



September 8, 2017

Dr. Lisa Long  
New York State Education Department  
Office of Accountability  
55 Hanson Place, 4<sup>th</sup> Floor  
Brooklyn, New York 11217

Dear Dr. Long,

The NYS Congress of Parents and Teachers, Inc. (NYS PTA) is honored to represent nearly 300,000 parents, families, educators, and ALL students across New York. It is our mission to make every child's potential a reality and support ALL children with ONE voice.

We write to you in general support of the three draft Every Students Succeeds Act (ESSA) waiver requests:

1. Draft Waiver Request - Grade 7 HS Math and Grade 8 HS Science
2. Draft Waiver Request - Off Grade Testing for Students With Disabilities
3. Draft Waiver Request - ELA Testing Waiver for Second Year ELLs and MLLs

**Grade 7 HS Math and Grade 8 HS Science**

NYS PTA fully supports reductions in standardized testing and fully supports the elimination of double testing of students, especially in cases where a student is taking advanced coursework, and is assessed at that level.

This waiver would allow middle school students who are taking advanced Regents course work in certain sciences and mathematics to be assessed, for accountability purposes, on the Regents exam they must take, as opposed to having to take both the Regents and the grade level assessment in math or science.

This would reduce the number of standardized tests these students would take, from two to one in both science and math. High-achieving students should not have the burden of being double tested just because of their achievements.

Further, these high-achieving students are not learning the coursework associated with their grade level assessment, so their scores could be artificially deflated - a detriment to the child.

Additionally, we do not support the penalties associated with not meeting the federal 95% test participation mandate nor the linking of school district and teacher/principal accountability to a single standardized test.

NYS PTA supports this waiver request.

### **Off Grade Testing for Students with Disabilities**

NYS PTA fully supports assessing certain students on their developmental levels as opposed to chronological age levels.

Unfortunately, some students with significant cognitive disabilities are not eligible for the New York State Alternate Assessment. Their cognitive disabilities, while not significant enough to allow them to take the Alternative Assessment, are still severe enough that they cannot participate in chronological instruction or testing, even if afforded accommodations which are unavailable in the current federal testing system.

Testing students with significant cognitive disabilities at their chronological age level is wrong. It leads to unnecessary student frustration, reinforces a feeling of failure for students who are more vulnerable, and is a waste of valuable learning time.

We would support more flexibility in testing students, so that no child with a significant cognitive disability sits through an exam that he or she cannot succeed at taking.

NYS PTA supports this waiver request, and further requests for flexibility.

### **ELA Testing Waiver for Second Year ELLs and MLLs**

NYS PTA fully supports expanded use of the New York State English as a Second Language Achievement Test (NYSESLAT).

Students identified as qualifying for this waiver would take the NYSESLAT, and the waiver would also:

1. exclude new ELLs (Year 1 ELLs) from having to take the traditional 3-8 English Language Arts (ELA) assessment;
2. exclude results on the 3-8 ELA assessment from Year 2 ELLs in accountability decisions; and

3. include results on 3-8 ELA assessment from Year 3 ELLs, but using Year 3 data in accountability decisions as opposed to data from Year 2.

It is fully appropriate to make testing modifications and accommodations for new ELLs. As we understand, it takes at least three years to receptively learn a language, and nearly seven to approach mastery. The NYS 3-8 ELA/Math assessments rely heavily on the ability to think critically about reading passages and math problems using sophisticated academic language. Presenting the 3-8 assessments in English to those who are new to our language increases student frustration, reinforces a sense of inadequacy, and uses valuable teaching time for no good outcome.

Until ELL students minimally master English language competency as shown in using the NYSESLAT, it is preferable to use this assessment instead of the traditional 3-8 ELA exam.

New York schools proudly serve nearly 100,000 new ELLs annually, speaking more than 200 languages. This waiver will continue the support for their learning.

NYS PTA supports this waiver request.

### **Conclusion**

Please reach out to us for any questions or concerns related to our submission. We look forward to supporting ALL of New York's children together.

Sincerely,



Gracemarie Rozea, President



Kyle Belokopitsky, Esq., Executive Director