Local board of education and other educational organization comments and recommendations related to the results of the Maryland State Department of Education survey on mandated assessments
November 24, 2015

Mr. Guffrie M. Smith, Jr., President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, MD 21201-2595

Dear Mr. Smith:

Pursuant to the requirements of HB 452, Allegany County Public Schools respectfully submits the following comments and recommendations related to the results of the survey conducted by the Maryland State Department of Education regarding local, state, and federally mandated assessments:

- The original assessment feedback submitted by Allegany Public Schools was reviewed and found to be complete and accurate.
- These assessments address a variety of purposes and mandates, including school system accountability, instructional design, and student mastery.
- We fully support and understand the value of local, state, and federally mandated assessments. These assessments provide benchmarks on student learning so instruction can be executed to meet the needs of every learner.
- We respectfully request choice, flexibility, and local discretion regarding the selection of assessments.

Thank you for the opportunity to provide comments and feedback on the survey.

Sincerely,

[Signature]

David A. Cox, Ed.D.
Superintendent of School

[Signature]

Nicholas T. Hadley
President, Board of Education

DAC/dmh

c: Ms. Renee McGuirk Spence, Executive Director, Public School Superintendents’ Association of Maryland, 9 Trotters Ridge Court, Catonsville, MD 21228

"Great Teaching. Great Learning. Every Student. Every Day."
November 23, 2015

Mr. Guffrie Smith, Jr., President
Maryland State Department of Education
200 West Baltimore Street
Baltimore, MD 21201

Dear Mr. Smith:

Pursuant to the requirements of HB 452, the Board of Education of Anne Arundel County offers the following comments and recommendations related to the results of MSDE's survey to the State Board regarding local, state and federally mandated assessments:

- The Board has reviewed the original submission of assessment feedback by Anne Arundel County Public Schools and have found it to be complete and accurate, based on the questions asked by the State Board.

- The assessments address various purposes and mandates, including accountability, instructional design and student achievement by each school system.

- Consideration should be given to the administration of alternative assessments so as to reflect the various learning styles and modalities among the diverse populations of young learners, including those who will move into careers after high school graduation rather than a higher education institute.

Thank you for the opportunity to provide input regarding local, state and federally mandated assessments.

Sincerely,

Stacy L. Korbela
President

SK/mec
CC: Dr. George Arlotto
Superintendent
Mr. Guffrie Smith, Jr., President
Maryland State Department of Education
200 West Baltimore Street
Baltimore, MD 21201

November 30, 2015

Dear President Smith:

Per House Bill 452, Baltimore City Schools has reviewed the Assessment Surveys compiled by the Maryland State Department of Education and the additional chart of grade-level times requested by the State Board. This letter is intended to note our District’s changes to the grade level testing times and to offer our overall comments and recommendations on local, state, and federally mandated assessments.

In order to ensure that the times provided best represent the student experience, we made adjustments to our locally mandated assessment times:

- Reduction in the time for Amplify-Reading 3D:
  - The first administration of the assessment is 20 minutes and the second and third administrations are 15 minutes long, resulting in 50 minutes of annual testing time.
- Reduction in the time for first grade interim assessments:
  - The first administration of the assessment is 75 minutes instead of 150 which leads to a reduction in total testing time of 75 minutes for students in the first grade.

City Schools used a RFP process last spring to identify an interim (formative) assessment tool that aligns to the Maryland College and Career Readiness Standards and provides teachers with valuable information to drive meaningful instruction. We believe that this formative assessment experience is critical to high quality teaching and learning and helps at the district level to allocate and adjust supports for schools.

The district’s local assessment plan for the 2015-2016 school year plus the reduced time allotted for PARCC has lowered the time our students spend on assessments on average by 5 total hours. It is important that students have as much instructional time as possible; however, the instruction should be informed by formal and informal assessment opportunities.

We support districts maintaining flexibility in the ability to select local assessment tools that align to curriculum and sequencing. While we understand the legal requirements for state and federal assessments, we encourage a continued review of the alignment and length of these assessments so each minute in school is beneficial to our students. Thank you for the opportunity to comment.

Sincerely,

Marnell A. Cooper
Chair, Board of School Commissioners

Gregory E. Thornton, Ed.D.
Chief Executive Officer

200 East North Avenue • Baltimore, Maryland 21202 • Visit us on the web at www.baltimorecityschools.org
November 19, 2015

Mr. Guffrie Smith, Jr., President
Maryland State Board of Education
200 W. Baltimore Street
Baltimore, MD 21201-2595

Dear Mr. Smith:

In compliance with HB 452/Ch. 421 to “review and consider the results of the Department’s surveys” and “make comments and recommendations related to the results of the Department’s survey to the State Board” before November 30, 2015, the submission by Baltimore County Public Schools regarding the assessments given in this district has been reviewed with the entire Board.

On behalf of the Board of Education of Baltimore County Public Schools, there are no concerns or recommendations.

Sincerely,

David Uhlfelder
Chair
Board of Education of Baltimore County

Dr. S. Dallas Dance
Superintendent

/mp
November 23, 2015

Mr. Guffrie M. Smith, Jr., President
Maryland State Board of Education
200 Wet Baltimore Street
Baltimore, MD 21201

Dear Mr. Smith:

The Calvert County Public Schools (CCPS) Board of Education submits this information to the Maryland State Board of Education in response to the assessment survey conducted to meet the requirements of House Bill 452/Ch. 421. For over a decade, CCPS has administered a robust local assessment program grounded in the belief that periodic measures of student learning best inform the instructional process. The board discussed this issue at their board meeting on November 19, 2015 and there are no recommendations from the board to change our current practice.

Local Assessment Philosophy

CCPS local assessments provide students with the opportunity to demonstrate what they understand and are able to do on tests that reflect instructional priorities established or influenced by national, state, and local curricular standards. As a result studying the data generated by local assessments, instructional decisions can be made at the class, school, and district levels. CCPS content area supervisors have developed specific assessments to evaluate the progress of the district’s students. These include diagnostic assessments, benchmarks, performance assessments, and end-of-year assessments.

In recent years, CCPS has moderately reduced the number of system-wide assessments that are administered to students, both as a means to reduce the frequency of testing and to encourage teachers to utilize more formative assessments in their classrooms. Formative assessments are formal and informal assessments teachers and students use at the classroom level to collect evidence for the purpose of improving learning. Formative assessments provide information to teachers and students during the instructional process. This information is then used to make decisions about what actions to take to promote further learning. The process allows teachers to decide when assessment is appropriate for their classroom and to plan instruction in response to targeted assessment of class and student-specific learning needs.

CCPS has two main categories of local assessments that complement State- and Federally- mandated assessments: County Course Exams and System-wide Assessments.

County Course Exams
County Course Exams (CCE) are systemic exams produced under the leadership of CCPS content area supervisors and administered to all students participating in a particular course of study. County Course
Exams are distinguished from System-wide Assessments in that CCE assessments contribute to students’ 5th marking period (or final exam) grade. We administer three types of CCEs:

1. **CCE Midterm Exams** are mid-year assessments administered to students in grades 9 - 12. These assessments are given in the months of December and January and contribute to students’ 5th marking period grade.

2. **CCE Performance Assessments** are typically skill-based assessments that require students to go beyond a multiple choice answer. These assessments are administered to students in grades 9 - 12 and may occur on multiple occasions throughout the school year, depending on the course of study. CCE performance assessments contribute to students’ 5th marking period grade.

3. **CCE Final Exams** are end-of-year assessments administered only to students who are in grades 9 - 11 during the school year in which the assessment is administered. Underclassmen should not be assessed prior to the appropriate underclassmen assessment window established by the content area supervisor unless permission is granted by the supervisor.

**System-wide Assessments**

System-wide Assessments (SWA) are produced under the leadership of content area supervisors and administered to all students participating in a particular course or grade level subject. These assessments may be used as formative or summative assessments. Information gained from these assessments may be used to make decisions regarding instructional programming. System-wide Assessments are distinguished from CCE assessments in that they do not contribute to a 5th marking period grade. Additionally, System-Wide Diagnostic Assessments (SWD) are also produced under the leadership of content area supervisors and administered to all students participating in a particular course or grade level subject. Diagnostic assessments are designed solely to provide instructors with information about student’s prior knowledge and misconceptions before beginning instruction and therefore should not factor into the calculation of a student’s grade.

CCPS acknowledges that a balance must be found between time needed for the administration of assessments and optimizing instructional time. Assessment decisions are typically made at the central office with feedback provided from school-based administrators and teachers. As we receive more detailed information from the PARCC assessments, we will continue to evaluate our local assessments and adjust accordingly.

Sincerely,

Tracy H. McGuire, President
Board of Education
Memorandum

To: Dr. Jack Smith, Maryland Interim State Superintendent of Schools

From: Patricia Saelens, PS, Assistant Superintendent

Subject: Commission to Review Maryland’s Use of Assessments and Testing in Public Schools (MSAR #10552 and 10553)

The purpose of this memorandum is to update you on the Caroline County Public Schools (CCPS) section of the Commission to Review Maryland’s Use of Assessments and Testing in Public Schools document recently submitted by the Maryland State Department of Education (MSDE) to the Maryland State Board of Education (MD BoE).

Please see changes below respective of the 2015 – 2016 school year. These assessment revisions are expected to provide relevant data, inform instruction and enhance teaching and learning.

