

**MASSACHUSETTS ASSOCIATION OF SCHOOL SUPERINTENDENTS (MASS)**

Thursday, February 25, 2021

***MCAS Test and ACCESS Test 2021:  
A Contradiction of Purpose and Use during a pandemic***

Over the past few months the Massachusetts Board of Education and the Massachusetts Department of Elementary and Secondary Education (DESE) have insisted that both the MCAS and ACCESS are the only assessments that will measure student learning loss due to Covid-19 and therefore school districts need to prepare to assess students. We ask our legislators to use their “bully pulpit” to insist that DESE allow local formative and benchmark assessments be used to measure and intervene on student learning loss in lieu of state mandated assessments. We also ask our legislators to support recently filed *HD1448 - An Act to cancel the administration of the MCAS for the 2020-2021 school year.*

Below we present the position statements from the BOE, Commissioner and/or DESE regarding the need to administer both assessments, and our counter arguments to those ideas.

<b>BOE, Commissioner, and DESE Position</b>	<b>Our Counter Position</b>
<p align="center">Both MCAS and ACCESS need to be administered to measure student learning loss and student language proficiency.</p>	<p align="center"><b>Educational use</b></p> <ol style="list-style-type: none"> <li>1) School districts are better served measuring student learning loss through the use of local diagnostic assessments (formative and benchmark). MCAS is a summative assessment measuring the level of learning toward the MA Curriculum Standards.</li> <li>2) Learning loss during Covid is more nuanced and local assessments are a better diagnostic of the missing learning progressions (missing building blocks toward) needed to attain proficiency of a curriculum standard.</li> <li>3) Both MCAS and ACCESS results arrive too late to allow for any effective diagnostic intervention planning to be done for students. The local “real time” assessments used by districts are far timelier and more usable on behalf of students.</li> <li>4) For many non-Title I districts who do not benefit from federal stimulus monies the estimated \$30 million cost to administer MCAS this year could be better used to address and remediate already known learning loss.</li> </ol>
<p>MCAS and ACCESS will be used as a diagnostic only by districts; results will not be used for accountability purposes; results will be posted.</p>	<ol style="list-style-type: none"> <li>1) For all the reasons stated above—we believe it is misleading to state that MCAS and ACCESS may be used as a diagnostic on true student learning and progressions.</li> <li>2) Results will not be used for accountability this year, however the mere fact that results will be posted will mean that school districts will be compared to each other and the shaming game will commence without the context of local differences each district has had to deal with during this pandemic. This comparison and shaming could result in further decline of student enrollment.</li> <li>3) Results will be invalid and unreliable as a diagnostic due to variability district to district, school to school, household to household.</li> <li>4) While the 2021 test scores are not to be used for accountability this year, we also should not be using 2021 test scores to set future district and school performance/accountability targets due to the lack of validity.</li> </ol>

<b>Educational use (continued)</b>	
ACCESS will be used to place students in a language proficiency level and to determine if the student is ready to exit the program.	<ol style="list-style-type: none"> <li>1) We have per DESE Guidance documents, never used ACCESS solely to determine either of these student needs: language level nor exit criteria. ACCESS has always been used as one of many local criteria – with the English Language Learner (ELL) team making the final decision.</li> <li>2) ACCESS was successfully administered to all ELLs in the state last January- this along with local assessments and team decision making should be the allowed guidance.</li> <li>3) ELL Guidance documents from DESE recommend and provide a full list of alternative assessments that can be used in addition to ACCESS- we support using this list in lieu of ACCESS for this one year.</li> </ol>
Concern for the social/emotional needs of our students struggling with added stressors due to the pandemic.	<ol style="list-style-type: none"> <li>1) The added stress having to enter a school, and for some it will be the first time in 12 months, for a test; a student population deemed to be in crisis.</li> <li>2) There will be skewed results from communities hit hardest by the pandemic as well as skewed results from our high needs and special populations.</li> </ol>
<b>Challenges</b>	
Value of student learning time as evidenced by the SLT surveys and BOE mandate for student learning time during the pandemic.	<ol style="list-style-type: none"> <li>1) Districts have sent home all devices that would have been used to administer MCAS and ACCESS tests.</li> <li>2) Districts would now need to collect the devices with enough lead time to ensure that the devices are in full working order and have the devices ready for test administration.</li> <li>3) This will effectively result in leaving students without devices for the regular teaching days-<b>therefore an actual loss of instructional time</b>; in other words, “more testing will result in more asynchronous instruction, not less” as DESE wants.</li> <li>4) ELLs will be most adversely and disproportionately impacted because they would need to go through this process twice thereby creating a greater inequity of instruction to a most at-risk group.</li> </ol>
Requirement per MCAS and ACCESS test administration guidance for a licensed educator to provide in-person proctoring- staffing	<ol style="list-style-type: none"> <li>1) Districts are having difficulty providing enough licensed educators for daily instruction. The staffing capacity of school districts this year more than any other year is stretched and having to cover both the instructional day when it is hybrid and remote as well as in-person testing will mean running three school structures.</li> <li>2) The cost of running three school structures will use valuable ESSER resources that are needed for return and recovery. These funds would be better spent providing critical instruction to address learning loss.</li> <li>3) Districts who have been fully remote and/or hybrid will need to return to collective bargaining on the impact of the change in working conditions if teachers who have been remote or partially in person need to be fully in-person to proctor testing.</li> <li>4) The additional human resource capacity needed to provide for all legal student testing accommodations for students with special education needs and students with second language acquisition needs.</li> <li>5) In a normal year, state testing requires all hands-on deck to provide for all special education and ELL accommodations – to do so in the current environment will be a staffing nightmare that may set many districts up for failure and possible litigation if unable to fulfill individual student testing accommodations.</li> </ol>

