Today’s testing landscape is the result of decades of bipartisan efforts to ensure that all students are on track for success. Yet concerns with over-testing, teaching to the test and recognizing that students are more than a test score loom large for parents and policymakers alike. Many state leaders are dealing with the difficulties of adapting to higher standards and aligned assessments while working to mitigate stakeholder concerns.

The information assessments provide has the potential to guide student learning, help close the gap between high- and low-achieving students, and support policymakers in identifying and replicating successful education policies. Yet many stakeholders argue that too much time and emphasis is placed on testing and that test scores do not accurately reflect what is happening in the classroom.

In addition to the information found in this report the Center on Education Policy provides a helpful explanation of the basics and background of assessments in its recent report.

**KEY TAKEAWAYS**

- States are limiting test administration time, eliminating duplicative assessments and switching assessment providers, among other strategies to ease the testing burden.
- The testing landscape is in a continuous state of flux as many states shift consortia membership and assessment providers or change testing requirements.
- Tough transitions to new assessments, testing time and quantity, student opt-outs and concerns about test results are challenges facing many policymakers.
While federal law requires students to be tested in math, English-language arts and science in particular grades, states are still struggling to mount the resources and expertise necessary to fully implement college and career readiness standards, let alone new assessments aligned to these higher standards. New assessments are not only more demanding of students but also come with new administrative, technological and scoring challenges. Roughly half of states also struggle with pushback against the use of consortium-developed assessments, which many view as federal overreach into a historically state and local issue.

These complex adjustments take time, but many leaders feel pressure to act now to make changes that will ease frustrations. Policymakers, caught between testing and accountability requirements and their constituents’ concerns, are seeking new ways to meet the needs of all stakeholders. The key questions faced by education leaders are:

1) Which assessments should we choose?
2) How do we use those assessments?

To aid education leaders and policymakers in answering these questions, this report highlights how other states have addressed these questions and their attendant issues.

The What: Trends in choosing assessments

In choosing assessments, education leaders and policymakers face a number of challenges, including:

- Political backlash against the two assessment consortia – the Partnership for Assessment of Readiness for College and Careers (PARCC) and the Smarter Balanced Assessment Consortium.
- Dissatisfaction with the quantity and relevance of current testing.
- Concerns about how to ensure that assessments are relevant for students and assess rich knowledge and critical thinking and problem-solving skills.

Given the political turmoil and public frustration around testing, states are seeking unique ways to meet their testing needs and satisfy a diverse group of stakeholders. Education Commission of the States has observed three trends that have emerged as states choose assessments: 1) shifting consortia membership, 2) blending assessment items and 3) the use of a college entrance exam to replace state tests.

Shifting consortia membership

Through funding from Race to the Top, states formed two assessment consortia tasked with developing assessments aligned to the Common Core State Standards. While state use of the standards remains relatively stable, a number of states have exited the two assessment consortia. At their peaks, nearly all the states and Washington, D.C., participated in one of the two assessment consortia as governing or affiliate members. That number has since dropped to 22, with seven states and D.C. currently acting as governing members of PARCC and 15 states governing Smarter Balanced, according to the consortia’s websites. The Department of Defense, which serves students in multiple states, recently entered into a membership agreement with PARCC as well.

Several other states have simply shifted from governing membership to affiliate membership. This type of membership allows states to maintain some level of involvement without paying dues but may prevent the state from using assessment materials or being involved in governance decisions.

The Blend Trend: Combining consortia and state-specific tests

Both consortia member and non-member states may choose to combine consortia-developed and state-developed test items to create
a unique state-specific assessment. States may prefer this approach because a state can tailor an assessment to its unique needs and potentially engender more public buy-in for a state-specific test while still benefiting from the expertise, resources and multi-state perspective of a consortium.

While the blended approach may give states a way to navigate the complex political pressures related to assessments, potential drawbacks to this approach include: 1) possibly compromising comparability of results across states, 2) limiting states’ access to some of the consortium’s additional resources, such as aligned interim assessments, and 3) increasing development time and costs compared to other approaches. States that seek to follow the blended approach will need to carefully weigh the costs and benefits of this strategy.

