

To The Oregon Board of Education, December 10, 2015

From Rachel Rich, 2205 Jeppesen Acres, Eugene, Oregon 97401, 541-554-5069

It's like paying top dollar for a Lexus, but only getting a shiny Lexus body covering up a clunker Edsel. Smarter Balanced tests simply do not live up to reasonable expectations.

You can depend on a Lexus to jet from 0-60 in 10 seconds and the SAT to deliver reports within 5 weeks. But Smarter Balanced takes 5 *months* to issue reports! Too late to adjust instruction or reassign students to different levels.

For its hefty price tag, you'd expect Lexus to have flawless paint and leather, just as you'd expect that Smarter Balanced's \$27.5 million dollar price tag would guarantee correct spelling, punctuation, grammar, format and logic. But the Online Third Grade Practice Test alone has numerous errors as blatant as forgetting quotation marks or spaces between words, and it hasn't been corrected in five years! At least new cars come with a warranty.

Just as your luxury car ought to feature all the bells and whistles, so should your standardized test. I'm not advocating buying a particular testing product, because many quality systems don't require a specific purchase. But for the sake of comparison, the MAP test reports multiple specific skills, such as **"Real and Complex Number Systems, Algebraic Thinking, Geometry, Statistics and Probability."** Contrast that with Smarter Balanced's overly broad categories labelled **"Concepts and Procedures, Problem Solving/Modeling and Data Analysis, and Communicating Reasoning."** Such vague categories are of absolutely no help guiding instruction or helping parents understand students' strengths and weaknesses.

Now add the shock that maybe Lexus misled you about gas mileage by secretly switching calculations from miles to kilometers. That's exactly what Smarter Balanced did by switching from alphabetical grades to numerical, making it less obvious that a proficiency level of 3 was the same as requiring a B to pass! Yes, a B! Meanwhile the Pearson testing firm quietly persuaded the Lexile Company to raise its reading level standards, which in turn raised the difficulty of Smarter Balanced passages, often years above grade level. Such deceptive practices leave the false impression that the majority of students became incompetent overnight.

Finally, wouldn't you expect a powerful Lexus to get you from Eugene to Portland in about two hours? The PISA and NAEP assess math and English in just 90 minutes, while the SAT needs 3 ¾ hours. Wait, Smarter Balanced requires 7-10?! Despite the extra hours, it doesn't even yield more information!

We should expect better from Oregon's assessment system. Let's not just listen to salesmen, but read contracts and especially the tests themselves. Let's assess all costs, including hidden fees like annual dues, pre- and practice tests, data storage, help desks, software updates, curriculum library, substitute teachers, proctors etc. – that are not included in per-pupil fees. Let's weigh time and resources consumed not only by the test itself, but *in preparation* by students, teachers, administrators, computer labs, etc. And we need a testing system that yields prompt, specific and useable data in a format that students, parents and teachers can understand. But above all, we need a testing system that doesn't merely demoralize and exhaust, but one that inspires and energizes.

Stellar assessment systems are already available. Most aren't pricey or even technology driven. For twenty years, many New York schools have used a highly successful system of authentic assessments involving *student-driven* research, projects and critiques. This alternative is now practiced in Hillsboro, Oregon.

There are many Oregon teachers experienced with creating top-notch assessments for their own classrooms, who have worked with the ODE on previous projects, who have given seminars on creating assessments, or who worked with teacher professional organizations to complete top rung systems. We are at your service.

Rachel Rich

Smarter Balanced Errors

Rachel Rich

The online Third Grade Smarter Balanced Practice Test is riddled with errors. That's *fact*, not ideology. It was thrown together in only ten months and not corrected in the intervening *five years*. For example:

Questions 2, 11, 13, 27: This particular Part A/Part B format is confusing even for adults, let alone third graders. Should it assess test taking ability or knowledge?

Question 10: Correct punctuation requires quotation marks around "placed one on top of another".

Question 16 has a typographical error: "Move the groups of sentences so that the group that makes the **bestbeginning** (sic) comes first." Oh, my. Meanwhile, even English majors don't agree on the best sequence for the story.

Question 12: "What inference can be made about why the author includes the backpack in the passage?" Most eight year olds do not know how to "infer", because they don't yet understand abstract concepts. It shows that no early childhood expert helped write this test.

