Florida Association of District School Superintendents

February 10, 2015

Mrs. Pam Stewart  
Commissioner of Education  
Florida Department of Education  
325 West Gaines Street  
Suite 1514, Turlington Building  
Tallahassee, Florida 32399-0400

Dear Commissioner Stewart:

On behalf of the Board of Directors of the Florida Association of District School Superintendents (FADSS), I have been asked to send you this letter regarding the upcoming administration of the Florida Standards Assessment (FSA) and other assessments. Florida’s school superintendents have the responsibility of meeting the education needs of 2.7 million students enrolled in Florida’s public schools. We have and continue to support increased rigor and high academic standards that are data-driven, with the goal of providing every student the same opportunity for educational excellence. To that end, we support a strong accountability system that can accurately and fairly assess student performance, evaluate teachers, implement pay for performance and assign school grades. However, we have become increasingly concerned as we approach the assessment season and are once again voicing our concerns.

It has become clear that this first year must be a benchmark year and that the high-stakes attached to the FSA be deferred for at least the 2014-2015 school year. To do otherwise is to jeopardize the entire accountability system that has served us well in increasing student performance over the past 15 years.

The new FSA, the first administration of which is scheduled in the next several weeks, is untried, untested, and a big unknown for students, teachers, and parents. Students, teachers, and schools should not be held accountable for results of an assessment that is substantially different from FCAT 2.0. Nor should they be held accountable when the assessment is being administered for the first time as a computer–based assessment, when neither the assessment or the state and local infrastructure to administer the assessment have been thoroughly field-tested.

Superintendents are being required to certify that the districts have sufficient technology to administer the FSA (English Language Arts, Writing and Math, Algebra 1 EOC, Geometry EOC, and Algebra 2 EOC). They are being required to certify the availability of equipment and systems to administer an assessment without having the time to assure that it will in fact work, particularly in such a high-stakes environment for students and schools.
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Serious concerns have been raised about whether the state and/or local systems can withstand the technology load that is required when so many students will be taking the assessment at the same time. Many districts will not have a load test until mid-February, which is just a few short weeks before the assessment is administered. Other districts are concerned about bandwidth, loss of service due to computer viruses and difficulty with signing onto the system.

Technology is not the only problem. The displacement of students is perhaps the most concerning issue. The critical question is: How long does it take for a school to test all of its students because of the state mandate to administer the FCATs/FSA and EOCs on computers? The answer is up to 60 instructional days, morning and afternoons, every day from March through May or six to eight weeks in many cases, especially high schools. It has been reported that media centers and computer classrooms will be closed to instruction for up to 62 instructional days in one district.

This is due to the limited available infrastructure in bandwidth and computers to administer these tests by computers and online instead of on paper. This move to computer-based testing was made in order to get the results sooner, but that will not be the case. The continuous climate of testing, rotating students in and out of the few rooms with computers, all day, for six to eight weeks, creates a continuous disruption of instruction and maintains an environment of high-stakes testing that permeates to everyone involved in the school including teachers, students, and parents. Students are losing the instructional time needed to complete courses for graduation or obtain industry certification.

Access to curriculum is another issue. In order to ensure secure administration of the FSA, access by students to the Internet, e-books, etc., regardless of student displacement, is disrupted. The instructional disruption is beyond the displacement of students.

Proficiency in computer keyboarding skills is another concern. All statewide assessments will be administered online and are computer-based, and there is an inherent assumption that all students have the computer literacy skills to successfully take the timed assessments on a computer. Being familiar with technology does not necessarily translate into being successful in taking a high-stakes assessment on a computer. The new FSA will require students to compose essays using word processing skills. Again, familiarity with technology does not automatically translate into computer-based testing technology skills.

Fortunately, you recognized this difficulty and have granted relief for some grades on the Writing component of the English Language Arts Assessment. The Writing component will be administered by paper and pencil for the next two years, up through the 7th grade. However, those students who must take the assessment for high school graduation must take it on a computer and may not have the skills to be successful. The math portion will require additional computer skills. Students are struggling with solving math problems using computers and utilizing system specific functions like “drag and drop” successfully. Finally, some of the assessment questions will be “technology enhanced questions” requiring an even greater ability on the part of students to be successful. In essence, students are being assessed on their computer skills and not on the content of the subject being assessed. This is not fair to students or to teachers who are being evaluated based on the results. Moreover, students are being assessed without knowing the threshold that must be met to reach a passing score.
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While superintendents strongly support the Florida State Standards in English Language Arts and Mathematics, we have continuously voiced our concerns that teachers have not had sufficient time to teach the standards that are being assessed this school year. Since 2011, school districts have implemented three different sets of education standards adopted by the Florida Legislature and implemented by the Department of Education: (1) Next Generation Sunshine State Standards, (2) Common Core Standards, and (3) the recently adopted Florida State Standards. Only grades K-3 have benefited from comprehensive implementation of the new standards, while the remaining grades have seen a blend of the old and new standards until this year. Full implementation throughout all grades requires a multi-year effort of intense teacher professional development, coupled with the adoption of curriculum and instructional materials that are accurately aligned with the new state standards. The lack of a systematic and realistic timeline for all grades to fully implement the Florida State Standards has been a source of the conflict and struggle faced by teachers today. These standards are not the same as the former standards. The previous standards emphasized the “what” and not the “why.” The new standards require a whole new way of delivering instruction. Teachers have not had adequate time or professional development to ensure student’s success.

Districts are now in the process of completing the “Computer-Based Assessment Certification Tool.” As you know this is a comprehensive tool that requires each district and school to indicate their ability to administer (and if the district/schools are not ready they must indicate what steps have been taken to be able to administer) the Spring 2015 Pearson FCAT/FCAT 2.0 and Spring 2015 AIR FSA assessments. This certification tool is just now being completed by districts.

Technically, districts will ultimately complete the certification tool and may verify that they will be able to administer the Florida Standard Assessment. But at what cost? The technology infrastructure on both the state and district levels has not been thoroughly tested to ensure that the FSA can be administered successfully throughout the state within the time allotted. Due to the lack of sufficient infrastructure and devices, instruction will be disrupted for up to six weeks, if not more. Students are not only being required to take a new assessment (FSA), but they are required to take it on a computer. They are being tested on their computer skills and not on their mastery of content. Moreover, they do not know what “passing” looks like, as the benchmarks will not be established until after the assessment is given. Therefore, students and teachers should not be held accountable for an assessment that is administered without the supporting infrastructure and is coupled with disruption in overall instruction.

Finally, school grades will be issued based on results that the public does not trust or understand. You have already acknowledged that learning gains cannot be determined, yet school grades will still be issued. Once again the public will have no confidence in Florida’s accountability system. This will have an impact on Florida’s economic development and job growth. Businesses will question whether Florida has a welcoming business climate when the public education system is in such disarray.

Superintendents support a strong, vibrant accountability system. We have discussed these concerns with you at almost every meeting over the last two years. We have expressed our concerns before the State Board of Education on numerous occasions. We have expressed our concerns in writing, in our legislative platforms and issue papers. To administer an untried assessment and attach such high-stakes on the first administration is highly questionable.
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We know that many of these issues can only be accomplished through sufficient planning and implementation, and in some instances, legislative action. We look forward to working with you in championing an assessment and accountability system that is credible, both empirically and in the eyes of the public.

If we continue down this road without adjustments, we fear the entire accountability system that we support is in jeopardy.

Sincerely,

John Ruis  
President – FADSS