CCPS Assessment Revisions; 2015 – 2016
1. P. 51, DIBELS/TRC, 6-12, Replace with Independent Reading Level Assessment (IRLA), Effective 2015-2016

2. P. 54, DAZE (DIBELS), 3-5, Replace with Independent Reading Level Assessment (IRLA), Effective 2015-2016

3. P. 55, DIBELS, K-5, Replace with Independent Reading Level Assessment (IRLA), Effective 2015-2016

Thank you for your attention to this information. Please contact me if you have questions.

Cc: Mr. Rowe
Mr. Ewald
November 12, 2015

Mr. Guffrie Smith, Jr., President
Maryland State Board of Education
200 W. Baltimore Street
Baltimore, MD 21201-2595

Dear Mr. Smith:

As required by HB 452/Ch. 421, the Carroll County Board of Education, at the recommendation of Superintendent Stephen Guthrie, convened a committee of educators, parents, and students to review and consider the results of the survey conducted by the Maryland State Department of Education (MSDE) and contained in the Report on Local, State and Federally Mandated Assessments in Maryland. This committee met three times and did a thorough job of reviewing the survey results, offering comments, and making recommendations to our local Board of Education related to the results of the survey. At the November 11, 2015 meeting of the Carroll County Board of Education, the committee presented its findings in public session, and the Board adopted the committee’s comments and recommendations to forward to the State Board of Education.

The Carroll County Board of Education appreciates the efforts of the MSDE to conduct this survey. As enacted by HB 452/Ch. 421, the purpose of the survey was to “assess how much time is spent in each grade and in each local school system on administering local, State, and federally mandated assessments.” It is our opinion that the survey did not accomplish this goal. The report does, in fact, compile state and local school system assessment information in a consistent format, but it falls short of tabulating the data to conclude how much time is spent in each grade level and in each local school system on administering the mandated assessments. Knowing how much time is spent at each grade level on mandated assessments was the key piece of information we were hoping to glean from the survey.

After careful consideration of the report and the results of the survey, the Carroll County Board of Education recommends the following to the Maryland State Board of Education:

• Use the information to calculate how much time is spent in each grade level and in each local school system on administering mandated assessments;
• View the results of the survey with caution; while the survey intended to capture how much time a student in each grade level spends testing, the results do not reflect the significant impact of testing, particularly the impact of online testing, on both the total school program (i.e., technology limitations, school schedules, loss of instructional time) and on family time (homework, test preparation);

• Re-assess the recommended student-to-computer ratio needed to implement online testing; while this ratio may provide for sufficient technology to administer the online PARCC assessments, it does not allow for the continued integration of technology into instruction occurring simultaneously with testing in other classrooms;

• Reconsider the statement in the report on page 13, under the Test Prep section, which concludes that no specific preparation should be needed moving forward since teachers will be using electronic devices and tools as part of regular classroom instruction; we do not believe this to be accurate in all classrooms and in all schools across the State; at the very least, there continues to be a disconnect between teacher-generated assessments (typically paper and pencil) and State-mandated assessments (online);

• Re-administer this survey in three years after the modifications to the PARCC assessment schedule and the release of PARCC data have been institutionalized; the results of this survey are now antiquated given the State’s decision to eliminate the PARCC Performance-Based Assessments; and

• Continue to monitor ways to decrease the amount of testing time required of students by exploring computer-adaptive versions of PARCC.

We thank you for the opportunity to comment on and make recommendations related to the results of the Report on Local, State and Federally Mandated Assessments in Maryland.

Sincerely,

James L. Doolan
Mr. James L. Doolan
President
Board of Education of Carroll County

Mr. Stephen H. Guthrie
Superintendent of Schools
Carroll County Public Schools
November 9, 2015

Mr. Guffrie Smith Jr.
President
Maryland State Board of Education
200 W. Baltimore Street
Baltimore, MD 21201

Dear Mr. Smith:

Subject: Assessments in Cecil County

The assessments administered in Cecil County Public Schools provide data that is used for two primary purposes. Diagnostic assessments are used to identify student proficiency levels as well as to provide educators with specific information regarding student learning needs. This assessment data is used to determine student intervention needs as well as to inform the Response to Intervention (RtI) process. These assessments are also used for progress monitoring purposes and assist educators in determining if instruction, intervention, and support are resulting in student achievement gains.

End of unit assessments are used to measure student mastery of core content courses. This data is used to inform both school and system implementation of the essential curricula. School and system leadership use these results to inform school improvement, professional development, and curriculum development needs.

The information provided about our assessment program as detailed on the Maryland State Department of Education Survey required by the Legislature is accurate.

Sincerely,

Dawn K. Branch
President
Cecil County Board of Education

cc: Cecil County Board of Education Members
    Dr. D’Ette W. Devine – Superintendent, Cecil County Public Schools

Our Mission: to provide an excellent pre-kindergarten through graduation learning experience that enables ALL students to demonstrate the skills, knowledge, and attitudes required for lifelong learning and productive citizenship in an ever-changing global society.
November 17, 2015

Guffrie Smith, Jr.
President, Maryland State Department of Education
200 W. Baltimore Street
Baltimore, Maryland 21201

Dear Mr. Smith:

Based on a review of the assessment summary documented for Charles County Public Schools in the Report to the Commission on Assessments, we are confident in the accuracy of the assessment types and assessment times. In addition, we as an elected Board, strongly encourage continued local control on decisions in terms of formative assessment, county based assessments and teacher created assessments. With the continued autonomy at the local level also comes the commitment to examine testing times to ensure instructional time is the priority. Our current assessment schedule reflects less than 2% of instructional time spent on mandated tests. Our goal is to ensure that assessments will only be administered in Charles County if the data directly impacts our students’ achievement.

Specifically, we feel that the Kindergarten Readiness Assessment (KRA) needs to be reexamined. The individual administration takes too much instructional time at the beginning of the year, and the data we obtain is not meaningful to our teachers. The formative assessment tools that we use are much more meaningful to our kindergarten teachers in planning for the individual needs of their young learners.

We are pleased with the changes made to the PARCC Assessment for the upcoming school year and feel that collapsing both tests into one testing window is a positive change for both our students and teachers.

Thank you for the continued support in ensuring the excellence of student achievement in the state of Maryland.

Sincerely,

Virginia R. McGraw
Chairman

Kimberly A. Hill, Ed.D.
Superintendent of Schools
Mr. Guffrie Smith, Jr., President
Maryland State Department of Education
200 West Baltimore Street
Baltimore, MD 21201

Dear Mr. Smith:

Pursuant to the requirements of HB 452, Dorchester County Public Schools offers the following comments and recommendations related to the results of MSDE’s survey to the State Board regarding local, state, and federally mandated assessments:

- We have reviewed the original submission of assessment feedback by Dorchester County Public Schools and have found it to be complete and accurate.
- In their totality, local, state, and federally mandated assessments constitute a major portion of a public school student’s educational experience.
- These assessments address a variety of purposes and mandates, including school system accountability, instructional design, and student mastery.
- Depending on the purposes, there should be as much flexibility, choice, and local discretion as possible regarding the selection of assessments.
- Consideration should be given to administering alternative assessment opportunities (such as performance opportunities and portfolios) that mirror the various learning styles and modalities of our students.

Thank you for the opportunity to provide input regarding this vitally important topic.

Sincerely,

[Signature]

Henry V. Wagner, Jr., Ed.D.
Superintendent

Philip L. Bramble, Jr.
President Board of Education

/cd
November 24, 2015

Mr. Guffrie Smith, Jr., President
Maryland State Board of Education
200 W. Baltimore Street
Baltimore, MD  21201-2595

Re: Commission to Review Maryland’s Use of Assessments and Testing in Public Schools (MSAR #10552 and 10553)

Dear Mr. Smith:

Thank you for the opportunity to review and comment upon the Commission’s Report. During our November 18, 2015 regular Board meeting, we discussed the report and our feedback. This letter consolidates that feedback.

The Frederick County Board of Education (Board) has been actively engaged on issues related to testing and assessments for much of this year. One of our Board’s stated advocacy and legislative principles focuses on local governance. Our local governance goals are intended to achieve best outcomes for students, to foster family and community engagement, and to demonstrate responsive leadership.

With that in mind, our Board recently heard from a variety of stakeholders – parents, students, educators, and community members – and took action to streamline our local testing and assessments framework. We memorialized those plans in our new Board Policy 522 which includes the following key provisions:

- **Purpose:** To establish the role of assessments within the instructional program.

- **Definitions**
  - **Local Assessments** – those formal assessments generated and required by Frederick County Public Schools (FCPS); such assessments do not include tests or assessments generated by teachers.
  - **State Assessments** – those formal assessments required by State and/or Federal law.

- **Role**
  - Local assessments should provide timely data in order to inform and improve instruction. Assessments must provide meaningful information to system leaders, teachers, parents, and students regarding student performance and mastery of the curriculum. System leaders should also be able to use assessment results to identify and close gaps in achievement, ensure equity in instruction, and to inform strategies to increase performance across all student groups. State assessments are administered as required by law.

