



**Testimony of Michael Cohen  
President of Achieve  
Indiana House Education Committee  
April 7, 2015**

Introduction

Chairman Behning, members of the Education Committee, I am pleased to have the opportunity to testify before you today about SB 566, and to discuss in particular the approach incorporated in the bill for replacing the ISTEP testing program.

It is clear that Indiana has an urgent need to develop and implement statewide assessments that are aligned to the Indiana Standards for English language arts (ELA) and for mathematics that were adopted just a year ago. These are needed to help prepare Indiana's students for college and career, to support the improvements in teaching and learning the standards require, and to continue Indiana's efforts to strengthen accountability and improve educators' effectiveness. High-quality summative assessments are key to all of these efforts.

Indiana has long been a leader among states in standards-based reforms to promote college and career readiness. The development of the Core 40 in 1994 and its option in 2004 as the default course of study for earning a high school diploma put Indiana far ahead of other states in taking the steps to prepare its students for college and career.

Achieve has worked with Indiana over a 15-year period to evaluate and, where necessary, recommend improvements to its standards and assessments. Achieve first reviewed Indiana's ELA and mathematics standards and assessments in 1999 and recommended significant improvements to both, which were largely incorporated in subsequent drafts. In 2003 Achieve conducted an analysis of the newly implemented ISTEP+ to determine the extent to which it was aligned with state standards, as well as whether the proposed scores for passing represented "solid academic performance" and the Pass+ score represented "exemplary performance." This study, commissioned by Indiana leaders, demonstrated an unprecedented commitment to transparency and quality with respect to setting cut scores. In 2004, Achieve used the Indiana mathematics standards as a benchmark – a standard of excellence – in our reviews of standards from other states.

Achieve has been a partner and source of expert advice in other ways as well. Indiana was one of five states (along with Kentucky, Massachusetts, Nevada, and Texas) that joined the initial research phase of American Diploma Project (ADP). Project researchers from Achieve and our partners, the Thomas B. Fordham Institute and the Education Trust, worked with college faculty, employers, and high school curriculum experts in each state to identify academic skills in mathematics and ELA that are essential for success in and broad access to postsecondary

institutions and careers that pay well and have advancement potential. This was the very first effort by states to anchor academic standards in the best available evidence of the essential demands faced by students preparing for college, work, and citizenship. The resulting ADP Benchmarks were subsequently used by more than half the states, including Indiana, between 2004 and 2009 to develop their own college- and career-ready standards in mathematics and English language arts.

In 2006 Achieve developed a set of recommendations to help Indiana increase its high school graduation rate while also raising its graduation standards, while others thought it would be nearly impossible to simultaneously raise both. In 2009, Achieve featured the importance of the Education Roundtable to develop and sustain a P-16 plan. And just last year, at Governor Pence's request, we reviewed the draft Academic Standards in mathematics and in ELA, and recommended their adoption to the Education Roundtable.

My testimony today on SB 566 continues Achieve's commitment to providing expert advice as Indiana continues to work on its system of standards and assessments. Having adopted new standards last year, Indiana needs new assessments aligned to them, and for a variety of reasons there are concerns that the test being administered this year is too long and too costly to develop and administer.

It is far less clear to me that the remedy to this situation is to throw out ISTEP in its entirety and replace it with an entirely different assessment. Unfortunately, in my judgment, SB 566 will take assessment in Indiana in the wrong direction. It will not serve Indiana's students and teachers well. It represents a retreat from Indiana's long standing commitment to and national leadership in setting high expectations for all students.

Before turning to the specific problems in SB 566, it's important to put the debate about cost in a broader context. According to the latest report from the Census Bureau, in FY 2012 Indiana spent \$9,719 per pupil K-12 public schools. It spends approximately \$40 per student for the ISTEP+ English Language Arts and Mathematics tests, about .0004 percent of per pupil spending. That may look like a lot of money when it turns up as an item in an appropriations bill, but as a portion of overall education spending, it's a small amount to spend on something that plays such an important role.

Let's now turn to specific concerns about the provisions for testing and standards in SB 566.

***Nationally recognized assessments will reduce the state's control over its standards and assessments.***

The bill does not define the term "nationally recognized assessments," though it does rule out any participation in PARCC and SBAC – tests created by consortia of

states and being given this year by a majority of states. According to a recent story in Indiana *Chalkbeat*, it appears that the legislation contemplates tests such as the Iowa Test of Basic Skills, a norm referenced test, or the adaptive, diagnostic tests developed by NWEA. If that's the kind of assessment envisioned by this bill, there are several things you should know.

