



CALIFORNIA'S ADVOCATE FOR HIGH QUALITY SCIENCE EDUCATION

November 16, 2016

Dr. Michael Kirst
President
California State Board of Education
1430 N Street, Suite #5111
Sacramento, CA 95814

The Honorable Tom Torlakson
State Superintendent of Public Instruction
California Department of Education
1430 N Street
Sacramento, CA 95814-5901

Re: Every Student Succeeds Act Waiver Request: Double Testing of Science Requirement and Temporary Suspension of Student Score Reports - Science

Dear President Kirst and Superintendent Torlakson:

On behalf of the 3,000+ members of the California Science Teachers Association (CSTA), we strongly and fully support the California Department of Education's revised federal waiver request to:

- Suspend administration of the statewide summative science assessments (commonly known as the CST/CAPA/CMA in science) beginning with the 2016-2017 school year.
- Pilot and field test new science assessments in grades 5, 8, and high school beginning with the 2016-2017 school year.
- Not report individual student scores and only report participation rates for the pilot and field tests of the new California Science Test (CAST) and California Alternate Assessment-Science (CAA-Science) in school years 2016-2017 and 2017-2018, with a third suspension year of 2018-2019 for the alternate assessment.

The reasons for our support are many and are based on what is best for California's students and their science education in order to prepare them for success in college and career in the 21st century.

CSTA Supports the Suspension of Outdated Science Assessments

Our new state standards for science require a much different approach to the teaching and learning of science than our previous standards. The implementation of new education standards is a multi-year, multi-step process that requires appropriate supports and actions in order to be successful (as outlined in California's NGSS Systems Implementation Plan: [*Note: Invalid NGSS Systems Implementation Plan link removed.*]). Since California adopted new standards for science in 2013, schools and teachers all over the state have begun to incorporate the new standards into their science classes. The state and other support providers have offered professional learning experiences for teachers, and on November 10, 2016 the California State Board of Education adopted a new *California Science Curriculum Framework*. Professional learning and



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new curriculum are just two important components of new standards implementation, a third and equally important component is the successful development and administration of new state-wide science summative assessments.

The administration of an outdated science assessment, aligned to our old standards, does not support the high-quality teaching and learning of science our new standards require. In addition, the administration of an assessment that is not consistent with what students are learning is unfair and unjust for students, and would do harm to the implementation efforts currently underway in classrooms across the state. Furthermore, instructional time is one of the scarcest and most valuable resources in our classrooms. Suspending the administration of the old assessment while the state administers pilot and field tests of the new assessment not only makes sense from a logistical standpoint, but also prevents the loss of instructional time spent on participating in assessments, particularly old assessment that are not aligned with what students are learning.

CSTA Supports the Statewide Administration of Pilot and Field Tests for Science

The utilization of pilot and field testing represents an essential component for developing new and improved assessments, as they allow both the state and its testing contractors to ensure that the assessment items represent accurate measurements of student achievement. The timeline for pilot and field testing these new assessments is quick, however it strikes the right balance between the appropriate amount of time to develop a new and innovative assessment and the need to offer students, teachers, and parents the information they need about student learning in science.

CSTA Supports Participation Rate Reporting and the Suspension of Score Reports

The calculation of student score reports during pilot and field testing is not only impossible, it would also be inappropriate. The purpose of these tests are to ensure the state has the capacity and infrastructure to administer this new type of assessment and to evaluate the validity and utility of test items and make improvements to those items. These pilot and field tests are a test of our systems, infrastructure, and the test items themselves, not a test of student achievement. Therefore it is wholly appropriate to refrain from issuing score reports and track and report only participation rates for the pilot and field testing years.

The CDE's revised federal waiver request as described above is what is right for California, its students and teachers, and supports implementation of our new state standards for science.

Sincerely,

A handwritten signature in black ink that reads 'Lisa Hegdahl'.

Lisa Hegdahl
President

cc: John B. King, Jr., Secretary, Office of Elementary and Secondary Education
Ann Whalen, Sr. Advisor to the Secretary, Office of Elementary and Secondary Education, U.S.
Department of Education

November 28, 2016

The Honorable Tom Torlakson,
State Superintendent of Public Instruction
California Department of Education
1430 N Street
Sacramento, CA 95814-5901

Dr. Michael Kirst, President
California State Board of Education
1430 N Street, Suite #5111
Sacramento, CA 95814

Re: Every Student Succeeds Act Waiver Request: Double Testing of Science Requirement and Temporary Suspension of Student Score Reports for Science

Dear Superintendent Torlakson and President Kirst:

I write on behalf of Children Now – California’s premiere children’s policy and advocacy organization – to support your revised waiver request to the U.S. Department of Education regarding science assessment. That waiver request would chiefly:

- Suspend administration of the existing statewide summative science assessments (commonly known as the CST/CAPA/CMA in science) beginning with the 2016-2017 school year.
- Pilot and field test new, NGSS-aligned science assessments in grades 5, 8, and high school beginning with the 2016-2017 school year.
- Not report individual student scores, and only report participation rates for the pilot and field tests of the new California Science Test (CAST) and California Alternate Assessment-Science (CAA-Science) in school years 2016-2017 and 2017-2018; and add a third suspension year of 2018-2019 for the alternate assessment.

