



October 22, 2015

Dear Commission member,

The following is a response by the NYS Congress of Parents and Teachers (NYS PTA) to the six points described by Governor Cuomo in outlining the Commission's charge. As New York State's largest parent advocacy group, we had hoped and even expected that we would be asked to participate as commission members and were disappointed when our direct voice was not considered.

We have played key roles in bringing diverse parent groups together in the past. Most recently, this past May, we brought groups as diverse as Students First New York, the NYS Alliance for Public Education and the Alliance for Quality Education together with NYS PTA representatives to offer common goals and views on sometimes diverse solutions to the NYS Board of Regents. Nevertheless, we conclude that we have an obligation to contribute our views and offer initial thoughts in response to each of the Governor's points.

1. **Standards Review.** *First, we need to complete a top to bottom review, and where necessary, reform the common core standards. Everyone agrees we want higher standards – including, by the way, the teachers unions and the education reformers – but the strategy must be relevant to our state. There is nothing common about our state. We should have New York standards developed by New York state and local professionals for New York's students. These changes should not be made in name only but in substance. We should make sure that those standards ensure students educated in New York State schools can compete in college, or for jobs, or with students from any other state or any other city across the world.*

**Response.** NYS PTA agrees that we need a top to bottom review of education standards and expectations. In fact, our education expectations and the instructional strategies used to address them should be continuously reviewed with an aligned implementation strategy that is relevant to New York State. While Governor Cuomo states that "there is evidence of failure everywhere", there is also considerable evidence of success. We would be well advised to study and build on the lessons of both if we are to expect any success. It is inconceivable that this might be achieved in three months.

The political process initiated by the governor can begin by asking: Why did 45 states come together to develop Common Core standards in the first place? Then look at the implementation experience across those states. What strategies have been employed in those states and what has been the result? Which states have experienced effective implementation and why?

Where have the efforts to share the need to change expectations and implementation strategies with parents and the general public been effective? What communication still needs to take place to assure that we move forward?

This spring the Governor and the legislature charged the Commissioner and the NYS Board of Regents with a complete review of the standards, testing, implementation strategies etc. The Governor should support that effort by providing the education department with sufficient time and resources to assess standards that are relevant to New York but that also prepare our students to successfully compete in college or for jobs in any other state or across the world.

NYS PTA maintains that the standards and testing review is best conducted by educators, curriculum and psychological specialists, prospective employers, and parents who are familiar with the uniqueness of New York. The expectations we hold for the learning experiences of our students must be a substantial part of this review process. The effectiveness of the standards cannot be isolated from testing which is designed to assess how well the standards are being incorporated into the classroom learning experience. Therefore, standards must be reviewed in conjunction with testing protocols and the use of those results.

The policy recommendations of the Commissioner and Board of Regents should be the impetus for any legislative action and must not be affected by any premature political agenda. The Standards review may conclude that the standards are appropriate, but must also address whether legislative support for added investments in implementation tools and time needed for educators to incorporate huge teaching or instructional changes is likely to prove effective.

- 2. **Curriculum Review.** Second, the Task Force will review the state's curriculum guidance to the make sure it fits the standards. Importantly this review must focus on and ensure that SED provides teachers with the appropriate and sufficient support they need to instruct their students. Before a student can be presented with new material, the teacher must first understand it and feel comfortable with it – and that did not happen here.*

**Response.** In reviewing the state's curriculum guidance, the task force must take care to understand the state's role regarding what curriculum is and is not. Sample curriculum modules should be quality reviewed by the Commissioner and NYSED as part of the guidance process with clarification that they are not the mandated scripts for educators. Altering teaching models takes time and resources. The Task Force should urge the legislature to assure that sufficient time and resources are available to educators and districts to implement model curriculum.

Curriculum is not a one size fits all instructional script that can be assessed by a desktop audit of instructional activities compared against standards. Curriculum is individual to each school and community and successful implementation is rarely perfect from day one. It evolves over time through trial and error. As the governor suggests, teachers must understand and feel comfortable with curriculum but each teacher must also own and believe in the instructional practice that translates curriculum into student learning. That process too, requires training, trial, reflection and correction to make instructional practice effective. Above all, however, the process must be supported with sufficient resources and time. In the end, the most effective teaching strategies will evolve through extensive data collection combined with direct observation of classroom practice. Visiting classrooms should be part of the Task Force review.

- 3. **Matching tests to curriculum and standards.** Third, the Task Force must develop a process to ensure student tests fit the curricula and standards.*

**Response.** It is essential that the process of developing testing strategies and specific test items follow a carefully planned sequence. Testing must be balanced against the standards, curriculum and performance expectations yet must also provide feedback in a timely fashion that serves to improve instruction, not just "grade" the student or teacher.