These and other off-the-shelf tests were not developed with Indiana's standards in mind. The odds are that few, if any, educators or education officials from Indiana had anything to do with the content or design of the tests. They were not developed by Hoosiers for Hoosiers.

They are almost certainly not aligned with Indiana's college- and career-ready standards...and it is not likely to be the case that a few "tweaks" to the standards or to the tests will bring them into alignment. For example, the Indiana ELA standards expect students to be able to read one or more texts, draw evidence from them, and write a coherent argument based on the evidence found in the text. In short, they need to read something and then write about it. This is a foundation of college and career readiness – ask any faculty member or employer.

Adaptive tests such as NWEA do not require students to write; they are comprised of fill-in-the-bubble type machine-scoreable questions. They may be good ones, but they don't require writing and therefore are, on their face, not aligned to Indiana standards. Tweaking the standards to bring them into alignment to the NWEA assessments means dropping this kind of writing from the Indiana's ELA standards. This isn't a tweak, it's major surgery. It would ratchet down the rigor of expectations for student learning, and would leave them poorly prepared for postsecondary education and careers. Adding a few writing prompts to NWEA test is also not a simple matter; it requires a different design, more testing time, and higher costs. Just ask NWEA about that.

*SB 566 requires that Indiana's standards must be modified to align with whatever nationally recognized tests is selected. This is backwards.* Standards provide the foundation for public education and for the reforms necessary to improve performance. They reflect what educators and leaders in the state believe is most important for students to know and be able to do as they progress through school, and provide the foundation for much of what happens in schools – the curriculum, the instructional practices, the professional development and teacher preparation, and the tests. Indiana just went through a year of turmoil as a result of abandoning the Common Core and developing your own state-specific standards. At the end of the day, however, you ended up with strong standards. I know that, because Achieve reviewed them at Gov. Pence's request. Once several revisions we suggested were made, we recommended their approval to the Education Roundtable. *These are the standards that should provide the foundation for Indiana's assessments.*

Indiana rejected the Common Core because, in your own terms, it wanted to wrest control from the federal government. I don't happen to agree with the notion that

the federal government ever controlled any state's standards....but that is the view of the Indiana General Assembly and the Governor. So be it. *How ironic, then, that having just wrested control over the state's academic standards from the federal government, the legislature is now about to turn control over state standards to a testing company, to which it will have already handed control over its tests.* Is this what the last year of turmoil was all about?

***SB 566 fails to pay sufficient attention to the purposes, alignment and quality of needed tests.***

The bill proposes replacing ISTEP with the BEST program of nationally recognized tests. However, the ISTEP assessments are the state's summative tests, used in part to hold schools accountable for their performance, and to evaluate the effectiveness of educators. These purposes are not among those enumerated in Chapter 5.1 of the bill, which describes the purposes of the BEST program. Yet the bill also insists that the tests comply with the requirements for keep Indiana's NCLB waiver, which requires complying with the assessment requirements of NCLB itself. NCLB requires state assessments that are aligned to state standards and are used for school accountability and educator evaluation. If the BEST assessments are not designed to be in compliance with NCLB, what tests will serve this purpose? You can't have it both ways, as the bill tries to do.

Tests must be validated for the purposes they serve. This criterion should be included in any law enacted to provide for Indiana's summative, federally required tests. This means that the psychometric properties of the test – reliability, ability to measure the full range of the standards, and the full range of performance, etc. – are especially important, as well as its appropriateness for use given the approach to evaluating educator effectiveness used in Indiana.

There should be an independent, external review of the evidence to support claims of alignment and validity. This review should be built in at several stages of the process including the review of proposal during the procurement process, and once any test is finalized. The reviews should be presented to the Education Roundtable and to the State Board of Education. Neither you nor they should not simply take the word of test vendors.

There is considerable attention in the bill to ensuring that Indiana retains/renews its NCLB waiver. You should note that in order for tests to meet the federal standards, they must meet the criteria of alignment to standards and validity for intended purposes. The U.S. Department of Education is asking for best practice, not anything to esoteric. If you proceed with a summative testing program that meets these criteria, it will be in the best interest of teachers and students – and it will support the waiver renewal. Focus on doing right for kids and the waiver will follow.

