

Empire State Supervisors and Administrators Association

Position Paper; Common Core, Standardized Testing, and APPR

October 2015

On behalf of the Empire State Supervisors and Administrators Association (ESSAA), we would like to share our concerns and provide input for revising and improving the current regulations and procedures for Common Core, standardized testing, and APPR. We appreciate the opportunity to provide this information as we reexamine our recently enacted education laws, regulations and policies and look forward to providing additional input and offer assistance in the future.

Our organization supports initiatives to raise standards and enhance student learning. We agree on the importance of rigor and higher learning standards to best prepare our students for 21st century college and career readiness. ESSAA's 3500 public school administrators across the State have carefully watched the implementation of the Common Core, the related standardized assessments, and teacher and principal evaluations. We have worked hard to implement these constantly changing policies and procedures, but clearly the present system is broken. Unfortunately, we have witnessed the negative impact of the poorly conceived and rushed implementation of these initiatives which have placed undue stress on students, parents, teachers, and administrators. The current system relies on an unproven statistical model that is not a fair and equitable one rooted in best practices that are supported by research and input from experts, stake-holders and practitioners. It is critical that a new implementation process is vetted by experienced practitioners to ensure there are no unintended consequences that adversely affect our public schools.

We look forward to the opportunity to provide meaningful input as the Governor, Legislators, Regents and Commissioner of Education begin a sincere examination of these reform policies. In that vein it is important to point out the following concerns regarding the Common Core Learning Standards, the "high stakes" assessments associated with these standards and, by extension, the ensuing teacher and principal evaluations derived from student performance on these assessments.

COMMON CORE AND TESTING

- The implementation of new standards was rushed and lacked the necessary teacher, principal and parent ideas and opinions. Pilot programs were not considered. The curriculum was not aligned with professional development activities, and the 3-8 tests were not designed to reflect to what students were exposed. At the start only two of the 20 teaching guides promised were available before the assessments, and students in upper grades did not have the benefit of the new Common Core rigor from the beginning of their schooling. High stakes tests were thrust upon students, parents, teachers and administrators without adequate planning and thereby created the perception in most professional education circles that 'We were flying the plane as it was being built.'
- The manner in which the Common Core Regents and 3-8 assessment exams were exacted prevented timely and appropriate training from occurring and as a result put undue pressure on teachers to learn, teach, and be assessed on a new curriculum. While these exams challenge students, questions were often lengthy and difficult to understand under the given time constraint. The fact that these examinations were not phased in as recommended, leads many to believe the goal was to undermine public education.
- The tests were poorly designed and many of the 3-8 test questions were developmentally beyond the grade level ability of students, often ambiguous in nature, and designed for students to fail. The developmental stages of the human brain, and the fact that the transition from concrete to analytical

processing does not occur until later in adolescence, was not considered. Additionally, ambiguous questions in both the ELA and Math Assessments and identical passages and questions appearing on more than one test and at more than one grade level contributed to frustration.

- The time allocated for 3-8 testing remains excessive and significantly reduces contact time within the classroom. Three ninety minute sessions over three days for ELA and again for Math are beyond the capabilities of children as young as eight years old. Additionally, the test imbedded field test questions, most of which were beyond the abilities of students, caused unnecessary stress, anxiety, and the feeling of hopelessness to many of them. Even with embedded field test questions, districts are still being required to administer additional standalone field tests adding to the frustration and creating additional loss of instructional time. For our students with disabilities who receive additional time, these tests have become a measure of endurance not knowledge.
- Test questions were embargoed and hidden from professionals, further frustrating administrators and teachers who did not have access to data needed to facilitate group and individual instruction. This lack of transparency hindered the ability to better understand the learning needs of students. Moreover, this approach limits teachers' abilities to adjust instruction to fit the individual needs of students. A field review of questions by public school teachers and administrators to eliminate ambiguous and developmentally inappropriate questions did not occur.
- Research has shown that a variety of socioeconomic factors and absence of resources for students, families and schools directly contribute to a lack of student achievement. Students across the state, in situations that are no fault of their own, have not succeeded on the assessments due to broken families, poor nutrition, unknown family tragedies and substandard housing. These sad conditions are not within the control of educators or students, yet our most fragile schools and students are being penalized and punished. As a result, the tests have widened the achievement gap between the "haves" and the "have nots" as the scores of economically disadvantaged students plummeted.
- Learning mandates have not been differentiated to take into account a district's current performance and achievement resulting in a "one size fits all" approach.
- The college readiness benchmark is irresponsibly inflated, and cut scores are, in many cases, unreachable. The NYSED college readiness benchmarks need to correlate with the College Board's benchmarks. These benchmarks need to be reexamined to create fair and more attainable cut scores. A consistent, stationary and transparent calculation system needs to be established to eliminate the perception that students and teachers are aiming at moving achievement targets.
- As a result of schools striving to meet the new standards, teachers are now teaching to the test and enrichment and creativity have been discouraged. The arts and exploratory subjects are no longer a priority and cursive writing has been virtually eliminated in most elementary schools across the state.