- **Time / Frequency**
  - Local assessments shall be used in a balanced way as a part of a students' total instructional program. Local assessments shall not be conducted in a way that is disruptive to the schedule or the instructional day. State assessments shall be administered in a way that minimizes disruption to the instructional environment. Every effort should be made to ensure that assessments be scheduled in a way that minimizes the overlap in the administration of multiple assessments. Some assessments are required; however, system leaders, teachers, and staff should have the flexibility to choose additional local assessments that work best for their students and that fulfill the goals delineated in this policy.
Evaluation of Assessment
System leaders shall evaluate local assessments on a regular basis. System leaders should ensure that feedback from teachers, students, and staff informs the local assessment evaluation process.

Criteria for Evaluation of Local Assessments:
• must fulfill the conditions specified under “Role” specified in this Policy
• must be aligned to the current curricula
• must demonstrate that instructional practice is aligned with FCPS strategic goals
• must measure student progress and mastery of curricula
• must be effective instructional and diagnostic tools to improve the practice of teaching and inform instruction supports

Local assessments that are not fulfilling the goals delineated in this policy should be eliminated. System leaders shall also routinely evaluate the effectiveness of State assessments and provide timely feedback to the State government on ways those assessments may be improved.

Our Board has included the excerpted provisions of the recently enacted FCPS Policy 522 because it is critical for State leaders to understand that our policy and operational leaders have already moved to identify areas of improvement identified by our own stakeholders, and FCPS has already made significant changes to our local assessment program based on our policy. Our Board respectfully requests that legislators and the State Board respect our Board’s local governance role in continuing to develop and amend testing and assessment policy to meet the needs of our students and other stakeholders.

Other areas of feedback include:
1) Local educators and the survey data compiled by the Maryland State Educators’ Association (MSEA) overwhelmingly showed that kindergarten teachers are unsatisfied with the Kindergarten Readiness Assessment and question its efficacy given our educators’ ability to provide their own authentic assessments. They also questioned the investments of time and technology spending for the KRA. This report provides little detail about the KRA. Why is it mandatory? What plans does the State have going forward for the KRA?
2) Teachers and schools need stability with assessments at all levels. There have been significant changes and new requirements and little time for our educators to stop and reflect and refine. Likewise, FCPS has made significant financial investments in technology related to testing and assessments; more changes render those investments wasted.
3) Our Board hopes the Commission and this initial feedback process is the beginning of real dialogue between local Boards and the State on testing and assessment issues, and that the Commission will provide collaborative, meaningful two-way opportunities for local Boards and stakeholders to give input.
4) Our Board continues to have questions about MSDE’s intent with regard to how testing will impact teacher evaluations and graduation requirements.

Thank you again for the opportunity to comment upon the Commission’s report. Our Board looks forward to future collaboration on testing and assessments in a way that preserves local governance and, thereby, protects the interest and furthers the goals of our local community.

Sincerely,

Brad W. Young
President
November 16, 2015

Mr. Guffrie Smith Jr, President
Maryland State Board of Education
200 W Baltimore Street
Baltimore, MD 21201-2595

Dear Mr. Smith,

At the beginning of September, a copy of the Report on Local, State, and Federally Mandated Assessments (Reports) in Maryland was provided to the Garrett County Board of Education for review. In accordance with HB 452/Ch. 421, the Board considered the report containing survey data collected by the Maryland State Department of Education from Maryland’s jurisdictions.

The October 13, 2015 Garrett County Public Schools agenda allowed time for Board members to make comments and recommendations. Considered complete and accurate, one revision to the report of an editing nature was requested. The Board requests an edit to Attachment 3 Page 132, as follows:

Submitted: “There is no population at this time that needs that require it.”

Edit Requested: “There is no population at this time whose needs require it.”

Thank you for the opportunity to provide comment on the report as measures are taken to prepare for the work of the Commission tasked to review Maryland’s Use of Assessments and Testing in Public Schools.

Sincerely,

Dr. Janet S. Wilson

Dr. Janet S. Wilson
Superintendent

cc: Garrett County Board of Education
November 17, 2015

Mr. Guffrie Smith, Jr., President
Maryland State Board of Education
200 W. Baltimore Street
Baltimore, MD 21201

Dear Mr. Smith, Jr.:

In accordance with the requirements of HB452, the Board of Education of Harford County reviewed the report on Local, State and Federal Mandated Assessments in Maryland. A Harford County Board of Education Ad Hoc Committee was formed to analyze the report and a copy of the report was sent to each Board member for his/her review and comments. An administrative session was held on November 9, 2015, to discuss the Mandated Assessment Report focusing in the following areas:

Assessment Program

The Board of Education of Harford County constantly analyzes our assessment program as it directly relates to daily instruction and to PARCC. As the school system continues to transition to Maryland College and Career Ready Standards and the PARCC assessments, each content area supervisor works collaboratively with the Office of Accountability to thoroughly review their specific assessment plan, its purpose, alignment, and impact upon the classroom.

In addition, each school’s data team utilizes the Classroom Focus Improvement Process (CFIP) protocol to analyze data. The data is used to improve instruction, create student learning objectives, and improve teacher efficacy.

Once the full suite of PARCC assessments becomes available, school and central office data teams will determine whether additional local assessments can be eliminated from the instructional program. The PARCC diagnostic assessments in English/reading/language arts and mathematics are in development and will be piloted in Harford County this year. Using these additional assessments will help provide a more detailed analysis regarding students’ strengths and weaknesses than some of the current assessments. To date, the following assessments have been eliminated: Scholastic Math Inventory (SMI) and county-wide benchmark assessments in Language Arts. Harford County Public Schools (HCPS) continues to be focused, thoughtful and intentional regarding the comprehensive assessment program.
Technology

Technology continues to be a challenge for the school system due to funding constraints. At this time, Harford County Public Schools does not have sufficient devices to provide computer-based instruction and testing. Forty percent of instructional computers in HCPS are at least seven years old. These computers are inadequate for testing. HCPS is in the process of implementing a Bring Your Own Technology (BYOT) plan in secondary schools which will be used for instructional purposes. However, students will not be able to take standardized assessments on their own personal devices. By utilizing digital learning, students will be prepared to embrace the digital testing platform as funding becomes available.

Instructional Time

The Harford County Board of Education believes that school systems must strive to find an appropriate balance between instructional time and mandated assessments. Although assessments provide critical information about student learning, no single assessment should ever be the sole factor in making an educational decision about a student.

In closing, Harford County Public Schools continues to implement a well-developed, focused assessment program that drives quality instruction.

Sincerely,

Nancy Reynolds, President
Joseph L. Voskuhl, Vice President
Thomas Fitzpatrick, Board Member
Robert L. Frisch, Board Member
Rachel Gauthier, Board Member
Joseph A. Hau, Board Member
Jansen M. Robinson, Board Member
Laura S. Runyeon, Board Member
Alfred L. Williamson, Board Member
November 23, 2015

Mr. Guffrie Smith Jr., President
Maryland State Board of Education
200 W. Baltimore Street
Baltimore, MD 21201

Re: Report on Local, State and Federally Mandated Assessments

Dear Mr. Smith:

In compliance with HB 452/Chapter 421, Assessment Commission Timeline, the Howard County Board of Education reviewed and considered the Maryland State Department of Education survey and Howard County Public School System assessment data submitted in the Report on Local, State, and Federally Mandated Assessments.

Detailed clarifications were suggested regarding the length of the assessment time. Those changes were approved by the Board and are attached for the Maryland State Board of Education to review. These comments and recommendations are available for the public to review from our November 19, 2015, meeting minutes.

Sincerely,

Janet Siddiqui, M.D.
Chairman
Board of Education of Howard County

Enclosure

cc: Board of Education Members
    Renee A. Foose, Ed.D., Superintendent
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<th>Component</th>
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**Title of Assessment:** Measures of Academic Progress – 3 Admissions: Per Year – Grades 6-8

**School System:** Howard County Public Schools (HCPS)
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<th>Is the assessment available in other languages for English Language Learners?</th>
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<td>Does the assessment require proctoring or other personnel to administer the assessment?</td>
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<td>How much time passes between administration of the assessment and receipt of results?</td>
<td>Variable</td>
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To whom the results were released: Schools and central office

Date the results were released: Entered into data system quarterly

Date assessment turned in to receive results: N/A Self-graded

Is the assessment high stakes for students? No

If by electronic device: Student electronic device ratio: N/A

Pencil/paper or electronic device: Paper/Pencil

Test prep needed: None Required

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Title of assessment: Foundations for Success – Grades K-2 (HCPSS)
November 20, 2015

Mr. Gufrnie Smith, Jr., President
Maryland State Board of Education
200 W. Baltimore Street
Baltimore, MD 21201-2595

Re: Comments on Report on Local, State, and Federally Mandated Assessments

Dear Mr. Smith,

Kent County Public Schools has reviewed its list of ‘mandated assessments.’ While there is a lot of discrepancy between school systems’ views on what is mandated, we feel that our list accurately represents testing that is required in our system. That being said, we are in a period of transition, as we continue to eliminate assessments that don’t yield the data we need to move forward. To this end, many of our assessments are being transitioned to a computer-based, more PARCC-like design.

As mentioned on page 7 of the August 2015 Report on Local, State and Federally Mandated Assessments in Maryland, the purpose of assessment is complex. Kent is focused on the following two goals:

· To monitor and improve student learning for all students,
· To identify areas of disparity in achievement and inequitable opportunity to learn

As a result, benchmark tests have been put on hold or are under revision and the goal has been to put high quality Student Learning Objectives in place that assess student mastery of the major work of the grade, largely through pre and post testing.