Question 21 is too wordy for third graders: "Which of the following sentences has an error in grammar usage?" Why not, "Which sentence uses incorrect grammar?"

Question 23: You can't even get adults to agree why the author spoke about The International Space Station to eight year olds.

Overall, the third grade SBAC practice test is too long, too wordy, uses two reading passages when one would suffice, features passages too long for a "cold read" (lengthy reads are only suitable for in-depth classwork) and includes too many exercises per passage. Eight-year-olds simply have shorter attention spans. Add seven hours for the actual test and it becomes more of a test of endurance. Just as worrisome is the fact that this test focuses too much on textual analysis, rather than on basic comprehension – a foundational skill for K-3 readers.

Also problematic are demands for computer skills over and above reading and writing - like fluent typing while clicking back and forth between pages, dragging, and highlighting. Students might practice this intermittently, but daily work uses books, pencil and paper. Not to mention the US Census shows 16% of students don't have a home or hand-held computer, meaning they fail due to lack of experience with technology. This renders literacy assessments highly inaccurate for determining student placement.

Here are additional comments from elementary teachers: Although SBAC now allows young students to have individual assistance, it's impossible for one lone teacher or even several aides to reach each student with questions. Many experienced aides are needed. Also, groups were allowed only 90 minutes per session and ran out of time, again not a true test of skill.

Smarter Balanced is sloppily written, too technologically demanding and not age-appropriate. Taxpayers have a right to expect more for their billions - \$8.1 billion in 2012 alone. The Oregon Department of Education said it spent at least \$27.5 million annually. Let's work together on a better assessment system for Oregon's students.

Bio Rachel Rich

For 21 years Rachel Rich taught middle school and high school English and Foreign Language, in addition to leading the longest running student exchange program between the same US and foreign schools. There she discovered America's schools are mistakenly compared to the 1/3 of overseas students who attend college prep schools, which fails to take into account the other 2/3 in vocational and remedial schools - with lower standards and earlier graduations.

Ms. Rich received a BA from the University of Oregon Honors College and earned an MA in German Language and Literature. Eventually she presented state and national seminars and contributed to foreign language publications. The Goethe Institute, an outreach of the German Consulate, enlisted her as a foreign language teacher trainer. Then the Confederation of Oregon Foreign Language Teachers named her Oregon Foreign Language Teacher of the Year. As board member for PNCFL (The Pacific Northwest Foreign Language Conference) and president of OATG (The Oregon Association of Teachers of German), she learned much from her brilliant colleagues. .

An advocate of educational reform, Rachel served on several committees for the Oregon Department of Education to pass House Bill 3565 (The Oregon Educational Reform Act). She also helped draft Oregon's CIM (Certificate of Initial Mastery) and CAM (Certificate of Advanced Mastery), as well as craft graduated benchmarks and testing tools for high school.

In 2014 the NEA recruited her to answer a national survey, help summarize respondents' findings and back it with research. It began with 1000 teachers addressing the topic of "360 degree Accountability". Her writing collaborative then presented a report to the NEA Vice President, Betsy Pringle, the Board, and the NEA Accountability taskforce at the Washington DC headquarters. Education historian, Diane Ravitch, published the team's report titled, "Changing the Story: Transformation toward Fair Accountability and Responsibility in Public Education": <http://dianeravitch.net/2014/12/19/the-wisdom-of-teachers-a-new-vision-of-accountability/>

Reading the survey cover to cover, Rachel discovered only a dozen of the nearly 1000 respondents who shared either neutral or positive experiences with high stakes testing. Overwhelmingly, the USDOE-sponsored-tests like PARCC and SBAC proved disastrous, especially for ELL and disabled students, as well as school budgets, electives, extra-curricular activities, morale and even drop-out rates among both students and teachers.

The adult-world realities that students face are complex. Despite the federal push for 100% college enrollment, it is often too expensive to obtain a degree with uncertain employment prospects, and there aren't as yet enough training opportunities for STEM jobs. Further, many employers merely seek a high school transcript showing creativity and follow-through, while none ask for standardized test scores. At the same time, a survey of 2016 Oregon university and college entrance requirements shows zero requests for Smarter Balanced scores, while *only* accepting the SAT, ACT, portfolios or work samples. It is a disservice for the ODE to tell students otherwise. K-12 curriculum and testing need both creativity and more realism.