science, social studies, spelling and reading, and is administered in the fall and spring.
- The test was developed by Harcourt Educational Measurement and evaluates skills such as critical thinking and foundation skills. The aim of the exam is to help educators and parents evaluate student ability and predict future success. Scores from the Metropolitan 8 can also be used to measure progress in a school or district and to assess trends in student performance.
- Topics covered in the reading section, depending on the grade level, include:
  - Sound recognition
  - Word identification
  - Vocabulary
  - Comprehension
  - Phonics
  - Letter recognition

- Sentence reading
- Topics covered in the mathematics section, depending on the grade level, include:
  - Problem solving
  - Procedures
  - Language and symbols
  - Mathematics operations, such as addition, subtraction, multiplication, division, decimals, fractions and percentages
  - Concepts and problem solving, including patterns, algebra, geometry, measurement and statistics
- Topics covered in the language section, depending on the grade level, include:
  - Listening vocabulary
  - Listening comprehension
  - Writing process, including organization, composition and editing;
- Topics covered in the science section, depending on the grade level, may include:
  - Weather
  - Animals
  - Health
  - Human body
  - Biological science
  - Physical science
  - Earth and space science
  - Physiology
  - Physics
  - Chemistry
  - Biology
- Topics covered in social studies section, depending on the grade level, may include:
  - United States and world history
  - United States and world geography
  - Political science
  - Economics
  - Culture

<https://www.tests.com/MAT-8-Testing>

### **National Assessment of Educational Progress (NAEP)**

- NAEP measures what U.S. students know and can do in various subjects across the nation, states, and in some urban districts.
- NAEP is a congressionally mandated project administered by the National Center for Education Statistics (NCES) within the U.S. Department of Education and the Institute of Education Sciences (IES).
- NAEP is given to a representative sample of students across the country. Results are reported for groups of students with similar characteristics (e.g., gender, race and ethnicity, school location), not individual students. National results are available for all subjects assessed by NAEP. State and selected urban district results are available for mathematics, reading, science, and writing.
- <https://nces.ed.gov/nationsreportcard/about/>

### **National Occupational Competency Testing Institute (NOCTI)**

- NOCTI offers customized assessments to meet the needs of a school, district, college, state, or association for students studying career and technical programs in high school and technical colleges. NOCTI follows industry test development guidelines and standards to ensure validity and reliability for every assessment.
- Whether using assessments to meet Perkins accountability requirements, to guide data-driven instructional improvement, or to assist with teacher evaluation systems, NOCTI provides solutions through its validated and reliable technical skill assessments. Job Ready Assessments
  - NOCTI's Job Ready assessments have been designed and developed for assessing entry-level knowledge and performance. They are based on industry standards and are intended to assist in making informed decisions to support educational programs. Nearly all Job Ready assessments consist of a multiple-choice and performance (hands-on) component. Administration of one or both components is determined at the local level or by statewide testing guidelines.
  - The multiple-choice component measures certain aspects of occupational competence such as factual knowledge and theoretical knowledge about the occupation.
  - The performance component is a work sample format which requires the participant to demonstrate acquired skills by completing an actual segment of work using tools, materials, machines, and equipment characteristic of the occupation for which the test is designed. Performance tests require third-party evaluators to judge participant work with the assessment administration completed in shops or laboratories equipped with appropriate and sufficient machines, equipment, hand tools, and/or materials.
- Pathway Assessments
  - NOCTI's pathway assessments are broader in scope than the Job Ready assessments and were developed for programs offering a sequence of courses related to a pathway area. With a focus on the Pathways established as part of the National Career Cluster Model, these assessments measure pathway or cluster-level technical, academic, and soft skills contextualized to the field.
- <https://www.nocti.org/>
- <https://www.nocti.org/pdf/NOCTI%20Testing%20at%20a%20Glance.pdf>

### **PreACT**

- PreACT simulates the ACT testing experience within a shorter test window on all four ACT test subjects: English, math, reading and science.
- Results predict future success on the ACT test, and provide both current achievement and projected future ACT test scores.
- To help all students achieve success, accommodations offered include locally assigned accommodations and available Braille, large print, reader script and audio.
- <http://www.act.org/content/act/en/products-and-services/preact/preact-classroom.html>

### **Preliminary SAT 8/9 (PSAT 8/9)**

- The PSAT 8/9 is the first in the College Board’s “SAT Suite of Assessments” and is offered to eighth and ninth graders. The purpose of the PSAT 8/9 is to establish a starting point in terms of college and career readiness as students’ transition to high school. <https://blog.prep-scholar.com/psat-8-9-should-you-take-it>