When reviewing our data, we realize that the amount of time needed can be misleading for many reasons. For example, at the elementary level, teachers are in the process of creating common assessments for various learning experiences in grades Kindergarten through Grade 5. These formatives allow for system-wide comparison of student progress across schools. However, they are not considered mandated assessments.
If added to our list of required tests our numbers would be greatly inflated. Also, we require that all students who sign up for AP must take the exams, so they are ‘mandated,’ but not all students take AP exams. In addition, teachers are required to give common formative assessments periodically. However, these are teacher-created, teacher-administered, and teacher-scored, so they do not show up on the chart. In reviewing other systems’ results, similar issues are evident.

Kent County Public Schools will continue to evaluate and update our assessment program for each grade level to meet the needs of our students. Furthermore, we believe that the State Board of Education and the Maryland Legislature should continue to adhere to the locally governed education policies and practices regarding student assessments.

Sincerely,

[Signature]

Dr. Karen M. Couch
Superintendent

[Signature]

Jeff Reed
Board of Education President
Maryland Association of Boards of Education

621 Ridgely Avenue • Suite 300 • Annapolis, Maryland 21401-1112 • www.mabe.org
Phone (410) 841-5414 • (800) 841-8197 • Fax (410) 841-6580

November 16, 2015

Mr. Guffrie M. Smith, Jr., President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Dear Mr. Smith:

On behalf of the Maryland Association of Boards of Education (MABE), representing all 24 local boards of education, I am writing to share MABE’s response after reviewing the results of the Maryland State Department of Education’s (MSDE) statewide student assessments’ survey. As you know, legislation was enacted in 2015 to establish the Commission to Review Maryland’s Use of Assessments and Testing in Public Schools (House Bill 452). To inform the work of the Commission, the legislation further required MSDE to conduct a survey to identify local, state, and federally-mandated assessments within our state.

The more than 300-page “Report on Local, State, and Federally-Mandated Assessments in Maryland,” including responses from each of the 24 local school systems, reflects the fact that, in Maryland, the General Assembly created the State Board and local boards of education and expressly delegated to them the responsibility for developing curriculum and student assessments. With the exception of federally-mandated assessments under the No Child Left Behind Act of 2001, student assessments in Maryland are governed largely by regulations adopted by the State Board, and local policies and practices adopted by 24 local school systems.

In this context, MABE believes the report aptly describes the state’s adoption of the Common Core State Standards in 2010, the subsequent development of Maryland-specific College and Career Readiness Standards, and implementation of the Partnership for Assessment of Readiness for College and Careers (PARCC) assessments. Similarly, the report compiles responses from local school systems on the array of locally-mandated assessments. As the report states, “This variation reflects the strong tradition of local autonomy and decision-making that exists in Maryland. Local school boards are elected or appointed to make decisions that best reflect the values and desires of local communities.”
School systems' responses to the survey emphasize the role of formative and summative assessments in educating students; measuring what students know and informing the appropriate instruction to benefit individual students. Common themes include: the use of data systems and interactive platforms to analyze student assessment data and immediately inform teachers in the classroom; the recent and ongoing transition to on-line assessments; and the ongoing responsibility to provide professional development for teachers and principals. MABE firmly believes that the coordination of these efforts by educational professionals within local school systems is essential to the continuous improvement of public education in Maryland, toward the goal of each student achieving his or her highest potential as a learner.

The report concludes by noting that "school systems are transitioning in how they provide the most valuable information about teaching and learning ... and are considering changes to their local assessment programs." On behalf of local boards, MABE urges the State Board and legislature to continue to adhere to the principle of locally-governed education policies and practices regarding student assessments. MABE looks forward to advocating this position as the Commission proceeds to analyze the schedules, purposes, and instructional value of local, state, and federally-mandated assessments.

Thank you for your consideration of MABE's response to the report and survey results. Please do not hesitate to contact me to discuss this or any other education issues.

Sincerely,

[Signature]

Brig.Gen.(Ret.) Warner I. Sumpter
President

WIS:kwb

Copy to:
Jack R. Smith, Interim State Superintendent of Schools
Frances Hughes Glendenning, Executive Director, MABE
Renee M. Spence, Executive Director, PSSAM
Betty Weller, President, MSEA
Elizabeth Ysla Leight, President, Maryland PTA
MABE Board of Directors
Board Chairs/Presidents
Superintendents of Schools/Chief Executive Officers
11/30/2015

Mr. Guffrie Smith, Jr.,
President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, MD 21201

Dear President Smith,

On behalf of our more than 170,000 Maryland PTA members, we appreciate the opportunity to share our thoughts on the important work that the Maryland State Department of Education (MSDE) has done to produce the “Report on Local, State and Federally Mandated Assessments in Maryland”. This report is the first of its kind on mandated standardized tests and provides important information necessary to helping parents understand student outcomes.

We agree that the goal of every parent with a child in our public school system, is the graduation of students ready for college or careers, ready to live productive lives in our state. Maryland PTA is committed to making every child’s potential a reality. The report describes the state’s development of Maryland’s College and Career Readiness Standards and implementation of PARCC assessments. One of the most important pieces of information in the report is the amount of time students spend taking standardized tests. This data provides tangible measurement of what students lose in instruction. Parents across the state have told us that they want to ensure that their students have minimal disruption to the learning environment for the sake of giving tests. Furthermore, they want the assessments to be aligned to the curriculum.

In the interest of Maryland parents and children, we are prepared to work with the Commission to find a solution to the concerns of parents and teachers. We urge town hall meetings where parents, teachers and administrators can openly share their thoughts and recommendations on how tests are being administered in classrooms and schools across the state. In the spirit of cooperation, we ask that MSDE and the Commission members take full advantage of incorporating the valuable perspectives of all partners in the education process, parents, educators and administrators. Only then, can we ensure that every test taken by Maryland children is fully vetted. Together, as we review the role assessments have on Maryland children, can we speak for every child with one voice.

Sincerely,

Elizabeth Ysla Leight
President
Maryland PTA
November 30, 2015

Mr. Guffrie M. Smith, Jr., President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, Maryland 21202

Dear Mr. Smith:

The Montgomery County Board of Education and Montgomery County Public Schools (MCPS) has reviewed our initial response to the August 2015 Maryland State Department of Education’s Report on Local, State, and Federally Mandated Assessments in Maryland. Following the review, we wish to submit additional information.

In Attachment 3, Locally Mandated Assessment Matrices, pages 185 and 186, we initially stated the “High School Final Exams Administered to Middle School Students” and “High School Final Exams” are high stakes assessments (graduation requirements). Upon review, this item should be corrected. The assessments are high stakes because they account for 25 percent of students’ semester grades; however, the assessments are not specifically graduation requirements.

Additionally, in the section of the Report titled, “Non-Mandated but Commonly Administered Assesments,” we are recommending the inclusion of the ACCUPLACER test, developed by the College Board. The ACCUPLACER test is utilized by Maryland colleges for course placement consideration. MCPS includes the ACCUPLACER assessment as one method through which high school students may demonstrate College and Career Readiness.

Finally, as a local assessment, MCPS developed and administers MIRL (Monitoring Instructional Reading Levels). MIRL provides the ability to collect students’ reading levels during small group instruction. At the time of our original submission in regard to comments on the Report on Local, State, and Federally Mandated Assessments in Maryland, a small pilot group of MCPS elementary schools utilized MIRL. As MIRL was not administered across all MCPS elementary schools, we determined it was not applicable for inclusion in the Report. However, we are including it here in the interest of providing a thorough response to the Report as well as the request for comment.

Phone 301-279-3617 • Fax 301-279-3860 • boe@mcpsmd.org • www.montgomeryschoolsmd.org
We also would like to share our support of the letter you received from the Maryland Association of Boards of Education that "urges the State Board and legislature to continue to adhere to the principles of locally-governed education policies and practices regarding student assessments." We agree that local boards of education and educational professionals within local school systems are best positioned to make decisions beyond the state mandates about what measures should be used to determine what students know that are based on the values and interests of the local community.

Thank you for this opportunity to provide clarification to our feedback for this Report. Please let us know if you have any questions or would like additional information.

Sincerely,

Patricia B. O'Neill
President

Larry A. Bowers
Interim Superintendent of Schools

Copy to:
   Members of the Board of Education
   Dr. Navarro
   Dr. Lang
   Mr. McDaniel
   Mr. Ikheioa
President Smith:

On behalf of our more than 71,000 teacher, support staff, and administrator members across the state, we recognize the important work that the Maryland State Department of Education (MSDE) did in producing its Report on Local, State and Federally Mandated Assessments in Maryland. Until now, there has been no statewide compilation of mandated standardized tests—so this report is a critical step forward.

During the first Commission meeting, several members expressed a desire to frame the group’s work within the context of student outcomes. This is essential. All mandated standardized tests should be put to a cost-benefit analysis: is the assessment valuable enough in providing instructionally informative data to justify the trade-off of less instructional time and curricular depth and breadth? If the end goal of our public schools is the graduation of students ready for college, careers, and productive lives as citizens, we should place as much attention on what students might lose by taking tests as on the data points we gain.

