



February 18, 2021

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Mr. Phil Rosenfelt, Acting Secretary of Education
U.S. Department of Education
400 Maryland Avenue SW
Washington, D.C. 20202

Dear Mr. Phil Rosenfelt:

As our state and communities grapple with the profound challenges of the global COVID-19 pandemic, the California Teachers Association (CTA) asks that you grant state waiver requests from the federal requirement that students take standardized summative assessments in the 2020-21 school year.

Over 37,000 teachers have signed our petition to waive state summative tests and continue to plead their case as to the vitalness of spending more time on the mental and emotional health and academic needs of our students rather than standardized testing. Our teachers want to return to in-person instruction when safe to do so. Until that is possible, they are devoted to providing students with robust distance learning programs that include rigorous lessons, ongoing formative assessments, and authentic local assessments when appropriate.

Educators across the state of California are currently teaching in various modalities depending on community transmission rates. As of February 17th, 52 out of 58 California counties are in the Purple Tier-Widespread Risk of COVID-19 and the remaining six counties are either Red or Orange. This data shows that the COVID-19 pandemic continues to ravage families and communities, and new variants are beginning to have a worrying impact across the state. Communities most impacted include our most vulnerable students who live in low-income and predominantly black and Latinx communities.

Our concerns with testing during a pandemic fall into the categories of the **feasibility of administration**, the **usability of the data**, and the **cruelty of putting our students, families, and educators through a high-stakes, summative assessment**.

Feasibility of Administration

We have serious concerns regarding the feasibility of administering state summative assessments during the current pandemic. Our California Department of Education (CDE) enumerated the challenges of administering in-person assessments given our state's resurgence of COVID-19 cases and the multiple issues with the administration of remote assessments, *"In fall 2020, the CDE recommended that LEAs administer tests in person where safe to do so, and that they use remote administration as a second option*

when necessary. With the recent resurgence of COVID-19, it is possible that the primary mode of administration may become remote. Among the challenges that have surfaced for stakeholders in this shift in context are:

- *Issues with bandwidth and internet access*
- *Lack of local resources to install secure browsers on devices used by students in remote environments.*
- *Inconsistent remote testing environments for students*

Given that most students and educators across the state are still engaged in distance learning, the predominant mode of testing would have to be remote. For reasons outline by the CDE staff, the logistical demands of remote testing will be nearly impossible to meet.

Usability of the Data

Due to the challenges outlined above regarding the feasibility of administration, legitimate questions have arisen regarding the reliability, accuracy, and comparability of data to past years.

Conducting state standardized testing in the spring 2021 would be detrimental to students and of limited use to teachers, schools, and school districts given widespread inequities in student access to technology and the internet, as well as concerns about the validity, accuracy and comparability of any data gathered from statewide summative testing administered remotely and taken under unknown and uncontrollable conditions.

Feedback from teachers aligns with the feedback received by CDE. The stress and loss of teaching time while trying to run intensive, high-stakes summative assessments remotely will severely outweigh any chance of receiving assessment data that is useful for students, teachers, families, or the state.

This pandemic offers a great opportunity for school districts to utilize and share their local assessment data in lieu of data from a dubiously valid statewide test. Local assessments offer high-quality, authentic data that can inform parents and the community of student progress. Districts can work with stakeholders to determine which data points can indicate, to both teachers and parents, student successes, areas of need, and which are most appropriate to share publicly.

The cruelty of putting our students, families, and educators through a high-stakes, summative assessment

As the front line in education, teachers are fully aware of the mental health toll that the pandemic is having on students. Our members are working very hard to meet the many needs of their students as best they can and as safely as possible. We must question how adding stress and losing precious instructional time to administer high-stakes summative assessments that will yield little if any valid or reliable results would be in the best interest of the mental and emotional health of students, teachers, parents, and communities.

The focus should be on tending to children’s immediate needs: physical, social-emotional, and academic. These needs will be better assessed and intervened at the local level. The use of ongoing, embedded formative assessment and locally chosen comprehensive assessments is critical in providing meaningful data to educators, students, and parents. Now is the time to follow numerous research findings (Black & Wiliam, 1998b; Hattie & Timperley, 2007; Kingston & Nash, 2009)¹ demonstrating the effectiveness of localized and formative assessments to more accurately gauge student learning, and to take full advantage of localized authentic assessments to support student learning during this public health crises.

In closing, CTA emphatically recommends that the U.S. Department of Education provide an assessment waiver option to states as soon as possible for 2020-21 school year. Otherwise, California and the U.S. Department of Education risk perpetuating the vast inequities and mental and emotional stresses already weighing on our students due to the COVID-19 pandemic.

Sincerely,



E. Toby Boyd, President
California Teachers Association

C: Joe Biden, United States President
CTA Executive Officers
Teri Holoman, Associate Executive Director, CTA
Lori Easterling, Manager, Legislative Relations, CTA

¹ Black, P., & Wiliam, D. (1998b). Assessment and classroom learning. *Assessment in Education*, 5(1), 7–74.

Hattie, J., & Timperley, H. (2007). The power of feedback. *Review of Educational Research*, 77(1), 81–112.

Kingston, N., & Nash, B. (2009, April). The efficacy of formative assessment: A metaanalysis. Paper presented at the annual meeting of the American Educational Research Association.