

**APPENDIX E: VERMONT LETTER CONCERNING ASSESSMENT  
AND ACCOUNTABILITY**

October 7, 2014

Dear State Board Colleague:

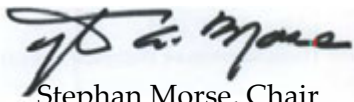
The Vermont State Board of Education and Secretary of Education have become increasingly concerned about the over-emphasis on standardized testing. While such testing is an essential part of an accountability system, the over-reliance on these measures has led to the narrowing of curriculum in many instances. Furthermore, these tests do not reflect the broad and inclusive purposes of education. Unfortunately, they have been used to punish rather than help schools while the federal underfunding of their mandates has denied our most needy children the educational opportunities that should be their birthright.

Vermont is not a waiver state. We declined pursuing this strategy as the “flexibility” offered under this plan appears to restrict our options for helping schools and children. More importantly, a careful examination of the value added evaluation models for teachers did not show us that these models have sufficient power to be responsibly used in high-stakes circumstances.

As part of our resolution, the board asked that our position be shared with other education leaders around the nation. We urge you to review these documents and to examine anew whether these test-based approaches to educational improvement have actually worked, are comprehensive of all our educational purposes, and meet the needs for an educated citizenry in the twenty-first century.

Of course, if we can assist in any way, please let us know.

Sincerely,



Stephan Morse, Chair  
Vermont State Board of Education



**Vermont State Board of Education**  
**Statement and Resolution on Assessment and Accountability**  
Adopted August 19, 2014

The Vermont State Board of Education is committed to ensuring that all students develop the knowledge, capabilities and dispositions they need to thrive as citizens in their communities, higher education and their careers in the 21<sup>st</sup> century. The Board of Education's Education Quality Standards (EQS) rules aim to ensure that all students in Vermont public schools are afforded educational opportunities that are substantially equal in quality, and enable them to achieve or exceed the standards approved by the State Board of Education.

These rules were designed to ensure continuous improvement in student performance, instruction and leadership, so that all students are able to develop high levels of skill and capability across seven essential domains: literacy, mathematics, scientific inquiry and knowledge, global citizenship, physical and health education and wellness, artistic expression, and transferable 21<sup>st</sup> century skills.

To achieve these goals, educators need to make use of diverse indicators of student learning and strengths, in order to comprehensively assess student progress and adjust their practice to continuously improve learning. They also need to document the opportunities schools provide to further the goals of equity and growth.

Uniform standardized tests, administered across all schools, are a critical tool for schools' improvement efforts. Without some stable and valid external measure, we cannot evaluate how effective we are in our efforts to improve schools and learning. Standardized tests – along with teacher-developed assessments and student work samples -- can give educators and citizens insight into the skills, knowledge and capabilities our students have developed.

What standardized tests can do that teacher developed tests cannot do is give us reliable, comparative data. We can use test scores to tell whether we are doing better over time. Of particular note, standardized tests help monitor how well we serve students with different life circumstances and challenges. When used appropriately, standardized tests are a sound and objective way to evaluate student progress.

Despite their value, there are many things tests cannot tell us. Standardized tests like the NECAP and soon, the SBAC, can tell us something about how students are doing in a limited set of narrowly defined subjects overall, as measured at a given time. However, they cannot tell us how to help students do even better. Nor can they adequately capture the strengths of all children, nor the growth that can be ascribed to individual teachers. And under high-stakes conditions, when schools feel extraordinary pressure to raise scores, even rising scores may not be a signal that students are actually learning more. At best, a standardized test is an incomplete picture of learning: without additional measures, a single test is inadequate to capture a years' worth of learning and growth.

Along a related dimension, the American Psychological Association wrote:

“(N)o test is valid for all purposes. Indeed, tests vary in their intended uses and in their ability to provide meaningful assessments of student learning. Therefore, while the goal of using large-scale testing to measure and improve student and school system performance is laudable, it is also critical that such tests are sound, are scored properly, and are used appropriately.”

Unfortunately, the way in which standardized tests have been used under federal law as almost the single measure of school quality has resulted in the frequent misuse of these instruments across the nation.

Because of the risk of inappropriate uses of testing, the Vermont State Board of Education herewith adopts a series of guiding principles for the appropriate use of standardized tests to support continuous improvements of learning.