Children Now has long supported this proposed set of actions to continue our state’s progress on implementation of California’s new science and engineering education standards – based on the NGSS – which will dramatically improve the preparation of all California students for success in both college and career in the 21st century. The continued administration of the science CST/CMA/CAPA presents a conflict for districts as they move to implement this approach that differs so greatly from the teaching and learning of science than was characterized by our previous standards. The implementation of new education standards is a multi-year, multi-step process that requires appropriate supports and actions in order to be successful; this includes new professional learning for teachers and principals, the adoption of our first-in-the-nation NGSS-aligned curriculum framework, new instructional materials and supplemental experiential learning opportunities, and, now, new assessments. There comes a point in a transition of this magnitude at which it is appropriate to let go of old mechanisms and move in full toward operation of a system

Superintendent of Public Instruction Tom Torlakson
President Mike Kirst
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based on new standards and requirements. Having adopted our new science standards in 2013, we believe that suspending administration of CST-CMA/CAPA is now warranted, to allow local education practice and state policy work to focus exclusively on our new standards and the new assessments that will be based on them.

By contrast, continuing to administer an outdated science assessment, aligned to old standards that no longer guide curriculum and instruction, does not support the high-quality teaching and learning of science our new standards require. It will provide information that is at best inconsistent with what students and parents understand learning expectations to be, and at worst, it will lead to confusion and consternation when results are presented that have no bearing on science education.

The state's science assessment plan will introduce piloting and field testing of the new assessments this year, which will move us toward full implementation for millions of students within just two years, offering the critical feedback that can inform and improve instruction aligned to our new standards. Given the test-development purposes of these early iterations of the test, it would be inappropriate to utilize student score reports from the pilots. Thus, we further support your proposal to suspend issuing score reports during the developmental phase.

Finally, Children Now believes the recent revisions to the state's waiver request provide assurances that will promote validity and equity of administration; minimize the reduction of valuable instructional minutes; mitigate unfair measurement of individual student achievement; and prevent reporting of inappropriate information to parents and the public. With all this in mind, the ESSA waiver request regarding science assessment is right for California and will strongly benefit our schoolchildren, and we stand with you in seeking this important change to policy and practice.

Sincerely,



Stephen G. Blake
Senior Advisor

Cc: Dr. John B. King, Jr., Secretary, U.S. Department of Education
Dr. Ann Whalen, Sr. Advisor to the Secretary, Office of Elementary and Secondary
Education, U.S. Department of Education



The Education Trust–West
Closing the gaps in opportunity and
achievement, pre-k through college.

November 29, 2016

Dr. Michael W. Kirst, President
State Board of Education

Superintendent Tom Torlakson
California Department of Education
1430 N Street, Suite #5111
Sacramento, CA 95814

Dear President Kirst and Superintendent Torlakson:

As a research, policy, and advocacy organization committed to closing opportunity and achievement gaps for low-income students and students of color, The Education Trust–West writes to support your request for a temporary waiver from the science testing requirement of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act.

The waiver would allow California to transition to assessments aligned with the Next Generation Science Standards (NGSS) and suspend the current science assessments that are based on outdated science standards. In doing so, California would avoid double-testing students in science in grades five, eight, and high school. The waiver would allow California to take the next two years to focus on piloting and field testing new NGSS-aligned assessments so the tests yield accurate and valid measures of student performance.

The waiver would allow teachers to continue to focus on the significant instructional shifts the new science standards require, and it would keep students focused on learning rather than on taking tests that are misaligned with current standards and whose results are no longer relevant to their teachers, parents, or the broader public.

A full, thoughtful, and intentional shift to NGSS is necessary in order to advance science achievement and equity in California. On the 2015 National Assessment of Educational Progress (NAEP), only 24 percent of grade 4 and 22 percent of grade 8 students scored at or above proficient, with Black, Latino, and English learner students even further behind. Overall, California ranked at the very bottom of states at both grade levels. Clearly, a major shift in science education is needed. With its focus on hands-on scientific inquiry, problem solving, interdisciplinary learning, and potential to support language development, NGSS can provide that shift.

We do have some concerns about a short-term lull in reporting of science scores to parents, educators, and the public. We urge the State to seek strategies for sharing information on the science pilot and field tests so that stakeholders can learn about the new item types and teachers

can adjust their instruction accordingly. We also urge the State to meaningfully equip educators, parents, and the public to access, analyze, and use the data coming out of the new “evaluation rubric,” a central component of an emerging and evolving state accountability system, to assess levels of academic achievement and college and career readiness.

Our expectation is that the shift to NGSS assessments will result in greater transparency of meaningful science achievement data in the longer term. As the new tests become fully operational, The Education Trust–West and many of our equity partners will remain vigilant in calling for results to be publicly reported by 2018-19 for each subgroup of students, for each school, across multiple domains. In addition, we will insist that scores be reported for each student to their parents and teachers by that date.

Access to rigorous science education is an urgent equity issue and important to the future prosperity of our state. We fully support California’s shift to NGSS and aligned assessments because all students must have the opportunity to learn the science content and skills they need to succeed in college and beyond. We believe the requested waiver will allow California to move thoughtfully in that direction.

Sincerely,



Ryan J. Smith
Executive Director
Education Trust–West

CC: Members, California State Board of Education
Karen Stapf Walters, Executive Director, California State Board of Education
David Sapp, Deputy Policy Director and Assistant Legal Counsel, California State Board of Education