- Senator John Flanagan (2nd Senate District), Chairperson of the New York State Senate Standing Committee on Education, led a series of hearings focused on the effectiveness of recent state education reforms in 2013. At the hearing held in Buffalo, NY on October 16, 2013, ESSAA and other representative groups vehemently articulated our concerns surrounding testing. The over testing and manner in which it has been implemented have taken an emotional toll on students. Instead of being excited about learning, they have become apprehensive about attending school. Students who once were "successful" have developed a negative self-image and low self-esteem. Unwarranted stress and anxiety have resulted in an increase of at-risk behavior and the need for counseling services. Teachers have become disheartened, with morale, optimism, and passion at an all-time low. At the same time parents have voiced their growing displeasure with our current educational priorities and direction through the opt-out movement. The "top down" implementation of the Common Core curriculum doomed its success from the beginning because the field level service providers and practitioners were intentionally ignored and replaced with financially invested voices.

Teacher and Principal Evaluations (APPR)

- While we believe that fair teacher and principal evaluations help professionals improve their practice and improve student performance, the new evaluation model was poorly conceived and hurriedly put into place without thought to the unintended consequences. This new legislation and the emergency regulations associated with it ignore current statistical research and suggestions from professionals in the field. It fails to accurately measure teacher performance, and makes it harder, rather than easier, to remove bad teachers. Implementation was too fast, the system prioritized testing over learning, and the goal became chasing federal money rather than ensuring education quality.
- Because there are standardized tests only in Mathematics and English Language Arts, policymakers determined to "score" all teachers, devised illogical means by which to "score" these teachers. For example, an art, music or physical education teacher in New York may be assessed by his students' standardized math scores. The result: many teachers are often assessed on the test scores of students they don't have and/or subjects they don't teach. Not considered in the mix are variables outside the control of teachers and principals related to the performance of students with disabilities, English Language Learners, and the impact of students opting-out.
- Schools are learning communities. An evaluation system that even partially bases an individual teacher's evaluation on his or her students' scores ignores the reality that student success is often predicated on the work of many adults in a school, as well as out-of-school support systems and resources that are often equally or in some instances even more responsible for student success.
- There is no evidence that evaluation systems incorporating student test scores produce gains in student achievement. To determine if there is a relationship, researchers recommend small-scale pilot testing of such systems. Student test scores have not been found to be a strong predictor of the quality of teaching as measured by other instruments or approaches.
- This current policy places an over reliance on test cut scores and weighting that is engrained within these regulations and should be replaced with a fair and equitable plan rooted in best practices supported by research and data from experts, stakeholders, and practitioners.

- With the adoption of the HEDI matrix, there is no need to require complex, multiple layers to determine a HEDI rating. Regulations should identify a basic scoring process that is consistent across the sub-components and categories. However, other steps in the process, like the use of additional scoring bands (e.g., 0-20 or 0-60) should be allowed locally, as collectively bargained, or subject to collective bargaining.
- Recently released growth scores for principals based on state assessments are in many cases incongruous with past performance, and this inconsistency has not been adequately explained by the State Education Department. The State Growth Scores for many principals have swung wildly from one year to the next with little logic or cogent explanation. For example, the principal of a current “Blue Ribbon School of Excellence” on Long Island received a State Growth Score of four labeling her as “Developing” one year removed from a score of seventeen. This is just one of many examples of unexplainable swings in Student Growth Scores being assigned to principals throughout New York State.
- The American Statistical Association has stated that research shows teachers account for about 1% to 14% of the variability in test scores. If a teacher accounts for 14% of the variability of test scores; what percentage could then be attributed to a principal? Yet, the new APPR evaluation system increases the emphasis on test performance in teacher and principal evaluations and now ties approximately 50% of a principal’s performance into assessments that even the Governor himself acknowledges are flawed.
- The current regulations requiring at least one teacher observation to be completed by an “impartial independent trained evaluator” have created the “unintended consequence” of taking building principals in some districts out of their buildings for significant amounts of time to perform observations at other schools. While these observations may be “impartial,” they do not contribute to the collaborative efforts between principals and their teachers in improving teacher practice and fulfilling each school’s mission. Additionally, they significantly increase the workload of a principal, in violation of the law, while reducing interaction with the students and staff in their own buildings.
- Years ago schools abandoned meaningless “drive by” or “one and done” observations by parties with no interest in the school or teacher because of their ineffectiveness and impersonal nature, yet this failed practice has been resurrected despite lack of support or endorsement from professionals in the field.
- Parents and practitioners have little confidence that these scores provide a meaningful opportunity to constructively reflect on student’s achievement or teacher and principal performance. They have inexact understandings and are confused about the information these tests convey about their child. Often parents assume these are achievement tests, when they are clearly not.
- In many cases successful school districts discarded excellent local teacher and principal evaluation models that focused on research, best practice and professional dialogue and were forced to negotiate the poorly designed teacher and principal evaluation plans now in place.