**Michigan** is already pioneering this blended approach, in which the state uses a combination of items from a consortium and from a separate vendor to create a unique state assessment. In 2014-15 and 2015-16, Michigan is field testing state-specific items developed by Michigan teachers. As a governing member, Michigan has full access to Smarter Balanced content at the price of the regular membership fee. The state must also pay a vendor to develop its state-specific items, as well as to administer and score the assessment. This approach requires the state to perform its own technical review to determine how its blended assessment fits into the Smarter Balanced scale scores and aligns with state standards.

In **Louisiana**, recent legislation prohibits more than 49.9 percent of state assessment questions for grades 3-8 to be based on consortia-developed assessments, including PARCC. Following Michigan’s lead, Louisiana is planning to use a blend of PARCC and state-specific test items for the 2015-16 school year. The **Massachusetts** State Board of Education recently approved a similar approach.

A handful of states have used their vendors as a means to collaborate on assessments outside of one of the consortia. The popularity of this approach may grow, as state education leaders scramble to respond to legislation removing states from consortia or setting tight deadlines for adoption of new assessments. For example, Florida is in the process of developing its own state-specific assessment. Florida and Utah both use the assessment vendor American Institutes for Research (AIR), and because of time constraints and the need to have a new test in place for the 2014-15 school year, Florida leased test items from Utah’s statewide assessment. Concerns over the validity of the test results prompted the Florida legislature to order an independent evaluation of the validity of Florida’s 2014-15 assessment.

**College entrance exams play a dual role**

A few states have recently chosen to administer a college entrance exam, rather than a state summative assessment, to meet federal testing requirements in math and English-language arts in grades 10, 11 or 12. Using a college entrance exam to meet federal testing requirements in high school may reduce testing, as many students already elect to take the SAT or ACT on top of mandatory assessments. Using one exam for both purposes may make 11th-grade testing more relevant for college-track students and increase college enrollment for students who might otherwise not have taken a college entrance exam. However, critics argue that students who are not on a college track may not benefit or have an incentive to perform well unless these assessments are used for high stakes, such as high school graduation. Additionally, using one exam for multiple purposes may jeopardize that assessment’s validity.

**Connecticut** and **New Hampshire** recently replaced the Smarter Balanced 11th grade exam with the SAT and received federal approval for this approach in their Elementary and Secondary Education Act (ESEA) waiver renewals. Both states have committed to reviewing the alignment between state standards and the SAT. Similarly, Michigan’s 11th grade exam will consist of a combination of the SAT, ACT WorkKeys and state summative assessments in English-language arts, mathematics, science and social studies. **Colorado** has proposed replacing the 10th and 11th grade PARCC assessments with a college preparatory and college entrance exam, respectively, but the state has not selected these assessments or received federal approval for this change.

Although not a college entrance exam, four states – **Alabama, Arkansas, Wisconsin** and **Wyoming** – will use the ACT Aspire, which is aligned with the 11th grade ACT, as a replacement for the previous high school math and English-language arts exam. Arkansas is replacing the PARCC
exam while Wisconsin and Wyoming are replacing the Smarter Balanced exam. A few states administer the ACT Aspire in addition to high school assessments. For 2015-16, Michigan will administer the PSAT in grades 9 and 10 instead of its state high school assessment.

In a related trend, states increasingly are requiring all students to take a college entrance exam, like the ACT or SAT. While individual districts in many states may already mandate this assessment, currently about half the states require statewide administration of these exams. This trend comes at the same time that many colleges and universities are no longer requiring college entrance exam scores for admissions, and some research has shown that high school grades are just as likely to predict college success as college entrance exams.8

The How: Emerging issues in using new assessments

Education Commission of the States has observed four emerging assessment issues that relate to: 1) transitions to new assessments, 2) concerns with testing time and quantity, 3) opting out of assessments and 4) concerns about the timeliness and comparability of results.

Coping with the Transition to New Assessments: Plans from the states

Test results are often used to make high-stakes decisions about student retention or promotion and graduation, teacher and principal evaluations, and school ratings and designations, such as those contemplated by A-F report cards for individual schools.

