

February 3, 2014

Chris Koch, State Superintendent
Illinois State Board of Education
100 N. 1st Street
Springfield, IL 62777

Dear Dr. Koch:

On Friday, January 31, thirty high school and unit districts from DuPage, Cook, Kane, and Lake Counties met to engage in discussion regarding Spring 2015 PARCC testing. This meeting was prompted by recent ISBE and ACT announcements regarding the following:

1. Designated PARCC testing windows
2. Elimination of the ACT as part of the State assessment model
3. ACT's shift to the new Aspire assessment

These issues were processed as a large group and were framed strictly through the lens of a high school district. Critical points of concern are summarized below and are unanimously shared by all 30 high school and unit district superintendents in attendance. These points were shared with Mary O'Brien, ISBE Director of Assessment, who joined the meeting via conference call.

Challenges/Problems/Dilemmas in Addressing Spring 2015 Testing

1. Problem of Conflicting Priorities

While we are impressed by the quality of the next generation test items showcased in the released PARCC prototype questions, ACT and Advanced Placement exams, along with end of semester course exams, are perceived as significantly more important than the PARCC exams in the eyes of students, families, and colleges.

The EPAS assessment system that includes the stair-stepped EXPLORE and PLAN exam and culminates in the ACT has a longstanding reputation among parents, students, and colleges as an important tool in the college preparation and admissions process. Many high school districts have adopted the EPAS growth model and use it as a key indicator of success and performance measurement. The ACT and integration of College Readiness standards are the backbone of many school improvement plans. Colleges and universities continue to use ACT as a key metric in the admissions process.

2. Hours and Days Devoted to Testing Reduces Critical Instruction Time

The Performance Based Assessment (PBA) and End Of Year (EOY) PARCC tests combined will require 9.5 hours of test time per student between March and June. This burden comes during the same window of time as AP Exams and spring ACT, resulting in a veritable season of test taking at the expense of instruction.

There are significant logistical testing schedule dilemmas caused by cross-grade student sections. In addition, there are scheduling implications for districts who have an early start of the school year in August. Despite the availability of a possible waiver to move up the testing window, it would result in additional conflicts with AP testing. The logistics and scheduling issues are causing districts to discuss the elimination of final exams. See Attachment A.

PERA presents additional complexities to the testing schedule. With the evaluation timelines and student growth measures legislated by PERA, all pre/post assessments need to be administered within the 1st semester so that data can be compiled and analyzed for evaluation and retention decisions by the end of February. Doing so essentially means that significant testing will be occurring 1st and 2nd quarters to fulfill teacher evaluations. See Attachment B which provides a global view of testing for high schools September - June.

3. *Technical Capacity/Preparedness for PARCC*

There is confusion around the online platform provider. The readiness timeline is unclear for administration on some devices and browsers.

4. *PARCC Relevance: Student Ownership and Motivation*

Because there are no practical incentives for the majority of students to give their best effort on PARCC, students will not have the intrinsic motivation necessary for attention, effort and achievement. With the current integration of the ACT into PSAT testing on Day One, there is some level of student buy in into the State assessment model. This is now eliminated based on dropping the ACT as a part of PARCC. It is unrealistic to have local school boards establish reward or punitive measures to instill motivation on PARCC. PSAT was supposed to become recognized as a valid and reliable metric by colleges to establish relevance among students, but this did not happen. There is extreme doubt that PARCC will become adopted as a metric for college placement and admission, and student motivation on the PARCC assessment will remain low.

5. *PARCC vs. ACT Aspire*

Given the relevance of ACT to high schools and an ongoing commitment by colleges to continue using it as a metric for admission and placement, high schools will need to consider maintaining the administration of the ACT in addition to PARCC. This will further contribute to testing overload. Given the strong level of support for ACT among high schools, an analysis of PARCC vs. ACT Aspire was completed. See Attachment C.

Several community colleges still seem unaware of PARCC and the promise of this assessment as a proficiency metric for students to avoid remedial undergraduate coursework. Additional concerns surround the realistic likelihood of the State providing the necessary funding level to support PARCC along with the timing of the approval. The elimination of the WorkKeys presented additional consternation among superintendents which will be shared by industry leaders, particularly in the area of manufacturing. It was unanimous among all high school districts to continue advocating for inclusion of the ACT for State assessment and accountability purposes.