1. The Proper Role of Standardized Testing – The purpose of any large scale assessment must be clearly stated and the assessments must be demonstrated as scientifically and empirically valid for that purpose(s) prior to their use. This includes research and verification as to whether a student’s performance on tests is actually predictive of performance on other indicators we care about, including post-secondary success, graduation rates and future employment.

In addition, standardized test results should be used only in concert with a diverse set of measures that capture evidence of student growth and school impact across all important outcomes outlined in the Education Quality Standards.

2. Public Reporting Requirement - It is a state and local obligation to report on the quality of the schools to the citizenry. Standardized testing is part of this reporting obligation. The state board encourages local public reporting of a diverse and comprehensive set of school quality indicators in local school, faculty and community communications.
3. Judicious and Proportionate Testing - The State Board of Education advocates for reducing the amount of time spent on summative, standardized testing and encourages the federal government to reduce the current requirements for annual testing in multiple subjects in every grade, 3-8, and then again in high school. Excessive testing diverts resources and time away from learning while providing little additional value for accountability purposes.
4. Test Development Criteria - Any broad scale standardized assessment used in the state of Vermont must be developed and used appropriately in accord with the

principles adopted by the American Educational Research Association, the National Council on Measurement in Education, and the American Psychological Association.

5. Value-added scores – Although the federal government is encouraging states to use value added scores for teacher, principal and school evaluations, this policy direction is not appropriate. A strong body of recent research has found that there is no valid method of calculating “value-added” scores which compare pass rates from one year to the next, nor do current value-added models adequately account for factors outside the school that influence student performance scores. Thus, other than for research or experimental purposes, this technique will not be employed in Vermont schools for any consequential purpose.
6. Mastery level or Cut-Off scores – While the federal government continues to require the use of subjectively determined, cut-off scores; employing such metrics lacks scientific foundation. The skills needed for success in society are rich and diverse. Consequently, there is no single point on a testing scale that has proven accurate in measuring the success of a school or in measuring the talents of an individual. Claims to the contrary are technically indefensible and their application would be unethical.

The use of cut-off scores reports findings only at one point on a statistical distribution. Scale scores provide significantly more information. They allow a more valid disaggregation of scores by sub-group, provide better measures of progress and provide a more comprehensive view of achievement gaps.

7. Use of cut scores and proficiency categories for reporting purposes - Under NCLB states are required to report school level test results in terms of the Percentage of Proficient Students. The federally mandated reporting method has several well-documented negative effects that compromise our ability to meaningfully examine schools’ improvement efforts:
  - Interpretations based on “percent proficient” hides the full range of scores and how they have changed. Thus, underlying trends in performance are often hidden.
  - The targets established for proficiency are subjectively determined and are not based on research. Interpretations based on “percent proficient” also lack predictive validity.
  - Modest changes to these subjective cut scores can dramatically affect the percent of students who meet the target. Whether a cut score is set high or

low arbitrarily changes the size of the achievement gap independent of the students' learning. Thus, the results can be misleading.

So that we can more validly and meaningfully describe school- and state-level progress, the State Board of Education endorses reporting performance in terms of scale scores and standard deviations rather than percent proficient. We will comply with federal requirements, but will emphasize defensible and useful reporting metrics.

8. The Federal, State and Local Obligation for Assuring Adequacy and Equality of Opportunity – Much as the state must insure a high quality education for all children, the school must be provided with adequate and equitable resources from the federal, state and local governments and must use these resources wisely and judiciously. Thus, any report on a school based on the state's EQS standards must also include a report on the adequacy of resources provided by or to that school in light of the school's unique needs. Such evaluations shall address the adequacy of resources, the judicious use of resources and identify any deficiencies.

### **Resolution on Assessment and Accountability Vermont State Board of Education**

WHEREAS, our nation and Vermont's future well-being relies on a high-quality public education system that prepares all students for college, careers, citizenship and lifelong learning, and strengthens the nation's and the state's social and economic well-being; and

WHEREAS, our nation's school systems have been spending growing amounts of time, money and energy on high-stakes standardized testing, in which student performance on standardized tests is used to make major decisions affecting individual students, educators and schools; and

WHEREAS, the overreliance on high-stakes standardized testing in state and federal accountability systems is undermining educational quality and equity in the nation's public schools by hampering educators' efforts to focus on the broad range of learning experiences that promote the innovation, creativity, problem solving, collaboration, communication, critical thinking and deep subject-matter knowledge that will allow students to thrive in a democracy and an increasingly global society and economy; and