As states switch to new, more challenging assessments and anticipate lower test scores during the transition, many have delayed or mitigated the use of test scores in accountability decisions for students, teachers and schools. Additionally, the U.S. Department of Education has given states a one-time pause for incorporating new assessment results into school report cards for the 2014-15 school year and offered flexibility on the use of student growth data from new assessments in teacher and principal evaluation systems.9

Ohio, for example, has implemented a comprehensive safe harbor plan that delays the impact of results from new assessments on multiple accountability fronts.10 As part of the safe harbor, schools may not use test results through the 2016-17 school year for granting student credit or for use in most student promotion or retention decisions. Because the state is transitioning to graduation requirements that give students more flexibility for the class of 2018 and beyond, no safe harbor provision applies to high school graduation.

To provide a safe harbor for teachers and principals, Ohio test results from 2014-15 and 2015-16 will not be used as part of evaluations or for employment decisions for teachers and principals for whom value-added ratings from state tests apply. The state provides alternative ways districts may calculate evaluations during the safe harbor period. Ohio school report cards will not include an overall letter grade for the school but will include all other information. Report card information will not be used for high-stakes decisions such as school closures.11

2015 Teachers of the Year express significant concerns with the use of student test results from new, untested assessments to make important employment decisions. These high-performing teachers also want to see test results returned in time to inform instructional decisions.

Communication, communication, communication: States should prioritize clear communication about testing with parents, educators and schools, especially regarding how test results data will be used.

- Ohio provides clear guidance on its safe harbor and makes it easy to sign up for e-mail updates on state tests.
- Colorado provides a number of useful communications tools, including a fact sheet explaining new state tests and how the results will be used.

This transition period is especially challenging for high school students because the growing pains of switching to new assessments could have a bearing on high school graduation decisions. To mitigate any disruptions in students’ ability to graduate, some states have eased graduation requirements or implemented transition plans that give students several options over the transition year.
The Idaho Board of Education recently waived the requirement that 10th graders pass the Smarter Balanced assessment to graduate high school. New Maryland regulations give students taking mandatory high school assessments in the bridge years – prior to 2016-17 – options for how to meet graduation requirements.

Testing time & quantity

With concerns about state standards and assessments running high, at least 16 states recently convened assessment task forces or mandated assessment audits, and many focused on how to reduce the testing burden. Generally, these groups find that the testing burden is due in part to: 1) the incorporation of performance tasks and testing critical thinking skills in new assessments, 2) the process of determining the optimal test length to ensure validity and reliability, 3) field testing a number of test items for future tests and 4) the sometimes redundant overlap of state and local assessments.

In response to concerns about over-testing, states are taking several approaches to reduce the testing burden, including:

Switching assessment provider.

Ohio recently switched from PARCC to AIR-developed tests and has demonstrated that the switch will reduce testing time by 39 percent to 50 percent compared to last year’s tests. However, PARCC recently shortened its tests, so the demonstrated reduction time could be different when compared to the new PARCC assessment for 2015-16.

Additionally, the Ohio Department of Education has given schools flexibility to choose to administer an entire assessment in one day or break up the assessment into two parts administered over two days.

Eliminating certain assessments that are duplicative or unnecessary to meet federal requirements.

By eliminating the performance task piece of the English-language arts test in certain grades, Michigan reduced testing time in certain grades by two-and-a-half hours per grade.

As detailed above, the state has replaced the 11th grade math and English-language arts assessments with a new high school exam that includes the SAT, effectively reducing 11th grade testing time by eight hours.

Indiana allowed the state Department of Education to waive the administration of the social studies part of the state assessment, given in grades 5 and 7, for 2015.

Limiting administration time of state and local assessments.

A recently passed Florida law permits assessments to take up no more than 5 percent of a student’s total school hours each school year.

Florida also eliminated the 11th grade English-language arts assessment.

As part of its “Principles for Fewer and Smarter Assessments,” the U.S. Department of Education recommends that testing make up no more than 2 percent of instructional time.

A combination of actions.

Colorado plans to assess social studies on a sampling basis by only testing schools once every three years. Colorado is able to propose this solution because social studies is not a federally required assessment.

What assessments are we giving? Two resources:

- The organization Achieve provides a Student Assessment Inventory for School Districts, which guides districts through the process of auditing and analyzing the usefulness of their current assessments.
- The Council of Chief State School Officers (CCSSO) released a framework to guide state and district leaders through an assessment analysis and potential reduction.
Colorado also plans to replace the 10th and 11th grade PARCC assessment with a college entrance-aligned exam (such as the ACT Aspire) in 10th grade and a college entrance exam (such as the ACT) in 11th grade. However, the U.S. Department of Education has not yet approved this plan.

