November 5, 2013

Dr. John B. King, Jr.
New York State Education Commissioner and
President of the University of the State of New York
The New York State Education Department
89 Washington Avenue
Albany, NY 12234

Dear Commissioner King:

On behalf of my office and the Superintendents of Schools for 18 of the 18 school districts in Western Suffolk BOCES, we are taking this opportunity to offer concrete ideas and informed recommendations for making the implementation of initiatives surrounding Common Core and APPR better for children, better for teachers, and better for our communities. We are in accord with the principles underlying the Common Core and we want to help shift the paradigm as we prepare children for the 21st century requirements of college and career readiness.

Our concerns are primarily pedagogical. The rush to implement the Common Core and the assessments has placed unnecessary burdens on both our students and teachers. We believe our children can perform at higher levels, and that our teachers can provide the instruction that will propel their classes forward. It is common knowledge that more time was needed to develop support for the Common Core standards, that the curriculum should have been aligned with all our professional development activities and that the tests should have been designed to reflect what students had actually been exposed to. We cannot and will not dwell on this because the race has started.

We believe there are things that can be done to slow the implementation and permit all of the stakeholders the necessary time to re-group and really prepare to make the changes necessary to implement the Common Core effectively. Absent a re-evaluation of the detrimental impact that APPR and the developmentally inappropriate construction of the NYS assessments are having on the initial rollout of the Common Core, we have serious concerns about the future stages of this valuable initiative. The suggestions that follow are given in the spirit that we are in this together and that only by listening to the practitioners in the field can we move forward and be successful.

1. **Slow down implementation of the new exams.**
   At a minimum, make this year and next year transition years. We suggest:
   a) Modify grade-level assessments to include a more reasonable expectation of Common Core material
   b) Revise cut scores to allow for greater margin of error due to transition
c) Regents Exams:
   - Extend the window during which both the old and new exams may be taken.
   - Allow two years between the implementation of the new common core Regents in geometry and the required Regents exams in math for the advanced diploma. The changes in math should not all be borne by the current algebra students who will be pioneers for all of the new common core math assessments as they progress. This would also lessen the burden on the teachers to learn, teach, and be assessed on a new curriculum and assessment in the same year.
   - The newly released sample Regents exam in English Language Arts is a good resource for informing instruction. The text selections, however, are lengthy and difficult to comprehend under a time constraint. When shared with current high school English teachers, the text needed to be re-read several times before the teachers had sufficient understanding to answer the questions. We cannot expect our students to be able to complete this task in a “suggested time” of 90 minutes.

d) We support extending the time from one year to two years before testing ELL students. This will give them more time to become fluent.

c) We support expanding the qualification to participate in an Alternate Assessment from 1% to 2% of students with severe disabilities.

2. Reduce “over testing” and eliminate the duplication of testing.
   In the interest of placing greater emphasis on instructional practices, we suggest:
   a) Continue to allow students to take higher level exams in place of Regents exams.
   b) Conduct field testing independently from “real” testing AFTER all state testing is over. Three days of testing for ELA and math is excessive.
   c) Revisit the testing schedule to allow for more instructional time. Conduct 3-8 testing alongside Regents testing. An inch wide and a mile deep approach to the new Common Core encompasses more time than the former standards.
   d) Continue pursuing the federal waiver to allow eighth grade students to use the results of the Algebra test in lieu of the eighth grade math assessment. This has already been done for Earth Science and the 8th grade science assessment. Make sure that these Regents results count toward a school’s proficiency rate.
   e) Consider alternating the testing annually for math and ELA.
   f) Eliminate the “timing” restriction on the test to reduce the anxiety for students to complete the complex questions on both math and ELA in the allotted time. Perhaps offer a suggested time frame, but allow students to complete assessment if they do not do so in the suggested time.

3. Re-evaluate the relationship between student test scores, the APPR plan and teachers’ scores.
   Our reasoning is as follows:
   - Districts determined their APPR plans at the local level. While they vary throughout the state, as long as the plans met the legal requirements, they were approved. SED is now reporting district level data as if this data is based on the same plan. It is misleading to compare districts using different plans.
Although the vast majority of school districts worked to implement APPR plans with fidelity, APPR in its current format is the source of excessive false positive and negative ratings.

There needs to be greater emphasis on “multiple measures of effectiveness” and less on a local component that prompts even more testing.

The SLO is not a valid indicator of teacher performance since there are significant variables that cannot be controlled.

