

Debbie Anderson, M.Ed. MLIS, NEA ELL Cadre Assessment Committee Co-Chair, 2003 Assessment Matters mini-conference w/ Assessment Training Institute (Stiggins, Rick).

Position(s): Hawaii should apply for the annual \$1,500,000 grant for an Assessment System Audit under the Every Student Succeeds Act (ESSA) of December 2015 (reauthorized after the March/April 2015 Phase I Student Assessment Administration Review State Level's "marginal" **operating** effectiveness). We're concerned about the current Phase II school level Audit's purpose, as it seemed overly focused on reviewing the Administration of standardized testing, without addressing sufficiently the Supreme Court recognized teststandards.org criteria of Validity, Reliability, etc.

The ESSA increases assessment flexibility and responsibilities for our State—an opportunity to change assessment for the better. In particular, legislators are asking you to address problems caused by an overemphasis on standardized testing. It has never been more important to develop balanced assessment systems that can provide meaningful information, improve teaching practices, and help students learn.

ESSA Title I, part A NFR addresses annual statewide assessments, with the goals of clarifying new flexibilities for states and districts to **reduce testing**; maintaining effective protections to preserve students' civil rights to ensure assessments are fair; and maximizing the positive impact of transparent, consistent information about student success and progress. The ESSA also provides several new flexibilities to help states reduce duplicative, unnecessary testing and develop innovative approaches to assessments.

Minimum: Annual statewide assessments in reading/English/Language Arts and mathematics in grades 3-8 and once in high school, as well as assessments **once in each grade span** in science for all students and annual English language proficiency assessments in grades K-12 for all English learners. Results must be broken out by student subgroups.

To the extent practicable, (states) must develop assessments using the principles of **universal design for learning**, which intentionally reduce barriers and improve flexibility in how students receive information or demonstrate knowledge.

An audit should differentiate types of assessments. The essential question is whether assessment (broken down by type) is worth the investment of time and money.

Informed use of assessment must include differentiating assessments and their purposes as follows:

- (a) large scale assessments used to inform the entire system performance,
- (b) assessments used to inform school performance,
- (c) assessments used to inform classroom performance, and
- (d) assessments used to inform student performance. Students should be assessed on the attainment of global learner outcomes through performance tasks, senior projects, or other similar forms of authentic assessment.

Some of the information sought in an Assessment System Audit includes the following:

- An inventory of all standardized tests, including when they are taken, who takes them, in what subjects, and are they legally required and under what authority;
- The purpose of each test;
- The origin and management of each test: who produced it, who grades it;
- Whether the test is a district, state, or federally mandated test; and
- How the test data is used to inform instruction.

See last attachment: STATE OPTION TO CONDUCT ASSESSMENT SYSTEM AUDIT. SEC. 1202. <<NOTE: 20 USC 6362.>>

“In September 2016 the Governor’s ESSA Team surveyed teachers across the state and found that the vast majority (91%) felt that the DOE should consider changes in the current state testing program and, like the principals, most felt the testing time should be reduced and that more authentic assessment models should be considered.”

p. 21. (December 6, 2016) Working Draft of Hawaii’s *Blueprint for Public Education*

ESSA: “Eliminating unnecessary testing”

We would like the current Audit to address further this comment: “Students are subjected to too much testing, and the Test Coordinators feel there is a drop off in performance due to ‘burn out.’ It should be noted that in addition to the required statewide assessments, schools may elect to administer diagnostic, formative, and end-of unit assessments to evaluate student’s abilities and progress.” This concern indicates questionable test reliability.

You can act to make proactive, positive changes in our state’s approach to assessment!

Assessment mini-Bibliography

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Stiggins, Rick. *Assessment Manifesto: A Call for the Development of Balanced Assessment Systems*. April 2008. Assessment Training Institute. ATI was founded in 1992 by Rick Stiggins to help classroom teachers develop skills needed to gather accurate information about student achievement and to use the assessment process and its results effectively to improve achievement.