### **Preliminary SAT (PSAT 10) and Preliminary SAT/National Merit Scholarship Qualifying Test (PSAT/NMSQT)**

- The PSAT/NMSQT and PSAT 10 are the same test, offered by the College Board at different times of year. They have these benefits in common:
  - They are both practice for the SAT because they test the same skills and knowledge as the SAT
  - They both provide score reports that can be used to personalize the Khan Academy® SAT practice
  - These score reports also list which AP courses the student should consider
  - The tests connect students to other scholarships
- PSAT 10 is taken by 10<sup>th</sup> graders; the PSAT/NMSQT is taken by 10<sup>th</sup> and 11<sup>th</sup> graders
- The scores from the PSAT/NMSQT are used to determine eligibility and qualification for the National Merit Scholarship Program
- <https://collegereadiness.collegeboard.org/psat-nmsqt-psat-10/taking-the-tests/compare-psat-nmsqt-psat-10>

### **Program for International Student Assessment (PISA)**

- PISA is an international assessment that measures 15-year-old students’ reading, mathematics, and science literacy in three year cycles. PISA also includes measures of general or cross-curricular competencies, such as collaborative problem solving. By design, PISA emphasizes functional skills that students have acquired as they near the end of compulsory schooling. PISA is coordinated by the Organization for Economic Cooperation and Development (OECD), an intergovernmental organization of industrialized countries, and is conducted in the United States by NCES. Data collection for the most recent assessment was completed in fall 2015.
- PISA 2015 assessed students’ science, reading, and mathematics literacy in more than 70 countries and education systems with science as the focal subject. PISA 2015 also included optional assessments of collaborative problem solving and financial literacy. U.S. 15-year-old students participated in both these optional assessments.
- <https://nces.ed.gov/surveys/pisa/>

### **SAT**

- The SAT is an entrance exam used by most colleges and universities to make admissions decisions. It is a multiple-choice, pencil-and-paper test administered by the College Board.
- The purpose of the SAT is to measure high school students’ readiness for college, and provide colleges with one common data point that can be used to compare all applicants. College admis-

sions officers review standardized test scores, GPA, classes taken in high school, letters of recommendation from teachers or mentors, extracurricular activities, admissions interviews, and personal essays. The importance of SAT scores varies from school to school.

- <https://www.princetonreview.com/college/sat-information>

### **Stanford Achievement Test, 10 Edition (SAT-10)**

- SAT-10 focuses on ensuring students meet requirements by national or state standards. The instrument was primarily developed to help identify and help children at risk of being left behind. Students in kindergarten through grade 12 are accepted to take the test. For each grade there is a specific test which is separated into reading, language, and math sections, with multiple choice questions, short answer, and extended response.
- <http://www.statisticssolutions.com/stanford-achievement-test-10-sat-10/>

### **TerraNova / CAT**

- TerraNova is a series of standardized achievement tests used in the United States designed to assess K-12 student achievement in reading, language arts, mathematics, science, social studies, vocabulary, spelling, and other areas.
- <https://www.datarecognitioncorp.com/Assessment-Solutions/Documents/TerraNova%20Overview%20Brochure%202016.pdf>

### **U.S. Civics Test / U.S. Citizenship Test**

- 100 civics (history and government) questions.
- <https://www.uscis.gov/citizenship/teachers/educational-products/100-civics-questions-and-answers-mp3-audio-english-version>

Source: Developed by LBFC staff from various test websites and the Pennsylvania Department of Education.

## Appendix C – NCEO Tables – 2009 State Accommodations for Students with Disabilities

The following five tables were compiled by NCEO and present an overview of the types of accommodations states offered students with disabilities in 2009. At the time NCEO organized the accommodations offered by states into five categories: 1) presentation, 2) equipment and materials, response, 4) scheduling/timing, and 5) setting; however, presently the equipment and materials category of accommodations is generally incorporated within the other categories of accommodations. Each of the NCEO tables presented contains corresponding notes and footnotes that identify the meaning of the acronyms referenced within the various tables along with other pertinent information.

**Table 1. Number of Regular States that Allow or Prohibit Selected Presentation Accommodations<sup>a</sup>**

Accommodation	Type of Accommodation/Impact of Use <sup>b</sup>					
	A	AC	AI	AI/AC	AC/UA	P
Large Print	49	0	1	0	0	0
Braille	47	0	1	1	1	0
Read Aloud Directions	32	10	0	0	0	0
Read Aloud Questions	9	40	0	2	0	0
Read Aloud Passages	2	17	3	1	0	9
Sign Interpret Directions	45	2	0	0	0	1
Sign Interpret Questions	18	20	0	0	1	0
Sign Interpret Passages	5	7	0	0	0	3
Native Language Translation of Directions	18	2	1	0	0	2
Native Language Translation of Questions	4	6	1	0	0	4
Native Language Translation of Passages	3	6	1	0	0	2
Repeat/Re-Read/Clarify Directions	31	3	0	0	0	0
Visual Cues	22	2	0	0	0	0
Administration by Others	4	0	0	0	0	0
Familiar Examiner	17	1	1	0	0	0
Additional Examples	4	0	0	0	0	0
Teacher Highlighting	17	4	0	0	0	0
Student Highlighting	14	2	0	0	0	0
Student Reads Test Aloud	14	0	0	0	0	0
Increased Space Between Items	4	1	0	0	0	0
Simplify/Paraphrase Directions	16	2	0	2	1	1
Tactile Graphics	13	1	0	0	1	0
Prompt/Encourage Student	13	2	0	0	0	0
Page Turner	5	1	0	0	0	0

<sup>a</sup> In addition to the presentation accommodations listed in this table, 34 states have "Other" presentation accommodations. See Table B.19 in Appendix B for details.