**District-focused options.**

Assessment choices: In addition to its assessment cap and eliminating 11th grade assessments, Florida now “allows districts to choose how to measure student performance in courses not associated with state assessments and prohibits final exams in addition to state end-of-course assessments.”

Assessment pilots: Colorado HB 15-1323 allows districts to apply to the state to pilot their own district-created or selected tests in place of statewide assessments. The state will choose from the piloted tests, and if the state legislature and U.S. Department of Education approve, the state could eventually use one of these pilot assessments statewide. The Department has not yet approved Colorado’s pilot test plan.

Assessment audits: Connecticut is providing Assessment Reduction Grants to districts for technical assistance to find ways to reduce testing. New York’s “Teaching is the Core” grant program is aimed at reducing and improving the quality of assessments.

**Assessment opt-outs**

Twenty-four states considered legislation to authorize assessment opt-outs in the most recent legislative session, according to the National Conference of State Legislatures. Only Colorado and Oregon were successful, bringing the grand total to four states – California, Colorado, Oregon and Utah – that explicitly authorize opt-outs. Utah permits students to opt out of statewide assessments only; students must participate in locally mandated assessments. Several states give districts the choice to allow students to opt out of assessments.

While assessment opt-outs received plenty of media attention this year, only a few states saw significant numbers, and students who opted out tended to be high school students and from more affluent districts. At the high end, as many as 53 percent of Washington 11th graders opted out of required mathematics and English-language arts assessments. Colorado and New Jersey also reported low opt-outs in elementary and intermediate grades and significantly more assessment refusal in high school. Preliminary analyses indicate that in New York students who opted out were more likely to be white and from a relatively affluent district and less likely to be economically disadvantaged or an English-language learner.

The U.S. Department of Education continues to emphasize that federal law requires that all students in tested grades are assessed, and the Department has a “range of enforcement actions” it may take in response to states that fail to ensure full participation, including withholding Title I funds. While the Department has warned states about the consequences of encouraging opt-outs, Education Commission of the States is unaware of any states that been denied federal funds or ESEA waivers as a result of high opt-out numbers.

**The release of assessment results**

In the fall of 2015, the two assessment consortia began releasing test results from the 2014-15 school year, and states have generally reported lower scores, as was expected in the shift to higher standards. States are largely advising the public that comparing new test scores to scores from past assessments would be unfruitful, as this would be an apples to oranges comparison.

Parents, teachers and policymakers have expressed concern over the timeliness of receiving results, although consortia and vendors stress that the efficiency of scoring and returning results will improve over time. A couple of states have passed laws that essentially prohibit test scores from being used for certain purposes if they are not returned in a timely manner. In Georgia, certain criteria for promotion and placement of students in grades 3, 5 and 8 won’t apply if the state Board of Education is unable to provide timely assessment results as the state rolls out new tests. Similarly, in Tennessee districts can opt out of including students’ state test scores in their final grades if the district does not receive the scores at least five instructional days before the end of the school year.

While comparability of scores across states was a strong selling point for using consortia-designed assessments, recent state exits from the consortia have lowered the number of states available for comparison. Additionally, while the consortia set their own cut-scores for attaining
a particular achievement level, some states set their own performance level descriptors (i.e., “proficient,” “advanced”). The disparity between consortia and various state descriptions of achievement further complicates states’ ability to compare results. However, of states using consortia assessments, to date only Ohio has significantly parted from the consortia’s cut scores by lowering the proficiency bar, and the state plans to use a different assessment in the future.

Looking ahead

Many education leaders feel pressure to act now to make changes that will ease frustrations with assessments. The challenge for these leaders is to find assessments that measure in-depth knowledge and real-world skills with a minimum burden on students and schools and that are cost-effective while providing useful and timely feedback. Education leaders should use available tools to audit the assessments being given at each level and seek areas of overlap and redundancy while keeping in mind that simply replacing one test with another or eliminating a test requirement may not alleviate all frustrations. Because assessments serve many purposes and come in all shapes and sizes, many options exist to meet the needs of students, teachers, school leaders and policymakers.