Student Assessment Administration Review – Phase 1 Review completed. Report issued in March 2015 and presented to the Board in April 2015. Overall review rating was marginal. There were five observations, three (3) with a moderate risk ratings, and two (2) with a low risk ratings.

h. “Possible reaction of the public, professional organizations, unions, DOE staff an/or others to the recommendations – N/A”

STANDARDIZED TESTS AND OTHER ASSESSMENTS POLICY

The Hawaii State Teachers Association believes that standardized tests and/or assessments should only be used to improve the quality of education and instruction of students. Furthermore, the Association believes that standardized tests, whether norm-, criterion-, or standards-referenced, can validly assess only a limited range of student learning. Therefore, they should be only an adjunct or supplement to information obtained through school and classroom-based assessment conducted by teachers. The purpose of such information should be to support and strengthen instruction as well as to summarize and evaluate student learning. Assessment techniques should allow for necessary accommodations, modifications, and exemptions and should be bias-free, reliable, and valid.

The Hawaii State Teachers Association opposes the use of standardized testing and/or assessments when:

- a. used as the criterion for the reduction or withholding for any educational funding;
- b. results are used to compare students, teachers, schools, communities, and states;
- c. used as a single criterion for high-stakes decision making, such as graduation requirements or grade promotion;
- d. the results lead to sanctions or other punitive actions;
- e. arbitrary standards are required;
- f. they do not match the motor skills and/or academic developmental levels or language proficiency of the student;
- g. student scores are used to evaluate teachers or to determine compensation or employment status;
- h. programs are specifically designed to teach to the test;
- i. testing programs or tests limit or supplant instructional time;
- j. every student is required to be tested every year;
- k. students and parents/guardians are not provided with a complete report of the student’s test results;
- l. time required to administer the test exceeds reasonable and appropriate limits for the age of the student;
- m. test preparation impedes or discourages learning, constrains the curriculum in ways that threaten the quality of teaching and learning for students;
- n. scores are used to track students;
- o. students with special needs or limited English proficiency are required to take the same tests as regular education students without modifications and/or accommodations;
- p. the outcomes or results cause overwhelming stress on teachers and students;
- q. resources are directed toward certain students who are targeted because their test results are critical to making Adequate Yearly Progress, while others are excluded because they are so far from the proficiency score that they are denied these resources; and
- r. the students are tested on standards for which they are not ready. (73, 89, 95, 05, 06, 07 edited)

ASSESSMENT OF STUDENT LEARNING POLICY

The Hawaii State Teachers Association supports ongoing comprehensive assessment of student growth.

The Association believes that the primary purposes of assessment are to:

- a. assist teachers, students, and parents/guardians in identifying the students’ strengths and needs;
- b. measure a program’s effectiveness, communicate learning expectations, and provide a basis for determining instructional strategies; and
- c. develop appropriate learning experiences for students.

Furthermore, HSTA believes that:

- a. assessment measures should be authentic - directly related to lessons teachers teach and materials teachers use;
- b. teachers should utilize a variety of measures to accurately assess student growth; and
- c. all methods of assessment should provide the necessary accommodations, modifications, and exemptions and be free of cultural, racial, and gender bias.

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STATE OPTION TO CONDUCT ASSESSMENT SYSTEM AUDIT. SEC. 1202. <<NOTE: 20 USC 6362.>>

(a) In General.--From the amount reserved under section 1203(a)(3) for a fiscal year, the Secretary shall make grants to States to enable the States to--

(1) in the case of a grant awarded under this section to a State for the first time--

(A) audit State assessment systems and ensure that local educational agencies audit local assessments under subsection (e)(1);

(B) execute the State plan under subsection (e)(3)(D); and

(C) award subgrants under subsection (f); and

2) in the case of a grant awarded under this section to a State that has previously received a grant under this section--

(A) execute the State plan under subsection (e)(3)(D); and

(B) award subgrants under subsection (f).

(b) Minimum Amount.--Each State that receives a grant under this section shall receive an annual grant amount of not less than \$1,500,000.

(c) Reallocation.--If a State chooses not to apply for a grant under this section, the Secretary shall reallocate such grant amount to other States in accordance with the formula described in section 1203(a)(4)(B).

(d) Application.--A State desiring to receive a grant under this section shall submit an application to the Secretary at such time and in such manner as the Secretary shall require. The application shall include a description of--

(1) in the case of a State that is receiving a grant under this section for the first time--

(A) the audit the State will carry out under subsection (e)(1); and

(B) the stakeholder feedback the State will seek in designing such audit;

(2) in the case of a State that is not receiving a grant under this section for the first time, the plan described in subsection (e)(3)(D); and

(3) how the State will award subgrants to local educational agencies under subsection (f).