<sup>b</sup> A = Allowed; AC = Allowed in Certain Circumstances; AI = Allowed with Implications for Scoring; AI/AC = Allowed with Implications for Scoring and in Certain Circumstances; UA = Unique Aggregated; P = Prohibited

Note: These totals include fifty states and the District of Columbia.

**Definitions:**

**Large Print** = all parts of the assessment are in print larger than that typically used.

**Braille** = all parts of the assessment are presented in braille.



**Table 1. Number of Regular States that Allow or Prohibit Selected Presentation Accommodations<sup>a</sup>**  
(continued)

**Read Aloud Directions** = the directions portion of the assessment is read to the student.  
**Read Aloud Questions** = the assessment items are read to the student.  
**Read Aloud Passages** = the assessment passages are read to the student.  
**Sign Interpret Directions** = directions portion of the assessment presented to the student via sign language.  
**Sign Interpret Questions** = assessment items presented to the student via sign language.  
**Sign Interpret Passages** = assessment passages presented to the student via sign language.  
**Native Language Translation of Directions and/or Items** = directions and/or test items are translated into the student's native language.  
**Read/Re-read/Clarify Directions** = directions may be clarified through restatement for the student.  
**Visual Cues** = additional visual cues are provided for students, such as arrows or stickers.  
**Administration by Others** = someone other than regular test administrator gives test to student (e.g., special education or general education teacher).  
**Familiar Examiner** = someone other than regular test examiner who the student knows and has worked with in the past gives the test to the student (e.g., special education teacher).  
**Additional Examples** = in response to student request for more information or clarification, test administrator can supply additional examples to assist the student.  
**Teacher Highlighting** = teacher uses a highlighter to highlight on test booklet (e.g., highlighting key words in directions).  
**Student Highlighting** = student uses a highlighter to mark on test booklet.  
**Student Reads Test Aloud** = student reads directions and/or items aloud to self.  
**Increased Space Between Items** = more blank space is given in the test booklet between items.  
**Simplify/Paraphrase Directions** = in response to student request for more information or clarification, test administrator can simplify or paraphrase test directions.  
**Tactile Graphics** = graphic items in the test are given through tactile representation.  
**Prompt/Encourage Student** = test administrator may encourage or prompt the student to continue.  
**Page Turner** = the student receives assistance turning the pages of the test booklet.

**Table 2. Number of States that Allow or Prohibit Selected Equipment/Material Accommodations**

Accommodation	Type of Accommodation/Impact of Use <sup>b</sup>					
	A	AC	AI	AI/AC	AC/UA	P
Magnification Equipment	48	0	1	0	0	0
Amplification Equipment	48	0	0	0	0	0
Light/Acoustics	34	1	0	0	0	0
Calculator	10	23	3	6	1	4
Templates	39	0	0	0	0	0
Audio/Video Equipment	17	4	0	2	0	0
Noise Buffer	33	1	0	0	0	0
Adaptive/Special Furniture	33	1	0	0	0	0
Abacus	17	13	0	3	0	1
Manipulatives	10	10	2	3	1	2
Adapted Writing Tools	22	2	0	0	0	0
Slant Board/Wedge	8	2	0	0	0	0
Secure Paper to Work Area	10	2	0	0	0	0
Visual Organizers	16	1	0	0	0	0
Color Overlay	24	0	0	0	0	0
Assistive Technology	16	10	1	2	0	0
Special Paper	21	2	0	0	0	0
Math Tables/Numberline	9	7	4	2	0	3
Dictionary/Glossary	17	14	1	3	0	1
Thesaurus	1	4	0	1	0	1
Keyboard	10	1	0	0	0	0
Graphic Organizers	8	6	0	0	0	1

<sup>a</sup> In addition to the equipment and material accommodations listed in this table, 26 states had "Other" equipment and materials accommodations. See Table B.21 in Appendix B for details.

<sup>b</sup> A = Allowed; AC = Allowed in Certain Circumstances; AI = Allowed with Implications for Scoring; AI/AC = Allowed with Implications for Scoring and in Certain Circumstances; UA = Unique Aggregated; P = Prohibited

Note: These totals include fifty states and the District of Columbia.