FINANCIAL CONSIDERATIONS

- In June, 2015 Common Cause/NY examined the political spending surrounding education issues in the last ten years in New York and sought to analyze the impacts of large amounts of political spending. The report showed how political spending around education issues has spiraled in New York State. Education privatization interests' aggregate political spending, including campaign contributions, independent expenditures, and lobbying, from 2005 through 2014 totaled \$93.3 million. The report shows that it is virtually impossible for everyday New Yorkers to obtain objective information or have their voices heard. "While in the past, education union political strength has resulted in the adoption of measures favored by teachers, the infusion of direct campaign contributions of privatizers has resulted in education scholarship tax credit bills that significantly advantage the wealthy in ways not seen in other states. New Yorkers' faith in the public policy decisions of their elected representatives is the victim, yet again. It is past time for common sense measures to be adopted in New York that would moderate the power of the three men in a room, break the stranglehold which wealthy and special interest political spenders have on our elections and public policy decisions, and encourage a robust and transparent legislative process to help evolve the most effective and efficient solutions to our state's problems." (Common Cause/NY, June 2015)
- The associated costs with Common Core implementation including training, staffing, curriculum materials, and remediation for students who do not make the mark have put additional financial stress on district budgets in an era of the 2% tax cap. This has often come at the expense of programs that enriched a student's educational experience. It is of note that that the cost of implementation of these programs by all estimates is well over the 700 million dollar Race to the Top Funds received and continues to grow. Unfortunately, we still are no better off than we were before the influx of federal dollars. One might actually say, we are significantly worse off now than we were before "winning" the Race to the Top!

IN CONCLUSION

It is important to point out that the longstanding concerns we have noted have been mostly ignored by the previous Commissioner. However, since Commissioner Elia assumed office in July, the Education Department and Regents have seemingly reconsidered the course of implementation of the Common Core Standards, Standardized Testing and APPR. Since returning to New York in July, the new Commissioner has made a sincere effort to visit the various regions of the state to gather input and suggestions from teachers, parents, administrators, and boards of education. In this short period of time, the new Commissioner has made an effort to follow up on the general suggestions made at our joint presentation (with our colleagues from SAANYS and NYSFA) to the Regents at the May 7th SED Learning Summit on Teacher and Principal Evaluation. Apparently, she recognizes many of the points we have stated here are valid and is gathering information to bring back to the Board of Regents. We applaud her efforts to immediately shorten the administration time of the 3-8 Math and English Language Arts tests and to develop opportunities for public school teachers and administrators to participate in a meaningful review of Common Core Curriculum and the associated testing program. Her development of a complete standards review and creation of an NYSED website portal for all stakeholders to register opinions on the State's standards (aka Common Core) will also be meaningful, if the suggestions from the field are considered and implemented.

It is also important to note that at the September Regents meeting the board was divided in approving the new 3012(d) regulations and delayed adoption of permanent regulations until the November 2015 Regents meeting. They ordered a review of the State Growth Model to ensure that it is a valid and reliable measure, and amended the regulations to provide a State level process for teachers or principals to appeal their State

determined growth scores in certain instances. In addition, the Regents provided interim relief for small or rural school districts to apply for a hardship waiver from the independent evaluator requirement based upon limited resources and size. Finally, they modified the current regulations related to disclosure of teachers' and principals' APPR scores by limiting only the release of the composite score and not each category rating. These recommendations by the Regents, their divided vote to approve the regulations, and the new extended period of public comment are all positive developments that seem to indicate the Regents and Commissioner are listening to the criticism lodged by the various stakeholder groups.

The recent NYSED call for educators to develop and review the items and passages for the NYSTP Grades 3-8 Common Core Tests, Regents Exams and NYSESLAT is also very encouraging. We applaud the department's effort to review test items to ensure they are grade level appropriate, at the grade appropriate readability level, within grade level expectations, fairly and appropriately measure Regents approved standards, and are the correct length to ensure adequate and appropriate time for administration. This is a major shift in department testing policy. The call for educators in the field to work with Questar Assessment (the new testing company) to review passages, review test items, and review field test responses before the creation of the final assessments indicates the Commissioner and department are listening to many of our suggestions. We encourage the nomination of experienced classroom teachers, teachers of students with disabilities, ELL teachers and other experienced public school educators to participate in this initiative. We also believe the long term gradual movement to computerized testing (sans PARCC) by 2020 through volunteer pilot districts is another step in the right direction.

In closing, we have an opportunity to review and improve Common Core learning, assessment, and teacher and principal performance evaluation in a meaningful, timely, and appropriate manner. Done correctly, this improvement can have a long lasting and positive affect for the students of New York State. We implore our elected officials and Education Department to abandon the many failed facets of the School Reform Agenda we have pointed out related to curriculum, student assessment and teacher and principal evaluation. We believe the responsibility for curriculum development lies clearly within the state and not in blindly accepting a controversial set of standards developed elsewhere. We also ask that you return the responsibility for teacher and principal evaluation to where it rightfully belongs; to locally elected boards of education.

The Empire State School Supervisors and Administrators Association (ESSAA) has been meeting with Commissioner Elia, and we remain committed to working together to preserve a challenging, healthy and rewarding learning environment in which to lead, to teach and to learn.