<b>Challenges (continued)</b>	
Requirement to have all students in-person taking the test.	<ol style="list-style-type: none"> <li>1) Initial surveys in some districts show increased number of parents who are not willing to send their child to school simply to be tested- therefore lower participation rates will skew results and any valid use of these results by the state—again making the case for local diagnostic assessments and data use as being the most valid and useful in these circumstances.</li> <li>2) Operational difficulties of testing in an environment of social distancing and the resulting longer testing windows needed because of limited square foot capacities in brick and mortar school buildings.</li> <li>3) The National Assessment of Educational Progress (NAEP) is postponing the 2021 assessment administration due to safety issues but also potentially flawed valid and reliable results.</li> </ol>
<b>Alternative Considerations</b>	
MASS respectfully request the following alternatives to the one-size fits all state MCAS test be considered for the 2021 year.	<ol style="list-style-type: none"> <li>1) Allow for local diagnostic assessments (benchmark and formative) to be used in lieu of MCAS.</li> <li>2) If accountability is an issue—have DESE require each district to submit student data from local assessments that will be used in lieu of MCAS this year and/or use Student Learning Tim (SLT) data in conjunction with local assessments in lieu of MCAS.</li> <li>3) If the federal US DOE does not allow a waiver- then provide for testing only in those grades mandated by US DOE and not the expanded grades tested under Massachusetts statute.</li> <li>4) If testing in all grades continues to be expected, provide for MCAS tests to be taken remotely – online and at home if a school district so chooses.</li> <li>5) Elongate the test administration window and allow for local districts to administer in summer or fall if they so choose.</li> </ol>

In closing, we know you will hear from Secretary of Education Peyser and Commissioner Riley the decision is not theirs to make. They will explain that first, US DOE must issue a waiver before MA BOE can address our MA statute. Both Secretary Peyser and Commissioner Riley are correct, states must request the federal waiver and ultimately then it becomes a state decision. States like New York and Michigan have already sought out waivers. It is important to note that waivers can cover a request for a complete moratorium to a request for adjustment or modification in the administration tool- such as allowing for local assessments to stand in lieu of state sanctioned tests.

Massachusetts should be “leading the way” in this area, and we are not. As superintendents, we are not afraid of accountability and if necessary we will provide data from locally administered formative and benchmark assessments; however, we are against traditional administration of in-person, state mandated assessments this year. We ask then, that 1) both the Secretary and Commissioner in their roles advocate to US DOE and newly appointed Secretary of Education Miguel Cardona to proceed with a federal waiver of both state standardized testing and state language proficiency testing as described in the alternative considerations section listed above; and, 2) the MA BOE prepare to vote in favor of the state waiver of both assessments.

We are educational leaders, we are the “chief child advocates” of our school districts. We are the experts, the professionals in this area. We know best during this time how to measure learning loss and how to proceed out of this pandemic toward addressing student learning loss without the scale of disruption in-person state mandated testing will cause. We should not be spending our time trying to operationalize test administration of students which ultimately will only serve to be a perfunctory compliance task that is stealing our valuable time away from efforts toward a healthy return, recovery, and acceleration of learning for all – and for us in our school districts, the return must start with vaccination of our educators. We respectfully ask you for your support.