**Table 2. Number of States that Allow or Prohibit Selected Equipment/Material Accommodations<sup>a</sup> (continued)**

*Definitions:*

**Magnification Equipment** = equipment that enlarges the print size of the test.  
**Amplification Equipment** = equipment that increases the level of sound during the test (e.g. hearing aids).  
**Light/Acoustics** = changes to the amount or placement of lighting or special attention to the acoustics of the test setting.  
**Calculator** = standard calculator and special function calculator.  
**Templates** = Templates used to mark location of focus on the test.  
**Audio/Video Equipment** = audio or video equipment.  
**Noise Buffer** = ear mufflers, white noise, and other equipment used to block external sounds.  
**Adaptive or Special Furniture** = any furniture the student requires (e.g., for sitting upright).  
**Abacus** = abacus or similar counting tools.  
**Manipulatives** = learning materials that are operated with the hands (e.g., math cubes, counters).  
**Adapted Writing Tools** = larger diameter pencil, pencil grip, or other writing tool that has been adapted for the student.  
**Slant Board/Wedge** = slant board or wedge.  
**Secure Paper to Work Area** = tape, magnets, or other device to secure paper to work area.  
**Visual Organizers** = markers, masks, and other devices to mark location of focus on test.  
**Color Overlay** = color overlay or shield.  
**Assistive Technology** = assistive technology (e.g., head wand, Kurzweil software).  
**Special Paper** = any special paper, such as graph paper, scratch paper, wide-ruled paper, etc.  
**Math Tables/Number Line** = math tables or number line, provided for, or created by, the student.  
**Dictionary/Glossary** = dictionary or glossary in English, English/other language, or other language only.  
**Thesaurus** = thesaurus.  
**Keyboard** = keyboard or adaptive keyboard.  
**Graphic Organizers** = graphic organizers created before or during the testing situation.

**Table 3. Number of States that Allow or Prohibit Selected Response Accommodations<sup>a</sup>**

Accommodation	Type of Accommodation/Impact of Use <sup>b</sup>					
	A	AC	AI	AI/AC	AC/UA	P
Proctor/Scribe	35	12	2	2	0	0
Computer or Machine	34	9	0	3	1	1
Write in Test Booklets	36	4	0	1	0	0
Tape Recorder	22	3	0	1	0	0
Communication Device	21	6	0	1	1	0
Spell Checker/Assistance	8	8	1	3	1	16
Braille	39	1	0	0	1	0
Sign Responses to Sign Language Interpreter	14	5	0	1	0	0
Pointing	23	1	0	1	1	0
Speech Device	12	14	0	0	0	1
Monitor Placement of Student Responses	8	0	0	0	0	0

<sup>a</sup> In addition to the response accommodations listed in this table, 30 states had "Other" response accommodations. See Table B.23 in Appendix B for details

<sup>b</sup> A = Allowed; AC = Allowed in Certain Circumstances; AI = Allowed with Implications for Scoring; AI/AC = Allowed with Implications for Scoring and in Certain Circumstances; UA = Unique Aggregated; P = Prohibited

Note: The totals in this table includes 50 states and the District of Columbia.

*Definitions:*

**Proctor/Scribe** = student responds verbally and a proctor or scribe then translates this to an answer sheet; for writing extended responses, specific instructions about how spelling and punctuation may be included.

**Table 3. Number of States that Allow or Prohibit Selected Response Accommodations (continued)**

**Computer or Machine** = computer or other machine (e.g., typewriter).

**Write in Test Booklet** = responses may be written in the test booklet rather than on answer sheets.

**Tape Recorder** = student's verbal responses are tape recorded, generally for later description.

**Communication Device** = various devices for the student to use in giving responses (e.g., symbol boards).

**Spell Checker/Assistance** = spell checker as a separate device or within a word-processing program.

**Braille** = device or computer that generates responses in braille.

**Sign Responses to Sign Language Interpreter** = responses may be given by sign language to a sign language interpreter.

**Pointing** = student points to response and staff member translates this onto an answer sheet.

**Speech/Text Device** = student's verbal responses are transferred to text via speech/text device.

**Monitor Placement of Student Responses** = the test administrator or other assistant monitors the placement of the student's responses on the answer sheet.

There was little variability in the Write in Test Booklet accommodation (see Figure 22). This accommodation was allowed in 25 states in social studies, and 35-37 states in each of the other content areas. Three states allowed this accommodation in certain circumstances for every content area, while 1 state allowed this accommodation in certain circumstances with implications for scoring in each content area. Interestingly, 1 state prohibited the use of the write in test booklet accommodation in writing, while no other states prohibited this accommodation in any other content areas.

**Figure 22. State Participation Policies for the Write in Test Booklet Accommodation by Content Area**

**Table 4. Number of States that Allow or Prohibit Selected Scheduling/Timing Accommodations<sup>a</sup>**

Accommodation	Type of Accommodation/Impact of Use <sup>b</sup>					
	A	AC	AI	AI/AC	AC/UA	P
Extended Time	38	4	2	0	2	0
With Breaks	42	1	1	0	1	0
Multiple Sessions	20	0	1	0	0	0
Time Beneficial to Student	37	2	0	0	0	0
Over Multiple Days	15	5	0	0	0	2
Flexible Scheduling	14	4	0	0	0	0

<sup>a</sup> In addition to the scheduling/timing accommodations listed in this table, 10 states had "Other" scheduling/timing accommodations. See Table B.25 in Appendix B for details.