The distribution of scores has a pattern. Teachers who participated in a state assessment have generally lower scores than those who did not. It is an unacceptable response to say the APPR was negotiated locally with all of the constraints placed on it by regulations as well as the threat of loss of state aid.

Teacher and principal evaluations have created such a complex system for approval that a compliance model has seeped into an established teacher and principal evaluation system. The latest new assessments have changed long standing understandings of what a level 1 score means; an unintended consequence perhaps, but when level 1 does not require AIS, why is it a level 1?

Our suggestions, therefore, are:

a) Place a three-year moratorium on tying APPR scores to high-stakes testing.

b) Rescind the requirement that school districts must provide the APPR Composite Score rating for a teacher or principal to a parent if requested. Even under the best designed APPR system, a performance rating has to be placed in context to understand its meaning.

c) Reduce the APPR weighting based on student performance from 40 points to 20 points. The scale used to calculate the Composite Score is skewed so that the assessment has a greater impact on the overall evaluation score than the 40 points would suggest.

d) Change the APPR plan process to a set of assurances requiring the Superintendent’s sign off. We already follow this procedure for millions of dollars in state aid and federal grants.

e) Provide schools with the tools to properly use prior student achievement data to set targets, similar to the SLO tool developed by Eastern Suffolk BOCES.

4. Provide alternatives to implementation of state-wide computerized testing.

While there are districts, particularly off Long Island, that will be unable to accommodate e-testing, computerized testing may be the best option for large districts. We, therefore, suggest:

a) Give districts the option for the traditional administration of tests.

b) Allow tests that are SAT-like in nature to be taken either by computer OR by using a scan sheet.

c) Phase in any new testing (like PARCC) beginning with a limited number of grade levels.

5. Common Core

As a group, we believe in the “philosophy” of the Common Core and its shifts, but we do not believe the majority of the modules are realistic for ALL students. We suggest:
a) Allow adequate time for teachers to engage in rich professional learning as they embrace and implement the curriculum modules. Use the model that SED used in the past to test new Regents exams over a three-year period.

b) The late release of completed modules hinders the ability to allow teachers to see the end result before they begin teaching which does not allow for a backwards design approach for instruction.

c) While we support increasing the rigor in reading passages, the texts that are included in the units/modules are extremely difficult to read. It would be helpful if supplemental text were included to provide support for differentiated instruction as well as accommodations for ELLs and SWDs. One size does not fit all.

d) The problems in the instructional modules should mirror the assessments to some extent. We have no guarantee that the current modules’ problem sets do in fact represent the flavor of the upcoming assessments.

e) As discussed by Chancellor Tisch, provide a waiver or relief for English Language Learners and students with disabilities. If not, the achievement gap is likely to widen considerably. The rush to include these ELLs, as well as special education students, in the Common Core assessments is putting the credibility of the entire process into question.

In closing, we support initiatives that are designed to raise standards and enhance student learning. As Superintendents in Western Suffolk BOCES, our schools have long demonstrated successful student results on all essential measures of achievement. We take responsibility for our schools and want very much to support continued efforts to prepare our students for college, work and lifetime learning.

It has been our collective observation during the rollout of APPR, the Common Core and the new assessments that many of our best recommendations, stemming from years of practice, have not been heard or more importantly, considered. The number of new initiatives has not only caused unnecessary turmoil and anxiety, they have distracted all of us from the important work we must do. The abrupt changes in curriculum, testing and evaluation now need some fine-tuning to benefit our students, the intended beneficiaries of all these changes.

Thank you for the valuable steps that you have just taken to delay PARCC; request a waiver for grade 8 math for Algebra students; and request a waiver for certain ELL and special education students. We hope that the modifications we have proposed might salvage the positive intent of the initiatives on APPR, Common Core and new assessments while modifying those things that are causing significant angst in our schools and communities. Let’s focus our time and attention on what matters – teaching and learning.

Sincerely,

Michael J. Mensch, Ed.D.
Chief Operating Officer

MJM:jj/with copies to:

Sen. Philip Boyle
Sen. John Flanagan
Sen. Charles Fuschillo
Sen. Carl Marcellino
Assembly. Michael Fitzpatrick
Assembly. Andrew Garbarino
Assembly. Charles Lavine
Assembly. Chad Lupinacci
Assembly. Michael Montesano
Assembly. Andrew Raia
Assembly. Joseph Saladino
Assembly. Robert Sweeney
Chancellor Merryl Tisch