WHEREAS, it is widely recognized that standardized testing is an inadequate and often unreliable measure of both student learning and educator effectiveness; and

WHEREAS, a compelling body of national research shows the over-emphasis on standardized testing has caused considerable collateral damage in areas such as narrowing the curriculum, teaching to the test, reducing love of learning, pushing students out of school, and undermining school climate; and

WHEREAS, high-stakes standardized testing has negative effects for students from all backgrounds, and especially for low-income students, English language learners, children of color, and those with disabilities; and

WHEREAS, the culture and structure of the systems in which students learn must change in order to foster engaging school experiences that promote joy in learning, depth of thought and breadth of knowledge for students; therefore be it

RESOLVED that the Vermont State Board of Education requests that the Secretary of Education reexamine public school accountability systems in this state, and develop a system based on multiple forms of assessment which has at its center qualitative assessments, does not require extensive standardized testing, more accurately reflects the broad range of student learning, decreases the role of compliance monitoring, and is used to support students and improve schools; and

RESOLVED, that the Vermont State Board of Education calls on the United States Congress and Administration to accordingly amend the Elementary and Secondary Education Act (currently known as the "No Child Left Behind Act") to reduce the testing mandates, promote multiple forms of evidence of student learning and school quality, eschew the use of student test scores in evaluating educators, and allow flexibility that reflects the unique circumstances of all states; and

RESOLVED that the Vermont State Board of Education calls on other state and national organizations to act in concert with these goals to improve and broaden educational goals, provide adequate resources, and ensure a high quality education for all children of the state and the nation.



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## MEMORANDUM

TO: Parents and Caregivers  
FROM: Rebecca Holcombe, Secretary of Education  
SUBJECT: Vermont's Commitment to Continuous Improvement  
DATE: August 6, 2014

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Under the No Child Left Behind Act (NCLB), as of 2014, if only one child in your school does not score as "proficient" on state tests, then your school must be "identified" as "low performing" under federal law. This year, every school whose students took the NECAP tests last year is now considered a "low performing" school by the US Department of Education. A small group of schools were not affected by this policy this year because they helped pilot the new state assessment and so did not take the NECAPs last year. Because these schools had their federal AYP status frozen at 2013 levels, eight schools are not yet identified as low performing by federal criteria. However, had these school taken the NECAPs as well, it is likely that every single school in the state would have to be classified as "low performing" according to federal guidelines.

**The Vermont Agency of Education does not agree with this federal policy, nor do we agree that all of our schools are low performing.**

In 2013, the federal Education Department released a study comparing the performance of US states to the 47 countries that participated in the most recent Trends in International Mathematics and Science Study, one of the two large international comparative assessments. Vermont ranked 7<sup>th</sup> in the world in eighth-grade mathematics and 4<sup>th</sup> in science. Only Massachusetts, which has a comparable child poverty rate, did better.

On the National Assessment of Educational Progress, Vermont consistently ranks at the highest levels. We have the best graduation rate in the nation and are ranked second in child well-being.

Just this week, a social media company that compares financial products (WalletHub) analyzed twelve different quality metrics and ranked Vermont's school system third in the nation in terms school performance and outcomes.

Nevertheless, if we fail to announce that each Vermont school is "low performing," we jeopardize federal funding for elementary and secondary education. The "low performing" label brings with it a number of mandatory sanctions, which your principal is required to explain to you.



This policy does not serve the interest of Vermont schools, nor does it advance our economic or social well-being. Further, it takes our focus away from other measures that give us more meaningful and useful data on school effectiveness.

It is not realistic to expect every single tested child in every school to score as proficient. Some of our students are very capable, but may have unique learning needs that make it difficult for them to accurately demonstrate their strengths on a standardized test. Some of our children survived traumatic events that preclude good performance on the test when it is administered. Some of our students recently arrived from other countries, and have many valuable talents but may not yet have a good grasp of the academic English used on our assessments. And, some of our students are just kids who for whatever reason are not interested in demonstrating their best work on a standardized test on a given day.