<sup>b</sup> A = Allowed; AC = Allowed in Certain Circumstances; AI = Allowed with Implications for Scoring; AI/AC = Allowed with Implications for Scoring and in Certain Circumstances; UA = Unique Aggregated; P = Prohibited

Note: Totals include 50 states and the District of Columbia.

**Definitions:**

**Extended Time** = student may take longer than the time typically allowed.

**With Breaks** = time away from test allowed during tests typically administered without breaks, sometimes with conditions about when this can occur (e.g., not within subtests) and how long they can be.

**Multiple Sessions** = assessments generally given in a single session can be broken into multiple sessions.

**Time Beneficial to Student** = administered at a time that is most advantageous to the student.

**Over Multiple Days** = administered over several days when the assessment is normally administered in one day.

**Flexible Scheduling** = the order of subtests may vary from the typical order of subtests.

**Table 5. Number of Regular States that Allow or Prohibit Selected Setting Accommodations<sup>a</sup>**

Accommodation	Type of Accommodation/Impact of Use <sup>b</sup>					
	A	AC	AI	AI/AC	AC/UA	P
Individual	47	0	0	0	0	0
Small Group	48	0	0	0	0	0
Carrel	37	0	0	0	0	0
Separate Room	33	0	0	0	0	0
Seat Location/Proximity	35	0	0	0	0	0
Minimize Distractions	24	1	0	0	0	0
Student's Home	18	2	1	0	0	0
Special Ed. Classroom	5	1	0	0	0	0
Increase/Decrease Opportunity for Movement	9	1	0	0	0	0
Physical Support	2	0	0	0	0	0
Hospital	14	0	0	0	0	0
Non-School Setting	8	0	0	0	0	0

<sup>a</sup> In addition to the setting accommodations listed in this table, 7 states had "Other" setting accommodations. See Table B.27 in Appendix B for details.

<sup>b</sup> A = Allowed; AC = Allowed in Certain Circumstances; AI = Allowed with Implications for Scoring; AI/AC = Allowed with Implications for Scoring and in Certain Circumstances; UA = Unique Aggregated; P = Prohibited

Note: These totals include 50 states and the District of Columbia.

**Definitions:**

**Individual** = individual assessed separately from other students.

**Small Group** = student assessed in small group separate from other students.

**Carrel** = student assessed while seated in a study carrel.

**Separate Room** = student assessed in a separate room.

**Seat Location/Proximity** = student is assessed in a specifically designated seat location, usually in close proximity to the test administrator.

**Minimize Distractions** = student is assessed in a quiet environment.

**Student's Home** = student assessed at home, usually when out of school for illness or other reasons.

**Special Education Classroom** = student is assessed in the special education classroom.

**Increase/Decrease Opportunity for Movement** = student is assessed in an environment that allows for increased or decreased opportunity for movement (e.g., the student may be allowed to walk around).

**Physical Support** = student is provided physical support during assessed.

**Hospital** = student is assessed in a hospital.

**Non-school Setting** = student is assessed in a non-school setting.

Source: National Center on Education Outcomes.

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## Appendix D – ECS Overview of 50 States and District of Columbia Opt-out Policies

EDUCATION COMMISSION OF THE STATES

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### Appendix

#### *Alabama*

No information identified.

#### *Alaska*

No information identified.

#### *Arizona*

The Department of Education's [parent guide to understanding state assessments](#) clearly states that, per state and federal policies, parents may not allow students to opt out of state assessments.

#### *Arkansas*

According to the [state Department of Education](#), participation in state assessments is mandatory under state law unless the state Board of Education decides otherwise. However, the state board is not permitted to make accommodations that negate the validity of a statewide assessment, which result in less than 95 percent of all students attending public school participating in the testing program.

#### *California*

California law ([Cal. Educ. Code § 60615](#)) allows parents to [opt their children out of assessments](#) through a written request. Districts are required to keep track of how many students were opted out by their parents.

#### *Colorado*

Although the state attorney general recently found that the state Board of Education does not have the authority to grant testing waivers to districts, the board recently passed a motion that seeks to exempt districts from any penalty if fewer than 95 percent of students participate in testing this spring.

#### *Connecticut*

The Department of Education clarified the state's policies on state assessments in [two](#) separate [documents](#) sent to district-level staff, namely that all students (with two minor exemptions) must take them.

#### *Delaware*

Citing state and federal law, the Department of Education's one-page [publication on opt-outs](#) states that students are exempt from state tests only for extreme medical incidents or for reasons of mental health.