Teachers have been developing and giving tests to generations of students. As educators, we believe that all tests should:

- Only exist if they provide timely and specific data necessary for teachers to improve instruction for individual students. Otherwise, there is no way for the test to help students learn.
- Be aligned to the curriculum, not the other way around.
- Minimally disrupt the learning environment. Therefore, tests that close down computer labs, change schedules, pull students and teachers from non-tested subjects, and cause undue stress (especially for ESOL or students with IEPs) should be limited, altered, or eliminated.
- Not exist merely for the purposes of Student Learning Objectives (SLOs) or other methods for teacher, principal, or school evaluation and accountability.
- Be developed as close to the classroom as possible. Teacher-developed tests should be prioritized when financially and logistically possible; purchasing tests from for-profit companies should be a last resort.

MSEA Feedback Process

To ensure that the Commission has the perspective of educators, we have been conducting a rigorous analysis of MSDE’s report in each of the 23 districts where we represent teachers and support staff. That work has been led by Time to Learn committees composed of teachers in each county.

These committees have used the MSDE report as a starting place and then consulted teachers at every level to validate what was reported and add any assessments that were missing but should have been included. While MSDE’s report is a critical foundation, it has many areas of incomplete quantitative and qualitative data, and in some cases, inaccurate or misleading answers. In many instances, there are assessments mandated by local school districts that are simply not listed at all.

The committees engaged in rich, detailed work that included convening group conversations and surveying their district’s teachers to get qualitative feedback on the tests they administer, including necessary test prep, how the tests affect the availability of technology and other learning tools, whether schedules are disrupted for testing, and many other issues. They received feedback from thousands of teachers across the state and have developed incisive, thoughtful reflections on standardized testing in their districts. We would be happy to arrange for Time to Learn committee members to present their findings before the Commission.
As noted, the committees found myriad gaps and incomplete or missing data in the MSDE report which they have been working hard to fill. The next section details the main areas of missing data that should have been included as stipulated by HB 452.

**Quantitative Data**

One of the most important pieces of information in the report is the amount of time students spend taking standardized tests. These critical data are a tangible measurement of what students lose in instruction. Unfortunately, the report frequently under-reports the volume of standardized testing or provides data which are nearly impossible to use for apples-to-apples comparisons across districts.

**Missing Assessments**

There were many school districts whose reports missing assessments. For example, while nine tests appear in the report for Frederick County eighth graders, educators report 18 locally mandated tests. This is especially problematic because two of the unlisted tests are math formatives and math unit tests in addition to the MSDE listed math benchmark tests. This looks like a textbook example of duplicative testing—but members of the Commission currently cannot make that judgment because the report is not reflective of the actual amount of testing. Once all of the missing assessments are added, it appears that Frederick County students spend almost one-half of an entire school year taking tests throughout their pre-K-12 education.

**Testing Time**

The report becomes very confusing when one begins to look at the “how long a student has to complete” section of each matrix, because the responses lack uniformity to enable true comparability across districts. For example, in Charles County (attachment 3, p. 93), ranges are as wide as 30-185 minutes for the same test. In Queen Anne’s County (attachment 3, p. 211), there is a test timed at “varies,” with a testing window of “various times”—providing essentially no useful data to the Commission. To choose one example among many that suffer from the same issue, in Caroline County (attachment 3, p. 57), the time is listed as “2 class periods” for a primary level DIBELS test but does not explain how long a class period is in an elementary school. In Prince George’s County (attachment 3, p. 191), there is a kindergarten reading test listed as “untimed.” Even on the statewide level, the Kindergarten Readiness Assessment is listed as “teacher has 8 weeks to enter data” (attachment 2, p. 4), which simply avoids the question entirely. (It should be noted that even though MSDE said in the first Commission meeting that the KRA takes 20-30 minutes, kindergarten teachers reported that it took closer to 90 minutes per student last year and about 70 minutes per student this year.)

**Testing Windows**

The most common incomplete data for this category were for unit tests, where most districts did not specify how many units their courses have. In Carroll County (attachment 3, p. 66), there are unit assessments listed in almost every subject and every grade, but the testing window is “at the conclusion of a specified unit of study,” making it unclear exactly how much testing occurs. Frederick County (attachment 3, p. 120) has vague answers such as “as determined by the school system,” “at appropriate points in the course,” and “school based.” In Allegany County (attachment 3, pp. 7-8), secondary math and ELA benchmarks are listed as quarterly, but that only includes post-tests. According to Allegany educators, the district requires that benchmarks are included in SLOs and therefore there are an additional four “pre-tests” that are not included in MSDE’s report.

In each of these categories, these examples are repeated many times across several districts and make it difficult to get a clear picture of exactly how much time is spent on testing in each grade. All this incomplete and inconsistent data have underscored the importance of the work of local Time to Learn committees in ensuring that the Commission, policymakers, and the public have easy to understand and accurate data on the amount of testing that our students are actually experiencing.

**Qualitative Data**

Many qualitative details are similarly absent from the MSDE report; questions were often answered in the report as tests are designed to function instead of how they actually are functioning. For example, the PARCC data (attachment 2, p. 6) make no mention of the fact that many schools have to close their computer labs and media centers during testing windows, greatly impeding learning. It also does not allow for the same accommodations as exist for other tests, which was a huge problem for many students with learning
disabilities who suffered through difficult test-taking experiences. But there is no mention of those issues in the questions about technology and accommodations. The report also says that PARCC did not require test prep—which may be the case at the state level—but many districts and schools did implement weeks of test-prep, encouraged by the high-stakes consequences of the state-mandated tests.

Here are just a few of the qualitative issues detailed by local Time to Learn committees:

In Baltimore County, where more than 2,000 teachers participated in their local Time to Learn survey, 81% of educators said that they are pulled from their regular duties during testing. This information is not reflected in the report answers to the “Does the assessment require proctors or other personnel to administer” question, and is likely not unique to Baltimore County. According to respondents, school resources lost during testing time include: computer labs, the library, intervention groups, and small group instruction for students with learning disabilities. Again, these lost services are not reflected in the report and the trade-off implicit in mandated standardized testing.

In Allegany County, educators estimate that as many as 20 days of instruction are lost for non-tested subjects like world languages, art, and physical education due to students missing those classes for testing or test-prep. They also report issues with their technology: that a tremendous amount of time and effort went into making their limited technology work for online testing; frequent problems with the system crashing mid-test and students having to start over from the beginning because their work was lost; and reports of lost internet connections and other glitches. These are not “transitional” problems, but systemic problems that exist in counties across the state.

One impossible to measure—though widely reported on—effect of over-testing on schools is the stress it puts on students and educators. Any valid cost-benefit analysis of standardized tests would be incomplete without taking into account the more human cost of what the testing obsession is doing to students’ motivation to learn, teacher morale, and how the nature of what is taught and learned dramatically conforms to assessment pressures. We urge the Commission to consider an anecdote we’ve heard in different versions for years: what is the cost of having an eighth grade English teacher who brings a student from a second grade reading level all the way up to a fifth grade reading level in one year, only to watch the student’s motivation crumble after failing a test he cannot possibly pass? Is it acceptable for our education system to produce outcomes like this?

Recommended Next Steps

We stand ready to work with the Commission, and hope that there is an opportunity for our members leading local Time to Learn committees to share their classroom experiences and the feedback they’ve collected from their colleagues with the Commission.

The suggestion at the first Commission meeting to survey principals, who could be asked many of the questions about how tests are really being administered in classrooms and schools, is also a logical next step.

We also ask that MSDE and the Commission members take full advantage of incorporating the valuable perspectives of educators in this process. We should all be working together to make sure that information is accurate and every test is on the table to be fairly examined.

Sincerely,

Betty Weller
President, Maryland State Education Association
November 30, 2015

Mr. Guffrie Smith, Jr., President
Maryland State Board of Education
200 W. Baltimore Street
Baltimore, MD 21201-2595

Dear Mr. Smith:

Members of the Board of Education of Prince George’s County Public Schools (PGCPS) reviewed and considered the findings of the Maryland State Department of Education survey entitled Report on Local, State and Federally Mandated Assessment in Maryland (August 2015). As requested in your October 20, 2015 letter to the Board and the Chief Executive Officer of PGCPS, we respectfully submit our comments to the State’s findings below.

As part of our districtwide initiative to reduce unnecessary district tests and to improve the quality of current tests, PGCPS established an Assessment Cross-Functional Team, composed of the Prince George’s County Educators’ Association (PGCEA) union representatives/teachers, School Test Coordinators, principals, and central office staff.

The Assessment Cross-Functional Team has been tasked to effectively review the purpose of assessments currently in use across the district and recommend eliminating any district level assessment that is not relevant or valuable to our teachers and students. Several recommendations were brought forward last year to the school system leadership, including the elimination of Mandatory Unit Systemic Tests (MUST) in Reading (Grades 3 through High School) and Mathematics (Grades 3 through High School) assessments, which was implemented effective July 1, 2015.

The Department of Testing, Research, and Evaluation (DTRE) in cooperation with the Prince George’s County Educators’ Association (PGCEA) and other departments has developed its own survey instrument that will be used to collect and gather feedback from principals and teachers on the effectiveness of districtwide and school-based assessments. The purpose of this survey is to determine what districtwide and school-based assessments teachers are using and what assessments are most effective. The survey will be administered to all teachers and principals in December 2015. See below for the complete list of district assessments (List of District Assessments).

Prince George’s County Public Schools will continue to work with PGCEA union representatives and other stakeholders, including community members, to develop clear next steps to streamline and improve district assessments.

