November 8, 2013

Dear Commissioner King,

The Suffolk County School Superintendents Association (SCSSA), an organization representing 69 districts that educate 250,000 students, is taking this opportunity to offer concrete ideas and informed recommendations so that the implementation of initiatives surrounding Common Core and APPR may be effective and productive.

As evidenced by the overall performance of Long Island students, it is clear that the SCSSA believes in high educational standards; we are in accord with the principles underlying the Common Core. We want to – and we will, continue to prepare children to be successful in college and in their careers.

Our concerns are primarily procedural. The rush to implement curriculum and assessments aligned with Common Core, without proper supports and professional discourse, placed undue burdens on students and teachers. There is no argument that more time was needed to ensure that support would be in place to move these initiatives forward. With that said, we need to work together, in partnership, to ensure that our public school students will be well-educated and prepared to be successful, productive citizens.

We believe that there are steps that can be taken to slow implementation of initiatives so that the intent behind Common Core may be preserved. Absent the time, absent the re-evaluation of the distracting and detrimental impacts that APPR and developmentally inappropriate construction of NYSED assessments are having on the initial roll-out of Common Core, we have serious concerns about the future of this valuable initiative.

The suggestions that follow are provided to you in the spirit of authentic partnership. By listening to and working with practitioners in the field, we will move our public education system forward, for the benefit of our students.
1. **Slow down implementation of new exams.** At a minimum, designate 2013/14 and 2014/15 as transition years. We support extending the time from one to two years before testing ELL students to give them more opportunity to become fluent in English. We also support expanding the qualification to participate in Alternate Assessments from 1% to 2% of students with severe disabilities. In addition, we suggest:

   a) Modify grade-level assessments to include a more reasonable expectation of Common Core aligned material;
   b) Revise cut scores to allow for greater margin of error due to transition;
   c) Exercise flexibility in regard to Regents exams:
      - Extend the window during which old and new exams may be taken;
      - Allow two years between the implementation of the new Common Core aligned Regents in geometry and the required Regents exams in math for the advanced diploma. The changes in math curriculum should not be all borne by the current algebra students who will be pioneers for all of the new math assessments as they progress. This would also lessen the burden on teachers to develop, learn, teach and be evaluated on a new curriculum and assessment in the same year;
      - The newly released same Regents exam in English Language Arts is a good resource for informing instruction. The text selections, though, are lengthy and difficult to comprehend under time constraints. We cannot expect our students to be able to complete this task in a “suggested time” of 90 minutes;
   d) Ensure that assessment results, including item analyses specific to schools and classes, are returned to districts in a timely manner, so that instruction can be informed – with curriculum adjustments and attention to student learning gaps, facilitated.

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 grades 3 – 8 testing alongside Regents testing. The Common Core related assessments encompass more time than did former standards;
   d) Continue pursuing the federal waiver to allow eighth grade students to take the Algebra Regents in lieu of the eighth grade math assessment. Make sure that these results count towards a school’s proficiency rate;
   e) Consider alternating annual math and ELA testing schedules;
   f) Eliminate the “timing” restriction on math and ELA tests to reduce student anxiety as they struggle to answer complex questions in an allotted time.

3. **Re-evaluate the relationship between student test scores, APPR and teachers’ scores.** Our reasoning is as follows:

   - Districts determined their APPR plans at local levels. While they vary throughout the state, as long as the plans met legal requirements, they were approved. SED is now reporting district level data as if these data were 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 a 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 that APPR was negotiated locally with all of the constraints placed on it by regulations as well as the threat of loss of state aid. A more acceptable response would be to acknowledge that there is limited value – currently - to connecting state assessments to teacher evaluation scores, and then move to create an appropriate solution;
• 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.

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 for a teacher or principal, if requested by a parent. 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 student performance results have greater impact on overall evaluation scores 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 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 outside of 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 traditional administration of tests;
b) Allow tests that are SAT-like in nature to be taken via a 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 the shifts it causes in instruction and learning. We do not, however, believe that the modules developed to translate the standards into curriculum are realistic for ALL students. We suggest:
a) Allow adequate time for teachers to engage in rich professional learning as the embrace and implement new curriculum. Use the model that had been used by SED 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 educators to understand the end result before teaching, which does not allow for a backwards design approach for instruction;
c) While we support increasing rigor in reading passages, the texts that are included in the units/modules are extremely difficult to read. It would be helpful if supplemental texts were included to provide support for differentiated instruction, as well as accommodations for ELLs and SWDs. One size does not fit all;
d) The problem sets in instructional modules should, to some extent, mirror problem sets in assessments. We have no guarantee that the current modules’ problem sets do, in fact, represent the flavor of 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 ELL students and students with disabilities, in 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 learning. As Superintendents in Suffolk County, our schools have long demonstrated successful student results on all essential measures of achievement. We take responsibility for our districts and want very much to support continued efforts to prepare students for college, work and lifetime learning.

In has been our collective observation during the rollout of APPR, 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 reflection and fine-tuning to benefit our students, the intended beneficiaries of all these changes.

Thank you for the valuable steps you have just taken to delay PARCC, to request a waiver for grade 8 math for Algebra students, and to request a waiver for certain ELL and special education students. We hope that the modifications 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,

Roberta A. Gerold, Ed.D.
President, SCSSA

RAG:mvl/with copies to:

Sen. Philip Boyle
Sen. John Flanagan
Sen. Charles Fuschillo
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Sen. Carl Marcellino
Sen. Lee Zelden
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