Request for ISBE Consideration

Based on the above stated concerns, high school superintendents are requesting ISBE consider going forward with an RFP aligned to the following:

1. Delay PARCC implementation and accountability; reassess and slow down the train to ensure effective implementation.
2. Eliminate PARCC testing at grade 11 and administer ACT and WorkKeys in its place.
3. Bring legislators, industry leaders and post-secondary leaders to the table for discussion to ensure a well-developed assessment model that is relevant and meets everyone's needs.

We are available to meet with you to further process this information. Thank you for your consideration.

Respectfully,

Adlai Stevenson H.S. Dist. 125
Barrington Community Unit School Dist. 220
CHSD 117
Community H.S. Dist. 128
Community H.S. Dist. 94
Community High School Dist. 99
Wheaton Warrenville CUSD 200
Community Unit School Dist. 201
DuPage High School Dist. 88
Elmhurst H.S. Dist. 205
Evanston Twp. H.S. Dist. 202
Fenton District 100
Glenbard Dist. 87
Glenbrook H.S. Dist. 225
Hinsdale Twp. H.S. Dist. 86
Indian Prairie School Dist. 204
J.S. Morton High School 201
Lake Forest H.S. Dist. 115

Lake Park Community H.S. Dist. 108
LEND
Leyden Community H.S. Dist. 212
Lincoln-Way High School 210
Lisle H.S. Dist. 202
Lyons Twp. H.S. Dist. 204
Maine Twp. H.S. Dist. 207
Naperville School Dist. 203
New Trier Twp. H.S. Dist. 203
Niles Twp. H.S. Dist. 219
Oak Park/River Forest H.S. Dist. 200
Proviso Twp. H.S. Dist. 209
Riverside Brookfield District 208
Round Lake 116
St. Charles Dist. 303
Township H.S. Dist. 211
Township H.S. Dist 214
Township H.S. Dist. 113

ASSESSMENT CALENDAR: PARCC – Advanced Placement – Final Exams**PARCC Assessment**

1. Assessments will all be online, web-based
2. All Freshmen, Sophomores, and Juniors will be required to participate
3. Two assessments to be administered
 - a. Performance Based – 75% of the way through the school year (3rd quarter)
 - b. End of Year – 90% of the way through the school year
4. 9 testing sessions total
5. 20 day testing window for each assessment

	Mon	Tues	Wed	Thurs	Fri
March					21 End of 3 rd Qtr (75%) PBA Assessment
	24	25	26	27	28
April	March 31 Spring Break	1 Spring Break	2 Spring Break	3 Spring Break	4 Spring Break
	7	8	9	10	11
	14	15	16	17	18
	21	22	23	24	25
	28	29	30		
May				1	2
	5 AP Exams	6 AP Exams	7 AP Exams	8 AP Exams	9 AP Exams
	12 90% through sch. yr. End of Year Assessment	13 AP Exams	14 AP Exams	15 AP Exams	16 AP Exams
	19	20	21	22	23
	26 No School	27	28	29	30
June	2 Final Exams	3 Final Exams	4 Final Exams	5 LAST DAY FACULTY	

Concerns:

1. The timelines outlined in PARCC essentially eliminates the entire 4th quarter for instruction.
 - a. All freshman, sophomore and junior students are tested. A great majority of our classes are mixed meaning they contain sophomores, juniors, and/or seniors. Therefore, a significant number of students could be absent from any given class for a period of 40 days which is approximately 87% of the quarter thereby significantly hampering what can be taught. Additionally, there will be no opportunity for other classes to use computer labs for instruction since they will be occupied with testing.
 - b. Given the new PARCC testing timelines and taking into account all the other events that occur, the Spring schedule will be completely disrupted for teaching and learning. Spring Break, potential continuation of ACT administration, AP exams, and PARCC assessments occupy approximately 80+% of the available school days.
 - c. Second semester final exams would have to be eliminated due to the overlap of the testing window for the End of the Year assessment which extends beyond the end of the school year.
2. The administration of PARCC and the ACT at the junior level has significant time implications.