List of District Assessments:

- Formative Assessment Systemic Test (FAST)
- Final Exams for Middle School Students accessing High School Course Credit*
- Kindergarten, Grade 1, and Grade 2 Data Capture
- Otis Lennon Student Ability Test (OLSAT)
- Preliminary Scholastic Assessment Test (PSAT)
- Stanford Achievement Test 10 (SAT 10)
- Student Learning Objective Pretest and Posttest Assessments (SLO)*
- Scholastic Math Inventory (SMI)
- Scholastic Reading Inventory (SRI)
- Content Unit Assessments (Specific Content Area, see note below)
Mr. Guffrie Smith, Jr.
Recommendations and Comments on HB452/Ch. 421
November 30, 2015
Page 2

- Mandated or approved tests administered at the school level
- Any mandated or school-wide assessments

*SLO and Final Exams are mandatory and cannot not be eliminated and therefore were not included in our survey instrument.

Note on Content Unit Assessments:
While the unit assessments were distributed throughout the district, they are not county mandated and can be used as a grade. Content Unit Assessments were not included in our survey instrument.

Below is a timeline that describes the work of the PGCPS Assessment Cross-Functional Team. The team will review the purpose of assessments currently administered across the district and recommend eliminating any district assessment that is not relevant or valuable to teachers and students.

<table>
<thead>
<tr>
<th>PHASE 1</th>
<th>Timeline</th>
<th>Task</th>
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<tbody>
<tr>
<td>July–December</td>
<td>July</td>
<td>• Conduct a comprehensive review of the district assessments that</td>
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<tr>
<td>2015</td>
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<td>schools are currently administering and share information with state (MSDE).</td>
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<td>• Continue establishing a districtwide assessment strategy and</td>
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<td>framework for high quality assessments.</td>
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<tr>
<td>September</td>
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<td>• Prepare survey instrument (inventory of current district assessments) for teachers and principals.</td>
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<td>• Draft a memo for CEO to inform staff about the district initiative</td>
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<td>to reduce unnecessary district tests and to improve the quality of</td>
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<td>current tests.</td>
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<tr>
<td>October</td>
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<td>• Share CEO memorandum with all PGCPS staff.</td>
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<td></td>
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<td>• Representatives from the Assessment Cross-Functional Team review current assessments and determine next steps.</td>
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<tr>
<td>November</td>
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<td>• Administer a survey to gather feedback from principals and teachers on the effectiveness of district and school-based assessments.</td>
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<th>PHASE 2</th>
<th>Timeline</th>
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<tbody>
<tr>
<td>January–May</td>
<td>January – February</td>
<td>• Based upon the reviews and results of the survey, work with content specialists, testing personnel, teacher review teams, and other stakeholders or constituents to form subcommittees to discuss initial results.</td>
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<tr>
<td>2016</td>
<td></td>
<td>• Subcommittees meet to provide recommendations and rationale.</td>
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<tr>
<td>February – March</td>
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<td>• Subcommittees present and report recommendations to the Assessment Cross-Functional Team.</td>
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<td>March – May</td>
<td></td>
<td>• Publish Assessment Literacy Brochure to help improve the assessment literacy of our community and to assist stakeholders in understanding the use of local, state, and national assessments in PGCPS.</td>
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PHASE 3

<table>
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<tr>
<th>Timeline</th>
<th>Task</th>
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| May–August 2016 | May – June
|                | • Recommendations are submitted to school system senior leadership for approval. |
|                | June – July
|                | • Recommendations are approved and added to the testing calendar.       |
|                | July – August
|                | • Revised district assessment system in the 2016–17 school year is released. |

If you require additional information, please contact my office at 301-952-6008 or Mr. Yakoubou Ousmanou, Executive Director of Testing, Research and Evaluation, at 301-702-3860 or by email at yakoubou.ousmanou@pgcps.org.

Sincerely,

Segun Eubanks, Ed.D.  Kevin M. Maxwell, Ph.D.
Chair, Board of Education  Chief Executive Officer

c:  Members, Board of Education
    Members, Executive Team
    Mr. Yakoubou Ousmanou
    Ms. Theresa M. Dudley, PGCEA
MEMORANDUM

TO: All Principals
    PGCEA Members

FROM: Kevin M. Maxwell, Ph.D.  
      Chief Executive Officer
      Theresa Dudley
      President of Prince George's County Educators' Association

RE: Reducing Unnecessary District Tests (Assessment Survey)

As part of our districtwide initiative to reduce unnecessary district tests and to improve the quality of current tests, we established an Assessment Cross-Functional Team, composed of Prince George's County Educators' Association (PGCEA) Union representatives/teachers, School Test Coordinators, principals, and central office staff.

The Assessment Cross-Functional Team has been tasked to effectively review the purpose of assessments currently in use across the district and recommend eliminating any district level assessment that is not relevant or valuable to our teachers and students. Several recommendations were brought forward last year to the school system leadership, including the elimination of Mandatory Unit Systemic Tests (MUST) in Reading (Grades 3 through High School) and Mathematics (Grades 3 through High School) assessments, which was implemented effective July 1, 2015.

The Department of Testing, Research, and Evaluation (DTRE) in cooperation with PGCEA will develop a survey that will be used to gather feedback from principals and teachers on the effectiveness of district and school-based assessments. The purpose of this survey is to determine what district and school-based assessments teachers are using and what assessments are most effective. The survey will be administered after Thanksgiving to all teachers and principals. See below for the list of district assessments. Please note that our school district is not authorized to eliminate any state mandated assessment.

Prince George's County Public Schools will continue to work with PGCEA Union representatives and other stakeholders, including community members, to develop clear next steps to streamline and improve district assessments. The attached document provides a timeline of the work of this Cross-Functional Team.

All questions or feedback related to the work of the Assessment Cross-Functional Team should be directed to Mr. Yakoubou Ousmanou, Executive Director of Testing, Research, and Evaluation, at yakoubou.ousmanou@pgcps.org or 301-702-3860.
Reducing Unnecessary District Tests
November 13, 2015
Page Two

List of District Assessments
1. Mandated or approved tests administered at the district level (see list below)
   a. Formative Assessment Systemic Test (FAST)
   b. Final Exams for Middle School Students accessing High School Course Credit
   c. Kindergarten, Grade 1, and Grade 2 Data Capture
   d. Otis Lennon Student Ability Test (OLSAT)
   e. Preliminary Scholastic Assessment Test (PSAT)
   f. Stanford Achievement Test 10 (SAT 10)
   g. Student Learning Objective Pretest and Posttest Assessments (SLO)
   h. Scholastic Math Inventory (SMI)
   i. Scholastic Reading Inventory (SRI)
   j. Content Unit Assessments (Specific Content Area, see note below)
2. Mandated or approved tests administered at the school level
   a. Any mandated or schoolwide assessment

Note on Content Unit Assessments:
While the unit assessments were distributed throughout the district, they are not county mandated and can be used as a grade.

Attachment

c: Members, Board of Education
   Members, Executive Cabinet
Assessment Cross-Functional Team

Phase Plan for District Assessment Review and Recommendation (DRAFT)

Teachers and staff need relevant assessment data to inform instructional practices; however, some parents and educators have voiced broad concerns that the number of assessments have become a distraction. There is a perception that students are being tested too much and there is a belief that testing takes away too much instructional time. Prince George’s County Public Schools (PGCPS) established an Assessment Cross-Functional Team to work with principals, administrators, teachers, union representatives, and central office staff to do the following:

1. Review the purpose of assessments currently administered across the district.
2. Recommend eliminating any district level assessment that is not relevant or valuable to our teachers and students.

Below is a timeline describing the work of the Assessment Cross-Functional Team.

<table>
<thead>
<tr>
<th>PHASE 1</th>
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</table>
| July 2015 – December 2015 | July      | Conduct a comprehensive review of the district assessments that schools are currently administering and share information with state (MSDE).  
|            |             | Continue establishing a districtwide assessment strategy and framework for high quality assessments. |
|            | September   | Prepare draft of survey (inventory of current district assessments).  
|            |             | Draft a memorandum for CEO to inform staff about the district initiative to reduce unnecessary district tests and to improve the quality of current tests. |
|            | October     | Share CEO’s memorandum with all PGCPS staff.  
|            |             | Representatives from the Assessment Cross-Functional Team review current assessments and determine next steps. |
|            | November    | Administer a survey to gather feedback from principals and teachers on the effectiveness of district and school-based assessments. |

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</table>
|            | March – May    | Subcommittees present and report recommendations to the Assessment Cross-Functional Team.  
|            |             | Publish Assessment Literacy Brochure to help improve the assessment literacy of our community and to assist stakeholders in understanding the use of local, state, and national assessments in PGCPS. |

<table>
<thead>
<tr>
<th>PHASE 3</th>
<th>Timeline</th>
<th>Task</th>
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</thead>
<tbody>
<tr>
<td>May 2016 – August 2016</td>
<td>May – June</td>
<td>Recommendations are submitted to school system senior leadership for approval.</td>
</tr>
<tr>
<td></td>
<td>June – July</td>
<td>Recommendations are approved and added to the testing calendar.</td>
</tr>
<tr>
<td></td>
<td>July – August</td>
<td>Revised district assessment system in the 2016–17 school year.</td>
</tr>
</tbody>
</table>
November 30, 2015

Mr. Guffrie M. Smith, Jr., President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Dear Mr. Smith:

As President of the Public School Superintendents’ Association of Maryland (PSSAM), I am writing to you on behalf of all 24 local superintendents. Together we represent close to 900,000 students and 60,000 teachers statewide. We thank you for the opportunity to respond to the Maryland State Department of Education’s (MSDE) statewide student assessment survey. The survey, which was required by Senate Bill 452, provided the opportunity to identify all federal, state, and locally mandated assessments. We believe that all 24 systems responded accurately based on the requirement of the legislation.