#### *District of Columbia*

While information from the District of Columbia was not identified, [one high school](#) warned that students who do not participate in assessments will not be eligible to participate in sports next year.

#### *Florida*

Although information about Florida's position could not be located on the Department of Education's website, it appears that Florida does not allow students to opt out of assessments. Pam Stewart, the state's commissioner of education, wrote a [letter](#) to state Sen. Don Gaetz clarifying Florida's position and highlighting, in detail, the potential consequences of a student opting out. Interestingly, a Florida school district had voted to opt the entire district out of state tests but [reversed that decision](#) because of the consequences.

#### *Georgia*

No information identified.

#### *Hawaii*

Hawaii appears to require all students to participate in state assessments (see p. 14 of the state's [test administration manual](#)).

#### *Idaho*

Idaho [has no policy allowing for students to opt out](#). It appears that districts can make their own decisions, but the Department of Education provides help for any districts that need to respond to parents who want to opt out. The state's [Smarter Balanced Educator Communicators Toolkit](#) includes suggested answers to questions about opting out.

#### *Illinois*

The Illinois State Board of Education issued a [letter](#) to parents stating that students may not opt out of the PARCC assessment under state and federal law. The board also states that districts can develop a policy for those students who refuse to take assessments on testing days, but emphasizes that refusal would violate state and federal laws.

#### *Indiana*

[Indiana's Department of Education](#) acknowledges that it is not against the law for a parent to refuse to allow a child to participate in assessments but cautions that students must participate in statewide assessments to graduate. Additional consequences and procedures to manage students who refuse to participate are determined at the local school level.



### *Iowa*

Iowa provides clear guidance on its Department of Education website, prohibiting opt-outs under state and federal law. The department provides that school districts determine the consequences for parents who choose to opt their children out.

### *Kansas*

Opt-out issues are handled at the local level. Kansas expects a minimum of 95 percent participation this year.

### *Kentucky*

The commissioner of education clarified that opting out of assessments is prohibited. He cited Kentucky statute [Ky. Rev. Stat. Ann. § 158.6453](#) and [703 Ky. Admin. Regs. 5:140](#) as creating an accountability system that is designed to ensure that all schools and districts are serving all students and that gaps in categories of students are identified, addressed and closed. The commissioner asked that schools explain to parents that all students must be tested to accomplish these goals.

### *Louisiana*

In addition to efforts to remove the Common Core standards from his state, Gov. Bobby Jindal issued an [executive order](#) on Jan. 30, 2015, that could allow parent opt-outs. According to [news reports](#), the governor, state school boards association and a state teachers union, along with several districts and Common Core opponents, have requested that the Board of Elementary and Secondary Education schedule a special meeting to clarify the state's opt-out policy.

### *Maine*

No information identified.

### *Maryland*

According to a [brochure](#) released by the Maryland State Department of Education, while parents have a fundamental right to choose whether to send their children to a public school, they cannot selectively choose or reject parts of the public education program itself – including student testing. A parent-initiated [lawsuit](#) challenging mandatory assessments and confirming a parent's right to refuse testing in Maryland is pending.

### *Massachusetts*

According to a 2014 [letter](#) from the state's commissioner of education, participation is mandatory because Massachusetts law ([Mass. Gen. Laws Ann. 69 §1i](#)) does not contain an opt-out provision. However, the same letter requires schools to provide an alternative educational activity for students who refuse to participate in the assessment. Still, one [Massachusetts district](#) that allowed students to refuse to take a state pilot exam received a

[notice](#) from the Board of Elementary and Secondary Education reiterating the assessment mandate.

### *Michigan*

According to a [report](#) by the Michigan Department of Education, there is no rule prohibiting parents from opting their students out of assessments. However, districts are encouraged to limit exemptions because they will be held to the requirement that 95 percent of their students complete the assessment.

### *Minnesota*

Currently, no consequences exist for students in Minnesota who opt out of state exams. According to a [Department of Education presentation](#), although students in grade 8 and above are expected to participate in the exams in order to meet their graduation assessment requirements, diplomas will not be withheld from students who are absent during testing. While state statute does not specifically allow for opt-outs, it does not prevent students from refusing to participate. Some districts assist in this process by providing opt-out forms (like the form provided by Minneapolis Public Schools).

### *Mississippi*

State statute ([Miss. Code Ann. § 37-16-7](#)) requires students to achieve a passing score on each of the required high school exit exams in order to receive their diploma. There is a [bill](#) working its way through the legislature that would prohibit entirely the state Board of Education and local school districts from including assessments in graduation requirements. [Another bill](#) that specifically granted parents the right to opt their children out of the exams and to formalize a procedure for opt-outs died in committee.

### *Missouri*

Currently, no formal process exists for students to opt out of state assessments. A [Q&A report](#) by the Department of Education notes that districts are compelled by federal and state statute to assess all of the students in their district. [State statute](#) requires district school boards to establish a written policy on student participation in these exams.

### *Montana*

No information was identified.