Clarifying questions

Where do assessments come from?

Federal requirements

The ESEA – reauthorized as NCLB – establishes conditions to be met for state education agencies to receive federal funds under Title I, part A of the law. One condition requires state education agencies receiving these funds to implement statewide assessments in mathematics and English-language arts in grades 3 through 8 and once in grades 10, 11 or 12.

While states typically meet the requirements for grades 3 to 8 using grade-level assessments – such as grade 4 math or grade 6 English-language arts – high school assessments are often aligned with a specific course, such as algebra or literature. These are known as end-of-course or end-of-instruction assessments and may also be used as exit exams that students must pass to graduate high school. Because fewer assessments are needed to fulfill No Child Left Behind (NCLB) requirements in high school, some high school grades may not be tested in these core subjects.

Federal law also requires a science assessment once in each of three grade brackets: 3-5, 6-9 and 10-12. Few states exceed these requirements, and most states test science in grades 4 or 5, 8 and a high school end-of-course assessment in biology.

Currently, 43 states and D.C. have been approved for some sort of flexibility on certain requirements under NCLB. Flexibility on federal requirements has not included the basic testing requirements in math, English-language arts and science, nor has it extended to assessment participation requirements.

State & local requirements

In addition to these conditions, many states and districts require assessments in other subject areas or for other purposes. About half of states mandate the statewide administration of a social studies assessment, such as U.S. history, and an additional college and career readiness assessment used for college admissions, such as the ACT or SAT, which is typically taken in 11th grade.
What recent changes to federal law might affect my state’s assessment system?

Two recent federal actions may significantly influence how states make changes to their assessment systems. The U.S. Department of Education recently released updated guidance on the process of peer review of state assessments. All states that have adopted new standards and assessments since 2012 will need to submit evidence of their assessment systems for peer review. States administering the same assessment, such as a consortia-developed assessment, may work together on the common parts of their submissions. However, these states will still need to submit some state-specific evidence.\(^{31}\)

On October 24, the Department released a Testing Action Plan to reduce unnecessary testing. The plan includes:

- Principles for fewer and smarter assessments.
- Planned Department actions to reduce over-testing, including potential funding, flexibility and technical assistance for states.
- State and local examples of testing reduction.
- Recommendations to Congress for how to reduce the testing burden in the next ESEA reauthorization currently under consideration.\(^{32}\)

How does assessment consortia membership work?

In 2010, the U.S. Department of Education awarded competitive grants to two consortia of states to develop assessments aligned with the Common Core State Standards. Most states participated as governing members and were involved in the development of the assessments, as well as governance of their consortium. Both consortia emphasize that, while federal funding fueled their initial work, member states are responsible for the policy decisions of each group.

As states have backed away from participation, the consortia have evolved and more nuanced levels of participation have emerged. Currently, PARCC catalogues states in terms of tiers of involvement with the consortium, ranging from full membership to licensing agreements for entire test forms to licensing agreements for select items only. States do not need to be dues-paying members of PARCC to contract for content and/or services. If a state chose to blend state and PARCC items to create a unique assessment, the state would enter a licensing agreement with the consortium. PARCC is beginning to release additional information about the options available to states.\(^{33}\)

Like PARCC, Smarter Balanced provides options for state participation. Governing members pay fees, are involved in governance of the consortium and receive access to all of the consortium’s assessment materials, as well as professional development and other supports. Fifteen states are governing members: California, Connecticut, Delaware, Hawaii, Idaho, Michigan, Montana, Nevada, New Hampshire, North Dakota, Oregon, South Dakota, Vermont, Washington, and West Virginia. Unlike PARCC, Smarter Balanced is not a “one stop shop” – governing members must choose a vendor to administer and score the Smarter Balanced assessments.

Affiliate members, by contrast, to do not pay a fee, are not involved in governance of the consortium and do not have access to assessment materials. These states are involved in creation of assessment materials and maintain an interest in the consortium’s activities. Iowa, North Carolina and Wyoming are affiliate members. As with PARCC, states may also participate as a license member, which allows the state access to products for a fee but does not involve it in any development or governance activities.

2. Louisiana House Bill 542, 2015.


4. Florida Senate Bill 616, 2015, 35.