We believe the survey was a reflective exercise. The survey provided local school superintendents the opportunity to receive additional information about the assessments given and how the data is used in other districts. In fact, since the survey was conducted during the summer, many of our districts have already begun to reevaluate their individual local assessment programs.

PSSAM believes it is important to state that all superintendents firmly believe in the value of formative and summative assessments. Assessments address a variety of purposes and mandates, including school system accountability, instructional design, and student mastery. They provide a balance between accountability and improving instruction. By providing benchmarks on student learning, individualized instruction can be provided to meet the needs of every student.

Finally, we emphatically support local school board decision-making regarding all education policy and practice decisions. Each local school system must have the flexibility to develop individual assessment policies that reflect the diverse needs of their district. It is also imperative that districts continue to be able to provide professional development for teachers and principals to improve instruction that is aligned with local assessment data.

Again, thank you for the opportunity to provide PSSAM’s feedback on the survey. Please do not hesitate to contact me if you wish to discuss our position on this issue.

Sincerely,

Theresa R. Alban, Ph.D.
President, PSSAM and
Superintendent Frederick County Public Schools

TRA
November 30, 2015

Mr. Guffrie Smith, Jr., President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Dear Mr. Smith:

In response to the State Board of Education’s request for each school system to review and comment on the document reflecting each county’s assessments, Queen Anne’s County offers the following comments. We believe that while well-intentioned, the MSDE’s survey completed by Maryland’s local school districts at the direction of the General Assembly to address SB 497 and HB 452 was vague in its language and, therefore, was interpreted differently by each of the school districts. There is evidence of this reflected in the amount and type of assessments reported among the various school systems within the state. We believe discrepancies were created by the term “mandated.” For example, In Queen Anne’s County, in order to ensure fair grading procedures, teachers are required to have a minimum number of formative and summative assessments built into their grade calculations. While they are of the teacher’s own design, they are by definition, “mandated” assessments based on our grading policies. Hence, we included them in our list of assessments. That is not true in many of the other districts.

Additionally, in most school systems, individual teachers design and administer their own unit tests to evaluate how well students are learning at a point-in-time throughout the curricula. However, in Queen Anne’s County, our math teachers have collectively created the unit tests for all math units in Kindergarten through grade five. We believe the administration of a common assessment allows for system-wide comparisons of how well the students are doing across all schools. Yet, by having a districtwide standard assessment, it is now considered a mandated test that must be included in the list of assessments. It misleadingly inflates the amount of mandated local assessments we must show on the collection chart.

In response to your question about the accurateness of the information Queen Anne’s County Public schools submitted to MSDE, we have reviewed and edited the list of assessments that was originally provided to the Maryland State Department of Education (MSDE). Following our first submission of the report, we have now returned to the document and removed from the list assessments that are no longer given this year, as well as any non-mandated assessments. We have now resubmitted our list of assessments to MSDE. It is our belief that this list is a
reasonably accurate estimate of the amount of locally mandated assessments, including unit
tests in mathematics, that a student in our school system would be expected to participate in
from grades Pre-K to 12.

While there is great variance between grade levels, from less than 1 hour of testing in Pre-K to
more than 33 hours in grade 5, the average amount of instructional time spent on locally
mandated assessments is less than 23 hours per year. This represents approximately 2.1% of
the allotted instructional time. With the knowledge of the importance of assessment in guiding
instruction and measuring individual student success and school and system accountability, we
believe that this is a reasonable amount of time spent on assessment. While Queen Anne’s
County Public Schools will continue to monitor and evaluate the assessments administered to
our students, we do not anticipate any major changes being made to our current
comprehensive assessment plan. Furthermore, we believe that the State Board of Education
and the Maryland Legislature should continue to adhere to the locally governed education
policies and practices regarding student assessments.

Thank you for the opportunity to provide feedback regarding this important educational topic.

Sincerely,

Tammy Harper
President, Board of Education

Carol A. Williamson, Ed. D.
Superintendent
November 19, 2015

Mr. Guffrie Smith, Jr., President
Maryland State Board of Education
200 W. Baltimore Street
Baltimore, MD 21201-2595

Dear Mr. Smith,

During the Open Session of the November Somerset County Public Schools Board of Education Meeting, the Board unanimously approved the information presented in the Assessment Report as required by HB 452/CH.421.

The document was reviewed by the SCPS Instructional Team, the SCPS Leadership Team and the SCPS Board of Education. All groups concur that the information presented is complete and accurate.

It is our hope to examine the amount of assessments administered, time needed to assess and validity of each assessment. At the same time we realize the importance of these assessments as we use the data to drive instructional decisions.

If you have any questions, please do not hesitate to call me at 410-651-1616.

Sincerely,

John B. Gaddis, Ed.D.
Superintendent of Schools

Warner I. Sumpter
Chairman, SCPS Board of Education
November 24, 2015

Dr. Jack Smith
Interim State Superintendent
Maryland State Department of Education
200 West Baltimore Street
Baltimore, Maryland 21201

Dear Dr. Smith,

In response to the Maryland State Department of Education’s Report on Local, State, and Federally Mandated Assessments in Maryland (Report), the Board of Education of St. Mary’s County offers the following comments.

The Board has reviewed the above-mentioned Report and discussed our local mandated assessment matrix, and we believe the information contained is accurately presented.

Most of the locally mandated tests are built into the normal curriculum coursework and are designed to evaluate skills and mastery of concepts. Other tests are specifically designed to evaluate a student’s progress whether additional instruction or intervention is warranted. A small portion of the local testing component is used to identify elementary school students for the gifted and talented program and/or placement in accelerated classes as they enter middle school. The Board feels that the amount and time of the locally mandated tests are necessary in order to ensure that our students are receiving instruction that will allow them to master skills and concepts. Our local assessments are used in tandem with Performance Matters, a comprehensive data warehouse, used by our instructional teams to monitor student learning on an ongoing basis. This tool allows a teacher to timely administer “course and/or concept” correction of a lesson based on in-class quizzes, homework, etc.

With specific comments regarding the PARCC assessments and the effect on other areas of instruction, MSDE’s expectation of a five to one student to electronic device ratio in order to successfully administer electronically was and remains a challenge. This expected ratio combined with the additional Internet bandwidth required to administer the tests impacted instruction within the schools during the testing timeframes. The timeframe for the PARCC assessments also impacted students’ daily schedules and other instructional time due to the need to utilize media and computer center labs for testing. This was particularly felt at the elementary school level for those grades not involved in PARCC testing as resources were diverted away from their traditional learning tools.

St. Mary’s County Public School System does not discriminate on the basis of race, color, gender, age, national origin, marital status or sexual orientation, religion, or disability in matters affecting employment or providing access to programs.
The Board of Education of St. Mary’s County supports continuing the long tradition of local autonomy and decision making that best reflect the needs of our students, and we appreciate the opportunity to comment on this report.

Sincerely,

Karin M. Bailey  
Chairman, Board of Education of St. Mary’s County

KMB/sfb

cc: Board of Education Members  
Mr. J. Scott Smith, Superintendent
November 18, 2015

Mr. Guffrie Smith, Jr., President
Maryland State Board of Education
200 West Baltimore Street
Baltimore, MD 21201-2595

Dear Mr. Smith:

In late September the Maryland State Department of Education sent a copy of the Report on Local, State and Federally Mandated Assessments (Report) in Maryland. HB452/Ch. 421 required local boards of education to review and consider the results and to make comments and recommendations.

Based on our review of the data we question whether interpretation of the directions was consistent across the state. In a discussion with MSDE staff this summer, our staff stated that due to the size of this county, teachers worked collaboratively to develop unit assessments that would be shared county-wide, and for that reason unit assessments were included in our report. In larger school systems this collaboration would be done at the building level. Page 32, paragraph 3 states, “The legislation specifically excluded assessments administered school-wide, by teacher and content teams, and by individual teachers.” We believe our assessment report includes more time than other school systems where collaboration was not as extensive.

It is our understanding that a subcommittee of the General Assembly has requested a compilation of assessment times by county. The table that MSDE staff is compiling, of assessment time totals by grade level, applied rules to high school grade levels that would not be true for the average student in our high schools. For example, under the Maryland graduation requirements students either take two years of a World Language or are a completer in a State-approved Career and Technology Program. The table assumes students take four years of World Language and are completers in CTE. The table also assumes that students take four years of physical education in high school, even though that exceeds the state requirement by three credits. The table, reviewed by our staff, was edited and resubmitted to the MSDE staff that created the document.
Finally, we would like to point out that some assessments are in place so that the data may be used to inform Student Learning Objectives (SLOs) mandated by the MSDE; and local assessments have been implemented, in the absence of state data, to provide this Board of Education with student progress information.

Thank you for facilitating an opportunity to provide feedback related to this report.

