Your Question:
You requested information on the amount of time spent testing on ACT/SAT vs. other high school assessments, alignment with standards, etc.

Our Response:

Use of College Entrance Exams (SAT/ACT) for Accountability and Federal Testing Requirements
Many states administer the ACT, SAT or related assessments in high school for a variety of purposes. For example, the ACT may replace the high school summative assessment required by federal law and be used to determine school performance, or the ACT may be administered in addition to the statewide summative assessment in high school.

This is a relatively new trend; while a couple of states (CT, NH) replaced high school testing with the ACT/SAT prior to ESSA, the new federal flexibilities have led to many more states exploring this option over the past several years.

Below we have provided a brief sketch of the ACT/SAT products administered statewide in 2017-18 and the purposes for which they were generally used. A more thorough review of these states can be found in our most recent 50-State Comparison of assessments. An Education First analysis provides similar information (see slide 11).

ACT
- **ACT for Accountability**: AL, MT, NE, OK (or SAT), WY (+state test) (5)
- **Additional ACT**: AR, HI, KY, LA, MN (or SAT), MS, NV, NC, ND (or WorkKeys), OH (or SAT), SC, TN (or SAT), UT, WI (14)
- **ACT WorkKeys**: AL, MI, ND (or ACT), SC, WI (5)
- **ACT Aspire**: AR (3-8, high school), WI (high school only) (2)

SAT
- **Accountability**: CO (+PSAT), CT, DE, DC (+PARCC), IL, MI, NH, OK (or ACT), RI (PSAT, SAT), WV (9+DC)
- **Additional SAT**: ID, ME, MN (or ACT), OH (or ACT), TN (or ACT) (5)
- **Additional PSAT**: DE, DC, GA, ID, MI, NM, OR (6+DC)

Concerns about whether these assessments align with state standards and provide appropriate accommodations for certain student groups remain unresolved across the states. A few organizations have conducted independent reviews of the ACT and SAT, including:

- **Feasibility of the Use of the ACT and SAT in Lieu of Florida Statewide Assessments**
  - On the **alignment** question, this study found: 1) Neither the SAT nor the ACT assessment is fully aligned to the Florida algebra 1 or English language arts grade 10 standards; and 2) both tests would require augmenting to be acceptably aligned, which could add to the cost and complexity of administration.
  - On the **comparability** question, this study found 1) that data were insufficient to draw clear conclusions; and 2) that “many students would be placed at different performance levels on the three tests (ACT, SAT and the state test), some by as much as four out of the five performance levels.”
• **Independent Analysis of the Alignment of the ACT to the Common Core State Standards**
  
  o Overall, this study finds that the ACT is a “weak match” to both the math and English language arts Common Core State Standards.

**Assessment Cost and Time Spent Testing**

The recent trend of replacing high school assessments with college entrance exams coincided with other testing trends — including concerns about testing time and quantity — and in some cases the replacement was designed to resolve testing burden concerns.

Education Commission of the States is aware of very few public resources that directly compare the ACT and SAT in testing time. The 2018 **Florida study** cited above provides the following table for algebra 1 testing time:

**Table 1a-1. Number of Items, Point Value, and Average Time per Item per Assessment for the Florida Algebra 1 Analysis**

<table>
<thead>
<tr>
<th>Test</th>
<th>Number of Items</th>
<th>Number of Extra Point Items</th>
<th>Total Point Value</th>
<th>Assessment Time</th>
<th>Average Time per Item</th>
</tr>
</thead>
<tbody>
<tr>
<td>Florida Spring 2016</td>
<td>68</td>
<td>0</td>
<td>58</td>
<td>180 min</td>
<td>2.6 min</td>
</tr>
<tr>
<td>Florida Spring 2017</td>
<td>68</td>
<td>1</td>
<td>59</td>
<td>180 min</td>
<td>2.6 min</td>
</tr>
<tr>
<td>ACT Form 74Fl</td>
<td>60</td>
<td>0</td>
<td>60</td>
<td>60 min</td>
<td>1 min</td>
</tr>
<tr>
<td>ACT Form 74C</td>
<td>60</td>
<td>0</td>
<td>60</td>
<td>60 min</td>
<td>1 min</td>
</tr>
<tr>
<td>SAT Apr 2017</td>
<td>58</td>
<td>0</td>
<td>58</td>
<td>80 min</td>
<td>1.4 min</td>
</tr>
<tr>
<td>SAT May 2017</td>
<td>58</td>
<td>0</td>
<td>58</td>
<td>80 min</td>
<td>1.4 min</td>
</tr>
</tbody>
</table>

**Limiting Testing Time and Quantity – Common Approaches**

- Audit state and local assessments.
- Eliminate assessments that are duplicative or unnecessary to meet federal requirements.
- Switch assessment provider.
- Limit administration time for state and local assessments.
- Engage in assessment innovation options.

**Limiting Test Administration Time – Policy Examples**

- **Florida H.B. 7069** (Enacted, 2015): Mandates that assessments take up no more than 5 percent of a student’s total instructional hours each school year.
- **Maryland S.B. 452** (Enacted, 2017): Lowers the mandated testing to 23.8 hours in elementary and middle schools and 25.7 hours for high schools, except in eighth grade, when the limit is 24.8 hours.
- **Louisiana H.B. 16** (Enacted, 2017): Limits the amount of time students spend taking standards-based assessments each year to no more than 2 percent of the minimum number of instructional minutes per year. Provides that this limitation does not apply to college entrance and college credit exams, AP or IB exams, and industry-based credential exams.

**Key Resources on Testing Cost and Time**

Education Commission of the States is aware of only one resource — **Strength in Numbers: State Spending on K-12 Assessment Systems** (Brookings) from 2012 — that compares assessment cost across the states. See page 9 for a per-pupil cost comparison by state. Other resources on testing cost and time include:
• **Testing Time** and *A Closer Look at Testing Time* (ASCD)

• **Student Testing in America’s Great City Schools: An Inventory and Preliminary Analysis** (Council of the Great City Schools)

• **Testing Trends: Considerations for choosing and using assessments** (see p.5-6) (ECS)

• **Comprehensive Statewide Assessment Systems** (see p.13-Appendix A) (Council of Chief State School Officers)

• **Student Assessment Inventory for School Districts** (Achieve)

• State reports:
  - Iowa (2014): See p.14-15 for information on Iowa’s testing time and cost at the time of the study.
  - Colorado (2015): Recommendations included eliminating or replacing certain assessments.
  - Wyoming (2015): Recommended testing time requiring no more than 1% of the school year.

**General Assessment Resources**

• **50-State Comparison: State Summative Assessments** (ECS) – This resource provides the state-mandated summative assessments for grades 3-12 in math, English-language arts, science, social studies, and college entrance in all 50 states and D.C.

• **Assessments 101: A policymaker’s guide to K-12 Assessments** (ECS) – This brief supports state leaders’ understanding of assessments by first classifying and categorizing assessments, and then providing an overview of common terms used when choosing and utilizing assessments.

• **ESSA: Quick Guides on Top Issues** (ECS) – This series of two-pagers covers assessment flexibility, participation requirements and student opt-outs, and innovative assessment options under ESSA.

• **National Center for the Improvement of Educational Assessment (NCIEA)**
  - ESSA Accountability
  - Innovative Assessment and Accountability Systems

• **Center for Standards and Assessments Implementation at WestEd (CSAI)**

• Council of Chief State School Officers (CCSSO): **Criteria for Procuring and Evaluating High-Quality Assessments**

• Education First: **Whatever Happened to All Those New & Better State Tests? The State of State Assessments**