Matching tests to standards must also consider the student perspective when taking the test. Is the test too long? Are complicated reading passages smattered through the test, or are they presented in a sequence of ever increasing difficulty? Do most students at a specific grade level find the questions and reading passages interesting and relevant to them? Are mathematic applications or the expected critical thinking processes confused with overly complicated testing language? **Will the test's effectiveness in gauging student competence diminish as student interest in test taking diminishes as a result of material presented?** The Task Force must remember that the testing is presented to children. Children work best when presented with interesting and relevant experiences in a format that is at not beyond their instructional or frustration level.

- 4. **Extension of Moratorium on use of test results.** Fourth, the Task Force will examine the impact of the current moratorium on Common Core grading to see whether or not it should be extended.*

**Response.** As our standards implementation is still in its relative infancy, the instructional process should be given time to stabilize before considering in-depth measurement of student growth or achievement. Introducing a teacher/principal evaluation model based on student achievement tests before instructional practice has stabilized has only served to promote undue stress, student anxiety, and teaching to the test rather than to improve thinking and learning.

When the rationale for moratorium is explained to parents, the response often heard is “if the only purpose for taking the test is to evaluate my child’s teacher, why should I ask him/ her to sit for the test?” In fact, when all test item and response information is available to teachers and properly explained to parents there is a great deal of useful information that can be used to direct instruction. A better use of a moratorium would be to suspend the use of student achievement results as a marker for educator and school effectiveness until new curriculum and instructional strategies have been given a sufficient opportunity to take hold and stabilize.

5. **Test reduction.** *Fifth, the Task Force will consider how the state and local districts can reduce the number of tests in the state and also reduce the amount of time students spend taking the tests, because some are absurdly long. Also, the Task Force should develop a plan with the local districts to review all tests – state tests and local tests – to go through them with the parents to analyze the tests’ purpose and usefulness with the goal of reducing the total test burden.*

**Response.** We would ask the task force to focus on test purpose and credibility rather than placing the emphasis primarily on reduction in number of tests or testing time. Parents tend to place greatest credibility with local assessments and teacher interpretation of student performance results. Local test administration tends to be shorter with more rapid return of data that can be used to target instruction. When state test credibility is absent or suspect, parents will not encourage students to do their best and in the worst case scenario will reject the assessment purpose or the tests themselves as not relevant to their child’s learning.

Yet, mandated and standardized tests do have value. On the broad level, they help identify schools and demographic groups in need of concentrated support. For individual students and their parents, these tests identify relative strengths and weaknesses and suggest ways that parents can work collaboratively with their children’s teachers. For teachers, where access to test results is timely and complete, including full access to specific questions and student responses, instructional strategies can be reviewed and improved. Providing strategies with clear communication tools for teachers to use when interpreting and reviewing results with parents can also prove effective. But only when tests themselves are viewed as fair, with timely and understandable results that are perceived to improve learning rather than merely label, can they be truly effective.

6. **Test Quality.** *Sixth, the Task Force will review the quality of state tests themselves to make sure the private contractor the state is using is doing a professional and competent job.*

**Response.** Review of the quality of tests themselves cannot be accomplished through a desk audit of test items. We believe the process must take time and can only be accomplished through a repeated series of administrations, analysis, correction and additional implementation with feedback from educators in the field. We believe testing quality review should be the task of educational specialists, teachers and district curriculum specialists. We urge commission members to focus instead on the **factors and indicators** they believe should be used by educators, curriculum and child development specialists to judge assessment quality.

As PTA members, we consider that we have more expertise in raising children than with judging test quality, so we have some fundamental questions for this review process:

- What is the essential purpose of annual state standardized testing? Do we test reading? Do we test critical thinking? Do we test how students apply a Common Core process of learning? Are we merely achievement testing? Or are we trying to do all of these things with one test?
- Why are some ELA reading passages or question language significantly (two or more years) above the average grade level?

- Are we and should we be testing skills at frustrating readability levels?
- Are we and should we be trying to assess content comprehension and higher order thinking skills using material that is outside students' prior experience or knowledge?
- Are reading passages developmentally appropriate with content and context that is interesting and relevant to students? As parents, we find that if the material is uninteresting or too complex, children tend to skim or stop reading within a short period of time.
- Are math questions phrased in a manner students have seen using principles that have been taught? Or, are reading skills fundamentally affecting the process of determining if students have acquired mathematical problem solving and application skills?
- Are we perceived as asking trick questions when we attempt to analyze higher level thinking?

As the Commission moves forward in its work, we will follow the discussion and conclusions as closely as we are able. We will then offer comment from a perspective that is intended to reflect the views, concerns and potential success strategies from parents in every type of community and every geographical region within New York State.

Sincerely,



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