Testing Snapshot: PARCC and ACT – Time Implications

April/May 2015 Testing for Juniors	
Assessment	Hours
PARCC (Literacy and Math)	15 hours 35 minutes
ACT Plus (English, Reading, Math, Writing, Science)	3 hours 30 minutes
WorkKeys Reading, Math, Locating Information)	2 hours 15 minutes
Total Testing Time	21 hours 20 minutes*

***Does NOT Include Advanced Placement Testing**

PERA AND PARCC: TEACHER EVALUATION AND ASSESSMENT TIMELINES

PERA requirements:

1. Inclusion of student growth measures in the teacher evaluation process.
 - a. 2 measures: 1 (one) Type I or Type II and 1 (one) Type III measure
 - b. Need to show student growth therefore pre/post assessments need to be administered.
 - c. The process of evaluation orientation, pre-conferencing, reflection, and discussion will be much more time intensive.
2. The Honorable Dismissal list is generated in March in order to fulfill dismissal timelines outlined in the school code. Therefore all evaluations need to be completed by the end of February/first week of March.

Concern:

PERA requirements for teacher evaluation and student growth significantly contribute to additional testing during 1st and 2nd quarters. PERA and PARCC result in year round assessment.

SCHOOL YEAR ASSESSMENT CALENDAR SNAPSHOT

September	Pre-assessment administered for teacher evaluations (PERA)
December - January	Post-assessment administered for teacher evaluations (PERA)
February (end)	Evaluations completed and recommendations made
March	Honorable Dismissal List is generated PARCC Performance Based Assessment (75% of school year) begins at the end of 3 rd quarter – approximately the 3 rd week in March. (All Freshman, Sophomore, and Juniors participate.)
April	PARCC testing continues for another 2 ½ weeks to fulfill testing window – extended timed tests may take longer
May	AP exams first 2 weeks in May PARCC End of Year Assessment (90% of school year) begins in the 2 nd week of May and continues into June to fulfill testing window. (All Freshman, Sophomore, and Juniors participate.)
June	PARCC End of Year Assessment completed in the 1 st week of June

PARCC and ACT Aspire

Trait	PARCC	ACT Aspire
Grades 3 – 11	Yes	Yes
Aligned to Common Core	Yes	Yes
Multiple online item types	Yes	Yes
11 th grade score accepted by colleges as part of admission	No PARCC webinar on September 6 stated that students should view PARCC, including at grade 11, as “practice.”	Yes
11 th grade score generates National Career Readiness Certificate	No	Yes Administration of WorkKeys, if it includes Reading Day 3, enables students to qualify for an NCRC.
Correlation Study to Other Test Scores for Validity and Reliability	No This question was asked at the training on January 8 in Warrentonville. Staff stated that PARCC scores will not be merged with other scores for study in order to develop longitudinal cut scores.	Yes Per ACT website, scale scores are linked to the College & Career Benchmark scores used for Explore, PLAN, and ACT. At December 6 training, staff indicated that studies linking the systems had been conducted. Also: white paper <i>Catching Up to College & Career Readiness</i> for grades 4-8.
Online Platform Finalized for 2014 – 2015 to enable planning at the district level	No Pearson holds contract for pilot only. RFP was released 9/10/13 and revised 10/9/13. Per PARCC website, decision will be made in February 2014.	Yes Per the Pearson website, they are the online platform provider and partner with ACT on Aspire.
Items Piloted	No Starting in March 2014	Yes Per ACT conference on December 6, items have already been piloted by over 600,000 students.
Manual work for setup minimal	No We were initially told that using browser caching was optional. At the January 8 training, we were told that browser caching, requiring substantial manual configuration, is now “strongly recommended.”	Yes We were told at the ACT conference on December 6 that browser caching is not needed if our system passes the online check, which is already available.
Data Reporting System	No Same RFP as online delivery platform.	Yes Examples available online.
Devices and Browsers Clearly Defined	No As of training on January 8, there were still some questions about browsers and devices.	Yes The ACT Aspire website lists which devices and browsers can be used.
Student Log-in ID Clearly Defined	No As of January 8 training, we were told that it student ID / log in had not yet been determined.	Yes ACT has a unique student ID system in place.
Fall Pretest Available Fall 2014	No Not until Fall 2015	Yes
Science Tests	No	Yes