(e) Audits of State Assessment Systems and Local Assessments.--

(1) Audit requirements.--Not later than 1 year after the date a State receives an initial grant under this section, the State shall--

(A) conduct a State assessment system audit as described in paragraph (3);

(B) ensure that each local educational agency receiving funds under this section-- [[Page 129 STAT. 1882]](i) conducts an audit of local assessments administered by the local educational agency as described in paragraph (4); and (ii) submits the results of such audit to the State; and

(C) report the results of each State and local educational agency audit conducted under subparagraphs (A) and (B), in a format that is widely accessible and publicly available.

(2) Resources for local educational agencies.--In carrying out paragraph (1)(B), each State shall provide local educational agencies with resources, such as guidelines and protocols, to assist in conducting and reporting audit results.

(3) State assessment system description.--Each State assessment system audit conducted under paragraph (1)(A) shall include--

(A) the schedule for the administration of all State assessments;

(B) for each State assessment--

(i) the purpose for which the assessment was designed and the purpose for which the assessment is used; and

(ii) the legal authority for the administration of the assessment;

(C) feedback on such system from stakeholders, which shall include information such as--

(i) how teachers, principals, other school leaders, and administrators use assessment data to improve and differentiate instruction;

(ii) the timing of release of assessment data;

(iii) the extent to which assessment data is presented in an accessible and understandable format for all stakeholders;

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(iv) the opportunities, resources, and training teachers, principals, other school leaders, and administrators are given to review assessment results and make effective use of assessment data; (v) the distribution of technological resources and personnel necessary to administer assessments;

(vi) the amount of time teachers spend on assessment preparation and administration;

(vii) the assessments that administrators, teachers, principals, other school leaders, parents, and students, if appropriate, do and do not find useful; and

(viii) other information as appropriate; and (D) a plan, based on the information gathered as a result of the activities described in subparagraphs (A), (B), and (C), to improve and streamline the State assessment system, including activities such as--

(i) eliminating any unnecessary assessments, which may include paying the cost associated with terminating procurement contracts;

ii) supporting the dissemination of best practices from local educational agencies or other States that have successfully improved assessment quality and efficiency to improve teaching and learning; and[[Page 129 STAT. 1883]]

iii) supporting local educational agencies or consortia of local educational agencies to carry out efforts to streamline local assessment systems and implement a regular process of review and evaluation of assessment use in local educational agencies.

<https://www.congress.gov/bill/114th-congress/senate-bill/1177/text>



S E A C
Special Education Advisory Council

919 Ala Moana Blvd., Room 101

Honolulu, HI 96814

Phone: 586-8126 Fax: 586-8129

email: spin@doh.hawaii.gov

February 7, 2017

**Special Education
Advisory Council**

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Ms. Dale Matsuura, *Vice Chair*
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Chair*
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Ms. Jasmine Williams
Ms. Susan Wood

Amanda Kaahanui, Staff
Susan Rocco, Staff

Lance Mizumoto, Chair
Audit Committee
Hawaii State Board of Education
P. O. Box 2360
Honolulu, HI 96804

**RE: V. A. Committee Action on the Department of Education's
Student Assessment Administration Review – Phase II**

Dear Chair Mizumoto and Members of the Committee,

The Special Education Advisory Council (SEAC) welcomes this opportunity to provide testimony on the Department's internal audit of the administration of student assessment. Our comments and recommendations are organized under the following primary observations of the audit:

**Observation #1: Test accommodations are not consistently
administered to students with documented needs.**

SEAC is dismayed to learn that six of the 10 students with disabilities sampled may have not received needed testing accommodations due to the failure to submit required request forms. The implication is that many more students may have also been denied access to needed Smarter Balance Assessment (SBA) accommodations identified in the students' IEPs. This oversight is likely to have affected the poor statewide assessment outcomes for SY 15-16 where among students with IEPs only 13.2% were proficient in ELA and only 10.9% were proficient in math.

The internal auditors recommend formal training to be provided for special education coordinators and SSCs on how accommodations are administered for SBA, and it appears that at least one district has received training to date. However, SEAC is concerned about the consistency and timeliness of training from complex area to complex area.

Recommendations:

- 1) Move up the completion date to ensure that more students are provided accommodations during the testing window that starts



February 22, 2017.

- 2) Require follow-up documentation on whether request forms were submitted in a timely way for accommodations identified in IEPs in effect this school year.

