

EDJE Letter to Secretary-Designate Miguel Cardona to Waive Federal Mandates for 2021 Student Testing

February 15, 2021

Dear Secretary-Designate Miguel Cardona:

As the nation struggles to address the impact of the pandemic on public schools, we urge the U.S. Department of Education to waive federal ESSA student-testing requirements for all states for 2020-2021 (as was done for 2019-2020).

We, Education Deans for Justice and Equity (EDJE), are an alliance of hundreds of deans of schools and colleges of education across the country who draw on our expertise as researchers and leaders to highlight three research findings to support our request.

First, ***problems abound with high-stakes standardized testing of students, particularly regarding validity, reliability, fairness, bias, and cost.*** National research centers and organizations have synthesized these findings about standardized testing, including the [National Educational Policy Center](#) and [FairTest](#). For example, some of the [harmful impacts](#) of high-stakes testing include: distorted and less rigorous curriculum; the misuse of test scores, including grade retention, tracking, and teacher evaluation; deficit framing (blaming) of students and their families and ineffective remedial interventions, particularly for communities of color and communities in poverty; and heightened anxiety and shame for teachers and students. Researchers have also spoken specifically about annual state testing, like in [California](#) and [Texas](#), arguing that such assessments should not be administered, much less be the basis for high-stakes decision making.

Second, ***these problems are amplified during the pandemic.*** The research brief, [The Shift to Online Education During and Beyond the Pandemic](#), describes the “law of amplification” and ways that the shift to online education widens long-standing inequities and injustices in education, particularly for groups already disadvantaged in schools. These challenges with technology, logistics, and safety would unquestionably apply to testing, whether in-person or online. For example, districts that administer computer-based tests in-person are now trying to determine how to recall computers that were loaned to students in order to have enough computers in school, which in effect, means that those students will not have computers for remote learning for weeks. In fact, with the vast changes and differences in curriculum and instruction that resulted from the shift to online education over the past year—that is, the reduction in opportunities to learn, particularly in schools that were already under-resourced—the content validity of the tests is almost certainly compromised, as described by the [National Education Policy Center](#). Furthermore, with so much trauma in the lives of students and families, schools need to invest all they can into quality time with students, supplemental tutoring, and enrichment and wellness programs, not stress-inducing, time-consuming tests that provide narrow data of limited use.

Third, in contrast to proponents of 2021 testing who argue that cancelling the tests would result in a lack of data to inform important decisions, ***we urge choosing more appropriate instruments and methods*** to learn what we need to know in order to make the best decisions for our students and communities:

- a) **Data for Longitudinal and Comparative Analyses:** We agree with those who argue that we need high-level and nationwide data to track student learning and performance longitudinally and comparatively, but state standardized testing does not provide such data. For such purposes, we already have the Nation's Report Card, i.e., NAEP (the National Assessment of Educational Progress), which is less expensive and intrusive, more valid and reliable, and can disaggregate by state/region, race, income, gender, age, language status, disability status, and so on. NAEP was cancelled for 2021. Large-scale data on the impact of the pandemic can be documented by valid administration of NAEP in 2022.
- b) **Data for School and System Improvement:** We agree with those who argue that we need district- and school-level data to ensure that certain groups, particularly historically underserved or high-needs groups, are not left behind or facing civil-rights discrimination. However, state standardized testing provides data that are far too narrow. To ensure a more complete picture of student learning, states like California are developing a “dashboard” of indicators of school and district performance and impact. Yet another framework for assessing how schools and classrooms are closing the “opportunity gap” is that developed by the national [Schools of Opportunity project](#). The billions of state and federal dollars spent on ESSA testing every year should instead be aligned with such frameworks, namely, by investing in and prioritizing the aspects of schools and systems that we know to improve student learning and wellness.
- c) **Data to Improve Instruction and Student Learning:** We agree with those who argue that we need to assess where each student is succeeding and struggling in order to improve and tailor instruction and support, but state standardized testing fails to provide such data. The tests are far too disconnected from instruction for such evaluation, and the test scores come back to teachers far too late. A range of alternative instruments and methods have been developed or identified to assess students more accurately, comprehensively, consistently, ethically, and equitably, including teacher-led assessments that can support formative interventions and/or summative milestones.

We stand ready to work collectively with you as we reframe the conversation about testing nationwide and move policy and practice in these directions, and we request the opportunity to meet with you to discuss how we might be of service.

Education Deans for Justice and Equity (EDJE)

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