

August 27, 2012

George Caruolo, Chairman  
RI Board of Regents  
255 Westminster Street  
Providence, RI 02903

Dear Chairman Caruolo:

On behalf of our organizations and the constituencies we serve, we are writing with some urgency to seek your assistance in halting or delaying the implementation of a “high stakes testing” requirement for high school graduation, currently scheduled to begin with test-taking by high school juniors in October.

As you know, a few years ago, the Board of Regents approved the implementation of “high stakes testing” for high school graduation, and then last year postponed implementing that requirement until the class of 2014. For some time, our organizations have raised deep concerns about this requirement, both because of its devastating impact on disadvantaged student populations – such as the poor, racial minorities, English language learners, and students with disabilities – and, just as importantly, because the evidence simply does not support the notion that high stakes testing either measures or improves student achievement in any meaningful way.

However, the purpose of this letter is not to reiterate our objections to high-stakes testing. (We appreciate you may already be well aware of our concerns.) Instead, regardless of one’s views on the topic, we wish to point out the inappropriateness of the particular tests that have been chosen to make this life-affecting decision.

The test that will be used on at least the first two years of graduates will be the NECAP. We have been puzzled from the outset about its use as a high stakes test since the Rhode Island Department of Elementary and Secondary Education’s (RIDE’s) own website acknowledges that “NECAP is only one indicator of student performance and ***should not be used*** for referring students to special education or ***for making promotion and/or graduation decisions.***” (emphasis added) In and of itself, that should serve as a sufficient and irrefutable reason not to be using it in this fashion.

In addition to that fundamental problem, RIDE has made clear that, commencing in 2015, a new test, known as the PARCC, is scheduled to replace the NECAP for high stakes testing purposes. We also wanted to make you aware of our significant concerns with the use of the PARCC as a high stakes test as well.

The PARCC will be a test given exclusively on a computer. There are serious technical and infrastructure concerns about Rhode Island’s ability to administer this type of test.

First, many schools presently do not have enough computers to allow students to take the PARCC test. Even if RIDE's plans to provide for the installation of the necessary hardware in all schools so that students can take this computerized test come to fruition in a timely manner, there are enormous costs associated with maintaining and repairing the computers that we believe have been given little attention. There have also been questions raised by some experts about whether the computers all need to be the same type.

There are further issues surrounding the capacity of the electrical and cable transmission lines, as well as routers and connection points in all the classrooms, to handle the loads while tests are being administered and gathered; the need for back-ups to address potential data and power failures; and the value of redundant systems, such as creating a paper log of student answers in case of a dispute about the student's "actual" answer. Additionally, utilizing online testing necessarily raises potentially substantial concerns about encryption and security.

Leaving aside these technological issues, there is a much more fundamental concern about students' ability to utilize the technology. Simple issues of keyboarding skills could massively skew the scores of some students. Between December 2009 and July 2010, RIDE had a study done of the technological literacy of its middle school students. (Students who were in middle school in 2010 will be some of the first students subjected to the computerized testing.) The results of that study showed that 27% of students were below the proficiency standard expected of them for technology use. Put another way, more than a quarter of Rhode Island students would be in danger of failing the PARCC test – and hence not graduating – merely because of their computer skills, *not because of their knowledge of the material being tested*.

Furthermore, there is the problem of the test's novelty. As of today's date, the PARCC test does not yet even exist. As a result, there has been no analysis of whether the test is statistically valid. It is impossible to know how the test aligns with Rhode Island's curriculum. It is impossible to check to see if the test actually measures what it purports to measure – high school proficiency. There is no information about what accommodations might be available for students with disabilities or English language learners, including such research-based accommodations as linguistic modifications of math test items to ensure a more accurate assessment of math skills for these populations. Nor has the test been normed to ensure that many of Rhode Island's students, including minority students and socio-economically disadvantaged students, aren't being unintentionally affected in adverse ways.

By tying diplomas to the PARCC – about which very little is known and before the test has been completed – RIDE is basing students' futures on a hope and a guess. This is neither fair nor appropriate.

We therefore ask you to have the Board of Regents take action to halt the use of NECAP, PARCC or similar tests in a "high stakes" capacity rather than as a useful evaluative tool. Even if the Board chooses not to do so, it should, at a minimum, once again suspend or postpone the implementation of this requirement until the various technological and other preparatory issues raised in this letter have been definitively resolved. We all wish to hold students to high standards, but they should be fair and meaningful standards.

We appreciate that the Board of Regents has limited time to act on our request. Because our constituencies have such significant concerns about the imminent implementation of high stakes testing, we anticipate being present with them at the October 4, 2012 Board meeting. We ask that the Board schedule time on their October agenda to consider and discuss our request to halt the use of high-stakes testing.

You may respond to Veronika Kot or Steven Brown at the contact information below, and it will be referred to all the signatories. Thank you for your consideration.

Sincerely,

Joanne Quinn  
THE AUTISM PROJECT

Aimee Mitchell  
CHILDREN'S POLICY COALITION

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GEORGE WILEY CENTER

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