Observation #2: Insufficient number of computers/devices for testing and technical issues experienced during testing.

The noted consequences of this resource issue may have a compounded negative effect on students with disabilities. The Smarter Balance Assessment Consortium acknowledges that students with disabilities need time to be trained on and to practice using testing accommodations prior to the administration of the assessment. A shortage of available working devices makes this requirement problematic. Additionally, many students with disabilities require assistive technology (computers and tablets) to access their curriculum. If students are using shared devices, it is likely that access may be compromised during testing periods.

Recommendations:

- 1) Require feedback from Complex Areas on the adequacy of testing computers/devices prior to the beginning of the next school year, so that additional monies can be budgeted as needed.
- 2) Move up the completion date to August 1, 2017 for the Assessment Section to ensure schools are properly preparing, testing and troubleshooting testing devices prior to testing windows. Since schools are using these devices for a multitude of tests, it is critical to address the issue prior to the beginning of the next school year to avoid additional disruption to teaching and the testing process.

Observation #3: Potential areas for process improvements.

SEAC concurs with Test Coordinators that students are being subjected to too much testing. Previous testimony before the Board's Student Achievement Committee revealed that some students with IEPs may be engaged in assessments of one kind or another as many as 90 days in a year. The excessive imposition of assessments and the lack of authentic assessments to help guide instruction is undoubtedly having a negative effect on academic outcomes and student and teacher morale.

Recommendations:

- 1) Apply for the ESSA's Innovative Assessment Pilot to propel the state in a more student-centered direction.
- 2) Issue a directive to the field to eliminate unnecessary testing.

Thank you for this important opportunity to provide testimony. If you have any questions regarding this testimony, please feel free to contact us.

Respectfully,

Martha Guinan
SEAC Chair

Ivalee Sinclair
Legislative Committee Chair

Susan Pcola-Davis
94-813 Leomana Way
Waipahu, HI 96797

February 6, 2017

Office of the Hawaii Board of Education
1390 Miller Street
Room 404
Honolulu, HI 96813

Subject: **Written Input Views on Agenda Items**

Board of Education Meeting February 7, 2017

Aloha Chair Mizumoto and Board Members:

I am a Community Member in the Pearl City Complex and have participated in town hall meetings regarding “ESSA.” Lately I have also been listening to the BOE meetings. Here are my views on these agenda items;

A. [Presentation of the Department of Education's Internal Audit Plan—Quarterly Update through December 31, 2016](#) ***new material 02/02/2017***

After reviewing the data provided, it seems that a problem with “Lack of Oversight and Monitoring” and “Lack of Compliance” is a substantial weakness in Hawaii’s Education System. Sure, this is obvious from the data, you may want to find a way to analyze quarter to quarter to see if there is improvement between quarters.

B. [Committee Action on the Department of Education's Student Assessment Administration Review - Phase II](#) ***updated material 02/02/2017***

After reading this carefully through twice, I would suggest that these issues are and probably have been contributing to the so called “Education Gap” that the state is trying to eliminate. Without addressing and correcting or improving the issues in this report, the state will continue to have a gap. These issues are not about teaching or curriculum, these are infrastructure issues that can be fixed.

C. [Committee Action on Casual Hire & Payroll Processes Follow-Up Review](#) ***updated material 02/02/2017***

I noticed that this report is addressing findings from November 2012. These issues have not been correcting in 5 years. How can the state expect improvement if the recommendations have not been completed?

Overall Summary:

These reports are very comprehensive and worth the time to read them. From a community representative's view, the time spent auditing is commendable. The auditors clearly have a handle on what needs to be done and their recommendations are thorough and reasonable. It just seems that with so many "non-completed" issues, how can one expect improvement.

Underlying technology issues compound the staff. Whether it be "crashing" computers or just the lack of a basic technology infrastructure, this significantly impacts results. If you can't even offer a cane to someone who can't walk, how will they ever be able to walk let alone run?

Oversight and monitoring is weak across the board on each of these agenda items. One would have to ask, "Where is the accountability?" in this equation.

So, this leads me to the BOE/DOE Strategic Plan. Any issue that is brought up through an audit must be important enough to be addressed in the plan. I have reviewed the plan and do see it addressing some of these issues from these three agenda items. However, the measures must be in place in order to know you've gotten the result(s) you were expecting.