Sincerely,

[Signature]

Greg Criniti
Talbot County Public Schools Board President

[Signature]

Kelly L. Griffith, Ed.D.
Superintendent
VIA U.S. MAIL & EMAIL

November 20, 2015

Mr. Guffrie Smith, Jr., President
Maryland State Board of Education
200 W. Baltimore Street
Baltimore, MD 21201-2595

RE: Comments and Recommendations related to MSDE’s Report on Local, State, and Federally Mandated Assessments

Dear Mr. Smith:

In accordance with the requirements of HB 452, Washington County Board of Education (WCBOE) is submitting their review of the Report on Local, State and Federal Mandated Assessments in Maryland.

On October 6, 2015, the WCBOE held a public work session to discuss the use of local, state, and federally mandated assessments and developed a general agreement to inform our recommendations to the Maryland State Board of Education. Our Superintendent, Dr. Wilcox, Associate Superintendent for Curriculum and Instruction, Dr. Pugh and her assessment team were available to provide a deeper understanding of the assessment process currently being used, their strengths and weaknesses, and proposed changes.

Five main issues received the most discussion: 1-Testing Windows, including ancillary time; 2-Availability of technology; 3-Statewide standard assessments vs. local assessments; 4-Formative vs. summative vs. benchmarks; and 5-Assessments as an instructional opportunity.

1-Testing Windows - Several adjustments are now in place or being proposed to reduce testing windows. Our processes are intended to be more sensitive to collateral non-instructional time, and it is important to ensure that results are made available to teachers, students, and parents as quickly as possible. We recommend that every effort be made to reduce the loss of instructional time for students, including those students who are not testing, but whose access to instruction may be impacted because of the logistical necessities required to facilitate testing (i.e. change in teacher, change in room, lack of a full class, or lack of access to technology, which extends the testing window). We recommend results be received in time to meaningfully inform instruction.

2-Availability of technology - WCPS is building digital capacity by combining school owned and personal devices in our inventory available for instruction, as well as for testing. A comprehensive evaluation of
network access, student devices and peripheral equipment such as a mouse, tracking ball, keyboard, and headphones etc. is in progress.

3-Concern that the Commission may recommend reducing local assessments only to increase the number of Statewide mandated assessments. We recommend following the United States Department of Education's (USDE) recommendations included in the October 24, 2015 "Fact Sheet: Testing Action Plan" which encourages “states (to) place a cap on the percentage of instructional time students spend taking required statewide standardized assessments to ensure that no child spends more than two percent of his/her classroom time taking these tests.” WCPS currently utilizes minimal local assessments. When combined with state and federal assessments, the total percent of time of the student’s day spent testing is well below the recommended two percent (when calculated based on 6 hours and 45 minutes per day in middle and high school and 6 hours and 30 minutes per day in elementary for 180 days), the majority of which is already for state assessments.

4-WCPS is moving away from benchmarks and focusing more on local formative assessments, while understanding the need to continue to provide summative assessments for all students, including high achieving students who opt to participate in courses that require an assessment, such as Advanced Placement (AP) and International Baccalaureate (IB). The local formative assessments are designed to promote discussion, inquiry, and appropriate instructional follow-up, rather than to provide a score or grade for a student.

5-WCBOE understands that when assessments are well developed and supported by high-quality instruction that they inform students, parents, and teachers, and can be an instructional opportunity in and of themselves.

Sincerely,

[Signature]

Donna L. Brightman, President
Washington County Board Of Education

C: Washington County Board of Education Members
Dr. Clayton M. Wilcox, Superintendent
Dr. Peggy Pugh, Associate Superintendent for Curriculum & Instruction
Mr. Gufrrie Smith, Jr., President  
Maryland State Board of Education  
200 W. Baltimore Street  
Baltimore, MD 21201-2595

Dear Mr. Smith:

RE: Report on Local, State, and Federally Mandated Assessments in Maryland

On September 4, 2015 Dr. Margo Handy, Assistant Superintendent of Wicomico County Public Schools, convened a meeting with Dr. Bonnie Ennis, Supervisor of School Improvement, Mr. Gary Doss, Local Accountability Coordinator, Mr. Thomas Ferretti, Data Analyst, and all of the Instructional Supervisors. The team met to discuss the report and consider suggestions and/or recommendations.

On September 18, 2015 Dr. John Fredericksen, WCPS Superintendent convened a follow-up meeting with Dr. Handy, Dr. Ennis, Mr. Doss and Mrs. Ruth Malone, Director of Curriculum and Professional Development to discuss the assessment report.

On November 10, 2015 the Board of Education members reviewed the comments and recommendations and were in agreement with information provided below.

Comments/Recommendations:
- In reviewing the report, everyone was in agreement that the data presented for Wicomico County Public Schools was accurate and reflected the assessment landscape for our district.
- The report included the required standardized assessments and district mandated assessments for mathematics, English-Language Arts (ELA) and science.
- The time allotted for the various assessments (including the redesign of PARCC) was differentiated by grade level. We included the administration time for the Scholastic Aptitude Test (SAT) here. This assessment will be given for the first time to all 11th grade students in Wicomico County in order to ascertain a College and Career Ready score. At every grade level the total time allotted to standardized and district mandated assessments is less than 2% of instructional time. The highest percentage of assessment time was found in grade 10 at 1.87%. Due to continued High School assessments (HSA) assessments at grade 10, PARCC English 10 and the various high school mathematics assessments, this...
grade level appears to have a higher percentage of assessment time than other grades. In actuality, this percentage may be much smaller. While all 10th grade students take PARCC English 10, mathematics assessments are not grade specific and, therefore, difficult to quantify at each grade level.

- During the initial meeting each of the instructional supervisors took the group through their content assessments, defined the purpose of the assessment and described how the data was being used to inform instruction. Consensus throughout the group was that the data gleaned through these assessments was valuable and the loss of instructional time did not exceed acceptable ranges.

At the present time, we will continue with our current assessment blueprint while working to inform our stakeholders of the purpose of each assessment and meaningful ways to utilize the data. We are reviewing and analyzing our testing program to make sure we optimize instructional effectiveness, minimize teaching interruptions, and maximize student learning.

Thank you.

Respectfully,

John E. Fredericksen, Ph.D.
Superintendent

Donald L. Fitzgerald
Board President
# Wilcomico County
## Assessment Time Allocations
### 2015-2016

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<tr>
<th>Elementary Test</th>
<th>Grade 1</th>
<th>Grade 2</th>
<th>Grade 3</th>
<th>Grade 4</th>
<th>Grade 5</th>
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<td><strong>Tot Time (min)</strong></td>
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### Total Minimum Test Time:
- **Grade 1**: 180
- **Grade 2**: 515
- **Grade 3**: 840
- **Grade 4**: 1140
- **Grade 5**: 1350
- **Grade 6**: 1350

### Total Maximum Test Time:
- **Grade 1**: 180
- **Grade 2**: 515
- **Grade 3**: 840
- **Grade 4**: 1350
- **Grade 5**: 1350
- **Grade 6**: 1350

### Min. Test Time % of School Hours:
- **Grade 1**: 0.26%
- **Grade 2**: 0.79%
- **Grade 3**: 1.2%
- **Grade 4**: 1.62%
- **Grade 5**: 1.65%
- **Grade 6**: 1.91%

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**Elm ELA Notes**
1. The first two grade 1 assessments are read-aloud books. These are read or day 1 and students write about the book. The book is read again on day 2 and students respond to selected response questions.
2. In grades 2-5, each of the first two assessments is composed of 8 EBSRs. The timing (60 minutes) is based on the fact that students must revisit the text to answer the questions. For 2015-2016, the time may be decreased based on teacher feedback.
3. Interim Assessment 3 in grades 1-5 is a longer assessment that includes EBSRs and a PCR. These are administered over two days in grades 1-3 and on one day in grades 4 and 5.
## Wicomico County
### Assessment Time Allocations
#### 2015-2016

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**Total Minimum Test Time (min)**: 917
**Total Maximum Test Time (min)**: 1377

**Min. Test Time % of School Hours**:
- Grade 9: 1.21%
- Grade 10: 1.37%
- Grade 11: 1.69%
- Grade 12: 0.80%

**Notes**:
- Biology Assessments are course specific, not grade specific.
- AP Exams are not included because most do not take them and it is impossible to quantify how many AP tests are taken by those who participate.
November 17, 2015

Mr. Guffrie Smith, Jr., President  
Maryland State Board of Education  
Maryland State Department of Education  
200 W. Baltimore Street  
Baltimore, MD 21201-2595

Dear Mr. Smith,

This letter is to verify that the Worcester County Board of Education (WCBOE) has received and reviewed the contents of the Report on Local, State, and Federally Mandated Assessments in Maryland from the Maryland State Department of Education. WCBOE contends that its schools adopt a minimalist approach towards the use of assessments, that is, they should be used strategically to inform instruction and to serve as an “audit” or “snapshot” of where a student is at a given time in their learning progression.

With the exception of some minor adjustments that have been made to the time spent on final exams and the local benchmark assessment program, where mathematics benchmark assessments have been eliminated in grades 2 through 8 while reading language arts benchmark assessments have been added at all grade levels, the report adequately reflects the local assessments that are given in Worcester County.

Please do not hesitate to contact us if you need any additional information.

Sincerely,

[Signature]

Robert Rothermel, Jr.  
President

Jerry Wilson, Ph.D.  
Superintendent of Schools