With respect to compliance with federal requirements, it is important to note that, historically, the U.S. Department of Education has not allowed adaptive tests to be

used a summative accountability tests because they do not measure grade level standards well. This is not to say there is no role for adaptive tests; they can be very useful as interim tests and to personalize instruction by pinpointing what students have already mastered and what they are ready to learn next. Their strength in this regard is also their weakness for federally required summative assessments – they don't necessarily fully test grade level skills.

Different purposes require different kinds of tests. That is why there is no need to set up a false dichotomy, and a needless debate, between summative tests and adaptive diagnostic tests such as NWEA. In just about every state, local districts incorporate diagnostic tests into the overall testing program, which is anchored by statewide summative assessments.

***There is an alternative path forward.***

It is clear to me, and I hope to you, that Indiana needs a test aligned to its current standards. This doesn't mean, however, that Indiana needs its own unique items. The Indiana standards are sufficiently similar to those in other states such that you can use some of the same items that other states use on their tests, an approach which can reduce test development costs and reduce the number of items that would need to be piloted in Indiana, giving you a much better handle on the factors that have driven testing time and costs for this current year.

The first step would be to develop Indiana's test blueprint, the design for the test that would reflect your priorities for what is most important to measure, the mix of item types you want and need in the test to assess your standards, testing time, and a range of other factors that always go into the test design and development. There you will begin to confront the inevitable trade-offs and compromises that are always part of the process.

Historically, states and their vendors then begin to develop and field test new items to meet their unique design specifications, often using some existing items from the previous state test, or from the vendor's own items. However, you now have an additional option, of partnering with other states. Both PARCC and SBAC are considering ways to allow non-consortia states to have access to their item banks, at a cost. In both cases their items have already been reviewed by educators (in PARCC's case, including Indiana educators) and field-tested. Beyond the consortia, Kentucky and Georgia are sharing items with each other. I believe that Utah has sold some of its items to Florida, Arizona, and Tennessee, for use in their state specific tests.

Under this scenario, Indiana retains control over its test. You get to decide which states or consortia to talk to and which items to select from among those made available to you, to meet your design specifications. You set the cut scores for "proficient" and other performance levels. You would still need to conduct

independent quality reviews to ensure alignment, validity, and other psychometric qualities.

To be clear, this is not a panacea. The costs savings won't be known until you seriously explore this approach. It will still be difficult to develop a high-quality assessment. Doing a good job of measuring performance against Indiana's standards is likely to require somewhat more testing time than your ISTEP currently requires, because of the complexity and rigor of the mathematics and literacy skills you expect students to master. I am convinced the payoff is worth the time.

Finally, as Indiana develops high-quality and aligned summative assessments, this is the right time to address the growing concerns about the amount of time and attention devoted to testing each year. Those concerns are real and legitimate.

The best estimates nationally are that annual statewide summative tests take up approximately 1-2% of instructional time each year. Most of the assessments students take are locally determined, in the form of various formative, diagnostic, periodic benchmark, and other tests. Many of these tests provide teachers with valuable information about student strengths and weakness that can inform instruction over the course of the year. But it is likely that in many districts, the number of such tests can be reduced, as some are duplicative of others or were adopted long ago and have outlived their usefulness.

That is why a growing number of states around the country are assisting local districts in undertaking comprehensive "audits" of local assessment programs. States and districts are going about this in a variety of ways, and with varying kinds of external support. To assist interested states and districts, Achieve has developed a Student Assessment Inventory for Local School Districts, a tool district leaders can use to take stock of their assessments and assessment strategy, and do so from a student perspective. The tool supports a process by which districts evaluate the assessments students are taking, determine the minimum testing necessary to serve essential diagnostic, instructional, and accountability purposes, and work to ensure that every district-mandated test is of high quality, is providing the information needed for specific school and district purposes, and is supported by structures and routines so that assessment results are actually used and action steps to help students taken. We encourage districts that use this tool, or other approaches, to report to parents and others in the school community which assessments have been eliminated and which are being continued, as well as the specific purposes of each test. You can find more information about this tool at <http://www.achieve.org/publications/student-assessment-inventory-school-districts>.

Thank you for your attention. I will be happy to respond to any questions you may have.