### *Nebraska*

It is unclear if parents may opt out of state assessments on behalf of students. Some materials from the Department of Education (including the [2013 online test administration manual](#) and the [accountability scoring rules](#)) reference a mechanism for parent refusal of state assessments, but other materials do not. The

department's position on this issue is unclear.

### *Nevada*

Apparently the Department of Education [allowed parents](#) to opt out of 2013 state assessment [field testing](#). No further information was identified.

### *New Hampshire*

[State law](#) requires that assessments be administered in all school districts and that all students in all grades participate. According to a [release](#) from the Department of Education, public school children are legally required to take the assessment and parents have no legal right to opt their children out. [Exemptions exist](#) only in special circumstances, such as serious illness, severe emotional distress and participation in another state or alternative assessment.

### *New Jersey*

The Department of Education sent [guidance](#) to district and school leadership on the opt-out issue, informing them that state and federal policy requires students to participate in statewide assessments and encouraging district and school leadership to inform parents and students why the assessments are important. According to a few news articles ([here](#) and [here](#)), Commissioner of Education David Hespe encouraged districts to create policies on handling opt outs, including potential disciplinary actions.

### *New Mexico*

In [this assessment procedures manual](#), the Department of Education makes clear that federal and [state law](#) require all students to participate in state assessments. Students who refuse to take the test, with the exception of those who receive a state medical exemption, count against the school for A-F School Grades. Although alternative methods are identified, the state requests that students demonstrate competency in the five core subject areas through completion of the accountability assessment in order to meet graduation requirements.

### *New York*

While there is a contingent in New York actively advocating for testing opt outs, the New York Department of Education issued guidance in 2013 clearly stating that there is no provision in statute or regulation allowing parents to opt their children out of state tests. Despite this guidance, education policy leaders in New York City are taking steps that would allow for opt outs (see sidebar).

### *North Carolina*

According to a [handbook](#) released by the state Board of Education, [board policy](#) prevents students from opting out of exams. An exam answer sheet must be provided to all students. Students whose answer sheets are blank will receive the lowest

possible score and the student's course and overall grade point average may be negatively affected. A [memo](#) from the deputy state superintendent provides additional information to LEA superintendents and charter school directors about assessment mandates and the protocol for handling refusal requests.

### *North Dakota*

There is no information from the Department of Education on this matter. However, legislators recently introduced [H.B. 1283](#), which would allow parents to opt out of state assessments and would require parents to be notified of their right to opt out prior to test administration. In addition, officials from the [West Fargo Public Schools District](#) disseminated information to parents informing them that while the district is required to administer assessments to all students, the district will not take action against any student and any student's family if the student does not complete the assessment.

### *Ohio*

The Department of Education prepared a [document](#) outlining the importance of student participation in state tests and three possible consequences to opting out. Ohio is one of only a few states in which the department clearly and publicly outlined the potential consequences of students not taking state assessments. Some of those consequences include:

1. Third graders may be retained due to the state's third-grade reading and retention policies.
2. Opting out may affect high school graduation, as assessments are part of the state's graduation requirements.
3. English language learners may be delayed or prevented from exiting the English development program.

### *Oklahoma*

The Department of Education does not provide opt-out options to students. According to a [report](#), statutory and Department of Education rules require all districts to provide a test to every student enrolled in respective testing grades. If a parent wants to opt a child out of an exam, the district must provide the test to the student and document the student's refusal to participate. The failure of a district to achieve a 95 percent participation rate will result in the district automatically earning a lower grade on the A-F report card.

### *Oregon*

The Department of Education provides an [FAQ](#) on testing exemptions, which includes information about allowed exemptions (disabilities or religious beliefs) and the request process; federal and state requirements; how exemptions impact school accountability ratings; and the impact of opt-outs on

graduation.

### *Pennsylvania*

State policy allows parents to opt their children out of state assessments if a test conflicts with a family's religious or moral beliefs, and [parents seem to be using this policy](#). It doesn't appear the state has issued guidance to parents or districts on this issue, although some school districts are apparently [taking disciplinary action](#) against teachers who inform parents about this opt-out provision.

### *Rhode Island*

The Department of Education [expects all students to participate in statewide assessments](#), and students may only be exempted, with department approval, for medical reasons or emergencies.

### *South Carolina*

One of South Carolina's state superintendents [sent guidance](#) to school district leaders on this issue. In short, state and federal policy does not provide opt-out provisions for parents or students.

### *South Dakota*

State policies require districts to administer state assessments to all students ([S.D. Code Ann. § 13-3-55](#); [S.D. Admin. R. 24:55:07:08](#)) and all students are required to take them ([S.D. Admin. R. 24:55:07:01](#)), with an exemption for English language learner students ([S.D. Admin. R. 24:55:07:11](#)). No information from the Department of Education was identified.

