Dear Secretary DeVos:

State and local leaders face the difficult task of preparing schools to educate students during the coming school year as the COVID-19 crisis continues. Administering statewide summative assessments will be a significant challenge in this uncertain environment, but delaying these assessments risks the loss of critical information that would highlight opportunity gaps and help policymakers celebrate and learn from schools that are helping students through this crisis. The U.S. Department of Education (ED) should act quickly to understand states' needs regarding assessment administration and provide support accordingly. The undersigned organizations urge ED to refrain from issuing waivers to states from the Every Student Succeeds Act (ESSA) requirement for administering statewide English Language Arts and math assessments for the 2020-2021 school year (section 1111(b)(2) and related reporting requirements in section 1111(h)).

With economic and well-being concerns weighing on them, all families should be able to trust that their children are receiving a high-quality education. Our nation's most vulnerable students—students from low-income backgrounds or in rural areas without access to internet in their homes, students of color whose communities have seen the highest rates of coronavirus infections, and students with disabilities and English learners who cannot access many online learning platforms—have disproportionately felt the effects of COVID-19 on their learning experience. Without summative assessments, state leaders will not know the magnitude of those learning losses or have the necessary information to identify solutions to get students back on track.

Given school closures, states needed the flexibility to forgo summative assessments for the 2019–2020 school year, but state leaders lost valuable data and are currently navigating uncertainty without clear information. Statewide summative assessments are the best means states have to collect and report comparable data about student performance that policymakers, parents, educators, communities, and researchers need to understand the academic effects of the pandemic. Assessment data will ensure that recovery efforts serve all students, including students of color, students from low-income backgrounds, English learners, students with disabilities, and other historically underserved groups. The loss of another year of data will leave leaders without a critical tool for identifying where to allocate resources for those who most need support. Without student performance data from statewide summative assessments, state leaders will not be able to:

- Provide transparency to parents and communities. Parents deserve clear information about how schools are serving students so that parents are empowered to make the best decisions for their children's futures. That need is even more critical now. The Data Quality Campaign's national parent poll, conducted in spring 2020, found that 77% of parents agree that states should resume administration of end-of-year summative assessments in math and reading in 2021 to better understand how well schools and students are meeting academic standards.
- Strategically and equitably allocate resources to meet all student needs. The pandemic has affected families and communities differently, exacerbating existing inequities in students' educational experiences. Right now, leaders do not have clear and consistent data to understand which schools or students are most in need of academic support. Policymakers should not be forced to act without this information again next year; they need comparable

- data aligned to state standards and disaggregated by student groups to target recovery efforts to get students on track for college, career, and life.
- Calculate measures of student academic growth that show changes in student performance between 2019 and 2021 and allow states to target resources accordingly. Growth measures are the most equitable method states have to measure student performance, revealing trends and patterns beyond student proficiency rates alone. Student growth information will be critical to understand the impact of current school closures and to help inform recovery efforts. There is parent demand for this growth data: 65% of parents agree that they want information on the amount of academic progress students made during school closures due to coronavirus.
- Find and learn from schools beating the odds and employing best practices for online and hybrid learning. Comparable performance data allows state leaders to identify the schools and districts that are most successfully serving all students during the pandemic and to look to those schools and districts to understand and elevate best practices.

Statewide summative assessments yield data that serves many important uses, including informing state accountability systems, school report cards, and continuous improvement efforts. Unprecedented disruptions to school routines might require changes to the ways leaders can feasibly use this data to inform decisionmaking. But, if states do not take the necessary steps to plan for assessment administration, they will have no information on school and system performance to use for any purpose.

State leaders face significant challenges to assessment administration next year. Obstacles—including managing a mix of in-person and online instruction, looming budget cuts, technical challenges related to assessment validity and reliability, and concerns about using this data for accountability—will likely result in a number of preliminary requests to waive assessment requirements for next year. **ED should make clear that it expects states to stay the course on statewide testing, while also committing to ways it plans to support them as they address these challenges (e.g. technical assistance, funding flexibility, and/or guidance).** There is still time to address many of these concerns if states begin planning now.

The challenges posed by this crisis only underscore the value of collecting and reporting on a standard measure of student performance. Leaders should not have to continue to steer recovery efforts in the dark, and families and communities should be able to access the information they deserve about how schools are serving all students.

Thank you for considering these recommendations. We welcome the opportunity to continue conversations with you about these and other ideas that can help states in their recovery efforts.

Sincerely,

Advance Illinois | advanceillinois.org
Alliance for Excellent Education | all4ed.org
America Succeeds | americasucceeds.org
Center for American Progress | americanprogress.org
Collaborative for Student Success | forstudentsuccess.org
Data Quality Campaign | dataqualitycampaign.org
EdAllies | edalliesmn.org
Education Reform Now | edreformnow.org

Foundation for Excellence in Education | excelined.org
FutureEd | future-ed.org
Great Leaders, Strong Schools
National Center for Learning Disabilities | ncld.org
National Urban League | nul.org
New Mexico Kids CAN | nmkidscan.org
Tennessee SCORE | tnscore.org
The Education Trust | edtrust.org
Thomas B. Fordham Institute | fordhaminstitute.org
U.S. Chamber of Commerce | uschamber.com
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