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NYSED Commissioner MaryEllen Elia
89 Washington Avenue
Albany, New York 12234

NYS Board of Regents Chancellor Betty Rosa
89 Washington Avenue
Albany, New York 12234

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Dear Commissioner Elia and Chancellor Rosa:

Since 2012, we have been reaching out to the State Education Department and the Board of Regents about the high stakes tests. We are not anti-testing, but we have some serious concerns about both the nature and the use of the state ELA and Math exams. We are aware that under your leadership there have been some positive changes. We appreciate the moratorium on using state test scores to evaluate teachers, the fact that the contract with Pearson was ended, and the move to untimed tests.

However, we continue, as a school community of parents, teachers, and administrators, to have some serious issues with the current test, which we implore you to address moving forward. We hope that you will consider these and respond to our letter. We invite you to visit our school, both to see our wonderful classrooms and to talk to teachers, parents, and administrators about testing.

These are some of our concerns:

- **The lack of transparency**, which our principal commented on in a New York Times Op Ed in April of 2014, continues to be a serious issue for us. We appreciate that more of the questions are now released, which makes it much more possible for parents and teachers throughout the state to understand what the test is asking of children. However, the ruling that teachers and administrators cannot read the test when they administer it is nothing short of ridiculous. (In some cases the teacher actually has to read aloud questions.) We want to be able to give informed opinions about the test without waiting for the released questions to come out. We also do not want to put teachers in a position that they are inadvertently violating a testing regulation if, as they proctor actively, they actually read a part of the test. We completely understand the need for test security and not sharing specific test details and questions during the grading period, however, once

this is completed, we do believe that with the exception of the field test questions, the test questions should be public.

- **The tests are too long.** There is no reason why children as young as 8 should be tested for approximately 7 hours to determine if they can read, write and do math. To put this in perspective, the LSAT is 3.5 hours; the SAT 3.75 hours; and the New York State ELA and Math Exams for 3rd graders approximately 7 hours (if we go by suggested allocation of time according to NYSED).
- **Even with reduced hours, the test should not be more than 2 days for ELA and 2 days for Math.** One day of each test should be multiple choice and one day short and extended responses. By day 3, even our highest performing students have had it. And the disruption to the regular school program for all students grades K-8 is remarkable. Specialty programs, related services and recess need to be cancelled; classes are displaced from rooms for accommodation groups; and the administrative work required on days leading up to the test, during the test, and after the test take supervisors and coaches away from the important work of being instructional leaders.
- **Untimed testing needs to have some upper limits so that children are not spending too much time testing.** Test developers should not feel that because the test is untimed, they can make it as long as they like. Although most of the testing days took most children between 60-120 minutes, Day 3 of the ELA took many children 3 hours, including many high performing children. We appreciate that not having a strict time limit helps reduce anxiety for some children. However, knowing that they can take all day creates additional anxiety for others who fear they are stopping too soon. In addition, we have heard of schools that insist that children take at least 3 hours to complete the test. We continue to believe that elementary school children should have a test that can be completed in 60-90 minutes per day. Given that, we believe that after double that amount of time is reached, testing should be ended.
- **The nature of the ELA test is extremely problematic.** In 2014, in a letter to Commissioner King, our SLT said that the test was “the worst ELA exam we have ever seen.” For the past three years the test has essentially stayed the same, and we continue to be horrified that this is how children are being assessed as readers and writers. At a PTA meeting where we shared some of the released passages and questions from previous years, parents attending (many extremely well educated) and teachers were divided on the correct answers to many questions. We have a school with many high performing students who are excellent readers and writers who go on to great success in middle school, high school, and college. We are determined NOT to change how we teach in order to teach to the test, but not all schools have that luxury. Asking young students to reread particular paragraphs multiple times, flipping back and forth between pages, to see how paragraphs are connected is an unnatural way of reading that does not measure true reading comprehension. In general, although we take exception to aspects of the Common Core Learning Standards, we have welcomed the opportunity to re-energize curriculum with greater emphasis on the kinds of critical, flexible thinking that our students must develop to meet the demands of their current and future lives. Unfortunately, in both their technical and task design, these tests do not align with the

Common Core. The ELA test was narrowly focused, requiring students to analyze specific lines, words and structures of texts and their significance. In contrast, the Common Core emphasizes reading across different texts in order to determine and differentiate between central themes—an authentic adult practice. Answering granular questions about unrelated topics is not. We were pleased that the math test seemed like a much better test that truly assessed math knowledge rather than seemingly being designed to trick students. We continue to have some concerns that the reading in the math test can be problematic for English Language Learners and for some children with special needs. The length of that test seemed to be appropriate on all days, although as per above, it should be two days.

- **The moratorium on using state test scores for teacher evaluation should be a permanent ruling, not a temporary one.** We know from careful analysis of how these tests were linked to teacher evaluation in past years that they are a bizarre and inaccurate measure. Very small changes in a child's test score can have a large impact on a teacher's rating. It is also completely unrealistic to think that if teachers' ratings are based on test scores, there will not be a significant distortion of the curriculum and a much greater focus on test prep than there already is.
- **The tests should be criterion referenced, not norm referenced.** The norm-referenced tests are designed to sort students into high, middle, and low performing levels on a bell curve. On a norm-referenced test of course, it is impossible for all students to do well. It is demoralizing to know that no matter how much instruction improves state-wide, there will always be a percentage of students who cannot pass the test, since its very design assures this. Criterion- or standards-referenced tests on the other hand set a standard of what students are supposed to be able to do at a specific grade level and it is theoretically possible for all students to pass such a test.

We speak out not just for our school community, but for schools across the city and the state. We are confident that at PS 321 we will not change our rich curriculum to focus more on test prep. We are united as a community of parents, teachers, and administrators about what constitutes great instruction for students and are committed to a rich arts curriculum, great social studies and science projects, and paying attention to the social-emotional aspects of children's lives. But schools in high poverty neighborhoods where children traditionally do not do as well on the tests do not necessarily have this luxury, particularly since test scores are still being used to close some low performing schools.

Since 2012 we have been asking that the Commissioner and the Board of Regents actually take the test to see what we are talking about. No one has ever taken that suggestion seriously, but we feel strongly that it is important the policy makers understand what they are making policy about, and until you take the exam, we are unsure that you will fully understand our concerns.

We look forward to hearing from you and again invite you to visit our school to discuss this further. Thank you.

Sincerely, The PS 321 School Leadership Team
(Signature Page Attached)

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