### *Tennessee*

It does not appear that the Department of Education has issued any guidance on this issue. However, state achievement tests for students in grades 3-8 compose a percentage of the student's final grade, up to 25 percent ([Tenn. Code Ann. §49-1-617](#)). The department does allow for department-approved [medical exemptions](#). Legislation enacted in 2014 allows parents to opt their student out of participating in a survey, analysis, or evaluation, but it is not clear if this extends to state assessments ([Tenn. Code Ann. §49-2-211](#)).

### *Texas*

According to Texas law ([Tex. Educ. Code Ann. § 26.010](#)), parents are not entitled to remove a child from class or other school activity to avoid a test. Although no information from the Texas Education Agency was identified, the Texas Association of School Boards has provided [guidance](#) to school boards about opting out of standardized tests, including the potential consequences of missing these tests.

### *Utah*

Utah law ([Utah Code Ann. § 53A-15-1403\(9\)](#)) allows parents to [opt their children out of state assessments](#). These students are excluded from state accountability measures but cannot be excluded from federal accountability measures and reports. (Also see a [recent memo](#) from the Department of Education about the state's opt-out policy.)

### *Vermont*

In 2014, the Department of Education issued a [statement](#) to help districts and school boards answer questions about opting out. In short, school districts are required to participate in state assessments and each school must account for 100 percent of its enrolled students by reporting a score or documenting a valid exemption, which include health or personal emergencies but not parent refusal.

### *Virginia*

In a 2013 [memo](#) to school district leaders, the state superintendent clarified that state assessment regulations do not provide for an opt-out policy and gave procedures to follow for any students refusing to take assessments. One of the procedures strongly encourages schools to request a written statement from parents about the reason for refusal, which should be included in the student's file.

### *Washington*

According to the Department of Education, a parent may refuse to have his/her child take state tests. However, high school students must pass certain state assessments [before graduating](#).

### *West Virginia*

No information was identified.

### *Wisconsin*

Per state policy ([Wis. Stat. § 118.30\(2\)\(b\)3](#)), school districts in Wisconsin must excuse students in grades 4, 8 and 9-11 from state assessments at any time during the testing window upon the request of a parent. Students in other grades may only be excused at the discretion of the school board.

### *Wyoming*

In 2014, the [Department of Education](#) requested an opinion from the Wyoming Attorney General's office regarding parent opt-outs from state-mandated testing. According to an [opinion](#) from the office of the state's attorney general, districts are required to assess all eligible students and students may not opt out of assessment.



## Appendix E – Sample Calculations (Participation Rate Greater and Less Than 95 Percent)

The following two tables were compiled by PDE for the purpose of comparing sample calculations based on the past and present formulas based on a participation rate greater than ninety-five percent versus a participation rate less than ninety-five percent:

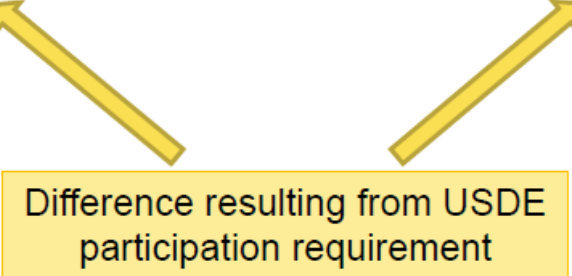
### Sample Calculation with Participation Rate Greater Than Ninety-five Percent

"Sample Elementary School" - 5 <sup>th</sup> Grade English Language Arts PSSA Administration	
150 "full academic year" students - 5 recently-arrived English learners = 145 eligible test takers	
Step 1. Subtract students who opt out, refuse, or otherwise do not participate in assessment from population of eligible test takers	
Example 1 – Scenario with no impact to achievement score	
Among 145 eligible test takers, <u>6 do not test</u>	
139 test takers [Participation rate = 95.9%]	
99 score Proficient or Advanced	
Calculate proficiency rate	
2016-17 and Prior Calculation	2017-18 and Forward Calculation
99/139 = <b>71.2%</b> Proficient/Advanced	99/139 = <b>71.2%</b> Proficient/Advanced

No change resulting from USDE participation requirement

**Sample Calculation with Participation Rate Less Than Ninety-five Percent**

“Sample Elementary School” - 5 <sup>th</sup> Grade English Language Arts PSSA Administration	
150 “full academic year” students - 5 recently-arrived English learners = 145 eligible test takers	
Step 1. Subtract students who opt out, refuse, or otherwise do not participate in assessment from population of eligible test takers	
Example 1 – Scenario with no impact to achievement score	
Among 145 eligible test takers, <u>12 do not test</u>	
133 test takers [Participation rate = 91.7%]	
99 score Proficient or Advanced	
Calculate proficiency rate	
2016-17 and Prior Calculation	2017-18 and Forward Calculation
99/133 = <b>74.4%</b> Proficient/Advanced	99/138 = <b>71.7%</b> Proficient/Advanced



Difference resulting from USDE participation requirement

Source: Pennsylvania Department of Education.