We know that statewide, our biggest challenge is finding better ways to engage and support the learning of children living in poverty. Our students from families with means and parents with more education, consistently are among the top performing in the country. However, federal NCLB policy has not helped our schools improve learning or narrow the gaps we see in our data between children living in poverty and children from more affluent families. We need a different approach that actually works.

What are the alternatives? Most other states have received a waiver to get out from under the broken NCLB policy. They did this by agreeing to evaluate their teachers and principals based on the standardized test scores of their students. Vermont is one of only 5 states that do not have a waiver at this time. We chose not to agree to a waiver for a lot of reasons, including that the research we have read on evaluating teachers based on test scores suggests these methods are unreliable in classes with 15 or fewer students, and this represents about 40-50% of our classes. It would be unfair to our students to automatically fire their educators based on technically inadequate tools. Also, there is evidence suggesting that over-relying on test-based evaluation might fail to credit educators for doing things we actually want them to do, such as teach a rich curriculum across all important subject areas, and not just math and English language arts. In fact, nation-wide, we expect more and more states to give up these waivers for many of the reasons we chose not to pursue one in the first place.

Like other Vermont educators, I am deeply committed to continuously improving our schools and the professional skill of our teachers. I have heard from principals and teachers across the state who are deeply committed to developing better ways of teaching and working with parents and other organizations to ensure that every child's basic needs are met. If basic needs are not met, children cannot take advantage of opportunities that we provide in school. However, the federal law narrows our vision of schools and what we should be about. Ironically, the only way a school could pass the NCLB criteria would be to leave some children behind – to exclude some of the students who come to our doors. That is something public schools in Vermont will not do.

## Matching our Measures to our Purpose

Certainly, we know tests are an important part of our tool kit, but they do not capture everything that is important for our children to learn. With this in mind, our State Board of Education clearly outlined five additional education priorities in our new [Education Quality Standards](#), including scientific inquiry, citizenship, physical health and wellness, artistic expression and 21<sup>st</sup> century transferable skills.

As parents and caregivers, we embrace a broader vision for our children than that defined in federal policy. Thus, we encourage you to look at your own child's individual growth and learning, along with evidence your school has provided related to your child's progress. Below are some questions to consider:

- What evidence does your school provide of your child's growing proficiency?
- Is your child developing the skills and understanding she needs to thrive in school and the community?
- Are graduates of your school system prepared to succeed in college and/or careers?
- Is your child happy to go to school and engaged in learning?
- Can your child explain what he is learning and why? Can your child give examples of skills he has mastered?
- Is your child developing good work habits? Does she understand that practice leads to better performance?
- Does your child feel his work in school is related to his college and career goals?
- Does your child have one adult at the school whom she trusts and who is committed to her success?
- If you have concerns, have you reached out to your child's teacher to share your perspective?

Be engaged with your school, look at evidence of your own child's learning, and work with your local educators to ensure that every child is challenged and supported, learning and thriving. Schools prosper when parents are involved as the first teachers of their children.

## The State's Obligation to Our Children

Working with the Governor, the State Board, the General Assembly and other agencies, and most importantly, with educators across the state, the Agency of Education will invite schools across the state to come together to innovate and improve our schools. We hope your school will volunteer to help develop and use a variety of other measures that will give parents, citizens and educators better information on student learning and what we can do to personalize and make it better. These measures include:

- collaborative school visits by teams of peers, to support research, professional learning and sharing of innovative ideas,
- personalization of learning through projects and performance assessments of proficiency,

- gathering and sharing of feedback from teachers, parents and students related to school climate and culture, student engagement and opportunities for self-directed learning,
- providing teachers and administrators standards-based feedback on the effectiveness of their instruction,
- developing personalized learning plans that involve students in defining how they will demonstrate they are ready to graduate, and basing graduation on these personalized assessments of proficiency rather than “seat-time”,
- analyzing growth and improvement at the Supervisory level as well as the school level, to identify systems that seem to be fostering greater growth in students, as a way of identifying and sharing promising practices across schools.

Vermont has a proud and distinguished educational history, but we know we can always do better. We are committed to supporting our schools as they find more effective and more engaging ways to improve the skills and knowledge of our children. As we have done before, we intend to draw on the tremendous professional capability of teachers across the state as we work to continuously improve our schools. Our strength has always been our ingenuity and persistence. In spite of federal policies that poorly fit the unique nature of Vermont, let’s continue to work together to build great schools that prepare our children to be productive citizens and contributors to our society.