



February 19, 2021

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Dr. Linda Darling-Hammond, President

State Board of Education

1430 N Street, Suite 5111

Sacramento, CA 95814

RE: CTA COMMENTS REGARDING Item #2: The Every Student Succeeds Act: Authorization to Pursue Flexibility on or a Waiver of Assessment, Accountability, and School Identification and Federal Funding Flexibility Requirements.

Dear Dr. Darling-Hammond:

The California Teachers Association (CTA) appreciates the California Department of Education's (CDE) efforts to obtain information from the United States Department of Education (USDOE) regarding potential flexibilities and waiver options regarding assessments in 2021. As our nation's educators look forward to the confirmation of our new Education Secretary Dr. Miguel Cardona, we understand that the information regarding the waiver of assessment requirements and the submission of that waiver request will require a quick turnaround. CTA has been consistent in our advocacy regarding the assessment waiver and we implore the SBE and the CDE to pursue a waiver for the required administration of the state standardized tests for the 2020-2021 school year. Additionally, this is not the time for the CDE and SBE to send mixed messages to the field about extending the testing window or moving testing to the fall.

Over 37,000 teachers have signed our petition to waive state 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. Our teachers want to return to in-person instruction when safe to do so, and 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.

As of February 17th, 52 out of 58 California counties are in the Purple Tier-Widespread Risk of COVID 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.

Our concerns with testing during a pandemic have not changed. These concerns 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

As highlighted in the January 2021 SBE Item, *“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 the majority of 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 use of assessment data and the comparability of data to past years.

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

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 LEAs 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. LEAs have already outlined their use of local assessments in their Learning Continuity Plans and districts can work with stakeholders to determine which data points can indicate to teachers and parents student successes and 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.

In closing, CTA emphatically recommends that the SBE submit an assessment waiver request to the USDOE as soon as possible for 2020-21 school year and not pursue unnecessary flexibilities for extending the testing window or taking away valuable instructional time in the fall by moving the testing window. Otherwise, the state risks perpetuating the vast inequities and mental and emotional stresses already occurring in our state due to the pandemic.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Toby Boyd". The signature is stylized with a large initial "E" and a long horizontal stroke extending to the right.

E. Toby Boyd, President
California Teachers Association

C: CTA Executive Officers
Teri Holoman, Associate Executive Director, CTA
Lori Easterling, Manager, CTA Legislative Relations
Brooks Allen, Executive Director, State Board of Education
Members, State Board of Education
CTA Liaisons to the State Board of Education

db:ETB